

## Appendix A: Summaries of Representations and Responses – Development Strategy

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## **Greater Cambridge in 2041: consultation format and process**

### **Consultation format and approach**

#### **Hyperlink for all comments**

Open this hyperlink- [Greater Cambridge in 2041](#) > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

**Number of Representations for this section:** 240 (albeit see note below)

#### **Note**

Whilst the webpage linked above effectively included only the vision and aims, a significant proportion of comments attached to this webpage relate to the development strategy, consultation approach and plan process. Comments shown in this section relate only to consultation approach. Comments relating to Vision and Aims were published for the JLPAG meeting held on 4<sup>th</sup> October. Comments relating to development strategy have been moved to either S/JH or S/DS as relevant. 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

Some representations commented on the format and approach to consultation. Regarding consultation format, a few comments by community organisations noted the complexity of information provided and requested simpler presentation; a few individuals noted challenges in responding via electronic means; Campaign for the Protection of Rural England argued that more hard copies should have been made available in accessible locations. Regarding consultation approach, a number of comments suggested that the consultation was premature and should have waited for greater certainty, for example in relation to regional water planning processes, and that there should have been greater consideration of the interrelationship of this consultation with other related consultations including those run by Greater Cambridge Partnership. Other comments suggested specific amendments or corrections to diagrams or wording in the consultation.

### Table of representations: Consultation format and approach

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Welcome opportunity to comment and largely support approach taken. Appreciate digitally presented and structured documentation to make it as accessible as possible to everyone. Use of maps and diagrams is effective. Ability to explore documentation through “themes” and “maps” is particularly helpful way of organising.	59705 (Central Bedfordshire Council)
Note the complexity of information. Not easy for people to understand the proposals sufficiently to meaningfully comment. Ask that future consultations use simpler language and format.	59717 (Swavesey PC)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Consultation Process - pleased with opportunity to engage to the extent it is able. But convoluted process, material is voluminous, 60 policies and maps difficult to interpret electronically, militates against inclusion of diverse age and socio-economic groups in a rural population. Further thought needed into reducing complexity but increasing inclusion, accessibility, and meaningfulness of consultation.</p>	<p>59858 (Barrington PC)</p>
<p>Economic and social consequences of pandemic and its aftermath could be significant, yet no assessment of any possible future changes is built into proposals. A delay to consultation would give time for some indications of impacts relating to local jobs and housing to emerge and be integrated.</p>	<p>60250* (T Orgee), 58896* (R Donald)</p>
<p>Questionable issues of timing. Premature plan because too many key facts which will inform it remain unavailable; Making Connections, Cambridge Eastern Access, LTCP consultation, Water Resources East Regional Water Plan, Ox-Cam Arc. Also, relationship to UK Innovation and Cambridge-Norwich Tech Corridors, driven by business interests but little public debate and not part of accepted national strategy.</p>	<p>59545 (Campaign to Protect Rural England)</p>
<p>Democratic deficit in process and evidence basis. Engagement events planned at too short notice.</p>	<p>60240 (Federation of Cambridge Residents' Associations)</p>
<p>Democratic deficit in process and evidence basis. Sewage in rivers and chalk streams is of national concern, not part of Water Resources East remit. Consultation on regional water plan summer 2022. Plan appears inordinately influenced by unelected Greater Cambridge Partnership, has business</p>	<p>60240* (Federation of Cambridge Residents' Associations)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
interests on its board. Consistent with self-appointed Arc Leaders Group promoting Ox-Cam Arc. Modelling used to inform CPIER, cited in Employment Land and Economic Development Study, does not take into account social and environmental issues.	
Webpage wording discourages feedback whilst saying it welcomes it. Emailed response because couldn't see another way of responding that wasn't the quick questionnaire.	59436 (Anonymous)
<p>Concerns regarding the consultation approach including:</p> <ul style="list-style-type: none"> <li>• Concern at length and complexity of information in technical documents; combined with over-simplification of consultation material, making it difficult to get a sense of the whole proposition.</li> <li>• Concern that the consultation was not easily accessible to those without computer and internet access; only very limited availability to the documents in hard copy at public locations; information regarding location of available documents was not included in public notice.</li> <li>• Public events were not accessible to more rural areas of the district</li> <li>• Overlap in timing with related Greater Cambridge Partnership consultations</li> <li>• Overlap with consultation and development of Combined Authority's Local Transport and Connectivity Plan</li> <li>• Premature ahead of confirmation of water supply</li> </ul>	59540 (Campaign to Protect of Rural England)

Summary of issues raised in comments	Comments highlighting this issue
All offered response formats are inadequate. Consultation makes too many assumptions, and demands a formulaic response to a complex and interconnected series of issues.	59459 (Cambridge Labour Party Environment Forum)
Short tick-box 'survey' and your 'detailed response' mechanisms wholly unsatisfactory. Options to use phones, apps etc. are of zero benefit; I do not own a smart phone.	60209 (J V Neal)
Introduction should make the plan period more obvious	56872 (J Prince)
Graphic of tree is misleading as it suggests the proposals represent best way of achieving the benefits, whereas the benefits either already exist or can be achieved by other and less damaging means. Use of the image therefore indicates a significant flaw underlying the proposals.	59598 (M Lynch)
Misleading omission of housing proposed as part of Cambridge Biomedical Campus in Figure 4	56963* (Trumpington Residents Association)
Figure 33 not all of the annotations are correct. For example new allocations at Gt Shelford and Duxford should be purple.	59645 (Historic England)
Glossary - Please add Scheduled Monument and Registered Park and Garden, significance, and setting.	59688 (Historic England)
Glossary - Welcomes inclusion of 'waterways and bodies of water' (page 358) in definition of green infrastructure. Term blue and green infrastructure could equally be used. Welcome inclusion of water, waste, and green infrastructure in definition of infrastructure (page 360). Text for SuDS (page 366) requires editing.	60485 (Anglian Water Services Ltd)

## How much development and where?

### Hyperlink for all comments

Open this hyperlink- [How much development and where?](#)> then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

**Number of Representations for this section:** 92 (albeit see note below)

### Note

Content in the webpage linked above provided a narrative overview of the proposed strategy. All comments responding to this page relate to the development levels and strategy. Within this document, these comments have been moved to either policy S/JH or policy S/DS as relevant. Representations which have been moved in this way are denoted with an asterisk in the following format: Representation number\* (Name of respondent).

## **S/JH: New Jobs and Homes**

### **Hyperlink for all comments**

Open this hyperlink- [Policy S/JH: New Jobs and Homes](#)> then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

**Number of Representations for this section:** 189

### **Note**

A small number of representations attributed to 'How much development and where' and 'New settlements' were relevant to Policy S/JH and have therefore been included in the table below. Representations which have been moved in this way are denoted with an asterisk in the following format: Representation number\* (Name of respondent).

### **Executive summary**

A number of comments, in particular those also promoting specific development sites, welcomed the decision to exceed the housing target derived from the national 'standard method' for calculating the number of new homes. However, they also stressed the economic strengths of Greater Cambridge and, therefore, wanted the higher jobs forecast to apply and for this to influence a higher housing target. Evidence cited to inform this view included the Cambridgeshire and Peterborough Independent Economic Review (CPIER) 2018, historic growth trends, housing affordability and the ongoing need to reduce in-commuting to Greater Cambridge. In many cases, references to this evidence were linked to the promotion of individual development sites not included in the Plan. Some respondents wanted to see the housing target regarded as a minimum, which should be reviewed regularly in



relation to jobs growth. A considerable amount of detailed technical evidence was provided which challenged the methodology for and approach to calculating the jobs and homes targets. This included concerns about the approach not taking account of suppressed demand in past trends, recognising that historically employment growth across the area has been higher than forecasted.

Conversely, a range of comments, particularly from individuals, parish councils, residents' associations and other organisations, questioned the need for the levels of growth included in the Plan. Concerns raised included the effect on climate change; the availability of water supply and the effect of development on water quality; insufficient transport and healthcare infrastructure; a reduced quality of life for existing residents and a harmful impact on local character. Some respondents noted the challenges associated with accurately forecasting jobs and homes over the plan period, due particularly to the effects of Brexit, the Covid pandemic and higher levels of homeworking. Reference was also made to the importance of taking account of the 2021 Census. A number of respondents expressed concern that housing targets for Neighbourhood Areas are likely to dissuade areas from preparing Neighbourhood Plans; others wanted to see more land allocated in sustainable rural settlements to support local services.

**Table of representations: S/JH: New Jobs and Homes**

Summary of issues raised in comments	Comments highlighting this issue
<p>The higher job forecast across the Plan period should be used and thereby a greater number of homes are required as:</p> <ul style="list-style-type: none"> <li>The lower figure does not take on board CPIER forecasts.</li> </ul>	<p><b>Individuals</b>                      56480 (V Chapman), 56488 (D &amp; B Searle), 56498 (W Grain), (RJ &amp; JS Millard), 57061 (C Meadows), 57102 (J</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Cambridgeshire and Peterborough Economic Review (CPIER) 2018 has recognised that there has been a higher rate of economic growth than forecast, predicts this growth will continue and states that doubling economic output by 2040 is realistic.</li> <li>• The Cambridgeshire and Peterborough Devolution Deal indicates that higher levels of growth should be planned for the Greater Cambridge</li> <li>• The lower figure does not reflect the anticipated growth aspirations of the Oxford to Cambridge Arc Spatial Framework and the key role of Greater Cambridge in achieving them</li> <li>• the lower figure does not reflect the fact that the economic success of Greater Cambridge and its sectors are of national and international importance.</li> <li>• The lower figure does not reflect previous trends - a historic reversion to the mean would show that the most acceptable Plan projection to be KS1 (2.1% p.a.)</li> <li>• The draft Plan, knowingly, focuses only on the 'most likely' of just two employment growth scenarios, with no weighting</li> </ul>	<p>Francis), 57300 (AJ Johnson), 58145 (Mr James Manning), 58363 (D Moore), 58627 (R Grain), 58789 (S Grain), 60385 (David Wright), 60477 (P,J &amp; M Crow),</p> <p><b>Other Organisations</b></p> <p>60518 (Cambridge Ahead)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>56711 (KB Tebbit Ltd), 57112 (Cambridge District Oddfellows),  56894 (RWS Ltd), 56993 (Hastingwood Developments),  57050 (CEMEX UK Properties Ltd), 57081 (Shelford Investments), 57092 (RO Group Ltd), 57120 (KG Moss Will Trust &amp; Moss Family), 57149 (Southern &amp; Regional Developments Ltd), 57192 (European Property Ventures - Cambridgeshire), 57196 (MPM Properties (TH) Ltd and Thriplow Farms Ltd), 57329 (Clarendon Land and Development Ltd), 57341 (HD Planning Ltd), 57344 &amp; 58496 (Bloor Homes Eastern), 57472 &amp; 57473 (Vistry Group - Linden Homes), 57513 (R2 Developments Ltd),</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>given to the scenario that is based on the most recent trends. Were weighting to be given to the scenario that is based on the most recent trends, it is likely that the associated housing requirement would increase by c. 9% to 48,300 homes.</p> <ul style="list-style-type: none"> <li>• Preferred option is based on an employment growth rate to 2041 for life sciences and other key sectors as the lower quartile between the EEFM baseline and the historic growth rate between 2001-17, therefore planning for reduced economic development in those sectors</li> <li>• There is a need to provide housing for employees and overcome existing severe difficulties recruiting talent for the knowledge-based jobs that are being created in the Cambridge area.</li> <li>• There is a need to improve housing affordability and to ensure that it does not become worse.</li> <li>• There is a need to reduce in-commuting.</li> <li>• There is an existing imbalance between rates of economic growth and housing delivery in Greater Cambridge.</li> <li>• If a correct balance between jobs and houses is not achieved, this runs the risk of further increasing house prices.</li> </ul>	<p>57543, 57546, 57552, 57555 &amp; 58476 (Cheveley Park Farms Limited), 57633 (Dudley Developments), 57647 (Endurance Estates - Balsham Site), 57682 (Endurance Estates - Bassingbourn Sites), 57892 &amp; 58527 (Martin Grant Homes), 58002 (Imperial War Museum/Gonville and Caius College), 58151 (Hill Residential), 58185 (Enterprise Property Group Limited), 58189 (SmithsonHill), 58216 (Hallam Land Management Limited), 58253 (Bletsoes), 58273 (Pigeon Land 2 Ltd), 58301 (University of Cambridge), 58360 (Hill Residential Ltd and Chivers Farms Hardington LLP58367 (Hawkswren Ltd), 58424 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58454 &amp; 58504 (Hill Residential Limited), 58529 (MacTaggart &amp; Mickel), 58542 (Artisan UK Projects Ltd), 58556, 58958, 59108, 59241, 59737 &amp; 59738 (Endurance Estates), 58583 (Endurance Estates - Caxton Gibbet Site), 58637 (Abbey Properties Cambridgeshire Limited), 58659 &amp; 58683 (Wates Developments Ltd), 58661 (The Church Commissioners for England), 58727 (Trumpington Meadows Land</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• The significant momentum and political weight behind funding, infrastructure improvements and growth initiatives in Greater Cambridge.</li> <li>• Using the lower figure means Greater Cambridge would be planning for growth comparable to area's that do not have GC's unique life sciences cluster. This will undermine the 'Cambridge Phenomenon' that has been gathering pace since the 1960s, but is only now starting to convert the academic advances in life sciences into commercial success.</li> <li>• To provide flexibility to support the significant economic growth in the area.</li> <li>• The Covid-19 pandemic has highlighted the importance of all aspects of life science research.</li> <li>• Technical issues with the employment modelling used.</li> <li>• No account is taken of reductions in floorspace, the demand for logistics and data centres, and the fact most of the supply is not available until post 2041.</li> </ul>	<p>Company), 58795 (Redrow Homes Ltd), 58902 (Ely Diocesan Board of Finance), 58909 (Clare College, Cambridge), 58946 (North Barton Road Landowners Group), 58954 (Jesus College - working with Pigeon Investment Management and Lands Improvement Holdings - a private landowner and St John's College), 59075 (L&amp;Q Estates Limited and Hill Residential Limited), 59142 (Silverley Properties Ltd), 59319 (Bridgemere Land Plc), 59475 (Cheffins), 59832 (MCA Developments Ltd), 60147 (U&amp;I PLC and TOWN), 60185 (Home Builders Federation), 60218 (Thakeham Homes Ltd), 60244 (Bidwells), 60262 &amp; 60266 (Gonville &amp; Caius College), 60267 (The White Family and Pembroke College), 60270 (Commercial Estates Group), 60294 (Miller Homes - Fulbourn site), 60301 (Miller Homes - Melbourn site), 60309 (Gladman Developments), 60322 (Daniels Bros (Shefford) Ltd), 60509 (Taylor Wimpey UK Ltd), 60540 (Beechwood Homes Contracting Ltd), 60546 (Thakeham Homes Ltd), 60562 (Countryside Properties), 60567 (Countryside Properties – Fen Ditton site), 60578 (Martin</p>

Summary of issues raised in comments	Comments highlighting this issue
	Grant Homes), 60608 (Endurance Estates – Orwell site), 60609 (CALA Group Ltd), 60623 (NIAB Trust – Girton site), 60631 (NIAB Trust), 60667 (Mill Stream Developments), 60758 (U+I Group PLC)
<p>Questions/concerns whether sufficient upward adjustments to the housing requirement have been made to meet the requirements of Section Id.2a of the Planning Practice Guidance on Housing and economic needs assessment to take into account:</p> <ul style="list-style-type: none"> <li>• growth strategies</li> <li>• strategic infrastructure improvements</li> <li>• housing affordability</li> </ul>	<p><b>Individuals</b></p> <p>57061 (C Meadows), 57102 (J Francis); 57300 (AJ Johnson), 58145 (J Manning),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>56993 (Hastingwood Developments), 57050 (CEMEX UK Properties Ltd), 57081 (Shelford Investments), 57092 (RO Group Ltd); 57112 (Cambridge District Oddfellows), 57120 (KG Moss Will Trust &amp; Moss Family); 57196 (MPM Properties TH Ltd and Thriplow Farms Ltd), 57344 &amp; 58496 (Bloor Homes Eastern), 57633 (Dudley Developments), 57647 (Endurance Estates - Balsham Site), 57682 (Endurance Estates - Bassingbourn Sites), 58185 (Enterprise Property Group Limited), 58367 (Hawkswren Ltd), 58424 (NW Bio and its UK Subsidiary</p>

Summary of issues raised in comments	Comments highlighting this issue
	Aracaris Capital Ltd), 58902 (Ely Diocesan Board of Finance), 58946 (North Barton Road Landowners Group), 60147 (U&I PLC and TOWN)
<p>There is a recognition amongst national and local agencies that there is a need to substantially increase housing delivery in Greater Cambridge to support economic growth and address significant housing affordability issues.</p>	<p><b>Individuals</b> 57061 (C Meadows), 57102 (J Francis); 58145 (J Manning)</p> <p><b>Developers, Housebuilders and Landowners</b> 56993 (Hastingwood Developments), 57050 (CEMEX UK Properties Ltd), 57081 (Shelford Investments), 57092 (RO Group Ltd); 57120 (KG Moss Will Trust &amp; Moss Family); 57196 (MPM Properties TH Ltd and Thriplow Farms Ltd), 57300 (AJ Johnson), 57344 &amp; 58496 (Bloor Homes Eastern), 57633 (Dudley Developments), 57647 (Endurance Estates - Balsham Site), 57682 (Endurance Estates - Bassingbourn Sites), 58185 (Enterprise Property Group Limited), 58367 (Hawkswren Ltd), 58424 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58709 (TWI), 58902 (Ely Diocesan</p>

Summary of issues raised in comments	Comments highlighting this issue
	Board of Finance), 58946 (North Barton Road Landowners Group), 60147 (U&I PLC and TOWN)
<p>The higher growth level option will require infrastructure funding, but there are existing transport improvements already planned for Greater Cambridge and further investment in infrastructure (e.g. water and electricity) will need to be secured as part of the Oxford to Cambridge Arc.</p>	<p><b>Developers, Housebuilders and Landowners</b>  56993 (Hastingwood Developments), 57050 (CEMEX UK Properties Ltd), 57061 (C Meadows), 57081 (Shelford Investments), 57092 (RO Group Ltd); 57102 (J Francis); 57112 (Cambridge District Oddfellows); 57120 (KG Moss Will Trust &amp; Moss Family); 57196 (MPM Properties TH Ltd and Thriplow Farms Ltd), 57344 &amp; 58496 (Bloor Homes Eastern), 57633 (Dudley Developments), 57647 (Endurance Estates - Balsham Site), 57682 (Endurance Estates - Bassingbourn Sites), 58145 (J Manning), 58185 (Enterprise Property Group Limited), 58367 (Hawkswren Ltd), 58424 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58946 (North Barton Road Landowners Group), 60147 (U&amp;I PLC and TOWN)</p>
<p>Marshall recognises the level of growth that has been put forward by the GCSP and the proposed delivery of a number of homes that exceeds the standard methodology calculations. Marshall encourages the GCSP to reconsider the opportunity to aspire for</p>	58349 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
greater employment growth that captures the true economic potential of Greater Cambridge.	
The SA should have tested the higher jobs forecast as a reasonable alternative, given it is a possible albeit not the most likely future scenario.	58851 (Scott Properties)
The SA fails to consider any alternative other than the level of need set out in the GCLP first proposals consultation. The SA should reflect the uncertainty about housing and employment needs. The SA fails to recognise that the greater in-commuting resulting from a higher employment need would be negated by increased housing. Its reasons for limiting the assessment of reasonable alternatives are self-defeating. The justification for discounting Option B however is clearly erroneous. If it was only necessary to assess the “most likely future scenario”, there would be no assessment of alternatives of any kind. This is contrary to the entire purpose of SA and SEA.	60244 (Bidwells)
The ‘Maximum continue existing patterns’ scenario - 78,000 jobs and 53,500 homes, is not just possible but is what the evidence suggests is actually the most likely future scenario.	58529 (MacTaggart & Mickel)
It is requested that jobs requirements in Policy S/JH are based on delivering the higher growth level option	58709 (TWI)



Summary of issues raised in comments	Comments highlighting this issue
<p>The housing provision should be towards the top range of 2,900 homes per year as suggested by the CPIER report and 2,825 homes per year (56,500 homes over the plan period) as set out in the HERR report. It is imperative to ensure that the growth in employment is matched by housebuilding. If a correct balance between jobs and houses is not achieved, this runs the risk of further increasing house prices.</p>	<p>57329 (Clarendon Land and Development Ltd)</p>
<p>OAN should be increased to at least 2,549dpa to align housing and economic growth and support the objectives of the Oxford-Cambridge Arc.</p>	<p>60322 (Daniels Bros (Shefford) Ltd)</p>
<p>An indicative calculation based on CPIER suggests that, if the jobs growth targets are to be achieved, around 2,900 homes a year would need to be built - an indicative total of 66,900 homes over 2020-2041.</p>	<p>60385 (David Wright)</p>
<p>44,000 new homes should be expressed as a minimum and that the policy should have flexibility to allow further homes to come forward in certain circumstances e.g. the planned supply of homes not coming forward during the currently anticipated timescales, or if growth in the number of jobs leads again to the current problems of higher house prices and higher in-commuting.</p>	<p>57249 (Deal Land LLP), 60270 (Commercial Estates Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Were a 2:1 weighting to be applied to the two ('central' and 'higher') scenarios, in favour of the 'most likely' but not dismissing the potential contribution of the most trends, one would arrive at a projected jobs growth of c. 65,200 and a consequential need for between c. 45,800 and 48,300 homes. Adopting the same approach that leads to the proposed housing requirement of 44,400 homes would result in a requirement for 48,300 homes – approximately 9% more than is proposed.</p>	<p>58795 (Redrow Homes Ltd)</p>
<p>Housing target should be based on achieving a blended economic growth rate of 2.8% per annum and should be 4,400 dwellings per annum to meet this economic growth rate.</p>	<p>58946 (North Barton Road Landowners Group)</p>
<p>The additional 550 homes a year should be regarded as a minimum figure, which should be reviewed regularly in relation to the growth in jobs within the travel-to-work areas.</p>	<p>60043 (Cambridgeshire Development Forum)</p>
<p>The Plan period should be extended to at least 2050 in order to align with the Plan period for the OxCam Arc's Strategic Framework. This would help facilitate for properly planned strategic growth across the wider region over the next 30 years.</p>	<p>58661 (The Church Commissioners for England), 60567 (Countryside Properties – Fen Ditton site)</p>
<p>Issues with the employment modelling:</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes), 60244 (Bidwells)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• The EEFM model is constrained to the 2016 Sub National Population Projections at the regional level.</li> <li>• Many of the assumptions of the EEFM model are fixed at the 2011 Census results, such as in the commuting matrix that determines residence employment.</li> <li>• The dampening down of the exponential growth in recent historical average growth rates were applied is based on the EEFM baseline projection. This projection fails to adequately address growth in the key sectors in the first place.</li> <li>• No consideration appears to have been given to a scenario using the upper quartile.</li> <li>• There appears to be little analysis of which quartile (which are in themselves arbitrary) might be the most appropriate beyond the assertion that the Greater Cambridge economy is at a peak and over the longer-term growth will likely be lower than that seen in the past decade. This fails to recognise the unique narrative behind the exceptional growth seen in the past decade.</li> <li>• Up until 2018 development in Greater Cambridge had been constrained/dampened by County and regional planning, the</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
<p>Cambridge Green Belt and the 2008 recession. It was therefore only after 2018 that investment truly started to reflect its full potential. Given that most of the data used in the ELEDES pre-dates 2018, prior to the adoption of the local plans, it is highly unlikely that it represents the peak in the Greater Cambridge economic cycle.</p> <ul style="list-style-type: none"> <li>• The mid-point or the upper quartile might be more appropriate, perhaps an even higher figure.</li> <li>• The analysis in the ELEDES does not seem to recognise the 'sticky' relationship between sectors. If one sector is being uplifted from the EEFM baseline, all other sectors should also be uplifted to some degree to balance the economy.</li> <li>• The lowest the GCLP should be planning for is 45,761 jobs, which is linked to the Local Housing Need Standard Method (LHNSM), rather than the EEFM 40,100 jobs.</li> <li>• Employment need is likely to be the average between the 2001-2017 annual average change and 2011-2017 annual average change, 90,250 jobs. This closely reflects the CPEIR proxy result of 92,100 jobs. This would seem to best fit the requirements of the NPPF by reflecting an unconstrained view</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
<p>of employment growth while recognising what is realistically deliverable.</p>	
<p>The methods for developing the employment projection scenarios deviate, markedly so, from the historic and recent growth rates in the area without any basis in evidence. The actual long run figures produced by GL Hearn appear substantially reduced in the Plan without any evidential basis, which has the effect of aligning projections on the same basis as the EEFM previously criticised by the CPIER.</p>	60518 (Cambridge Ahead)
<p>How GL Hearn’s analysis of the historical data and projections to 2041 set out in Table 51 relate to the earlier Tables 43 and 48, and then proceed on the basis of this analysis to recommend the Plan’s projected growth rates - KS3/1.1% and KS2/1.5% set out in Table 5227 - is entirely opaque yet is such a critical element of the overall analysis.</p>	60518 (Cambridge Ahead)
<p>Against this argument about growth in the period 2011-17 being extraordinary and should therefore be discounted in assessing the prospective Plan rates of growth, the BRES results for actual growth across 2017-20, let alone for the combined BRES/CBR data, entirely contradict the view that the underlying rate of growth is falling back.</p>	60518 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
Question the jobs numbers, whether gross or net, forecasts or projections.	59764* (B Hunt)
Concerned about how required housing has been assessed.	59258* (Teversham PC)
There should be no more homes or businesses than are required by Government. The resources of the area cannot cope and there is not the capacity to increase those resources.	57221* (D Lott)
<p>Approach to forecasting employment growth must also take into account suppressed demand and more accurately account for historic or current property market dynamics. Fundamental concerns in this regard, particularly in relation to industrial land which is highly constrained in the area and exhibits old stock. Additional factors need to be taken into account in estimating future need, including:</p> <ul style="list-style-type: none"> <li>• Typical levels of demand at other similar local authorities of up to 27,300 sqm (300,000 sqft) per annum;</li> <li>• National benchmarks of floorspace per dwelling of about 6.4 sqm per dwelling compared to Greater Cambridge’s 3.5 sqm per dwelling;</li> <li>• Future demand generated by the 44,400 new dwellings to be delivered over the draft plan period; and</li> <li>• Footloose demand from national and international occupiers</li> </ul>	57647 (Endurance Estates - Balsham Site), 58958, 59108 & 59241 (Endurance Estates), 60608 (Endurance Estates – Orwell site)

Summary of issues raised in comments	Comments highlighting this issue
<p>In terms of job growth target and employment floorspace requirement, the following comments are made:</p> <ol style="list-style-type: none"> <li>1. In projecting past trends, the floorspace requirement will constrain jobs growth to levels below what has been forecast, particularly the level forecast by the Cambridge &amp; Peterborough Independent Economic Review (2018) (CPIER);</li> <li>2. Floorspace requirements do not take into account reductions in floorspace over the Plan period as older or lower quality employment land and buildings are redeveloped for alternative uses;</li> <li>3. Implications of the growth in logistics arising from changes in the economy, including growth in online retailing, should be considered in light of the findings of the update to the Retail and Leisure Study; and,</li> <li>4. Implications of the growth in Data Centres on the demand for employment floorspace over the Plan period should be considered.</li> </ol>	<p>58216 (Hallam Land Management Limited)</p>
<p>In terms of supply to meet the employment floorspace requirement, noted that a substantial proportion of the identified supply is not available until post 2041. It cannot therefore contribute to meeting the requirement and the jobs target. Additional supply is therefore required, in the form of new allocations.</p>	<p>58216 (Hallam Land Management Limited)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Alternative figures provided for employment growth:</p> <ul style="list-style-type: none"> <li>• The lowest the GCLP should be planning for is 45,761 jobs, which is linked to the Local Housing Need Standard Method (LHNSM), rather than the EEFM 40,100 jobs.</li> <li>• Realistically, employment need is likely to be the average between the 2001-2017 annual average change and 2011-2017 annual average change, 90,250 jobs. This closely reflects the CPEIR proxy result of 92,100 jobs. This would seem to best fit the requirements of the NPPF by reflecting an unconstrained view of employment growth while recognising what is realistically deliverable.</li> </ul>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes)</p>
<p>Plan should provide flexibility to facilitate higher job growth. Historically the employment growth across Greater Cambridge has been higher than predicted. This is also notwithstanding the recent introduction of Use Class E, which may see greater movement between the previous Class B Uses and additional employment sites coming forward with the potential intensification of existing employment sites, thereby increasing the need for housing land.</p>	<p>58659 &amp; 58683 (Wates Developments Ltd), 60518 (Cambridge Ahead)</p>



Summary of issues raised in comments	Comments highlighting this issue
To provide for appropriate flexibility for unforeseen economic growth, a range of additional contingency site allocations should be included within the housing trajectory.	58659 & 58683 (Wates Developments Ltd)
The 10% buffer proposed is not sufficient and additional sites should be allocated to provide flexibility. Further work will be required to identify the size of an increased buffer but this should be at least 15%	58795 (Redrow Homes Ltd)
Whilst the Councils have nominally been able to show that they will be able to demonstrate a 5YHLS on adoption of the Plan, this projection is prone to challenge and is not robust	58795 (Redrow Homes Ltd)
There is a housing supply of 5.15 years which is close to the minimum amount required. The uncertainty around the deliverability of sites means that there is reasonable potential for the council to not meet its housing targets if multiple developers fail to provide housing within the five year period. Therefore, the council should consider additional suitable housing sites through a more dispersed approach to development across settlements within the Plan area that could be delivered within the five year period to ensure that it can safely meet its housing target	59068 (A P Burlton Turkey's Ltd)

Summary of issues raised in comments	Comments highlighting this issue
<p>To meet its assessed need, the Council is only proposing a limited number of new allocations at urban extensions and new settlements and is seeking to realise additional capacity from existing allocated and committed sites as provided for in the existing strategy. In practice, the risks to delivery mean that the Council's stated provision for the 'medium' scenario plus a 10% buffer is unlikely to be achieved within the plan period utilising very limited additional sources of flexibility.</p>	<p>59737 &amp; 59738 (Endurance Estates)</p>
<p>As per para 10.19 of the October 2021 Housing Delivery Study (HDS), Waterbeach is assumed to deliver at 250dpa, but Bourn Airfield and Cambourne West are set to only deliver at 150dpa with the odd year of delivery rising to 200dpa. The clear evidence to justify this disparity in sites of a similar scale is unclear.</p> <p>Northstowe is consistently assumed to deliver 250 dpa but within the next 4 years is to deliver in excess of 300dpa. This approach would not appear to have been taken with regard to Table 18 of the HDS, which sets out that average build out rate of urban extensions delivering 2,000+ homes are 225-275. An expected delivery of over 300dpa for multiple years is highly optimistic and it is not clear from the evidence base how this is justified, to ensure no optimism bias</p>	<p>60279 (Commercial Estates Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
this should be lowered to a more realistic average build out rate of 250dpa, which fits within the identified range above.	
Policies S/JH and D/DS would not be sound on the basis because they would not be justified or effective. Our view is that for a housing delivery strategy to be effective, it will be required to take into account all reasonable alternatives to deliver the right amount of housing in the right place, including further small and medium sized additional housing sites.	60667 (Mill Stream Developments)
For the housing delivery strategy to be effective, it will be required to take into account all reasonable alternatives to deliver the right type and amount of rural housing, in the right place to meet local needs, including much-needed affordable homes. The absence of additional housing allocations within the rural southwestern part of South Cambridgeshire other than the two sites at Melbourn, means that Plan is unlikely to meet the specific housing needs of this part of Greater Cambridge.	60667 (Mill Stream Developments)
Development should be focused towards existing employment clusters, such as Granta Park	58709 (TWI)
The HERR recommends a jobs target of 58,500-78,700. This range is vast given the importance of the issue and the need for planning	58527 (Martin Grant Homes), 60274 (Commercial Estates Group), 60518 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
<p>policies to be flexible and respond to changing circumstances (NPPF para 33); as such:</p> <ul style="list-style-type: none"> <li>• The higher jobs growth should be planned for as a minimum or further work is required by the Councils to identify an appropriate point within this range for the GCLP to positively plan for.</li> <li>• an early review mechanism is included if employment growth continues to run substantially above anticipated levels, in order that sufficient sites can be brought forward more quickly to accommodate this growth.</li> </ul>	
<p>Our assessment of the proposed employment numbers over the Plan period shows that growth in the Plan area has been underestimated. Our assessment outlines what we consider to be more realistic job numbers which are higher than those in the emerging Plan [<i>NB Alternative job numbers apparently not specified in representations</i>]</p>	<p>57543, 57546, 57552 &amp; 57555 (Cheveley Park Farms Limited)</p>
<p>The supply figures incorporate some large sites which will be built out well beyond the plan period, as such the identified unmet need within the plan period is potentially far greater than identified above.</p>	<p>58216 (Hallam Land Management Limited)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Statements in paragraphs 6.37 and 6.38 of the ELR are contradictory, and it is not clear whether the ELR considers that the loss of B8 floorspace will continue in Cambridge City or not. Notwithstanding, we consider it prudent for the Councils to plan on the basis of the full identified need for B8 floorspace in South Cambridgeshire (i.e. 93,849 sq m).</p>	<p>58216 (Hallam Land Management Limited)</p>
<p>It is important that sites which are in locations capable of delivering B2/B8 employment uses or capable of accommodating existing businesses who wish to relocate are fully considered and identified through the Local plan process in order that the future demand can be met.</p>	<p>58556 (Endurance Estates)</p>
<p>In considering new employment growth consideration should be given through the plan making process to identify potential employment sites which are located on key transport corridors (A14; M11 or A10) to ensure this employment sector is catered for and suitable sites are identified throughout the district.</p>	<p>58556 (Endurance Estates)</p>
<p>Draft Policy S/JH clearly underestimates and fails to meet the need for employment floorspace, particularly Class B8 logistics floorspace. This does not reflect NPPF para 83 that calls for planning policies to recognise and address the specific locational requirements of</p>	<p>59076 &amp; 59318 (Newlands Developments)</p>

Summary of issues raised in comments	Comments highlighting this issue
different sectors, including storage and distribution operations at a variety of scales and in suitably accessible locations.	
<p>Changes Requested:</p> <ul style="list-style-type: none"> <li>• The evidence base supporting the draft Local Plan is updated to reflect recent market and economic trends, particularly in terms of e-commerce and the impact this has had on demand for logistics floorspace.</li> <li>• The scale of employment development envisaged within the evidence base and emerging Local Plan is significantly increased to align with economic trends and to take into account the wider ambitions for the region and the vision for the Oxford-Cambridge Arc.</li> <li>• The Brickyard Farm site is allocated to assist in meeting the employment needs of Greater Cambridge.</li> <li>• Ensuring policy sets the assessed land requirement as a minimum rather than a ceiling on employment-generating development in Greater Cambridge.</li> <li>• The proposed Policy restriction on large scale regional and national warehousing and distribution within the area in draft Policy J/NE be removed to align with national planning policy guidance.</li> </ul>	59076 (Newlands Developments)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Despite the decision by the EELGA to discontinue updating the EEFM, it should not be automatically disregarded. It provides a good indicator of how the economy may develop within the context of the assumptions included in the model.</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes)</p>
<p>Companies are being 'priced out' of Cambridge, not only reducing the range of businesses present but the range of job opportunities for the local population as a direct result. This does not appear to have been picked up in the Councils' evidence base and is an important reminder that the success of the Cambridge phenomenon cannot be taken for granted. Local Plan needs to address the knock-on impact of the phenomenon on other areas of the economy and ensure that these are also supported.</p>	<p>57647 (Endurance Estates - Balsham Site), 58958 &amp; 59241 (Endurance Estates)</p>
<p>Greater Cambridge relies on other parts of the wider region to provide industrial premises, which is contrary to national guidance and planning policy. Whilst the Councils' study identifies an existing deficit in the supply of B2/B8 premises (reflecting anticipated losses) of 55,000 sqm, the study's three forecast methods generate weak to negative levels of need that do not account for the need to address the ongoing losses of industrial premises and the current highly limited options for industrial occupiers in Greater Cambridge</p>	<p>57647 (Endurance Estates - Balsham Site), 58958, 59108 &amp; 59241 (Endurance Estates), 60608 (Endurance Estates – Orwell site)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Is there flexibility in the type and location of employment sites? Does the Council have a clear understanding of which sectors have been its key growth areas in recent years and what type of employment space and infrastructure would be needed (and where) if these sectors continue to grow?</p>	<p>60518 (Cambridge Ahead)</p>
<p>Economic growth must be sustainable and it would be inappropriate to determine a level of need that is undeliverable, as advocated by the NPPF.</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes)</p>
<p>It is difficult to determine exactly how much employment need there is in the context of such a vibrant economy.</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes)</p>
<p>It would be more appropriate, at least as a reasonable alternative, to reverse the analysis and instead consider the available capacity for growth in the area and determine how this sits with the various economic projections under consideration. This work will be essential to determining if any unmet housing and/or employment needs exist for the purposes of the Duty to Cooperate, determining the level of employment and housing need that is actually deliverable.</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes), 60244 (Bidwells)</p>



Summary of issues raised in comments	Comments highlighting this issue
<p>The Councils should allocate additional employment land to meet the 'higher jobs' forecast or undertake further work to identify an appropriate jobs target within the range identified by the HERR.</p>	<p>57526 (H d'Abo)</p>
<p>There are issues with the conversion from homes:</p> <ul style="list-style-type: none"> <li>• the baseline resident population used: <ul style="list-style-type: none"> <li>○ ignores student housing entirely, which will have supported a considerable population.</li> <li>○ where students are occupying market housing, they tend to do so at far greater densities (people per household) than families.</li> </ul> </li> <li>• The Housing Land Supply report identifies that 1,112 dwellings were completed in Cambridge in 2017/18 and 868 dwellings in 2018/19. However, the Housing Delivery Test (HDT) results suggests that the number of homes delivered, which includes communal establishments, was 1,145 and 1,098 respectively. This suggests 13% more homes than dwellings alone.</li> <li>• Rather than just blending the two sources of population data, it would be better to provide scenarios considering the implications of using the official estimates, the patient register</li> </ul>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes), 60244 (Bidwells)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>and different blends of the two. This would allow the reader to understand the sensitivities involved.</p> <ul style="list-style-type: none"> <li>• Modelling should be revised to consider the implications of a 1:1 commuting scenario on all jobs to be delivered by the GCLP as: <ul style="list-style-type: none"> <li>○ LHNSM is purely a policy tool for determining the minimum number of homes LPAs should seek to plan for. Its inaccuracies are well documented and there is no valid reason to include it in any form in a more comprehensive analysis of housing need.</li> </ul> </li> <li>• It would be appropriate to consider the implications of a further uplift in housing to remedy the rise in in-commuting as a result of the adopted local plans failing to provide sufficient housing for the actual growth in employment. This has led to housing pressures in surrounding areas that were not planned for and would perpetuate a pattern of unsustainable commuting unless addressed.</li> <li>• There appears to be confusion by what is actually meant by 'homes' (referred to in the Topic Paper and GCLP first proposals) and 'dwellings' (referred to in the HER).</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• It is clear that a considerable number of homes in communal establishments were delivered in 2017/18 and 2018/19, and it is highly likely that similar numbers were delivered each year since 2011. Therefore the starting assumptions for the base date are likely to be incorrect and this is likely to have influenced the household formation rates used.</li> <li>• The housing requirement of 44,400 must be dwellings only because it does not include any consideration of communal establishments of any kind.</li> </ul>	
<p>The economic variables used that are considered acceptable include unemployment rates, economic activity rates and double-jobbing.</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes)</p>
<p>The differing outputs of the two economic growth scenarios is too vast for the Councils to conclude at this early stage of the plan preparation process that the GCLP should plan for the lower figure. The HERR states that the GCLP should plan for economic growth within the range of the two scenarios and the Councils should undertake further work to establish a housing requirement within this range or plan for the higher figure.</p>	<p>56711 (KB Tebbit Ltd)</p>
<p>Likely that the ELEDES will require revision before the GCLP is adopted due to data from the 2021 Census becoming available as</p>	<p>57472 &amp; 57473 (Vistry Group - Linden Homes), 60244 (Bidwells)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>areas of substantial change such as Greater Cambridge are likely to see the greatest revision.</p>	
<p>The higher growth (i.e. recommended scenario) relates to an additional 78,700 jobs across the plan period (see 2020 ELEDES para 6.11, pg.97). Therefore, there is an internal inconsistency across the Local Plan and its supporting evidence, and it is not clear how the recommended higher growth scenario of 78,700 jobs has been translated into the Local Plan’s lower provision of 58,500 jobs.</p>	59034 (Lolworth Developments Limited)
<p>The labour demand scenario is used to inform the employment space requirements for office and R&amp;D uses, while light industrial, general industrial and storage and distribution space requirements have been based on the past trends scenario, and particularly a projection of the annual net completions between the monitoring years of 2011/12 and 2017/18, which is considered a very short period of time to inform policy recommendations over the next 20 years.</p>	59034 (Lolworth Developments Limited)
<p>According to 2020 ELEDES Table 10 (pg.94), the job growth associated with “2011-17 annual average change”, which is understood to reflect the recommended scenario for the industrial/warehousing uses, equates to 125,200 jobs across all</p>	59034 (Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
<p>sectors for the 2020 to 2041 period. There is no available data provided in terms of how these jobs are distributed across the various employment segments. As a result, there is no transparent evidence of how the proposed jobs growth is distributed across the various employment space types and on this basis, we consider that the evidence in relation to jobs growth estimation lacks transparency and robustness.</p>	
<p>The Plan needs to reflect the current and future needs of the logistic industry as that need is now manifesting itself, post Covid and post Brexit. While it is seeking to provide a range of new employment space this will not, together with the existing allocations, provide a good range in the type, size and location of sites that respond to the needs of businesses.</p>	60398 (Tritax Symmetry)
<p>The estimation of the office and R&amp;D jobs growth is based on a series of forecasts highlighting a policy-on view on how those sectors (which are considered historically as the key drivers of the local economy) are expected to grow further. The emphasis on office-based segments appears to characterise the approach in the Local Plan as a whole, and which therefore does not acknowledge</p>	59034 (Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
the importance of other economic sectors, including logistics and industrial-based activity.	
With regard to paragraphs 6.36 to 6.37 of the ELEDES, the evidence demonstrates clearly that there are specific market signals showing 'market pressure' in Cambridge City together with demand for larger units as e-commerce increases and automation evolves, both the evidence and the emerging policies choose to ignore these signals and driven by policy choices to focus on the office-based economy. This is contrary to NPPF paras 81, 82 and 83	59034 (Lolworth Developments Limited)
Various inconsistencies and deficiencies within the Councils' evidence that means the anticipated B8 and the combined Eg(iii)/B2/B8 requirements and jobs growth are significantly underestimated. Both jobs scenarios of 58,400 or 78,700 additional jobs across the Plan period suggest that over the next 20 years B8 jobs will grow by 457 jobs or 21.7 jobs per annum, while the combined Eg(iii)/B2/B8 equivalent will decrease by 1,339 jobs or by -63.7 jobs per annum across the Plan period. This contradicts the market signals and recent activity that highlight pressures to identify additional employment land in Greater Cambridge to avoid losing businesses that want to either invest or expand in the area.	59034 (Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
Additional B8 job growth of around 3,100 jobs to 5,700 jobs should be anticipated across the Plan period, once the strategic logistics requirements are considered as identified by NPPF and PPG.	59034 (Lolworth Developments Limited)
The emerging policy is not soundly-based. There is need for the supporting evidence to objectively and robustly identify employment requirements across office, industrial and storage and distribution uses rather than taking a policy-on view that largely focuses on office growth and does not adequately assess the needs arising for other segments of the economy.	59034 (Lolworth Developments Limited)
Agree that the Plan should formulate proposals based upon the forecast of the most likely level of new jobs	60441 (Westley Waterless Parish Council)
Principle of exceeding the standard method housing target is welcomed	56711 (KB Tebbit Ltd), 56894 (RWS Ltd), 57513 (R2 Developments Ltd), 58527 (Martin Grant Homes), 58659 & 58683 (Wates Developments Ltd), 58661 (The Church Commissioners for England), 58727 (Trumpington Meadows Land Company), 58851 (Scott Properties), 58909 (Clare College, Cambridge), 59068 (A P Burlton Turkey's Ltd), 59142 (Silverley Properties Ltd), 59319 (Bridgemere Land Plc), 59832 (MCA Developments Ltd), 60185 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
	60218 (Thakeham Homes Ltd), 60294 (Miller Homes - Fulbourn site), 60301 (Miller Homes - Melbourn site), 60385 (David Wright), 60477 (P,J & M Crow), 60509 (Taylor Wimpey UK Ltd), 60546 (Thakeham Homes Ltd), 60567 (Countryside Properties – Fen Ditton site), 60578 (Martin Grant Homes)
Supports ambitions for 44,000 new homes and 58,500 new jobs across all employment sectors.	57199 (Abrdn), 57267 (Universities Superannuation Scheme - Commercial), 57249 (Deal Land LLP), 58202 (Universities Superannuation Scheme - Retail), 58911 (Metro Property Unit Trust), 59147 (Cambourne TC), 59485 (Shepreth PC), 59692 (Central Bedfordshire Council)
Support for the identified requirement for 44,400 new homes	58601* (Vistry Group and RH Topham & Sons Ltd), 58748* (Great Shelford -Ten Acres- Ltd)
The Medium Growth Scenario is a sensible approach and takes into account the need to reduce commuting to the economic hubs within the authorities' areas however further work is required to confirm whether this target could be achieved, especially in relation to water supply infrastructure.	57315 (Huntingdonshire DC)



Summary of issues raised in comments	Comments highlighting this issue
<p>Entire projection of housing needs seems to be based on two reports from a single external consultancy. Given the importance of these projections, there should be more than one professional opinion sought.</p>	<p>57888 (C Schofield)</p>
<p>Due to the disparity between the different approaches to calculating homes and jobs numbers the Councils should take seriously the qualification expressed on employment levels and therefore housing need in the Hearn 2 report at para 5.5: “Although the above data sets have broadly similar views on the level of employment at 2017, the count and therefore the rate of change differed substantially, making future forecasting problematic.”</p>	<p>59597 (M Lynch)</p>
<p>Must be strong reservations about the advisability of basing the planning policy for 2021 -2041 entirely on the figures set out in Hearn 1. The Standard Method was introduced by the Government in 2017 in order to set an ‘ambitious target’ of providing 300,000 new homes across the whole of the UK. The only justification for the construction of more dwellings than the Standard Method requires is the need to foster and sustain the remarkable advances in life sciences and healthcare led by the particular strength of scientific and technical expertise in Cambridge and the surrounding area.</p>	<p>59597 (M Lynch)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The 2014-based household projection for 2020 for Greater Cambridge was 119,400 households. In the 2018 based projections the estimate for 2020 is 108,500, so in four years the 2014-based projections have over-projected by around 10,000 households.</p>	<p>60674 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Urgent need for the most rigorous measures to reduce Co2 emissions to a minimum following the Government's undertakings at the Glasgow COP 21 conference. To help to achieve this: (i) the number of currently unoccupied dwellings in the Greater Cambridge area should be properly taken into account within the 'in the pipeline' figure; and (ii) the number of new dwellings in addition to that calculated according to the Standard Method should be as far as possible secured to the sole occupation of the families of employees of scientific and technical undertakings in the fields of life sciences and health care.</p>	<p>59597 (M Lynch)</p>
<p>Minimum or Medium (but not Medium Plus) housing growth recommended and justified by sustainability, already significant growth proposed that needs to be delivered, changes in working practices due to COVID-19 reduces need for housing close to work</p>	<p>56851 (Save Honey Hill Group), 57635 (J Conroy)</p>
<p>Support growth and development in our region, but it needs to be delivered in a sustainable fashion. Keen to ensure that further</p>	<p>59944 (L Frazer MP)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>growth plans do not negatively impact on a number of villages and residents in my constituency. Concerned about the level of growth that has been outlined and encourage the local authorities, especially South Cambridgeshire, not to seek to increase building levels beyond the government minimum target. Also, imperative that local leaders identify and support the infrastructure requirements that our regions' already higher than average housing growth demands.</p>	
<p>A moderated target would lessen the uncertainty of deliverability, ease of the identified water supply issue and give time to for water companies to decide and implement sound options, and reduce climate impacts. Could provide more reserve housing sites, providing flexibility to maintain a five year housing supply, reduce pressure on villages and start to slow the pace of change in an area.</p>	60109 (C Blakely)
<p>Support the allocation of 10% more housing than required by the standard test to avoid unplanned development as happened in Cottenham (an extra 500 houses now being built in unplanned locations as a result of speculative development) while waiting for the adoption of the 2018 South Cambridge District Plan.</p>	59878 (Cottenham PC)

Summary of issues raised in comments	Comments highlighting this issue
Huntingdonshire District Council are not currently looking towards neighbouring authorities to assist in meeting their housing or jobs need.	57315 (Huntingdonshire DC)
Why do you need each house to only accommodate 1.3 workers?	56736 (Croydon PC)
The GCLP should be allocating a proportionate housing requirement to established sustainable settlements, particularly those which have a Neighbourhood Plan or are a designated NP Area.	58527 (Martin Grant Homes)
Proposed approach to Neighbourhood Plan housing targets does not comply with NPPF paras 66 & 67 as it states that NP housing requirements would be met using the Local Plan windfall housing numbers - exposes shortcomings in the proposed development strategy	56711 (KB Tebbit Ltd), 57513 (R2 Developments Ltd), 58253 (Bletsoes), 58527 (Martin Grant Homes)
Widespread promotion of Neighbourhood Plans is likely to act as a constraint on development in rural area as conflict between aim of boosting housebuilding and local community NIMBYism. Housing targets for Neighbourhood Areas is likely to dissuade areas from preparing Neighbourhood Plans	57082 (C King), 57293 (C Sawyer Nutt), 59108 (Endurance Estates), 60335 & 60346 (FC Butler Trust), 60367 (HJ Molton Settlement), 60375 (S & J Graves), 60385 (David Wright), 60477 (P, J & M Crow)
The Councils should carry out up-to-date local housing need surveys for the whole area (e.g. at ward or parish level) to determine local needs. Used as robust evidence for the determination of planning	59108 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
applications, this would be a fairer system which would guide development to the right locations and deliver affordable housing	
Adoption of the GCLP should trigger the formal review of an adopted Neighbourhood Plan to ensure that distributed growth to sustainable settlements is allocated at sustainable sites within the NP Area	57513 (R2 Developments Ltd), 58527 (Martin Grant Homes)
Support an approach which identifies new housing targets for future neighbourhood areas, which do not form part of the homes figures to be met by allocations.	58273 (Pigeon Land 2 Ltd)
The GCLP should proactively allocate a proportionate amount of housing growth to sustainable rural settlements, such as Group Villages, which would be consistent with NPPF para 79	57513 (R2 Developments Ltd)
The general approach to identifying new rural allocations for housing is supported	58881 (St John's College Cambridge)
To allow rural settlements to thrive and offer an increased housing opportunities (including affordable housing) the GCLP should seek to allocate sites for development in a broader variety of settlements.	58253 (Bletsoes), 58360 (Hill Residential Ltd and Chivers Farms Hardington LLP), 58881 (St John's College Cambridge)
More small and medium sized sites should be allocated in the Rural Southern Cluster, provided the sites are very well served by sustainable transport, in order to: provide homes where the need is greatest; reduce the need for in-commuting by workers at the	58428 (Grosvenor Britain & Ireland)

Summary of issues raised in comments	Comments highlighting this issue
<p>research parks, and reduce carbon emissions; improve access to labour in the life science sectors of south Cambridge; speed up housing delivery in the first half of the plan; reduce reliance on windfall sites; greatly improve housing choices for residents and sustain the villages.</p>	
<p>A more flexible approach towards the allocation and delivery of housing sites in Rural Areas is needed. The proposed approach is preventing obvious development opportunity sites such as farm buildings within/contiguous with settlements from being developed. Such sites would enable investment and regeneration in rural communities, whilst minimising the amount of greenfield land needed for housing.</p>	59068 (A P Burlton Turkey's Ltd)
<p>There is a need to deliver student accommodation for the undergraduate and postgraduate population; note that the First Proposals document confirms that these units also contribute to the overall housing requirement.</p>	58909 (Clare College, Cambridge)
<p>Concerns about the notion of "Windfall Development". Either we have a Development Plan or not – the notion of "unplanned" "windfall" or "opportunistic" development – especially if it were to be determined by officers as opposed to councillors – is not compatible</p>	59850 (Barrington PC)

Summary of issues raised in comments	Comments highlighting this issue
with “plan-led development”. The opening the door to opportunistic applications that run counter to the direction of the Development Plan.	
Scope of the plan inevitably creates tensions between the interests of the city and those of the surrounding, primarily rural areas. The First Proposals also seek to support both the Oxford Cambridge Arc Spatial Framework and the proposed East West Rail connection - both of which introduce additional development pressures and significant environmental impacts upon South Cambridgeshire. No longer a “Local” Development Plan, but in effect a Regional Development Plan where the local interests and concerns of villages such as Barrington lie at the bottom of the hierarchy of interest and control.	59850 & 59853 (Barrington PC)
Local government should not be planning more economic and population growth in this area or more housing than current government targets require, but prioritising social housing and new water infrastructure to reduce stress on our rivers and wildlife.	60032 (S Fenn), 60235 (Federation of Cambridge Residents' Associations)
Cambridge City Council has declared a climate emergency, which this plan simply doesn't reflect. Request that it be rejected, rewritten and re-submitted for full public consultation	60032 (S Fenn)

Summary of issues raised in comments	Comments highlighting this issue
Concern about jobs led growth without any restrictions other than the market	56964 (Trumpington Residents Association)
A greater variety of jobs (and possibly more of them), with a wide range of options including opportunities for those not wishing a desk flying career, to return to the 1:1 ratio of jobs in the village and village residents working from 2001. This would aid the sustainability search	57644 (Histon & Impington PC)
Greater Cambridge is dominated by high end tech and science jobs. Not enough diversity of opportunity. For climate change we need a higher level industrial strategy across the county. Some lost industries should be onshored, reducing global transport emissions and not relying on Chinese coal powered electricity for manufacturing.	57862 (Histon and Impington PC)
Green jobs should be prioritised over high-tech jobs in part because of the evidence that high-tech employment led growth is not beneficial to low-skilled workers	56527 (C Preston)
Predicting job growth is difficult and must be monitored throughout the plan period, due to: the impact of Brexit on the local economy is not yet known; some large employers are leaving Cambridge (Marshalls and the County Council); hybrid/home-working will	58235 (Cambridge Past, Present & Future)



Summary of issues raised in comments	Comments highlighting this issue
change the dynamic between where people work and where they live; hot-desking will increase in offices meaning that individual office buildings will support larger numbers of workers/jobs, this could decrease the amount of floor space required; people will commute fewer days per week and therefore will tolerate longer commutes in order to take advantage of cheaper housing	
Employment land in the new settlements must be safeguarded and not lost to other uses.	58235 (Cambridge Past, Present & Future)
GCSPS must work with other LAs to support the employment requirements of surrounding market towns.	58235 (Cambridge Past, Present & Future)
Homes should include all types, sizes and tenures, and include self-build	56480 (V Chapman), 56488 (D & B Searle), 56498 (W Grain), 56516 (RJ & JS Millard), 58363 (D Moore), 58627 (R Grain), 58789 (S Grain),
The First Proposals as a whole fail to set a figure or a range for the number of specialist housing for older people needed across the plan area. The issues identified mean that, together with considering full housing needs, and the requirement for an increased supply buffer, consideration must be given to specifying the amount of homes to be provided for to meet the demand for Extra Care and	59737 & 59738 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
other types of specialist accommodation, and then how these will be delivered, in accordance with NPPF para 60	
Welcome the recognition within the plan for a policy to guide proposals for specialist housing and homes for older people through 'whole life housing' approaches.	60518 (Cambridge Ahead)
Need to consider impacts on Green Belt for this amount of growth	56511 (C Martin)
Cambridge Greenbelt has two purposes, to stop urban sprawl and to protect the setting of the City. Further major developments around it will put the Greenbelt under even greater pressure because of the major damage being done to the essentially rural landscapes beyond the Greenbelt.	59498 (Babraham PC)
Figure of 2,111 new homes per annum mentioned here. Using pre-covid data and rejecting the Government standard models for development.	59862 (Dry Drayton PC)
Need much higher standards for new developments	56511 (C Martin)
Key issue in Cambridge is unaffordable housing – the housing crisis is a matter of policy and the solution isn't necessarily building more homes. The housing crisis is a matter of policy and ownership rather than a question of the number of homes in existence. Priorities	56527 (C Preston)

Summary of issues raised in comments	Comments highlighting this issue
should include: building more council housing, a return to secured tenancies, introduction of a land value tax	
<p>New homes need to be affordable to:</p> <ul style="list-style-type: none"> <li>• allow people to live near their work</li> <li>• avoid external care requirements rather than a close family member living nearby providing basic care</li> </ul>	56860 (Bassingbourn-cum-Kneesworth PC), 57644 (Histon & Impington PC)
Important to reduce long distance commuting by car	56571 (Gamlingay PC)
Important to recognise different working patterns post covid – these need to be taken into account when projecting housing requirements and considering relationship between locations of housing and employment sites. Housing aspirations have changed; major conurbations are not now so attractive.	56571 (Gamlingay PC), 56680 (N Campbell), 56736 (Croydon PC), 56843 (S Vale), 56851 (Save Honey Hill Group), 57610 (J Pratt), 57888 (C Schofield), 57932 (F Goodwille)
The existing allocations for employment must be fully utilised before any further release of land (eg S/CBC/A) is permitted.	57932 (F Goodwille)
<p>Too much unsustainable growth and development is being proposed, resulting in risk for:</p> <ul style="list-style-type: none"> <li>• Greater Cambridge and Vision &amp; Aims of Local Plan;</li> <li>• completely changing the character of Cambridge;</li> <li>• a much less pleasant place to live, which does support the needs/mental health of existing residents;</li> </ul>	56685 (A Kennedy), 56851 (Save Honey Hill Group), 57533 (A Martin), 57635 (J Conroy), 57835 (S Sinclair), 57785 (Cambridge Doughnut Economics Action Group), 59122 (C Martin), 59207 (D Fox), 59498 (Babraham PC), 59940 & 59943 (Fen Ditton PC), 60032 (S Fenn), 60035 (H Warnock), 60235 (Federation of Cambridge Residents'

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• no difference to the affordability crisis, people will continue to have to live further out and commute;</li> <li>• a lot of the apartments being purchased by investors which won't help housing crisis;</li> <li>• existing infrastructure, including water and roads/inadequate transport and effects on sewage system;</li> <li>• insufficient green space;</li> <li>• climate change and higher carbon emissions from construction and materials;</li> <li>• food security and ecosystems</li> </ul>	<p>Associations), 60507 (R &amp; K Whitaker), 60674 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Increase in population resulting from the additional homes target of 44,000 will have a negative impact on an already struggling traffic, school and healthcare infrastructure. Existing transport infrastructure at capacity or ineffective.</p>	<p>60076 (Guilden Morden PC)</p>
<p>Review required after COVID/Brexit</p>	<p>59122 (C Martin)</p>
<p>The policy related to employment needs is fundamentally flawed. It is developer and Cambridge University led for their own profit with no consideration of the wider implications of the impact on the housing needs of local Cambridge people and the environment of our City. The local plan should be resisting further commercial</p>	<p>58368 (F Gawthrop)</p>

Summary of issues raised in comments	Comments highlighting this issue
development which is driving further inroads into the green belt and the destruction of the unique nature of Cambridge	
Not clear how the base number accounts for actual completions in 2020 and 2021. A buffer of 10% should not be added to what has already been built.	59943 (Fen Ditton PC)
The 2021 census will give a more accurate base for the actual numbers of houses needed to meet the total need in 2041.	59943 (Fen Ditton PC)
Employment patterns appear to be changing rapidly. If numbers of persons employed have dropped in addition to the noted drop or low growth in economic output, the overall employment target for 2041 may be too optimistic. Therefore, necessary to either change the forecast housing need or remove/reduce the 10% buffer.	59943 (Fen Ditton PC)
Changes to the planning regulations governing change of use should be assessed and the amount of qualifying space should be estimated, and impact on the high value jobs underpinning the growth aspiration and potential for conversion of such spaces to housing should be assessed.	59943 (Fen Ditton PC)
The additional jobs, to be supported by housing, is not necessary: unemployment here is very low. It is being forced on the area by	57785 (Cambridge Doughnut Economics Action Group)

Summary of issues raised in comments	Comments highlighting this issue
external actors, including international investors. Cambridge is being exploited for financial gain.	
The Cambridge area has a very high level of employment so it's not as if we need more businesses, and hence housing developments, coming to this area	59498 (Babraham PC)
The Government's Standard Method is normally used as a default. In going beyond this method the Plan should also include the total of existing unoccupied dwellings in the 'already in the pipeline' figure in calculating the number of dwellings required, and to explore all possible means, by incentive, penalty or otherwise, to ensure that such dwellings are occupied within a reasonable time; and adopt a policy that of all new dwellings constructed above the 'Standard Method' number, at least 25% should be housing for social rent	57785 (Cambridge Doughnut Economics Action Group)
Other parts of the UK that may be better for growth than Cambridge – need to work with new department for levelling up	57034 (W Harrold), 57785 (Cambridge Doughnut Economics Action Group), 59207 (D Fox), 59498 (Babraham PC), 60032 (S Fenn), 60035 (H Warnock), 60235 (Federation of Cambridge Residents' Associations)
Do we have resources for more development? In particular, Water is in short supply with over-abstraction threatening aquifers and rivers.	58351 (Linton PC)

Summary of issues raised in comments	Comments highlighting this issue
Suitable transport infrastructure, not car based, with homes close to work.	
Impact on carbon expenditure, water use and flood risk due to ground cover: assess in light of climate change and that Cambridge has extremely stretched water resources	57610 (J Pratt)
No further allocations should be permitted until water supplies have been secured.	57932 (F Goodwille), 60072 (R Evans)
Fully endorse that delivery of the water infrastructure required to prevent further deterioration of local chalk aquifers is potentially a "deal-breaker" within the timescales of the Local Plan.	59120 (M Berkson)
Controlling the level of housebuilding is the single most important step to save our chalk streams and secure a sustainable water supply. Therefore, need to : reduce its housebuilding target to (at most) the Government's standard method figure; and work with me and others to make the case to the Department for LHC for a downward adjustment of the standard method figure, until such time as a comprehensive plan to protect the chalk aquifer is delivered by Cambridge Water and the Government.	60248 (A Browne MP)
The development proposed would damage our rivers, chalk streams, our ecology and our farming because we do not have sufficient	59498 (Babraham PC), 60072 (R Evans), 60229 (H Warwick)

Summary of issues raised in comments	Comments highlighting this issue
<p>water supplies at present, a point a previous Local Plan had made. Water supplies certainly will not support the proposed level of development and piping it in from an area that is also Water Stressed makes no sense.</p>	
<p>Our sewerage system is inadequate and further development will put additional strain on it, increasing the risk of sewerage outflows into rivers.</p>	59498 (Babraham PC), 60035 (H Warnock)
<p>Object to the scale of growth proposed due to the lack of available water supply without damaging the River Cam and its tributaries, including chalk streams. This includes impacts on water quality. Water industry plans may be delayed or not fully delivered. Policies or mechanisms should be included in the draft Plan that set out how development approvals will be aligned to improvements in water supply, and what will happen if those improvements are not achieved.</p>	58235 (Cambridge Past, Present & Future), 59716 (Swavesey PC), 60035 (H Warnock)
<p>Note concerns relating to water supply necessary to accommodate a higher level of growth, however this could be addressed through a stepped requirement allowing for the necessary infrastructure to be delivered.</p>	58273 (Pigeon Land 2 Ltd)



Summary of issues raised in comments	Comments highlighting this issue
<p>The consultation for the Regional Water Plan is not due until summer 2022 yet the public consultation for the Local Plan is going ahead when we have no idea if and how water and sewerage challenges can be met and what trade-offs have been proposed. Therefore you had insufficient information on which to base your draft Local Plan and responders have insufficient information to base responses on.</p>	<p>59498 (Babraham PC)</p>
<p>Any further development around Cambridge, will necessarily take scarce grade 2 and 3a land out of production. Developments in Fen land will deprive us of grade 1 agricultural land. Grade 1 designation is reserved almost solely for the peat-based soils of the drained fens. Proposed developments around the Waterbeach area are therefore thought to be very unwise. This land is already needed for food production in a country which imports c. 60% of its food supply.</p>	<p>59498 (Babraham PC)</p>
<p>The draft Local Plan appears to be inordinately influenced by the unelected GCP which has business interests and ambitions represented on its board and no counteracting resident's interests. Much of the text of the draft Local Plan appears to be consistent with announcements made by the self-appointed Arc Leaders Group which promotes the Ox-Cam Arc.</p>	<p>59498 (Babraham PC)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
We request that the Plan is rejected, rewritten, addressing the points made in our representations, then re-submitted for full public consultation.	59498 (Babraham PC), 60235 (Federation of Cambridge Residents' Associations)
The impact that the scale of planned housing and economic growth will have on existing health infrastructure needs to be carefully reviewed, and where improvements and/or new facilities are required to meet the needs of this new population, this should be supported through appropriate developer contributions.	59128 (Cambridgeshire and Peterborough Clinical Commissioning Group)
The cross-boundary impacts of developments also need to be considered, where NHS services often span multiple Local Planning Authority Boundaries	59128 (Cambridgeshire and Peterborough Clinical Commissioning Group)
Planning policy should support the need to deliver homes for NHS staff to meet need, particularly in areas where there is pressure on affordability which is impacting on the ability to attract and retain key staff	59128 (Cambridgeshire and Peterborough Clinical Commissioning Group)
Major risk of developing too much and too fast, destabilising the Cambridge community. Be sure these dwellings will be occupied - many recently built are bought as investment by overseas purchasers looking to reduce the risk for their money and are standing empty.	57610 (J Pratt)

Summary of issues raised in comments	Comments highlighting this issue
<p>Especially wrong to overdevelop North East Cambridge. It is very attractive to put everything next to the new station, but this will generate a huge increase in traffic. It is naive to think that people living there will all work there. Commuting in and out will cause chaos. Many of the new homes will be bought by commuters to London or worse absent foreign investors, with no affordable housing</p>	<p>57533 (A Martin)</p>
<p>Green Belt status for the Mingle Lane development was granted because of exceptional circumstances. It preserves the nature of the parish and is a major reason to live here. There are not the exceptional circumstances to warrant removal of this status. The development would make traffic congestion and pollution worse.</p>	<p>56676 (A Phillips)</p>
<p>Care needs to be taken when summarising consultation responses as there is an inherent bias in who responds to these consultations</p>	<p>56802 (M Colville)</p>
<p>There appears to be a misinterpretation of consultation response evidence. 49% is not a majority of respondents</p>	<p>58814 (R Mervart)</p>
<p>Making full responses to the Local Plan in the way you requested would be a highly labour intensive process because of the</p>	<p>59498 (Babraham PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
requirement to respond to sections and sub-sections of the Local Plan then to cut and paste responses into a further document.	
We note the complexity of the information contained in the Local Plan and would observe that it is not easy for local people to understand the proposals sufficiently to meaningfully comment. We would ask that future consultations use simpler language and format. Testing readability of materials with non-planning people could help with this.	59716 (Swavesey PC), 59850 & 59853 (Barrington PC)
USS notes that the Greater Cambridge Employment Land and Economic Development Evidence Study recommends retaining the site allocation for the Clifton Road Industrial Estate.	57267 (Universities Superannuation Scheme - Commercial)
The preferred allocation at Site Ref. S/RSC/HW (Land between Hinton Way and Mingle Lane, Great Shelford) for 100 dwellings would be consistent with the commitments to support economic growth and increase housing delivery and the supply of affordable housing.	57300 (AJ Johnson)
As per letter 30 June 2021 titled 'Greater Cambridge Local Plan – Green belt and the Duty to Cooperate', it is urged that full consideration is given to all possible locational choices during the course of the preferred options consultation. Only if it is	57315 (Huntingdonshire DC)

Summary of issues raised in comments	Comments highlighting this issue
demonstrated that Greater Cambridge cannot meet its standard method (minimum) housing need, rather than any higher aspirational target would Huntingdonshire District Council give further consideration to this issue.	
ECDC will want to be satisfied that the evidence behind the balance between jobs and homes growth is sufficiently robust. ECDC may have concerns if, over the coming years, new homes considerably exceeded job growth, or job growth considerably exceeded new homes. Under such scenarios, there could be ‘spill over’ effects on East Cambridgeshire, hence the need for the plan to have mechanisms in place to actively ‘plan, monitor and manage’ for these potential eventualities.	59860 (East Cambs DC)
The delivery of 44,000 new homes and 19 new sites should be increased to cover the number of houses developable under site JDI number 40509; Land to the south of Babraham Road and east of site H1c, Sawston which has been incorrectly omitted from the assessment.	57012 (KWA Architects)
Marshall is pleased that the significant contribution which its land can make to the future wellbeing of Cambridge has been recognised through its draft allocation. Marshall is committed to working	58349 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
positively and proactively with the Councils to ensure that Cambridge East comes forward to optimise its social, environmental and economic potential.	
Support emerging strategic policies S/JH (new jobs and homes), J/NE (new employment) and J/EP (supporting a range of facilities in employment parks), which the Cambridge Innovation Park West proposals would respond to. Substantial planned housing growth will generate additional employment land requirements. Furthermore, CIPW would contribute to the spatial distribution of employment land – providing significant and high-quality floorspace and shared campus-style facilities in a predominantly rural, yet sustainable location.	60260 (Cambridge Innovation Parks Ltd)

### Other sites proposed for allocation

Summary of issues raised in comments	Comments highlighting this issue
Land west of Long Lane, Fowlmere (HELAA site 40327)	57329 (Clarendon Land and Development Ltd)
Land to the north east of Hurdleditch Road, Orwell (HELAA site 40383) / Land to the south	55711 (K.B. Tebbit Ltd)

west of Hurdleditch Road, Orwell (HELAA site 40378)	
Land to the south of Babraham Road and east of site H1c, Sawston (HELAA site 40509)	57012 (KWA Architects)
Land east of Highfields Road, Highfields Caldecote (HELAA site 51599)	57472 & 57473 (Vistry Group - Linden Homes)
Land at Fulbourn Road, Teversham (HELAA site 40295)	56894 (RWS Ltd)
West Wratting Estate (HELAA site 56213)	57526 (H d'Abo)
Hall Farm, West Wratting Estate (new site 59388)	57526 (H d'Abo)
Land adjacent to Babraham (HELAA site 40297)	57543, 57546, 57552, 57555 & 58476 (Cheveley Park Farms Limited)
Land south of Old House Road, Balsham (HELAA site 40438)	57647 (Endurance Estates - Balsham Site)
Land off The Causeway, Bassingbourn (HELAA site 40228) & Land off Poplar Farm Close, Bassingbourn (HELAA site 40230)	57682 (Endurance Estates - Bassingbourn Sites)
Land north of Cambourne (HELAA site 40114)	57892 (Martin Grant Homes)
Scotland Farm (East & West), Scotland Road, Dry Drayton (HELAA site 56252), Land to the west of Scotland Road, Dry Drayton (HELAA site 40317)	58216 (Hallam Land Management Limited)

& Land to the east of Scotland Road, Dry Drayton (HELAA site 40318)	
Land off High Street, Little Eversden (HELAA site 40211), Land off Chapel Road, Great Eversden (HELAA site 40212) & Land west of Comberton (HELAA site 40152)	58253 (Bletsoes)
Land east of Cambridge Road, Hardwick (HELAA site 40414)	58360 (Hill Residential Ltd and Chivers Farms Hardington LLP)
Land north of Impington Lane, Impington (HELAA site 40061)	58504 (Hill Residential Limited)
Land west of London Road, Fowlmere (HELAA site 40116)	58659 (Wates Developments Ltd)
Land to the east of Cambridge Road, Melbourn (HELAA site 47757)	58683 (Wates Developments Ltd)
Land south of High Street, Hauxton (HELAA site 40283)	58795 (Redrow Homes Ltd)
Land north of Barton Road and Land at Grange Farm, Cambridge (HELAA site 52643)	58946 (North Barton Road Landowners Group)
Land south of Addenbrooke's Road and east of M11, Cambridge South (HELAA site 40064)	58954 (Jesus College working with Pigeon Investment Management and Lands Improvement Holdings, a private landowner and St John's College)



Land to the north, east and south of Six Mile Bottom (HELAA site 40078)	59075 (L&Q Estates Limited and Hill Residential Limited)
Brickyard Farm, Boxworth Farm, Boxworth (HELAA site 47353)	59076 & 59318 (Newlands Developments)
Cambridge Science Park, North East Cambridge (HELAA site 59390)	60147 (U&I PLC and TOWN)
Land to the north of St Neots Road, Hardwick (HELAA site 40224) & Land between A428 and St Neots Road, Hardwick (HELAA site 40550)	60260 (Cambridge Innovation Parks Ltd)
Land at Rectory Farm, Milton (HELAA site 54906)	60262 (Gonville & Caius College)
Land at Rectory Farm, Milton (HELAA site 54096)	60266 (Gonville & Caius College)
Land south of Fulbourn Road and north of Worts Causeway, known as Cambridge South East (HELAA site 40058)	60270 & 60274 (Commercial Estates Group)
Land off Shelford Road, Fulbourn (HELAA site 51610)	60294 (Miller Homes - Fulbourn site)
Land off Cambridge Road, Melbourn (HELAA site 47903)	60301 (Miller Homes - Melbourn site)
Land east of Long Road, Comberton (HELAA site 40497)	60546 (Thakeham Homes Ltd)

Land to north west of Balsham Road, Linton (HELAA site 40411)	60562 (Countryside Properties)
East of Horningsea Road, Fen Ditton (HELAA site 47647) & West of Ditton Lane, Fen Ditton (HELAA site 40516)	60567 (Countryside Properties – Fen Ditton site)
Land to rear of Fisher's Lane, Orwell (HELAA site 40496)	60608 (Endurance Estates – Orwell site)
Land east of Redgate Road, Girton (HELAA site 40241)	60623 (NIAB Trust – Girton site)
Whaddon Road, Meldreth (west of The Burtons) (HELAA site 55082)	60667 (Mill Stream Developments)
Land South Of Milton, North of A14 (HELAA site 47943)	60758 (U+I Group PLC)

## H/RM: Residential moorings

### Hyperlink for all comments

Open this hyperlink - [Policy H/RM: Residential moorings](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

### Number of Representations for this section

2

### Note

- The representation summaries for Policy H/RM: Residential moorings are included alongside the comments on the overall housing need made to S/JH: New jobs and homes as issues relating to housing need are referred to within them. The representation summaries for Policy H/RM: Residential moorings will also be included alongside the representation summaries for the other Homes Chapter policies when they are reported to a later JLPAG meeting.

### Abbreviations

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

### Executive Summary

There was support for addressing provision from Huntingdonshire DC. The Cambridge and South Cambridgeshire Green Parties highlight the need for engagement, and for provision of appropriate facilities.

**Table of representations: H/RM – Residential moorings**

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Support for extending the policy to the small proportion of River Great Ouse where the banks lie within South Cambridgeshire.	57454 (Huntingdonshire District Council)
Important to review successes and failures of existing policy to inform any necessary updates. Need to learn from previous consultations where proposals were met with fierce opposition.	60806 (Cambridge and South Cambridgeshire Green Parties)
<p>There are issues with existing provision that should be considered:</p> <ul style="list-style-type: none"> <li>• new moorings should have appropriate pump out facilities,</li> <li>• pontoons should be designed with a narrowboat in mind to ensure boats will fit, and</li> <li>• fixtures for moorings need to be designed with caution, and reflecting need for boats to be able to move as water levels change.</li> </ul>	60806 (Cambridge and South Cambridgeshire Green Parties)

## **H/RC: Residential caravan sites**

### **Hyperlink for all comments**

Open this hyperlink - [Policy H/RC: Residential caravan sites](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

### **Number of Representations for this section**

6

### **Note**

- The representation summaries for H/RC: Residential caravan sites are included alongside the comments on the overall housing need made to S/JH: New jobs and homes as issues relating to housing need are referred to within them. The representation summaries for H/RC: Residential caravan sites will also be included alongside the representation summaries for the other Homes Chapter policies when they are reported to a later JLPAG meeting.

### **Abbreviations**

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

## Executive Summary

The Cambridge GRT Solidarity Network and Cambridge and South Cambridgeshire Green Parties raise concerns regarding sufficient provision of sites and the effective assessment of need. The Environment Agency highlight the importance of addressing flood risk.

### Table of representations: H/RC – Residential caravan sites

Summary of issues raised in comments	Comments highlighting this issue
Need to review the vulnerability of tenure which may be an issue.	56782 (Croydon PC)
No comment.	57455 (Huntingdonshire District Council)
Needs to distinguish between mobile home parks and caravans on farms used for seasonal workers.	57754 (Bassingbourn-cum-Kneesworth PC)
Annex C (Flood Vulnerability Classification) of the NPPF classifies caravans, mobile homes and park homes intended for residential use as highly vulnerable as if located adjacent to rivers they are at significant risk from being quickly inundated without sufficient warning or means of escape. Therefore: <ul style="list-style-type: none"><li>• flood risk should be a key consideration in the policy criteria, and</li><li>• sequential test needs to be applied when considering sites.</li></ul>	59730 (Environment Agency)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Deep concern for the policy, particularly given Police, Crime Sentencing and Courts Bill which targets Gypsy and Traveller communities and effectively criminalises their way of life. This policy needs to safeguard these groups and provide sufficient pitches/plots to meet their needs.</p>	<p>60246 (Cambridge GRT Solidarity Network)</p>
<p>Essential that this policy is based on good evidence and on genuine consultation with the communities affected. Concerned that the Accommodation Needs Assessment will have been unable to establish much contact with the communities affected. Local Plan should prioritise the delivery of sites for Gypsy, Roma and Traveller communities and ensure that they meet their needs, are sufficiently spacious and affordable, and are in locations that are desirable to this community.</p>	<p>60807 (Cambridge and South Cambridgeshire Green Parties)</p>

## **H/GT: Gypsy and traveller and travelling showpeople sites**

### **Hyperlink for all comments**

Open this hyperlink - [Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

### **Number of Representations for this section**

11

### **Note**

- The representation summaries for H/GT: Gypsy and traveller and travelling showpeople sites are included alongside the comments on the overall housing need made to S/JH: New jobs and homes as issues relating to housing need are referred to within them. The representation summaries for H/GT: Gypsy and traveller and travelling showpeople sites will also be included alongside the representation summaries for the other Homes Chapter policies when they are reported to a later JLPAG meeting.

### **Abbreviations**

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



## Executive Summary

A number of organisations highlight the importance of provision of sites, and ensuring those sites are suitable, such as having access to facilities, and appropriate foul drainage. Best practice examples are highlighted. One developer expresses concerns regarding the provision of sites as part of major developments.

### Table of representations: H/GT: Gypsy and traveller and travelling showpeople sites

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for policy</p> <ul style="list-style-type: none"><li>• Additional suitable sites should be provided, and unauthorised sites subject to the same planning as housing and residential caravan sites</li><li>• There is a need for a traveller site to support members of the travellers community who need good access to the hospitals on CBC</li><li>• Provision for permanent and transit sites must be addressed, with a process to provide sites including on the edge of Major Developments</li><li>• A diverse range of locations should be provided to ensure they offer choice and respond to the preferences of future residents</li></ul>	<p>57755 (Bassingbourn-cum-Kneesworth PC) 56783 (Croydon PC), 56999 (Trumpington Residents Association), 58287 (H Smith), 57456 (Huntingdonshire District Council)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
The principle of inappropriate in the Green Belt must be enforced for all	58296 (Histon & Impington PC)
<p>Opposed to proposed policy. Gypsy and Traveller Accommodation is best provided through standalone Gypsy and Traveller site allocations or through windfall allocations. If there is a requirement for this accommodation to be provided as part of larger developments, this should only relate to the larger developments for new settlements and such requirements should be set out in the allocation policy for that site</p>	57399 (Persimmon Homes East Midlands)
The current policies are not working and have delivered too few sites. Failings will be exacerbated by the Police, Crime Sentencing and Courts Bill	58573 (Cambridge GRT Solidarity Network), 60808 (Cambridge and South Cambridgeshire Green Parties)
<p>Should be following best practice as set out in the London Gypsies and Travellers 'Best Practice for assessing the accommodation needs of Gypsies and Travellers'</p> <ul style="list-style-type: none"> <li>• This applies to consultation and needs assessment methodologies</li> <li>• Recent needs assessments have under-stated needs</li> </ul>	58573 (Cambridge GRT Solidarity Network), 60808 (Cambridge and South Cambridgeshire Green Parties)
Need to allocate better quality sites	58573 (Cambridge GRT Solidarity Network), 60808 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
The nature of G&T sites means they should be treated as highly vulnerable and flood risk should be a key consideration in any policy criteria	59731 (Environment Agency)
The existing site at Fen Road continues to be a source of ongoing local water quality and environmental health problems due to inadequate foul drainage provision. Policy H/GT should include provision for mains foul drainage and protection of water quality as part of the policy criteria	59731 (Environment Agency)

**S/DS: Development Strategy**

**Hyperlink for all comments**

Open this hyperlink- [S/DS: Development Strategy](#)> then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol.

**Number of Representations for this section:** 245 (albeit see note below)

### **Note**

A large number of representations attached to the Greater Cambridge in 2041 and How much development and where webpages have been moved to the tables below to ensure relevant strategy comments are considered together. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number\* (Name of respondent).

### **Executive Summary**

Regarding plan-wide development levels, representors (including a number promoting specific sites) proposed that the strategy should plan for more employment and housing, in order to support economic growth, reduce in-commuting, deliver more affordable housing, and to provide a more flexible supply of homes. A number of Individuals, parish councils and community groups commented that the strategy should plan for less development, noting: the circular nature of planning for more and more growth, climate and nature impacts, harm to quality of life and the character of the area, that development will compound affordable housing challenges and existing inequality, or that the proposal is higher than government's standard minimum housing need. The Environment Agency and Natural England stated that they were concerned about whether the growth proposed can be sustainable without causing further deterioration to the water environment. These bodies, together with Cambridge Water and Anglian Water, expressed their intention to work collaboratively with the Councils to explore the issue further. Other comments noted the need to reconsider the strategy in the light of COVID. The quick questionnaire included a related question (Quick question 1) which asked whether respondents supported the proposed housing level. Of 580 responses, 31% either strongly agreed or agreed; 16% were neutral, and 54% either strongly disagreed or disagreed.

There was wide ranging in principle support for the climate focused development strategy, including focusing development in locations which reduce need to travel, and in locations with existing and committed transport links. On the other hand, around 100 individuals supported the Friends of the River Cam letter objecting to the plan on the grounds of inadequate water supply, effect on national food supply, failure to minimise climate change, likely irreparable damage to ecosystems, carbon emissions from construction, lack of integrated public transport, undermining the Levelling Up agenda, democratic deficit in process and evidence base. The quick questionnaire included a related question (Quick question 2) which asked whether respondents agreed that new development should mainly focus on sites where car travel, and therefore carbon emissions, can be minimised. Of 572 responses, 68% either strongly agreed or agreed; 16% were neutral, and 16% either strongly disagreed or disagreed.

A number of comments, particularly from those promoting specific developments, argued that the plan was too heavily focused on strategic sites and too restrictive of village development. Regarding directions of growth, a limited number of individuals and developers argued that given previous plans had focused housing development to the north of Cambridge, future development should be focused to the south, close to the area of ongoing employment growth. Others proposed greater levels of development in the rural southern cluster and A428 corridor than was currently proposed in the plan. Regarding the economy, a number of landowners and developers argued that more sites should be provided to meet specific sector needs.

A large number of landowners and developers argued that that the strategy relied too much on large urban extensions to Cambridge City and new settlements in South Cambridgeshire, which had infrastructure dependencies which therefore presented a risk to the deliverability of the plan. Comments expressed concern about the accelerated delivery rates assumed at the strategic sites included in the First Proposals. The same respondents proposed that the plan should include a greater number of smaller sites, particularly in the rural area, to allow a sufficient amount and variety of land to come forward to support the objective of significantly boosting supply of homes, and to support rural communities.

A small number of individuals expressed concern at the plan's reliance on East West Rail and/or objected to the East West Rail project. Equally a small number of individuals and parish councils expressed concern about whether transport and other infrastructure would cope with the pressure generated by the development proposed in the plan.

Regarding the approach to Cambridge urban area, comments were mixed, including support for densification from some individuals, concern from individuals regarding the impact of densification on quality of life, and comments from developers or landowners (or their agents) promoting village sites that brownfield sites can be challenging to deliver. Regarding the edge of Cambridge and in the Green Belt, comments included those from promoters of sites not included in the plan stating that exceptional circumstances existed to release their site from the Green Belt, and individuals and community groups objecting to the releases included in the First Proposals. Affected parish councils urged greater separation between proposed development - at Cambridge East and at Mingle Lane, Great Shelford - and their villages. Regarding new settlements, support was expressed by a limited number of individuals, East West Rail Company, and Cambridgeshire County Council, for Cambourne as a location for expanded development. A number of site promoters for other locations highlighted the reliance of this site on the uncertain delivery of East West Rail. Regarding the rural area, individuals and parish councils supported the limits on rural development proposed in the plan.

The quick questionnaire included four related questions (quick questions 7 to 10) which were relevant to this policy. These questions asked respondents' views about development focused on the rural southern cluster, village development and provided the opportunity to identify additional sites. Responses to these questions broadly reflected the comments attributed to policy S/DS summarised above.

## Tables of representations: S/DS: Development Strategy

### Plan-wide development levels

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment that the strategy should plan for more employment and housing, including for the following reasons:</p> <ul style="list-style-type: none"> <li>• the Councils’ preferred option forecasts of jobs and homes are low</li> <li>• to reflect the Councils’ higher growth scenario</li> <li>• embrace the maximum economic benefits that can sustainably be accommodated within the Greater Cambridge area</li> <li>• Experiencing unprecedented levels of economic growth; 32% jobs increase over plan period and jobs growth has outstripped homes</li> <li>• Provide substantial increase in housing, at least 15% above proposed</li> <li>• to fully meet the housing requirement + 10% buffer</li> <li>• to ensure delivery of the required annualised housing supply</li> <li>• to ensure choice, affordability and diversity of housing</li> </ul>	<p><b>Developers, Housebuilders and Landowners</b></p> <p>57340 (HD Planning Ltd), 57650 (Endurance Estates - Balsham Site), 58309 (University of Cambridge), 58567 (MacTaggart &amp; Mickel), 58600 (Hill Residential Ltd and Chivers Farms (Hardington) LLP), 58676 (The Church Commissioners for England), 58805 (Redrow Homes Ltd), 58815 (Great Shelford (Ten Acres) Ltd), 58879 (Scott Properties), 58899 (Axis Land Partnerships), 58963 (Endurance Estates), 59048 (Emmanuel College), 59082 (L&amp;Q Estates Limited and Hill Residential Limited), 60541 (Beechwood Homes Contracting Ltd), 60580 (Martin Grant Homes), 60668 (Mill Stream Developments), 60685 (Trinity College), 58335* (Marshall Group Properties), 57148* (Southern &amp; Regional Developments Ltd), 57191* (European Property Ventures – Cambridgeshire), 57212* (Deal Land LLP), 58265* (Pigeon Land 2 Ltd), 58356* (Hill Residential Ltd and Chivers Farms -Hardington- LLP), 58948*</p>

<ul style="list-style-type: none"> <li>• Reduce in-commuting</li> <li>• reverse commuting patterns and meet full affordable housing need.</li> <li>• to address under-delivery of affordable housing at new settlements</li> <li>• to provide flexibility should allocated sites not come forward as anticipated</li> <li>• to ensure that allocated sites don't have a monopoly position whereby the LPA is under pressure to grant permission even where it has concerns about the proposal</li> <li>• Approach to faster delivery at Edge of Cambridge, Northstowe and Waterbeach is not supported by evidence</li> <li>• Shortfall of 44 dwellings – only account for 11,596 of the 11,640 to be planned</li> <li>• To accommodate additional growth from Ox-Cam Arc</li> <li>• Does not demonstrate how can meet future jobs targets or needs, particularly mid tech</li> </ul>	<p>(Endurance Estates), 59032* (L&amp;Q Estates Limited &amp; Hill Residential Ltd)</p>
<p>Comment that the strategy should plan for less growth, for the following reasons:</p>	<p><b>Individuals</b></p> <p>57592 (M Jump), 60188 (J Preston), 57582* (C Maynard), 59777* (M Bijok Hone), 57850 &amp; 57854* (T Harrold), 57980*</p>



<ul style="list-style-type: none"> <li>• concern that the model of planning for growth inevitably leads to more growth – suggested to consider when the current model may be forced to change</li> <li>• worsening conditions and finite capacity for growth with limited resources</li> <li>• Overoptimistic and unrealistic vision of growth</li> <li>• Predict and provide approach is flawed</li> <li>• Downward revision needed to reflect covid and home/hybrid working, less need for homes close to jobs, some demand can be met outside Greater Cambridge.</li> <li>• Challenge the need for growth in an area of over-rapid expansion, cannot continue indefinitely</li> <li>• planning for 44,000 homes is incompatible with the aim of decreasing carbon impacts, nature recovery, and improving quality of life</li> <li>• Failure to minimise climate change, existing development already outstrips CO2 emissions;</li> <li>• Over ambitious and high risk to Vision and Aims.</li> <li>• Minimum / Medium options can be justified with limitations of sustainability</li> </ul>	<p>(E Osimo), 57831* (S Sinclair), 58057* (B Marshall), 59764* (B Hunt), 58165* (S Kennedy), 57929* (F Goodwille), 56801* (M Colville), 57632* (J Conroy), 57033* (W Harrold), 57129* (D Lott), 57777* (C Harding), 57886* (C Schofield), 59456* (A Alderson), 60108* (C Blakeley), 60187* (J Preston), 57886* (C Schofield),</p> <p><b>Public bodies</b></p> <p>56737 (Croydon PC), 59258* (Teversham PC), 59258* (Teversham PC), 57801* (Coton PC), 59030* (Great Shelford PC), 58325* (Linton PC)</p> <p><b>Third Sector Organisations</b></p> <p>58097 (Cambridge Doughnut Economics Action Group), 56965 (Trumpington Residents Association), 57548* (Save Honey Hill Group), 57767* (Cambridge Doughnut Economic Action Group), 57786* (Carbon Neutral Cambridge), 58103* (Cambridge Doughnut Economics Action Group), 60738* (Cambridge and South Cambridgeshire Green Parties)</p>
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- economic growth encourages inward migration from other areas which is unsustainable
- The plan's proposals to support carbon neutrality will themselves consume carbon. There is no environmental capacity for additional homes and people.
- No more development allocations until environmental and transport capacity assumptions, in line with the principles of Doughnut Economics have been holistically assessed.
- Cambridge has reached maximum; more growth will impair quality of life
- Increase of nearly 40% is character changing
- Effect on national food security;
- Likely irreparable damage to ecosystems;
- Lack of integrated public transport, increased congestion (and pollution);
- Growth in Cambridge outstrips infrastructure.
- concern that the plan will not achieve affordable housing, given the primary driving force of external investment
- Growth in jobs will compound existing problems of affordable housing;

- concern that the support of capital growth will increase inequality
- Drive for growth comes from landowners and businesses, residents see the impacts;
- Move away from formulae to find ways to accentuate the positives and eliminate negatives;
- The proposed level is higher than the government advises
- The standard government calculation may itself be questioned
- Support only the absolute minimum number of new homes, around 37,400, already in the planning pipeline.
- No justification for an increase in houses
- Priority should be on Levelling Up other areas – there are plenty of brownfield sites elsewhere in the country
- Focus on improving transport links from outside Greater Cambridge
- concern at the inclusion of a 10% buffer when that is accounted for by planning for more than the Standard Method
- concern at the inclusion of a 10% buffer which accounts for 40% of the total number of additional homes

<ul style="list-style-type: none"> <li>• Puts economic growth as primary objective, which is incompatible with climate and nature recovery objectives. The plan should be scrapped; homes and jobs should be supported in locations elsewhere in the country which are in need of regeneration, and which have environmental capacity.</li> <li>• Existing housing stock will take available carbon budget and water supply. Growth is irresponsible without solution to these problems</li> <li>• What models does the Planning Service have to determine likely limits to growth of the Cambridge economy?</li> </ul>	
<p>We remain genuinely concerned about whether the growth proposed (48,800 new homes inclusive of 10% buffer and 37,200 from previous plans) can be sustainable without causing further deterioration to the water environment. We understand the regional and water company water resource planning is still ongoing and the next version of the IWMS Detailed WCS will be updated as these plans come to fruition. We offer our support to work collaboratively with all the parties involved. Support the idea of development limited to levels that can be supported by a sustainable water supply (phased delivery) until the time the</p>	<p>59719 (Environment Agency)</p>

<p>strategic infrastructure is in place, though we are mindful this may lead to heavily back loaded delivery.</p>	
<p>Major concerns with scale of development and 2041 timeframe for delivery, given damage already being inflicted on natural environment and lengthy lead-in time for identification and delivery of measures to address water resource issue and implement strategic green infrastructure.</p>	<p>59964* (Natural England)</p>
<p>Welcome recognition water supply is significant issue for deliverability. Support preparation of Integrated Water Management Study. Demonstrate appropriate deliverable mitigation measures can support sustainable growth until new strategic water supply infrastructure operational. Consider extended timeframe for delivery.</p>	<p>59969* (Natural England)</p>
<p>Support the environmental objectives of the Plan and would want to have continued joint working with other stakeholders such as the Environment Agency to agree matters such as a joint approach to calculating growth. Anglian Water proposes that a Statement of Common Ground approach is taken as part of Duty to Cooperate to reach agreement on evidence and methodology with the two Councils and the EA.</p>	<p>60457 (Anglian Water Services Ltd)</p>

<p>We would welcome regular and continued engagement and collaboration to ensure that planned growth can be supplied in a sustainable way. The timing and location of individual developments is critical to our planning.</p>	<p>60496* (Cambridge Water)</p>
<p>Committed to reduction of abstraction from chalk aquifers. Increased collaboration vital to ensure growth can be supplied sustainably. Strongly support ambitious targets for water efficient home building and any new development.</p>	<p>58915 (Cambridge Water)</p>
<p>This talks of 'creating space' but admits that water supply cannot just be created quickly. With so many problems* (air quality, transport, water, high housing costs, strained services) how can we cope with more?</p>	<p>58094* (Hills Road Residents' Association)</p>
<p>No assessment of current growth and its cumulative impact or the success or failure of current Local Plan policies</p>	<p>60236* (Federation of Cambridge Residents' Associations)</p>
<p>The 2018 Local Plan requires a rework due to the impact of the global pandemic.</p>	<p>58062* (Horningsea PC)</p>
<p>A regular review of the quantum, composition and location of job growth is needed to allow flexible adjustments across the full range of topics covered by the Local Plan.</p>	<p>57819* (W Wickstead)</p>

Contingency sites should be included to ensure the plan is effective (deliverable over the plan period) as required by the NPPF.	58693 (Wates Developments Ltd)
Support for the level of employment and homes, if it is carefully located and is sustainable.	59141* (Cambourne TC)
The overarching strategy should plan for more homes with the plan period spread across the settlement hierarchy.	57150 (Southern & Regional Developments Ltd), 57195 (European Property Ventures - Cambridgeshire)
Further consideration of sites suitable for potential development of specialist housing for older people (including Extra Care development) in sustainable locations should be undertaken	58333 (Simons Developments Ltd), 59740 (Endurance Estates)
Concern that further employment growth will continue to put pressure on housing. Suggestion to limit commercial development.	57938 (North Newnham Residents Association)
The policy stifles the role of Neighbourhood Planning in Greater Cambridge by not allocating specific levels of growth to guide the review of or preparation of Plans in designated Neighbourhood Plan Areas which possess an established sustainable settlement. The approach to guide Neighbourhood Plans by identifying indicative levels of growth from Windfall numbers is not a sound or robust way to proceed	58534 (Martin Grant Homes Ltd)

<p>Objections to the approach to windfalls including</p> <ul style="list-style-type: none"> <li>• Over-reliance on windfalls</li> <li>• Comment that the new Windfall figure is artificially high due to the extended period in the previous decade where a large number of speculative development proposals were approved, and that an increase is not necessary</li> <li>• Suggestion that the windfall allowance should be lowered and more sites explicitly allocated</li> <li>• Evidence suggests previous development has been higher than estimates but finite supply of brownfield sites so fewer will come forward in future</li> <li>• Resist inappropriate development of gardens (contrary to NPPF para 71); inclusion in allowance will perpetuate trend</li> </ul>	<p>58534 (Martin Grant Homes Ltd), 58561 (Grosvenor Britain &amp; Ireland), 58668 (Wates Developments Ltd), 58693 (Wates Developments Ltd), 58899 (Axis Land Partnerships), 60181 (Home Builders Federation), 60272 (Commercial Estates Group), 60323 (Daniels Bros – Shefford – Ltd)</p>
<p>2041 is an appropriate plan period, given uncertainty over major transport infrastructure projects including East-West Rail and Oxford to Cambridge expressway.</p>	<p>57314* (Huntingdonshire DC)</p>
<p>Suggestion that there could be a case for a longer plan period to 2050 to be advanced to:</p> <ul style="list-style-type: none"> <li>• allow time to plan the necessary infrastructure</li> <li>• align with the OxCam Spatial Framework plan period</li> </ul>	<p>58622 (Vistry Group and RH Topham &amp; Sons Ltd), 58676 (The Church Commissioners for England)</p>



<p>Proposal to increase the homes buffer above 10% and further sites allocated to:</p> <ul style="list-style-type: none"> <li>• ensure a robust strategy to account for both the current heavy reliance on existing allocations and planning permissions, as well as to accommodate any additional jobs growth</li> <li>• provide greater certainty over the delivery of housing</li> <li>• offset the potential risks that development will not come forward as planned</li> <li>• Housing Delivery Study recommends at least 10% to ensure over-allocation given strong economic growth. Facilitate houses close to local employment</li> <li>• 20% buffer would increase robustness of supply position</li> </ul>	<p>58668 (Wates Developments Ltd), 58693 (Wates Developments Ltd), 58805 (Redrow Homes Ltd), 60180 (Home Builders Federation), 60273 (Commercial Estates Group), 60323 (Daniels Bros – Shefford – Ltd), 60541 (Beechwood Homes Contracting Ltd), 58265* (Pigeon Land 2 Ltd)</p>
<p>Concern raised that the First Proposals does not demonstrate a 5 year land supply, noting:</p> <ul style="list-style-type: none"> <li>• The annual requirement should be derived from the 44,400 plan period figure</li> <li>• Delivery added to the early trajectory has not been properly tested</li> </ul>	<p>58805 (Redrow Homes Ltd), 60541 (Beechwood Homes Contracting Ltd)</p>
<p>Expected five-year housing land supply on adoption in 2025 will be 5.15 years. This is marginal and could easily fall should sites</p>	<p>60182 (Home Builders Federation)</p>

<p>not come forward as expected. Consider allocating small sites of less than one hectare to bolster supply in the first five years following adoption.</p>	
<p>Assumption that all 44,000 houses have to be allocated within Greater Cambridge to minimise carbon footprint of travel and congestion is too simplistic and unsound. Reality is people will continue to travel to/from outside area for variety of reasons. Potential for more rail commuting from Fenland and East Cambridge and Levelling Up in the County. NEC will attract out-commuters.</p>	<p>59942 (Fen Ditton PC)</p>
<p>Support for the identified requirement for 44,400 new homes; 10% flexibility allowance; additional land for a minimum 11,640 homes is appropriate.</p>	<p>58601* (Vistry Group and RH Topham &amp; Sons Ltd), 58748* (Great Shelford -Ten Acres- Ltd)</p>
<p>Recognising the housing needs requirements Anglian Water supports the approach taken on the quantum of growth planned with additional 10% allowance for flexibility. Note Anglian Water considers the Water Resources Management Plan (WRMP) and Drainage and Wastewater Management Plan (DWMP) with their 25-year time horizon, direction on sustainability requirements and demand management,</p>	<p>60444 (Anglian Water Services Ltd)</p>

enable appropriate and timely investment to support growth, also proposes enter into a Memorandum of Understanding.	
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**Spatial strategy thematic topics**

Overarching

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Broad support for the overarching strategy	<p><b>Individuals</b></p> <p>57035 (W Harrold), 60110 (C Blakeley),</p> <p><b>Public bodies</b></p> <p>57110* (D Ogilvy – Bartlow Parish Meeting), 56861 (Bassingbourn cum Kneesworth PC), 58358 (Linton PC), 59877 (Cottenham PC), 60440 (Late representation: Westley Waterless PC),</p> <p><b>Other Organisations</b></p> <p>58003 (Imperial War Museum/Gonville and Caius College),</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p><b>Developers, Housebuilders and Landowners</b></p> <p>60243 (Bidwells), 60256 (Jesus College),</p>
<p>Support in principle for the strategy’s approach of directing development to locations that have the least climate impact, where active and public transport is the natural choice, and where green infrastructure can be delivered alongside new development.</p>	<p><b>Individuals</b></p> <p>58183 (Cllr N Gough),</p> <p><b>Public bodies</b></p> <p>57110* (D Ogilvy – Bartlow Parish Meeting), 56572 (Gamlingay PC), 59691 (Central Bedfordshire Council), 59966 (Natural England), 57477 (ESFA - Department for Education), 57314* (Huntingdonshire District Council), 59250* (Cambridgeshire and Peterborough Combined Authority),</p> <p><b>Third Sector Organisations</b></p> <p>60677 (Cambridge and South Cambridgeshire Green Parties),</p> <p><b>Other Organisations</b></p> <p>58309 (University of Cambridge), 60444 (Anglian Water Services Ltd),</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p><b>Developers, Housebuilders and Landowners</b></p> <p>57310 (Deal Land LLP), 58096 (Jesus College), 58195 (Terence O'Rourke Ltd), 58196 (Countryside Properties (UK) Ltd), 58240 (Janus Henderson UK Property PAIF), 58359 (Marshall Group Properties), 58488 (BDW Homes Cambridgeshire &amp; The Landowners (Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock &amp; Ms Hartwell), 58647 (Deal Land LLP), 58657 (Socius Development Limited on behalf of Railpen), 58731 (Trumpington Meadows Land Company ('TMLC') a joint venture between Grosvenor Britain &amp; Ireland (GBI) and Universities Superannuation Scheme (USS)), 58743 (CBC Limited, Cambridgeshire County Council and a private family trust), 58257 (Pembroke College), 58900 (Varrier Jones Foundation), 58952 (Varrier Jones Foundation), 59020 (Peterhouse), 59048 (Emmanuel College), 59100 (Pace Investments), 59252 (Croudace Homes), 59403 (Pace Investments), 60263 (Gonville &amp; Caius College), 60610 (CALA Group Ltd), 60612 (Endurance</p>

Summary of issues raised in comments	Comments highlighting this issue
	Estates – Orwell site), 60624 (NIAB Trust – Girton site), 60629 (NIAB Trust), 60633 (NIAB Trust)
Support strategy focused on strategic sites with better transport links, and with limited level of development proposed for villages	56801* (M Colville), 57110* (D Ogilvy – Bartlow Parish Meeting), 59995 (Steeple Morden PC), 60077 (Guilden Morden PC), 56907* (West Wickham PC), 59470* (Shepreth PC), 58350 (Toft PC), 58241 (Cambridge Past, Present & Future),
Support continued development of committed sites	57316 (Huntingdonshire DC),
Support for focus on brownfield sites	60444 (Anglian Water Services Ltd),
Support for a blended strategy including a range of locations	58359 (Marshall Group Properties),
Support for emphasis on dense settlements, including supporting new towns to be vibrant self-sustaining communities with good facilities.	57709 (J Pavey),
Support for strategy which important issues, including needs, climate change, making use of existing sites.	56791* (J Kirkbride),
Support for focusing development in locations where infrastructure already exists.	56861 (Bassingbourn cum Kneesworth PC),
Support for focusing development in locations with existing and committed transport links.	56923 (Cambridgeshire County Council),

Summary of issues raised in comments	Comments highlighting this issue
Support weighted distribution towards most sustainable locations and key employment hubs.	60219 (Thakeham Homes Ltd),
Areas around Cambridge are good, logical sites	58039 & 58041* (Great and Little Chishill PC)
Support new homes that do not destroy the county and its waterways. Brownfield sites to be prioritised for development. Greenbelt to be fully protected.	59810* (Dry Drayton PC)
Support a GCLP strategy that supports and plans for continuing economic growth and innovation hubs, as well as the homes needed to reduce commuting into the area in a way that minimises environmental impacts and improves the wellbeing of communities.	58001* (Imperial War Museum/Gonville and Caius College), 58703* (Trumpington Meadows Land Company)
<p>Comments regarding the overarching strategy, including:</p> <ul style="list-style-type: none"> <li>• there is a vital need for the strategy to protect green spaces, and protect the qualities that makes Cambridge City a great and unique place to live</li> <li>• The need to locate jobs close to homes to reduce the need to travel</li> <li>• New development should have solar hot water and high levels of insulation</li> </ul>	56572 (Gamlingay PC), 56737 (Croydon PC), 57709 (J Pavey), 59966 (Natural England), 60188 (J Preston), 60234 (P Blythe), 60444 (Anglian Water Services Ltd), 60640 (TTP Campus Limited)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• emphasis should be given to placemaking and ensuring the character of existing communities is not harmed but rather enhanced</li> <li>• Consider further evidence as part of Sustainability Appraisal on whole lifecycle carbon benefits of selected approach.</li> <li>• Ensure the distinctive character of the City, towns and villages are not adversely affected through new development</li> </ul>	
<p>Strategy needs to tackle commuting patterns from outlying villages into City. With the presence of Green Belt, opportunities for development within the City are limited. The strategy therefore relies on areas beyond the Green Belt developing and consolidating their employment offer.</p>	60641 (Bruntwood SciTech)
<p>Note locations for development, with limited housing adjacent to Trumpington</p>	56963* (Trumpington Residents Association)
<p>Many of committed developments also unlikely to deliver sufficient level of accessible high quality green infrastructure to meet the needs of new residents without adverse recreational pressure impacts to the existing ecological network including</p>	59966 (Natural England),



Summary of issues raised in comments	Comments highlighting this issue
<p>statutorily designated sites. These issues need to be addressed urgently through further stages of Plan preparation.</p>	
<p>Emphasis should be given to placemaking and ensuring the character of existing communities is not harmed but rather enhanced</p>	<p>57709 (J Pavey),</p>
<p>Need to locate jobs close to homes to reduce the need to travel.</p>	<p>56572 (Gamlingay PC),</p>
<p>Further evidence should be produced by the Councils as part of the Sustainability Appraisal on the whole lifecycle carbon benefits of the selected approach and reasonable alternatives to guide consideration of a policy on the phasing of developments sites and supporting infrastructure including biodiversity opportunities and infrastructure option carbon benefits.</p>	<p>60444 (Anglian Water Services Ltd),</p>
<p>Ensure the distinctive character of the City, towns and villages are not adversely affected through new development, by exploiting opportunities to use brownfield land</p>	<p>60640 (TTP Campus Limited)</p>
<p>Development Strategy doesn't appear to include a balanced option on delivery of local housing needs for comparison, with an aligned transport strategy, which excludes the over densification and corresponding penalties of the S/NEC proposal.</p>	<p>58106 (M Asplin),</p>

Summary of issues raised in comments	Comments highlighting this issue
Growth should be dispersed across the settlement hierarchy.	60310 (Gladman Developments),
Emphasise the importance of a variety of growth locations and sizes to support housing growth. New settlements, strategic extensions and development in rural locations all form a key part in meeting varying housing needs and ensuring a consistent supply of housing delivery.	60547 (Thakeham Homes Ltd),
Wrong Plan at wrong time with climate, biodiversity and water emergency. Prioritise social housing, environmental matters and protect Green Belt not economic development at any cost. Undermines Government Levelling Up and brownfield first agenda.	59500 (Babraham PC)
Breaches obligations for sustainable development; does not consider embodied carbon and car borne emissions. Inadequate water supply and sewage system.	59945 (O Harwood)
Forward thinking Vision is not matched by development strategy, predicated on growth, which will increase carbon. Inconsistent with Governments Levelling Up agenda.	59548 (Campaign to Protect Rural England)
With the climate crisis the starting point should be to plan for truly sustainable neighbourhoods, meeting needs locally, and building resilient communities.	56524* (C Preston)

Summary of issues raised in comments	Comments highlighting this issue
Better to have larger settlements less dependent on cars and close to employment	56735* (Croydon PC)
Support for the vision, aims and the amount of development, but not the distribution and proposed allocations.	58387* (Grosvenor Britain & Ireland)
Councils discourage new homes in places where car travel is the easiest way to get around and yet villages with stations (e.g. Meldreth, Shepreth and Foxton) are not allocated any growth. Yet with only the prospect of a station in Cambourne, it is considered sufficient for a c.2,000 home allocation.	58672* (Artisan* (UK) Projects Ltd)
Too much farmland allocated for development in the Plan which is unsustainable and physically impossible. The plan does not address the fundamental problems of food and water security. Destroying the countries best farmland Cambridge Area is not simply a bad idea, it would dangerously damage the UKs food security.	59492* (D Seilly)
Please note the “Place Standard” Survey by Cllr Sam Davies in Queen Edith’s, Feb. 2020. GB1 & GB2 should not become an isolated community. Windfall proposals for residential development in Cambridge, and elsewhere, being subject to no limit on individual scheme	59770* (B Hunt)

Summary of issues raised in comments	Comments highlighting this issue
<p>size, will encourage developers to maximise profit at the expense of quality of life for residents. Specific sites should have their capacity limits stated from the outset.</p>	
<p>Comment proposing revisions to the strategy to ensure the plan meets its aims, including:</p> <ul style="list-style-type: none"> <li>• greater focus on bringing sustainable transport initiatives from outside the Greater Cambridge area</li> <li>• evaluate progress of adopted strategy before adding to it</li> <li>• objecting to allocation of North East Cambridge and associated relocation of Cambridge Waste Water Treatment Plant</li> <li>• applying minimum growth option and focusing development at Cambridge East and potentially Cambridge Biomedical Campus.</li> </ul>	57551 (Save Honey Hill Group)
<ul style="list-style-type: none"> <li>• The plan fails to consider the overall environmental capacity and climate change impact and the effect on the historic environment in a holistic way.</li> <li>• Where is the overall vision of what Cambridge will be like in the future? Who is the city for? This plan does not make clear.</li> </ul>	60236* (Federation of Cambridge Residents' Associations)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Essential all policies are rigorously enforced and not just window dressing. Many organisations are proposing short and long term developments. Plan must take account of each proposal and ensure full co-ordination.	59061* (M Berkson)
Agree with policy direction and Figure 6. Support the fact that no new settlement is proposed around Six Mile Bottom and agree with comment (page 39) that further new settlements should not be allocated.	60442 (Late representation: Westley Waterless PC)
Notes expansion of Cambourne, continuing to develop Bourn Airfield. Mansel Farm, Oakington (20 homes near Beck Brook). Notes mention of 10% extra buffer for homebuilding, and 1,000 more homes on the Eddington site (M11 side).	59863 (Dry Drayton PC)
The plan includes many welcome similarities with CA's Suggested Spatial Vision, including supporting the need for higher density development, five strategic sites, agglomeration supported by transport corridors, creation of a connected nature network.	60519 (Cambridge Ahead)
Need to act on the recommendations of the Climate Commission.	60519 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
New development should have solar hot water and high levels of insulation.	56737 (Croydon PC),
2 <sup>nd</sup> & 4 <sup>th</sup> paragraphs should recognise the importance of access to excellent education provision and areas can/should be improved through regeneration or enhancement.	58502* (ARU)
The proposed house expansion would change the nature of Cambridge from a small town to a large city. Please focus on connecting the biomedical campus to other residential areas outside of Cambridge city.	57984* (F Seregni)
Cambridge City Council and South Cambridgeshire District Council lies outside the defined coalfield. No specific comments to make.	59736* (The Coal Authority)
Non-substantive comment	57852* (T Harrold), 57860* (T Harrold)

Strategic influences and Duty to Cooperate

Summary of issues raised in comments	Comments highlighting this issue
<p>Welcome consideration of how Plan fits with other plans and strategies, including Ox Cam Arc, and prepared within wider regional context, noting duty to cooperate. Pleased to engage in preparation and development of a draft Statement of Common Ground.</p>	<p>59970* (Natural England)</p>
<p>To ensure compliance with NPPF para. 16 of the NPPF, the Councils should seek to identify or establish a suitable forum for engaging with the Government for the OxCam Arc.</p>	<p>58655* (The Church Commissioners for England)</p>
<p>Welcome the approach to preparing the preferred development strategy / draft allocations and green infrastructure initiatives in parallel. Consideration has been given, through the Sustainability Appraisal, to the best locations to restore the area's habitat networks and provide more green spaces for people providing health and wellbeing benefits. Support identification of 14 Strategic Green Infrastructure initiatives.</p>	<p>59968 (Natural England)</p>
<p>No objection in principle to the existing and new allocations, areas of major change or opportunity areas being taken forward subject to:</p> <ul style="list-style-type: none"> <li>• identification of strategic water supply infrastructure and/or feasible interim solutions</li> <li>• establishment of a robust plan to deliver the 14 Strategic Green Infrastructure initiatives ahead of development</li> <li>• need robust requirements to deliver biodiversity net gain and on-site green infrastructure</li> </ul>	<p>59971 (Natural England)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Pleased to note the assessment in relation to historic environment, especially HELAA Appendix 4. Welcome commitment to preparation of Strategic Heritage Impact Assessment for site allocations.	59601 (Historic England)
Important that site allocation policies include sufficient clarity (NPPF para 16d). Policy should identify assets on site/nearby, mitigation measures, reference HIA. Suggested wording.	59602 (Historic England)
Combined Authority is consulting on its Sustainable Growth Ambition Statement; considers good growth in context of six 'capitals'. Reflection of six capitals in Plan policies and Sustainability Appraisal is supported.	59313* (Cambridgeshire and Peterborough Combined Authority)
The location and form of new development should fully consider the principles of creating healthy environments.	59114* (Cambridgeshire and Peterborough Clinical Commissioning Group)
ECDC has no objections at this stage. Notes there are no additional major development proposals close to the border and no obvious significant 'cross-border' implications of relevance to East Cambridgeshire.	59859 (East Cambridgeshire DC)
Wide range of spatial options have been tested. Chosen option aids achieving net zero carbon ambitions, particularly relating to transport, by locating homes, employment and services near to one another. Support this approach. Focusing development largely in close proximity to Cambridge City, is also least likely to impact on infrastructure within Suffolk.	59953 (Suffolk Council)



<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Want to produce a joint evidence base to set out the most up to date position and for this to be further updated as the Drainage and Wastewater Management Plan (DWMP) progresses.	60460 (Anglian Water Services Ltd)
The area is too complicatedly organised by local government divisions with no satisfactory overview. We need to work on many existing problems before we fall for Government's hopeful plans for South East and Arc that are not regarding the complications realistically.	60233* (H Warwick)
Supportive of Councils working jointly, aligns with commitment in existing Plans and allows strategic matters to be considered comprehensively in a joined-up manner. Critical to work alongside Cambridgeshire authorities to ensure wider cross boundary issues are addressed. If a Council fails to satisfactorily discharge its Duty to Cooperate a Planning Inspector must recommend non-adoption.	60307* (Gladman Developments)
Be clear how it will deliver on ambitions of Oxford-Cambridge Arc. Support strategic spatial planning approach being applied to Ox-Cam Arc but it appears a substantial amount of housing may be planned for and delivered at an earlier stage due to conflicting timescales.	58640* (National Trust)
Plan assumes coordination with OxCam Arc project, which is now under review by government.	59540* (Campaign to Protect Rural England)
Plan assumes influence by UK Innovation Corridor and Cambridge-Norwich Tech Corridor, which are projects driven by unelected business interests.	59540* (Campaign to Protect Rural England)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Opposition to Oxford Cambridge Arc Spatial Framework and East West Rail southern route. Concerns these may lead to central government-imposed rather than locally-agreed development which will be highly detrimental to the area.	59851 (Barrington PC)
The planning authorities should engage with their neighbours under the Duty to Cooperate to ensure they respond to the footprint of the Cambridge economy, including its travel to work area.	60519 (Cambridge Ahead)

Spatial directions for development

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Proposal that the plan should reflect more strongly the benefits of the Public Transport Corridors Spatial Option	59040 (Axis Land Partnerships)
Comment that new housing should be focused on the south of Greater Cambridge, and limited in the north, given the existing imbalance of jobs with homes.	56803 (M Colville), 58561 (Grosvenor Britain & Ireland)
Note that in previous plans large developments were located to north and jobs to the south of city. This requires increased traffic to work through and around Cambridge City. Expect policies to counter negative effects by putting more stringent requirements on developers for sustainability criteria.	57639* (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Developments are concentrated on the North side of Cambridge due to 'better' transport links, but it would be easy to improve bus services on the South side of Cambridge.</p>	<p>58896* (R Donald)</p>
<p>Comment that the level of development focused in the southern cluster should be increased, to:</p> <ul style="list-style-type: none"> <li>• support the continuing growth of the economic cluster in life sciences and technology related activities, and</li> <li>• provide homes well related to jobs</li> <li>• reduce long distance commuting</li> </ul>	<p>58195 (Terence O'Rourke Ltd), 58503 (Bloor Homes Eastern), 58561 (Grosvenor Britain &amp; Ireland), 58188* (Smithson Hill), 60561 (W Garfit),</p>
<p>South West sustainable transport corridor should be given greater weight than relying on corridors where infrastructure projects are to be decided / proven deliverable.</p>	<p>57343* (HD Planning Ltd)</p>
<p>Comment that the plan should capitalise further on the committed key sustainable transport infrastructure along the A428/E-W Rail/OxCam Arc corridor, and that further development should be proposed here.</p>	<p>58567 (MacTaggart &amp; Mickel), 58622 (Vistry Group and RH Topham &amp; Sons Ltd)</p>
<p>Comment that the strategy should review other sustainable corridors in the same way as the Rural Southern Cluster approach, including</p> <ul style="list-style-type: none"> <li>• the southwest corridor, which benefits from the railway and GCP Melbourn Greenway project.</li> <li>• the A428/E-W Rail/OxCam Arc corridor</li> </ul>	<p>57340 (HD Planning Ltd), 58567 (MacTaggart &amp; Mickel)</p>

Summary of issues raised in comments	Comments highlighting this issue
Comment that the development strategy should revise its focus away from the western A428 corridor of Cambridge to the east where strategic growth locations like Six Mile Bottom can create a more sustainable pattern of development linked to good transport links, supporting the southern cluster.	59082 (L&Q Estates Limited and Hill Residential Limited)

### Economy

Summary of issues raised in comments	Comments highlighting this issue
Support for focus on employment uses such as Life Sciences (including healthcare, biotechnology and biomedical activities) associated research and development laboratory space and life science related advanced manufacturing	57316 (Huntingdonshire DC),
It is right for the strategy to be realistic around the locational limits of some new jobs floorspace which is centred upon national and global economic clusters.	58195 (Terence O'Rourke Ltd),
Should be governed by local need. Local jobs to reduce travel to work and be more sustainable.	57639* (Histon & Impington PC)
Plan for a new era of flexible work and location choices, including build to rent as part of diverse housing needs. Failing to manage pressure of future employment flows will result in	60519 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
escalating house occupancies, rents, expanding travel to work areas, and rising congestion levels.	
Concern about the lack of clear information about where employment land is located and to categorise this land into different potential uses	58561 (Grosvenor Britain & Ireland), 60276 (Commercial Estates Group)
<p>Cambridge needs more quality office buildings within Cambridge Prime Central submarket with most severe supply pressures in Greater Cambridge.</p> <p>Supply/demand imbalance is acute and getting worse. Whilst there is need for housing, Grade A commercial floor area should be encouraged, incentivised and make best use of brownfield site.</p> <p>No constraints to development, only what quantum can be accommodated. Allocation should not be prescriptive. Site specific matters will determine what impacts and benefits arise.</p>	58646* (Socius Development Limited on behalf of Railpen)
<p>Comment that the plan should provide allocations to meet demand for warehouse and distribution centres for the following reasons:</p> <ul style="list-style-type: none"> <li>the evidence base for the emerging GCLP underestimates the need for Class B2 and B8 uses, and does not reflect the market demand for these uses in Greater Cambridge</li> </ul>	58585 (Endurance Estates - Caxton Gibbet Site)
Address logistics needs and locational requirements (NPPF); good connectivity to strategic road network, on large flat sites.	60215 (Tritax Symmetry)

Summary of issues raised in comments	Comments highlighting this issue
Plan does not demonstrate how it can meet future jobs targets or needs, particularly for mid tech.	60685 (Trinity College)

Strategic and smaller scale development

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for development at strategic sites for the following reasons:</p> <ul style="list-style-type: none"> <li>• Development can be located close to existing infrastructure</li> <li>• They perform better in transport terms and result in greater internalisation of trips</li> <li>• They can provide large numbers of new homes</li> <li>• They provide long term certainty of delivery</li> <li>• They are at locations which make best use of land while creating well-designed, characterful places</li> </ul>	<p>56861 (Bassingbourn cum Kneesworth PC), 56923 (Cambridgeshire County Council), 57316 (Huntingdonshire DC), 58309 (University of Cambridge), 58359 (Marshall Group Properties), 58523 (Phase 2 Planning), 58808 (R Mervart), 58923 (Clare College, Cambridge)</p>
Comment that all strategic sites need to:	56923 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• provide sufficient land for educational purposes, taking into account Cambridgeshire County Council's agreed school site sizes</li> <li>• ensure that schools are centrally located and easily accessible to families living within the catchment area by walking or cycling, to support 'healthy schools' objectives</li> </ul>	
<p>Comments regarding strategic sites including new settlements, including the following points:</p> <ul style="list-style-type: none"> <li>• require carefully considered design incorporating suitable levels of facilities and open spaces</li> <li>• locate jobs in these locations to minimise travel and maximise their attractiveness to new residents</li> <li>• Generally, the larger the development the greater the chance of trips being internalised, and the settlement is likely to have a greater chance at being able to provide key services and facilities.</li> <li>• Any development in the Cambourne / Bourn Airfield area needs to have good links to the existing community to enable greater access to services and to reduce the potential transport impacts of any new development</li> </ul>	<p>56803 (M Colville), 56923 (Cambridgeshire County Council)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Spatial strategy should focus the larger development sites in locations which offer public transport options to reach major employment centres. Development in rural locations of an appropriate scale should not be deterred as and when more sustainable personal transport options are available, eg electric vehicles using renewable energy.</p>	<p>60044 (Cambridgeshire Development Forum)</p>
<p>Concern that the strategy relies too much on large urban extensions to Cambridge City and new settlements in South Cambridgeshire, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Strategic sites are often complex to bring forward and implement with significant investment in infrastructure often required before dwellings can be delivered</li> <li>• Risk to deliverability of the plan</li> <li>• Does not represent a flexible and balanced approach capable of responding to changing circumstances or providing a mix and variety of sites</li> <li>• will significantly limit the supply of new housing sites being delivered by smaller and mid-sized (SME) housebuilders</li> <li>• Specific infrastructure challenges noted including relocation of Cambridge Waste Water Treatment Plant at</li> </ul>	<p><b>Individuals</b></p> <p>56956 (J Swannell), 57301 (Mrs Ann Josephine Johnson), 58146 (J Manning), 57063 (C Meadows)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>60369 (Critchley Family), 58534 (Martin Grant Homes Ltd), 60458 (P, J &amp; M Crow)</p> <p>60394 (D Wright), 56557 (Bonnel Homes Ltd), 56713 (KB Tebbit Ltd), 56895 (RWS Ltd), 56902 (R. Cambridge Propco Limited), 56995 (Hastingwood Developments), 57056 (Endurance Estates), 57083 (Shelford Investments), 57094 (RO Group Ltd), 57104 (J Francis), 57113 (Cambridge District Oddfellows), 57121 (KG Moss Will Trust &amp; Moss Family), 57150 (Southern &amp; Regional Developments Ltd), 57195</p>



Summary of issues raised in comments	Comments highlighting this issue
<p>North East Cambridge, East West Rail, and relocation of Cambridge Airport</p> <ul style="list-style-type: none"> <li>• Strategic sites often do not deliver policy-compliant levels of affordable housing</li> </ul>	<p>(European Property Ventures (Cambridgeshire)), 57202 (MPM Properties (TH) Ltd and Thriplow Farms Ltd), 57346 (Clarendon Land), 57348 (Bloor Homes Eastern), 57502 (Cambridgeshire County Council (as landowner)), 57636 (Dudley Developments), 57650 (Endurance Estates - Balsham Site), 57684 (Endurance Estates - Bassingbourn Sites), 58187 (Enterprise Property Group Limited), 58255 (Bletsoes), 58401 (Hawkswren Ltd), 58433 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58488 (BDW Homes Cambridgeshire &amp; The Landowners (Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock &amp; Ms Hartwell), 58503 (Bloor Homes Eastern), 58534 (Martin Grant Homes Ltd), 58534 (Martin Grant Homes Ltd), 58600 (Hill Residential Ltd and Chivers Farms (Hardington) LLP), 58356* (Hill Residential Ltd and Chivers Farms -Hardington- LLP), 58629 (Hill Residential), 58668 (Wates Developments Ltd), 58693 (Wates Developments Ltd), 58694 (LVA), 58879 (Scott Properties), 58899 (Axis Land Partnerships), 58923 (Clare College, Cambridge), 58929 (Carter Jonas), 58950 (North Barton Road Landowners Group), 58963 (Endurance</p>

Summary of issues raised in comments	Comments highlighting this issue
	Estates), 59082 (L&Q Estates Limited and Hill Residential Limited), 59148 (Silverley Properties Ltd), 59252 (Croudace Homes), 60580 (Martin Grant Homes), 60625 (NIAB Trust – Girton site), 60632 (NIAB Trust), 58948* (Endurance Estates), 59032* (L&Q Estates Limited & Hill Residential Ltd), 60323 (Daniels Bros – Shefford – Ltd), 60329 (Steeplefield), 60345 (FC Butler Trust), 60356 (FC Butler Trust), 60383 (S & J Graves), 60580 (Martin Grant Homes), 60668 (Mill Stream Developments),
<p>Objection to short lead in times assumed for the largest sites include in First Proposals, noting that:</p> <ul style="list-style-type: none"> <li>• these conflict with those recommended in the Housing Delivery Study, and in the Greater Cambridge Local Plan Strategic Spatial Options for Testing – Methodology November 2020 – Appendix 6.</li> <li>• Adopting these would not provide sufficient time for post-adoption supplementary plans or guidance</li> </ul>	58899 (Axis Land Partnerships), 59040 (Axis Land Partnerships)
Objection to assumptions regarding faster housing delivery at strategic sites, for the following reasons:	<b>Individuals</b>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Should take into account delivery evidence from other locations</li> <li>• No justification for how Waterbeach will achieve increase</li> </ul>	<p>56481 (V Chapman), 56499 (W Grain), 57063 (C Meadows), 57104 (J Francis) 57301 (A Josephine Johnson), 58146 (J Manning) 58639 (R Grain)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>56489 (D &amp; B Searle), 56517 (RJ &amp; RS Millard), 56995 (Hastingwood Developments), 57051 (Cemex UK Properties Ltd) 57083 (Shelford Investments), 57094 (RO Group Ltd), 57113 (Cambridge District Oddfellows), 57202 (MPM Properties (TH) Ltd and Thriplow Farms Ltd), 57348 (Bloor Homes Eastern), 57502 (Cambridgeshire County Council (as landowner)), 57636 (Dudley Developments), 57650 (Endurance Estates - Balsham Site), 57684 (Endurance Estates - Bassingbourn Sites), 57893 (Martin Grant Homes), 58187 (Enterprise Property Group Limited), 58401 (Hawkswn Ltd), 58433 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58503 (Bloor Homes Eastern), 58534 (Martin Grant Homes Ltd), 58622 (Vistry Group and RH Topham &amp; Sons Ltd), 58629 (Hill Residential), 58644 (Abbey Properties Cambridgeshire Limited), 58668</p>

Summary of issues raised in comments	Comments highlighting this issue
	(Wates Developments Ltd), 58693 (Wates Developments Ltd), 58805 (Redrow Homes Ltd), 58815 (Great Shelford (Ten Acres) Ltd), 58899 (Axis Land Partnerships), 58950 (North Barton Road Landowners Group), 59040 (Axis Land Partnerships), 60580 (Martin Grant Homes), 57121 (KG Moss Will Trust & Moss Family), 60580 (Martin Grant Homes),
<p>Concern about in delivery rate assumptions for strategic sites:</p> <ul style="list-style-type: none"> <li>• Disparity between sites of similar scale</li> <li>• Inconsistent and contrary to Housing Delivery Study.</li> <li>• Lower average build-out rate to 250dpa, with peak 300dpa in years 1 or 2 if it can be evidenced.</li> <li>• Inconsistent with Lichfields Start to Finish evidence and past delivery</li> </ul>	60271 (Commercial Estates Group), 60323 (Daniels Bros – Shefford – Ltd)
<p>First Proposals plan is heavily reliant on the delivery of a handful of strategic developments, particularly large and complex sites. To ensure that the delivery of industrial space does not stall, and the supply-demand gap for employment space widens as a result, a pipeline of smaller developments which can deliver commercial sites quickly will be needed in the short-to-medium term.</p>	60357 (H. J. Molton Settlement)

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment that more development should be directed to small and medium sized sites on the edge of Cambridge and in the rural area, for the following reasons:</p> <ul style="list-style-type: none"> <li>• support sustainable rural development</li> <li>• enhance vitality of rural settlements including supporting the existing services and facilities, as per NPPF para 79</li> <li>• meet increasing demand for housing away from larger settlements arising from the COVID pandemic</li> <li>• NPPF para 60 notes the need to allow sufficient amount and variety of land to come forward to support the objective of significantly boosting supply of homes</li> <li>• support stated aim of supporting rural communities</li> <li>• Risk to five year supply and resulting potential impact of speculative development by limiting such sites</li> <li>• The plan should positively plan for development at established rural settlements, including Group Villages</li> <li>• There are a number of sustainable villages including being accessible by sustainable modes of transport, and where development in one village may support services in a village nearby</li> </ul>	<p><b>Individuals</b></p> <p>56481 (V Chapman), 56499 (W Grain), 57063 (C Meadows), 57301 (Mrs Ann Josephine Johnson) 58639 (R Grain), 56479* (V Chapman), 56487* (D &amp; B Searle), (W, Grain), 56515* (RJ &amp; JS Millard), 58624* (R Grain), 58771* (S Grain), 57014 (J Francis), 56956 (J Swannell), 56961 (S &amp; D Jevon and Raven)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>60263 (Gonville &amp; Caius College), 57121 (KG Moss Will Trust &amp; Moss Family),58355 (Bridgemere Land Plc), 56489 (D &amp; B Searle), 56517 (RJ &amp; RS Millard), 56557 (Bonnell Homes Ltd), 56713 (KB Tebbitt Ltd), 56895 (RWS Ltd), , 56995 (Hastingwood Developments), 57051 (Cemex UK Properties Ltd), 57056 (Endurance Estates), 57083 (Shelford Investments), 57094 (RO Group Ltd), 57113 (Cambridge District Oddfellows), 57150 (Southern &amp; Regional Developments Ltd), 57195 (European Property Ventures (Cambridgeshire)), 57202 (MPM Properties (TH) Ltd and Thriplow Farms Ltd), 57310 (Deal Land LLP), 57346</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Such sites can deliver policy-compliant levels of affordable housing</li> <li>• provide a flexible, diverse supply of housing sites</li> <li>• facilitate greater space for people</li> <li>• provide opportunities to connect with the surrounding countryside to improve mental and physical health</li> <li>• provide local, smaller housebuilders the opportunity to acquire sites</li> <li>• address NPPF para 62 requirement for housing types and sizes to reflect the needs of the community</li> <li>• NPPF para 105 regarding minimising the need to travel notes that the opportunities will be different in urban and rural areas</li> <li>• Limiting such development conflicts with the Plan’s aim of enhancing existing places</li> <li>• Public transport infrastructure investment should be directed to villages to make them more sustainable</li> <li>• Village employment sites can enhance the sustainability of such settlements by reducing the need to travel</li> </ul>	<p>(Clarendon Land), 57348 (Bloor Homes Eastern), 57374 (Colegrove Estates), 57502 (Cambridgeshire County Council (as landowner)), 57516 (R2 Developments Ltd), 57527 (Mr Henry d'Abo), 57636 (Dudley Developments), 57636 (Dudley Developments), 57650 (Endurance Estates - Balsham Site), 57684 (Endurance Estates - Bassingbourn Sites), 58146 (J Manning), 58187 (Enterprise Property Group Limited), 58255 (Bletsoes), 58285 (Pigeon Land 2 Ltd), 58333 (Simons Developments Ltd, 58370 (D Moore), 58401 (Hawkswren Ltd), 58433 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58488 (BDW Homes Cambridgeshire &amp; The Landowners (Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock &amp; Ms Hartwell), 58503 (Bloor Homes Eastern), 58512 (Hill Residential Limited), 58523 (Phase 2 Planning), 58534 (Martin Grant Homes Ltd), 58561 (Grosvenor Britain &amp; Ireland), 58567 (MacTaggart &amp; Mickel), 58600 (Hill Residential Ltd and Chivers Farms (Hardington) LLP), 58629 (Hill Residential), 58644 (Abbey Properties Cambridgeshire Limited), 58668 (Wates Developments Ltd), 58693 (Wates Developments Ltd), 58694 (LVA), 58805 (Redrow Homes</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Changes in working patterns arising from COVID have enhanced the sustainability of rural living. The Sustainability Appraisal (SA) for the Local Plan does not adequately account for this change in sustainable characteristics.</li> <li>• Can support provision of needed community infrastructure</li> <li>• To maintain smooth delivery of housing throughout plan period</li> <li>• At villages, tightly drawn framework boundaries limit infill opportunities</li> </ul>	<p>Ltd), 58815 (Great Shelford (Ten Acres) Ltd), 58879 (Scott Properties), 58900 (Varrier Jones Foundation), 58923 (Clare College, Cambridge), 58929 (Carter Jonas), 58952 (Varrier Jones Foundation), 58963 (Endurance Estates), 59020 (Peterhouse), 59080 (A P Burlton Turkey's Ltd), 59148 (Silverley Properties Ltd), 59252 (Croudace Homes), 59307 (Countryside Properties) , 59740 (Endurance Estates), 59048 (Emmanuel College), 58613* (MacTaggart &amp; Mickel), 58265* (Pigeon Land 2 Ltd), 56497* 57148* (Southern &amp; Regional Developments Ltd), 57191* (European Property Ventures – Cambridgeshire), 57342* (HD Planning Ltd), 58483* (D Moore), 58564* (Croudace Homes), 58635* (Abbey Properties Cambridgeshire Limited), 58652* (Wates Developments Ltd), 58672* (Artisan* (UK) Projects Ltd), 58875* (St John's College Cambridge), 60217* (Thakeham Homes Ltd), 60545* (Thakeham Homes Ltd), 60295 (Miller Homes – Fulbourn Site), 60302 (Miller Homes – Melbourn Site), 60323 (Daniels Bros – Shefford – Ltd), 60329 (Steeplefield), 60345 (FC Butler Trust), 60356 (FC Butler Trust), 60383 (S &amp; J Graves), 60510 (Taylor Wimpey UK Ltd),</p>

Summary of issues raised in comments	Comments highlighting this issue
	60541 (Beechwood Homes Contracting Ltd), 60563 (Countryside Properties), 60580 (Martin Grant Homes), 60610 (CALA Group Ltd), 60612 (Endurance Estates – Orwell site), 60624 (NIAB Trust – Girton site), 60629 (NIAB Trust), 60633 (NIAB Trust), 60668 (Mill Stream Developments), 60284 (Wheatley Group Developments Ltd),
Support for the Councils’ response to NPPF para 69 - that plans should accommodate at least 10% of their housing on sites no larger than 1 hectare	57316 (Huntingdonshire DC)
<p>Objection to the Councils’ response to NPPF para 69 - that plans should accommodate at least 10% of their housing on sites no larger than 1 hectare, for the following reasons:</p> <ul style="list-style-type: none"> <li>• there are a number of available sites for residential development, located outside of the Green Belt, at sustainable settlements such as Group Villages</li> <li>• all sites relevant to para 69 should be identified within the plan</li> </ul>	56557 (Bonnell Homes Ltd), 56713 (KB Tebbitt Ltd), 56961 (S & D Jevon and Raven), 57340 (HD Planning Ltd), 57346 (Clarendon Land), 58355 (Bridgemere Land Plc), 60284 (Wheatley Group Developments Ltd), 60561 (W Garfit),



Summary of issues raised in comments	Comments highlighting this issue
Need to show meeting NPPF para 69. The plan states that the requirement will be exceeded but includes windfall sites which are unidentified. Must be able to demonstrate it can meet the requirements through allocations or on sites identified on the Brownfield register.	60183 (Home Builders Federation)
Comment that directing self-build to strategic sites will limit this form of development meeting local needs.	57374 (Colegrove Estates)

Water supply and drainage

Summary of issues raised in comments	Comments highlighting this issue
Support recognition that water supply challenge is a serious issue to be resolved.	59970* (Natural England)
Object on grounds of inadequate water supply, effect on national food supply, failure to minimise climate change, likely irreparable damage to ecosystems, carbon emissions from construction, lack of integrated public transport, undermining Levelling Up agenda, democratic deficit in process and evidence base. Support Friends of River Cam objection.	<p><b>Individuals</b></p> <p>59467* (H Alder), 59480* (Jo Ashman), 59501* (Babraham PC), 59503* (J Ayton), 59505* (A Barry), 59509* (L Benedetto), 59511* (N Ashman), 59513* (V Estellers Casas), 59516* (C Fisher), 59518* (S Fisher), 59520* (M Forbes), 59521* (V Fowkes Bolt), 59522* (A Fraser), 59523* (R Fredman), 59524* (C Friend), 59525* (L Garnier), 59526* (Z</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p>Gilbertson), 59538* (F Goodwille), 59539* (C Goodwille), 59552* (R Hegde), 59557* (E Hewitt), 59560* (J Holden), 59561* (G Holland), 59562* (K Hulme), 59564* (J Johnson), 59746* (A Jones), 59748* (T Jones), 59749* (J Kavanagh), 59750* (P Kenrick), 59751* (M Kivlen), 59752* (Anonymous), 59753* (T Knight), 59754, 59756, 59757* (Anonymous), 59758* (R Lambert), 59760* (D Langley), 59763* (J Langley), 59766* (T Levanti-Rowe), 59769* (J Lucas), 59772* (M Majidi), 59777* (M Bijok Hone), 59778* (S Marelli), 59784* (C Martin), 59789* (P Carney), 59790* (A McAllister), 59791* (B Bolt), 59792* (S Mercer), 59793* (C McKay), 59794* (R Meyer), 59795* (I Fourcade), 59796* (B Bruun), 59798* (S Burch), 59800* (M Cassidy), 59802* (B Basheer), 59804* (J Clarke), 59807* (G Offley), 59808* (M Cooper), 59809* (I Page), 59811* (M Patten), 59815* (P Pettitt), 59820* (H Pike), 59822* (M Presa), 59829* (H Price), 59844* (S Ramaiya), 59848* (R Edwards), 59865* (C Wilson), 59873* (J Winterkorn), 59874* (S Worzencraft), 59875* (J Nilsson-Wright), 59876* (M Zmija), 59884* (J Waterfield), 59885* (P Waterfield), 59887* (E Wayne), 59888* (N Willis), 59889* (L</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p>Ramakrishnan), 59890* (E Reid), 89891* (K Rennie), 59892* (F Crawford), 59893* (K Reti), 59894* (R Savage), 59895* (A Sharpe), 59897* (R Cushing), 59958* (N Deja), 59959* (LC Driver), 59960* (S Sharples), 59961* (S Sinclair), 59962* (R Sorkin), 59963* (F Spalding), 59967* (D Stoughton), 59990* (J Tanner), 59993* (M Taylor), 59994* (H Thomas), 60000* (C Todd), 60039* (A Wilson), 60041* (M Farrington), 60500* (R Doyon),</p> <p>60501* (J Pratt), 60617* (J Toynbee), 60618* (S Loveday), 60621* (I Fowler), 60622* (C A Holloway), 60636* (K Smyth), 60637* (C Redfern), 60638* (D Murrell), 60670* (Anonymous), 60671* (Anonymous), L Whitebread), 60824* (R Bienzobas), 60210 (J V Neal) 60505* (Late representation: C Candeloro), 60820* (Late representation: L Whitebread)</p> <p><b>Third Sector Organisations</b></p> <p>59594* (Campaign to Protect Rural England), 60037* (Friends of the Cam Steering Group)</p>
<p>Has the water provision been planned for all these developments? What will be their water source? How will the</p>	<p>57833* (S Sinclair)</p>

Summary of issues raised in comments	Comments highlighting this issue
health of the Cam and its associated chalk streams be maintained?	
Plan does not satisfactorily address inadequate water supply	60234 (P Blythe)
Support for the approach taken to addressing water supply issues	58882 (A Sykes), 59133 (M Berkson)
Further development needs to be phased in line with public water supply availability, if the plan is to meet its environmental objectives.	58970* (RSPB Cambs/Beds/Herts Area)
Comment that the plan's approach to water supply issues should also be taken to permissions and s106 agreements. Queried whether proposed infrastructure projects take into account water demand from construction.	58882 (A Sykes)
Support for the need for the delivery of new strategic water supply infrastructure	58731 (Trumpington Meadows Land Company), 59082 (L&Q Estates Limited and Hill Residential Limited)
The plan does not satisfactorily address issue of inadequate water supply; need to identify strategic water supply solutions and / or interim measures	60188 (J Preston)
There is insufficient capacity for utilities delivery (supply of water and waste water disposal);	59258* (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Need to await the findings of the Regional Water Plan. Greater Cambridge already has an unsustainable supply of potable water.</li> <li>• The local sewage system is currently inadequate.</li> </ul>	60236* (Federation of Cambridge Residents' Associations)
<p>Comment that water resources should not be seen as a constraint to growth, noting that:</p> <ul style="list-style-type: none"> <li>• the onus is on Water Resources East and the water companies, through their obligations in the Water Industries Act 1991, to plan for and provide water to meet the requirements</li> <li>• Water Resources East have stated that water supply should not curtail development and that the regional plan will offer up a number of solutions to address short-long term needs.</li> <li>• Developments will need to implement integrated water management regimes</li> <li>• If infrastructure is not in place a stepped requirement may be necessary (last resort). Ensure planned housing requirements can still be met within plan period and does not become continually delayed (PPG para 68-021)</li> </ul>	57650 (Endurance Estates - Balsham Site), 58359 (Marshall Group Properties), 58963 (Endurance Estates), 60171 (Home Builders Federation)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Comment that work needs to be undertaken to further identify and programme practical interim solutions to a specific timescale to overcome the potential constraint to growth in the area posed by water supply constraints.	58534 (Martin Grant Homes Ltd)
Need to consider how water will be provided for this amount of growth - the chalk aquifer is already being over abstracted	56511 (C Martin)
Concern about water supply impacts of the plan, including the potential carbon impacts of any required water transfer.	56523 (C Martin)
Comment regarding the strategy, noting its dependence on uncertain infrastructure issues, including water supply, East West Rail and relocation of Cambridge airport. Comment that water supply is likely to affect surrounding districts to varying degrees, and that if the issue was not resolved it would be difficult to justify the proposed level and speed of delivery. Suggestion that a stepped trajectory and phased delivery of development might be the best way to respond to these issues.	57316 (Huntingdonshire DC)
The Plan should consider whether there are strategic site allocations elsewhere in the plan area that will benefit from new planned investment in water infrastructure. Provision is currently being	59082 (L&Q Estates Limited and Hill Residential Limited)

Summary of issues raised in comments	Comments highlighting this issue
<p>made for a new pipeline connecting water supplies from the north of Lincolnshire to the Colchester area of Essex, which includes supply to the eastern part of Greater Cambridge near Six Mile Bottom. This £500 million scheme will be delivered by 2025 (early on in the Local Plan period) and will allow water to be moved from areas where it is more plentiful to areas of scarcity across the region.</p>	

Transport and other infrastructure

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment that the preferred strategy performs well in transport terms as demonstrated by the Greater Cambridge Local Plan: Transport Evidence Report October 2021, noting that not all transport mitigation has been tested.</p>	<p>56923 (Cambridgeshire County Council)</p>
<p>Comment that any unresolved issues regarding transport might have impacts on neighbouring districts.</p>	<p>57316 (Huntingdonshire DC)</p>
<p>Support for co-ordinated working. As details of EWR Co's proposals are not yet confirmed, there is a risk of overlap in location of potential development options between EWR Co and Local Plan. Liaise on development proposals at and around Cambourne and Cambridge Stations.</p>	<p>59872* (East West Rail)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Objection to the plan's perceived implicit support for East West Rail, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Very expensive</li> <li>• City Deal proposals can enhance connectivity between Cambourne and Cambridge</li> <li>• Will cause environmental harm and planning blight</li> <li>• Very low benefit cost ratio</li> </ul>	<p>57035 (W Harrold)</p>
<p>Concern regarding East West Rail including:</p> <ul style="list-style-type: none"> <li>• Will cause environmental harm and planning blight</li> <li>• Protect and enhance Green Belt;</li> <li>• Very expensive</li> <li>• Adverse impact on and need to protect communities;</li> <li>• Will obliterate most objectives including climate objectives;</li> <li>• Our area being sacrificed for Arc but will receive no benefit;</li> <li>• Destroy valuable agricultural land.</li> </ul>	<p>57851* (T Harrold), 57853* (T Harrold), 57854* (T Harrold), 57857* (T Harrold), 57858* (T Harrold), 58256* (Little &amp; Great Eversden PC)</p>
<p>East West Rail is beneficial only if the route approaches Cambridge from the North and connects with the East Coast.</p> <p>Looping South after Cambourne contradicts the policy of limiting development in the Southern Fringe.</p>	<p>59103* (M Berkson)</p>



Summary of issues raised in comments	Comments highlighting this issue
<p>East West Rail has potential to transform the area, maximising sustainable opportunities for growth. Transport impact assessments / modelling should consider cumulative impacts of existing and proposed development at Cambourne, and implications for wider area, including on strategic and local road network within Central Bedfordshire.</p>	<p>59691 (Central Bedfordshire Council)</p>
<p>Moving forward without clear idea how extra housing will impact wider area. Need models showing impact of traffic and public transport use. Proceed as slowly as Government allows until information is available, do not accelerate approved projects. Agree most important factors are environmental impacts and on local traffic. Building near workplaces will only mitigate extra travel. Public transport system will need to be transformed. Without details of impacts of developments my response will be no to them all.</p>	<p>59436* (Anonymous)</p>
<p>Comment noting:</p> <ul style="list-style-type: none"> <li>• Lack of information on transport links required, ensure they are brought forward concurrently</li> <li>• Insufficient provision of public transport</li> </ul>	<p>60188 (J Preston)</p>
<p>Comment regarding potential transport impacts of existing employment sites and the proposed strategy, including the following:</p> <ul style="list-style-type: none"> <li>• employment sites at Duxford, Granta Park, the Wellcome Genome Campus and the Babraham Institute draw car trips from North Hertfordshire</li> </ul>	<p>58650 (North Hertfordshire DC)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Expansion of Cambridge Biomedical Campus will draw more car trips onto the A10, negatively impacting on Royston</li> <li>• Creation of Cambridge South Station will relieve some pressure on the A10, but stations in North Herts will need enhancement to address additional pressures here, including requiring data from Greater Cambridge to help quantify these</li> <li>• Role of Royston as a local centre for communities in the south of South Cambridgeshire should be recognised and responded to, were any development to be proposed in this area</li> </ul>	
<p>Transport links in Cambridge cannot cope with existing demand, leading to congestion, making it dangerous for active travel. Transport proposals do not adequately address this.</p>	56791* (J Kirkbride)
<p>Support for the committed infrastructure proposals that are being progressed by the transport bodies and the objective of seeking to achieve a modal shift away from the use of the private car</p>	58359 (Marshall Group Properties)
<p>Comment that coordination with every organisation involved in transport strategy is absolutely essential</p>	59133 (M Berkson)
<p>Current transport links and proposals are inadequate. Promoting a strategic and sustainable approach to public transport in Cambridgeshire, including a detailed</p>	60051 (Cambridge Connect)

Summary of issues raised in comments	Comments highlighting this issue
proposition for light rail on two main routes: Cambourne-Cambridge city centre-Addenbrooke's-Granta Park-Haverhill; Cambridge Science Park-Trumpington.	
The plan should focus on public transport and cycle connections	57980* (E Osimo)
Concern that all new development will generate vehicle traffic, noting that most people will still want a car, and that even car free development will require servicing by vehicles. Concern at the lack of a fully integrated transport policy	59258* (Teversham PC)
Applaud aim to encourage development in locations not reliant on cars. Also aim to reduce environmental impact of transport; significantly improve public transport to villages. Cars likely to remain mainstay so ensure electric charging infrastructure is provided.	57583* (R Pargeter)
Relying on planned public transport links will leave the Plan vulnerable to challenge if projects are delayed. Focus more on existing infrastructure.	57342* (HD Planning Ltd)
National Highways have been collaboratively engaging regarding the effect of the emerging GCLP on the Strategic Road Network; seeking to ensure the impact of allocated sites are identified and suitably mitigated. Detailed technical modelling validation queries relating to the Transport Evidence Report.	60073 (National Highways)
Ox Cam Arc; creating low carbon transport links between important centres is good but should minimise impacts on natural environment and ecology. Will create a corridor of 'soul-less dormitories'. The only winners are developers not local people.	60075 (C de Blois)
Comments on the transport evidence report, including:	60255 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Supporting its conclusions</li> <li>• Noting the significant additional traffic generated by the various strategic spatial options previously tested</li> <li>• Welcoming requirement for implementation of trip budgets at strategic sites</li> </ul>	
Comment on the need to deliver timely infrastructure including public transport, broadband, social facilities, retail in new developments,	57645 (Histon & Impington Parish Council)
Comment that Transport Evidence assumes a massive increase in Park & Ride spaces, which could harm landscape and Green Belt.	58241 (Cambridge Past, Present & Future)
Ensure faster delivery of existing new settlements does not impact infrastructure provision and services in surrounding areas.	57314* (Huntingdonshire DC)
Green Infrastructure must be delivered before, or alongside new development	56572 (Gamlingay PC)
No new cultural or provision for other 'city-scale' needs which will put the city centre under even greater pressure.	60236* (Federation of Cambridge Residents' Associations)
Such a large increase in house building in the city requires a significant investment in community facilities and infrastructure to be a benefit to current local communities, not a further strain on resources. Investment in public transport should come before extra housing.	57834* (D Lister)
The plan does not meet the infrastructure needs of new residents	59030* (Great Shelford PC)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
In areas of significant housing growth, developer contributions for health and care services must be sought to meet growing demand. Planning obligations should address strategic and local priorities.	59114* (Cambridgeshire and Peterborough Clinical Commissioning Group)
The cumulative impacts of residential developments on healthcare infrastructure in the area should be recognised. Planning policies must help finance improved healthcare services and facilities through effective estate management.	59134 (Cambridgeshire and Peterborough Clinical Commissioning Group)
The plan should consider education and hospital needs in greater detail.	58882 (A Sykes)
There is insufficient infrastructure (roads, schools and hospitals in particular) to support delivery of the strategy.	59258* (Teversham PC)
For a plan to be sound the cumulative impact of policies should not undermine its deliverability. Viability assessment must consider all policy costs and benchmark land values accurately. Land values for brownfield sites appear low, should be reconsidered and increased to reflect higher existing use values.	60175* (Home Builders Federation)

Justification for/presentation of the development strategy

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
The plan is not clear what is meant by development having “the least climate impact”, the term is not defined, leading to ambiguity for developers as to what proposals should be seeking to achieve	58676 (The Church Commissioners for England)
Comment that the policy should include greater clarity about the full list of allocations including for employment, and their relationship with adopted allocations.	57340 (HD Planning Ltd)
Comment that the plan does not include a trajectory setting out the anticipated rate of development for specific sites.	58676 (The Church Commissioners for England)
Comment that there isn’t an overarching spatial strategy that explains the rationale behind the distribution of future development, and why the areas and locations identified will help achieve the Vision and Aims. The strategy should be more strongly presented in the context of proposed connectivity enhancements such as East West Rail and Cambourne to Cambridge.	58237 (Hallam Land Management Limited)
<p>Comment that the reasons for selecting the preferred strategy are not clearly set out:</p> <ul style="list-style-type: none"> <li>• the Preferred Option (Spatial Option 9), along with the alternative blended strategy (Spatial Option 10), appear as standalone options without reference to the previous options</li> <li>• Appendix E to the Sustainability Appraisal ostensibly provides the</li> </ul>	58899 (Axis Land Partnerships), 59040 (Axis Land Partnerships)

Summary of issues raised in comments	Comments highlighting this issue
<p>justification for the preferred spatial strategy, however this also does not explain why the preferred spatial strategy is considered to be the best performing option when compared to other spatial options, nor does it give reasons for why other spatial options have been discounted</p> <ul style="list-style-type: none"> <li>• The Councils fail to demonstrate that the conclusions of assessment of the 10 spatial options have led the determination of the best performing strategy for the First Proposals document. Instead, there is the very strong suspicion that a spatial strategy has instead been retrofitted to suit a series of pre-chosen sites</li> <li>• no clear explanation as to why transport corridors option was discounted</li> <li>• there are no SA Objectives where Spatial Option 9: Preferred Option Spatial Strategy clearly performs better than the other Spatial Options</li> <li>• The Sustainability Assessment appraisal only of sites that fitted with the emerging spatial strategy has prevented the allocation of suitable sites that could be included in a more appropriate development strategy</li> <li>• Assessment of site options on 'Public Transport Corridors' source of supply was combined with Villages to create a category of 'Dispersal: Villages / Transport Corridors' for which no clear</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• explanation is provided. In combining the two options, many of the benefits of aligning major development sites (200+ units) to a Public Transport Corridor location are neutralised by the disbenefits of Dispersal Villages.</li> </ul>	
<p>Comment that the plan does not justify why Cambourne is identified for development when the Development Strategy Options – Summary Report noted that the relevant Spatial Option to Cambourne performed ‘relatively poorly within the plan period, as it is unlikely that the full infrastructure to support development will be provided’.</p>	<p>58899 (Axis Land Partnerships), 59040 (Axis Land Partnerships)</p>
<p>Comment that the plan lacks clarity as to how the overall figure for future development at Cambourne during the Plan period accords with the Councils’ development strategy</p>	<p>58676 (The Church Commissioners for England)</p>
<p>Comment that more distinction needs to be given as between consideration of rural settlements as opposed to rural areas, noting that interrelationship with surrounding areas is material and that it is accepted that residents in village locations must rely upon services and facilities outside of their particular settlement to meet all of their needs.</p>	<p>58694 (LVA)</p>
<p>Concern that the rationale for proposing some allocations in in the rural area and for rejecting other available and suitable villages sites is not evidenced robustly, for the following reasons:</p>	<p>56713 (KB Tebbit Ltd), 57346 (Clarendon Land), 58534 (Martin Grant Homes Ltd),</p>



Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Suggestion that the approach to rural allocations was site-led rather than being led by an objective process which compares the sustainability credentials of sustainable rural settlements.</li> <li>• Other sites with more positive Housing &amp; Employment Land Availability Assessment (HELAA) assessments were not allocated.</li> <li>• Concern how the strategy has been interpreted into the allocations proposed.</li> </ul>	59252 (Croudace Homes), 60568 (Countryside Properties – Fen Ditton site)
Lack of information how extra housing will impact the city/wider area. Proceed slowly until more information is available.	60673 (Anonymous)
Comment that the plan should show for reference the relocation of Cambridge Waste Water Treatment Plant (CWWTP)	58106 (M Asplin)

## Spatial strategy sources of supply

### Cambridge urban area, including brownfield sites

Summary of issues raised in comments	Comments highlighting this issue
Support for focus on densification, including: <ul style="list-style-type: none"> <li>• in existing urban areas in locations well served by public transport</li> <li>• making effective use of land</li> </ul>	58053 (Trinity Hall), 58668 (Wates Developments Ltd), 58808 (R Mervart), 59048 (Emmanuel College), 57709 (J Pavey),

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• within Cambridge as a sustainable location for development</li> </ul>	
Support for smaller sites where well-integrated with existing neighbourhoods, including on previously developed sites in the urban area, including for windfall development, especially in such locations	58922 (Metro Property Unit Trust)
Brownfield development should be prioritised	58325* (Linton PC)
Agree that brownfield development should be prioritised and in locally-agreed not nationally targeted locations. Development “around” villages is not considered sustainable.	59851 (Barrington PC)
Plan does not follow ‘brownfield first’ approach; it should encourage urban intensification.	59945 (O Harwood)
Take opportunities to reuse brownfield land to ensure protection of other more sensitive locations in the countryside.	60640 (TTP Campus Limited)
Support for the proposed approach however this should focus sustainable development on under-utilised previously developed sites	58907* (Metro Property Unit Trust)
Existing buildings should be re-used wherever possible before new building is considered.	60677 (Cambridge and South Cambridgeshire Green Parties)
<p>Objection to focus on densification, noting</p> <ul style="list-style-type: none"> <li>• potential harm to quality of life and that is not in keeping with the objectives of Wellbeing &amp; Social inclusion” and “Great Places”</li> </ul>	57798 (M Starkie), 57638 (J Conroy), 57766* (T Elliott); 57582* (C Maynard)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• harm to quality of life and economic growth</li> <li>• Cambridge has reached maximum; more growth will impair quality of life;</li> <li>• Other urban centres should be developed with adequate transport links to avoid permanent gridlock in Cambridge;</li> </ul>	
<p>Comment on the potential challenges of developing on brownfield sites, including that they:</p> <ul style="list-style-type: none"> <li>• can be blighted by contamination,</li> <li>• have complex ownership issues that affect delivery</li> <li>• be too small or inadequately accessed</li> <li>• are usually associated with higher abnormal costs which can sometimes put pressure on viability and the ability to deliver higher standard, sustainable developments</li> </ul>	<p>57150 (Southern &amp; Regional Developments Ltd), 57195 (European Property Ventures - Cambridgeshire), 58676 (The Church Commissioners for England), 58693 (Wates Developments Ltd)</p>
<p>Comment that the setting of the historic centre, and its relationship with the countryside with a network of green spaces complementing the built environment, must be preserved</p>	<p>57938 (North Newnham Residents Association)</p>
<p>Comment in relation to densification, that thought also needs to be given to development of new communities on sites that: facilitate greater space for people; provide a greater variety of housing; increase affordability</p>	<p>58963 (Endurance Estates), 59082 (L&amp;Q Estates Limited and Hill Residential Limited)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>for those unable to afford urban prices; and provide opportunities to connect with the surrounding countryside to improve mental and physical health</p>	
<p>Question raised whether sites within Cambridge brought forward from the 2018 Local Plan and some of which were previously allocated in the 2006 Local Plan are likely to deliver within the plan period.</p>	<p>58923 (Clare College, Cambridge)</p>
<p>No mention of Covid and city centre opportunities from potential radical changes in retail and office working.</p>	<p>60236* (Federation of Cambridge Residents' Associations)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Support identification of North East Cambridge for the creation of a compact city district on brownfield land. Concerned by homes target (page 32); trajectory at odds with that agreed with Homes England as pre-requisite for relocating WWTW. Policy should include 5,600 homes on Core Site by 2041.</p>	<p>60148 (U&amp;I PLC and TOWN)</p>
<p>Anglian Water agrees that North East Cambridge should be listed first in the strategy given it is 'a compact city district on brownfield land already identified for development, including a mix of jobs and homes'.</p>	<p>60444 (Anglian Water Services Ltd)</p>
<p>Support for NEC but object to lack of consideration for accommodating displaced commercial uses</p>	<p>60762 (U&amp;I Group PLC)</p>
<p>Objection to inclusion of North East Cambridge for the following reasons:</p> <ul style="list-style-type: none"> <li>it is premature to include it ahead of Development Consent Order outcome for relocation of Cambridge Waste Water Treatment Plant (CWWTP)</li> </ul>	<p>57798 (M Starkie), 58106 (M Asplin), 57129* (D Lott), 57548* (Save Honey Hill Group), 57632* (J Conroy), 58105* (M Asplin), 59883 (Fen Ditton PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Unnecessary and too large.</li> <li>• Relocated WWTW will be insufficient for needs of further growth.</li> <li>• Oversupply of homes within City.</li> <li>• Tall buildings 4 stories max.</li> <li>• 300dph too dense.</li> <li>• Nearest local shops Newmarket Rd</li> <li>• Huge impact Milton Rd, Elizabeth Way, A10 north</li> <li>• next to two of more deprived LSOAs and requires sewage works to relocate to Green Belt rather than upgrading.</li> <li>• No mention of retired for balanced community</li> <li>• Scale and density not supported</li> <li>• Plan and NEC AAP do not require relocation of WWTW</li> <li>• S/NEC reliant on relocation of WWTW in Green Belt</li> <li>• No justification or operational need for WWTW to relocate to Green Belt</li> <li>• Housing development is not supported, focus on employment with public transport</li> <li>• development at the proposed location, on Green belt would result in 'Very High Harm' contrary to the substantial weight.</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
<p>Objection to inclusion of North East Cambridge as presented and correspondent lack of draft allocation at Cambridge Science Park, as it conflates the delivery of new homes reliant on the DCO with the ongoing growth of employment associated with the existing Cambridge Science Park cluster.</p>	<p>58400 (Trinity College)</p>
<p>Objection to assumed trajectory for North East Cambridge, noting</p> <ul style="list-style-type: none"> <li>• Likely challenges to the build out rate generated by the requirement for a trip budget</li> <li>• expected DCO outcome timings</li> </ul>	<p>59040 (Axis Land Partnerships)</p>
<p>Objection to the relocation of Cambridge Waste Water Treatment Plant (CWWTP) to enable development at North East Cambridge, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Loss of Green Belt</li> <li>• Development of green spaces</li> <li>• Carbon impact</li> <li>• The current WWTP is still operational</li> <li>• Harm to the current open landscape</li> <li>• Relatively small number of homes enabled by the relocation</li> </ul>	<p>56523 (C Martin), 58106 (M Asplin)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Objection to S/C/SMS Garages between 20 St. Matthews Street and Blue Moon Public House, Cambridge on basis that loss of off-street parking provision at the garages will harm residents' amenity.	58381 (F Gawthrop)

The edge of Cambridge, and Green Belt

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Support for the approach of limiting development on the edge of Cambridge beyond already approved sites.	56965 (Trumpington Residents Association), 58241 (Cambridge Past, Present & Future)
Support the delivery of sites on edge of Cambridge given they are sustainable locations to existing jobs, services, infrastructure, and transportation	58731 (Trumpington Meadows Land Company)
Urge greater protection of village separation, noting example of inadequate separation between proposed Cambridge Airport (Land North of Cherry Hinton) site between the settlement and new development.	59258* (Teversham PC)
Support for limited release of Green Belt on the edge of Cambridge	57502 (Cambridgeshire County Council - as landowner)



Summary of issues raised in comments	Comments highlighting this issue
Support for conclusion that housing needs alone do not provide the 'exceptional circumstances' to justify removing land from the Green Belt on the edge of the city	56965 (Trumpington Residents Association)
The additional 11,640 dwellings required to cover a 10% buffer have already been provided for elsewhere, so the high level of need that should be demonstrated before considering any additional Green Belt land release has not been met.	58166* (Dr S Kennedy)
Comment that edge of Cambridge greenfield sites can deliver policy compliant levels of affordable housing	58950 (North Barton Road Landowners Group)
<p>Comment that exceptional circumstances exist to justify release land from the Green Belt in all parts of Greater Cambridge affected by the designation, for the following reasons:</p> <ul style="list-style-type: none"> <li>• the significant need for housing and affordable housing in Greater Cambridge and the need to support economic growth</li> <li>• opportunities exist in the Green Belt to promote sustainable patterns of development</li> </ul>	57063 (C Meadows), 57083 (Shelford Investments), 57121 (KG Moss Will Trust & Moss Family), 57150 (Southern & Regional Developments Ltd), 57636 (Dudley Developments), 58433 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58629 (Hill Residential), 58731 (Trumpington Meadows Land Company), 58929 (Carter Jonas), 58950 (North Barton Road Landowners Group)

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment regarding the reasonable options needing to be explored before considering whether exceptional circumstances exist to justify changes to Green Belt boundaries, including the following:</p> <ul style="list-style-type: none"> <li>• In Cambridge increasing densities and reusing previously developed land is not straightforward and may be inappropriate because of heritage assets and the difficulty of finding alternative sites for existing uses</li> <li>• previously developed land opportunities that are deliverable have already been identified within and on the edge of Cambridge</li> </ul>	<p>57063 (C Meadows), 57083 (Shelford Investments), 57121 (KG Moss Will Trust &amp; Moss Family), 57636 (Dudley Developments), 58629 (Hill Residential), 58929 (Carter Jonas), 58950 (North Barton Road Landowners Group)</p>
<p>Development on GB is not generally acceptable, but to release a small site from the GB which in parallel secures greatly enhanced bio-diversity, and some informal rural public access, is a factor that weighs heavily in favour of the release</p>	<p>60561 (W Garfit)</p>
<p>Support for releasing Green Belt land in Shelford.</p>	<p>58815 (Great Shelford (Ten Acres) Ltd)</p>
<p>Support for releasing Green Belt land in Sawston</p>	<p>57376 (Deal Land LLP)</p>

Summary of issues raised in comments	Comments highlighting this issue
Support for releasing Green Belt land in Coton	60580 (Martin Grant Homes)
Don't build on Green Belt	57980* (E Osimo),
Comment that the plan should include even less focus on the Green Belt and villages	58808 (R Mervart)
Objection to proposed development in the Green Belt, in particular at villages. Place greater focus on new settlements/communities and expansion of existing sites.	56803 (M Colville)
Objection to proposed busways to new settlements as they would harm Green Belt, landscape, ecology and heritage.	58241 (Cambridge Past, Present & Future)
Do not oppose development around Cambridge outside Green Belt provided new green spaces delivered to North East to reduce pressure on Wicken Fen. Any changes to Green Belt must be fully evidenced and justified.	59273 (National Trust)
Oppose proposals to remove further land from Green Belt, particularly Babraham and Hinxton. Inconsistent with purposes of Green Belt in Great Places Aim.	59595 (Campaign to Protect Rural England)
No exceptional circumstances for releasing Green Belt land in excess of meeting Cambridge's needs, particularly around villages	60310 (Gladman Developments)

Summary of issues raised in comments	Comments highlighting this issue
when there are other non-Green Belt suitable and sustainable sites.	
Concern about the amount of Green Belt land likely to be destroyed, in particular through relocating WWTW to Honey Hill.	60677 (Cambridge and South Cambridgeshire Green Parties)
Support the provision of additional housing on existing allocated land at Eddington.	58297* (University of Cambridge)
Cambridge East represents the largest and most sustainable opportunity to realise this potential.	58335* (Marshall Group Properties)
Comment that development at Cambridge East can support cross-city connectivity through the provision of a transformational transport strategy.	58359 (Marshall Group Properties)
Support for inclusion of Cambridge Biomedical Campus for additional development, noting that the scale of floorspace requirements justifies the full scale development of the district set out in Vision 2050, west as well as east of the West Anglia mainline.	58961 (Jesus College (working with Pigeon Investment Management and Lands Improvement Holdings), a private landowner and St John's College)
Support proposed allocation for Campus. CBC Limited will support landowners deliver a Vision 2050 compatible scheme.	58247* (CBC Limited, Cambridgeshire County Council and a private family trust)
Support the need for growth and to concentrate that growth in sustainable locations.	58251* (CBC Limited, Cambridgeshire County Council and a private family trust)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge Biomedical Campus is one of the best locations to sustainability address future needs.	
Spatial Strategy refers to the desirability of locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge. Strongly support, a similar approach should be adopted at the Cambridge Biomedical Campus, with the provision that this is offered as tied accommodation to create genuine affordable housing.	59770* (B Hunt)
Objection to inclusion of S/CBC/A area for housing.	57933 (F Goodwille)
<p>Objection to proposed Green Belt release at Cambridge Biomedical Campus, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Scale of proposal</li> <li>• Harm to the Green Belt</li> <li>• Loss of high quality agricultural land</li> <li>• Objection to inclusion of housing within the allocation</li> <li>• Employment needs could be met by densification of the existing campus or at off-site research locations</li> <li>• Creates urban sprawl</li> <li>• Harm to biodiversity</li> </ul>	56965 (Trumpington Residents Association), 58090 (D Lister), 58167 (Kennedy)

Summary of issues raised in comments	Comments highlighting this issue
<p>Comments about growing the Cambridge Biomedical campus;</p> <ul style="list-style-type: none"> <li>• Impact on quality of life of residents;</li> <li>• Unclear whether infrastructure to support;</li> <li>• Impacts on green belt and biodiversity, including Ninewells nature reserve;</li> <li>• Accessibility and congestion;</li> <li>• Better, frequent low emission public transport could spread population growth;</li> <li>• Only justification for Green Belt release is affordable housing for hospital workers to reduce commuting, but must remain affordable.</li> </ul>	<p>57628* (M Polichroniadis), 58307 &amp; 58322* (D Lynch)</p>
<p>Releasing Greenbelt land next to Babraham Road: Green Belt land protects countryside. Only justification for releasing it is affordable housing for hospital workers to reduce commuting, but must remain affordable.</p>	<p>59028* (R Stone)</p>

New settlements

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for development at new settlements for the following reasons:</p>	<p>56803 (M Colville), 56965 (Trumpington Residents Association)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• They can be designed with excellent transport links</li> <li>• They offer a blank canvas with which to design climate friendly and enjoyable living spaces within suitable locations</li> <li>• They do not burden existing villages</li> <li>• They can be sited outside of the Green Belt</li> </ul>	
Support for continuing development at the new settlements of Northstowe, Waterbeach and Bourn Airfield allocated in previous plans	56481 (V Chapman), 56489 (D & B Searle), 56499 (W Grain), 56517 (RJ & RS Millard), 58639 (R Grain)
Northstowe, Waterbeach, Bourn and Cambourne are unproven employment markets with demand remaining in and on edge of Cambridge, and encourage unsustainable travel patterns.	60281 (Commercial Estates Group)
<p>Support for expanding Cambourne, for the following reasons:</p> <ul style="list-style-type: none"> <li>• the new East West Rail station will make it a well-connected area</li> <li>• Cambourne was the best performing in transport terms of the free-standing new settlements of those tested at stage one- with the Cambourne to Cambridge public transport scheme and East West Rail included</li> </ul>	56481 (V Chapman), 56489 (D & B Searle), 56499 (W Grain), 56517 (RJ & RS Millard), 56923 (Cambridgeshire County Council), 57893 (Martin Grant Homes), 58585 (Endurance Estates - Caxton Gibbet Site), 58639 (R Grain), 58676 (The Church Commissioners for England), 59833 (MCA Developments Ltd), 59866 (East West Rail)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Opportunity to co-locate homes and jobs, in close proximity to major public transport routes</li> <li>• It is a location capable of higher levels of self-containment and where the options to reduce reliance on private cars is highest</li> <li>• Further develops and enhances a new settlement where the groundwork has already been laid, providing access to services and facilities within Cambourne and likely provision of new services and facilities</li> <li>• One of largest and most sustainable settlements in Greater Cambridge</li> <li>• EWR will provide a sustainable new travel option contributing towards achieving net zero carbon</li> </ul>	
<p>Comment that the delivery of additional employment land at Cambourne must be part of any strategy to make it more vibrant</p>	<p>58585 (Endurance Estates - Caxton Gibbet Site)</p>
<p>Comment that there is little evidence that travel behaviour in Cambourne will shift significantly with the delivery of a railway station given the small take up of employment units in its business park and limited high street offer.</p>	<p>59082 (L&amp;Q Estates Limited and Hill Residential Limited)</p>



<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Comment that the Councils should be planning for a significant extension or new settlement within the Cambourne area	58676 (The Church Commissioners for England)
Comment that no decision on development at Cambourne should be taken until there is confirmation regarding East West Rail	59153 (Cambourne TC)
Comment that the policy for Cambourne should state that planning permission will not be granted until work commences on a Cambourne Station and no new homes will be allowed to be occupied until the station and East West Rail services are operational	59153 (Cambourne TC)
Comment that Cambourne was the best performing in transport terms of the free-standing new settlements of those tested at stage one- with the Cambourne to Cambridge public transport scheme and East West Rail included. Any development in the Cambourne / Bourn Airfield area needs to have good links to the existing community to enable greater access to services and to reduce the potential transport impacts of any new development.	56923 (Cambridgeshire County Council)
Suggestion that the plan should provide greater clarity about the location of growth at Cambourne, and that development can come forward here ahead of East West Rail, supported by	57893 (Martin Grant Homes)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Greater Cambridge Partnership's Cambourne to Cambridge Public Transport Scheme	
Concern raised about assumed trajectory at Cambourne given uncertainty over East West Rail delivery and timing	58879 (Scott Properties)
Proposal for additional new settlements, to support the aim of significantly boosting housing supply.	58622 (Vistry Group and RH Topham & Sons Ltd)

### Rural area

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Support for limits on rural development proposed in the plan, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Protecting existing villages</li> <li>• Protecting rural nature of the area</li> <li>• Other locations have equal or better public transport connections</li> <li>• Maintain the character of Cambridgeshire</li> <li>• Particularly protect villages in the Green Belt</li> <li>• Improve public transport using existing road network</li> </ul>	56789 (Shudy Camps PC), 56803 (M Colville), 58345 (Caxton PC), 58350 (Toft PC), 58808 (R Mervart), 59957 (Little Abington PC), 59995 (Steeple Morden PC), 60077 (Guilden Morden PC), 60110 (C Blakeley), 59710 (Caldecote PC), 56521* (R Smith)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>Villages have already absorbed significant growth.</li> </ul>	
Villages have endured significant development recently with no infrastructure and facilities.	58039 & 58041* (Great and Little Chishill PC)
Enabling infill development within smaller villages is supported as this will support rural services, the vitality and viability of villages, and their shops and services contributing to overall sustainability.	59691 (Central Bedfordshire Council)
Support for inclusion of allocations for housing and employment in the rest of the rural area as part of the proposed development strategy	58196 (Countryside Properties (UK) Ltd), 58255 (Bletsoes), 58952 (Varrier Jones Foundation)
Support for recognition in the policy DS recognises that appropriate development in the rest of the rural area includes “new employment sites in the countryside meeting specific business needs”	
Comment that the strategy should be more flexible to allow greater scales of development at Group and higher tier villages.	57374 (Colegrove Estates), 59056* (A P Burlton Turkey’s Ltd)
Comment that the strategy for the rural area should also reflect on the merits of planned public transport provision, as this further strengthens the sustainability of villages.	57310 (Deal Land LLP), 57650 (Endurance Estates - Balsham Site), 58647 (Deal Land LLP)

Summary of issues raised in comments	Comments highlighting this issue
Comment that affordable housing in locations requiring car ownership is not affordable.	58183 (Cllr N Gough)
More housing in rural areas should be allowed with the redevelopment of windfall sites.	59056* (A P Burlton Turkey's Ltd)
Comment that Foxton is a more sustainable village given its rail station	57516 (R2 Developments Ltd)
Comment noting the planned improvements to sustainable transport connections that will enhance the sustainability of Papworth, including: East West Rail; GCP proposed bus service enhancements, A428 Black Cat to Caxton Gibbet project, cycle and pedestrian links to Cambourne.	57348 (Bloor Homes Eastern), 58567 (MacTaggart & Mickel), 58900 (Varrier Jones Foundation), 58952 (Varrier Jones Foundation)
Note the improvement to connectivity in Caxton Village created by the proposed Cambourne East West Rail station.	56481 (V Chapman), 56489 (D & B Searle), 56499 (W Grain), 56517 (RJ & RS Millard)
Objection to statement on page 30 of the First Proposals document "Using less land for development reduces our carbon emissions, and allows more space for nature and wildlife". High quality development can also, at suitable lower densities, achieve carbon neutrality and	58668 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
provide enhancements for nature and wildlife, along with a wealth of other benefits.	
Objection to the limits placed on small new housing sites in, and around smaller settlements	56557 (Bonnell Homes Ltd), 58600 (Hill Residential Ltd and Chivers Farms (Hardington) LLP), 58644 (Abbey Properties Cambridgeshire Limited), 58694 (LVA), 58899 (Axis Land Partnerships)
Request that the development strategy increases its provision of housing for rural areas where redundant farm buildings exist	59080 (A P Burlton Turkey's Ltd)
The list of permitted categories in the rural area should be amended to include 'horticulture and garden centres.'	58852 (Dobbies Garden Centres Ltd)
Support settlement hierarchy policy as a means of directing development towards most suitable and sustainable locations. Concerned about impact of speculative applications. Suggest the word 'indicative' be removed to strengthen and add clarity. Support the reclassification of Cottenham and Babraham villages.	6011 (C Blakeley)
Support for inclusion of Babraham Research Campus in the Plan, to provide additional space for life science businesses to cluster and grow	58087 (Babraham Research Campus Ltd)
Provisos needed for Babraham Institute being released from Green Belt. "How Many Homes" by CPRE Devon, demonstrates ONS	59501* (Babraham PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>population projections seriously flawed, 40% overestimation of housing needs. Anthony Browne MP survey found very high proportion of residents did not want further housing developments. Green Belt under pressure and been nibbled away. Very high employment so no need for more, and associated housing.</p>	
<p>Support for inclusion of Mingle Lane, Great Shelford within the plan, for the following reasons:</p> <ul style="list-style-type: none"> <li>• close proximity to employment opportunities and the good accessibility by sustainable modes of transport</li> <li>• good range of services and facilities within the village</li> <li>• exceptional circumstances relating to housing need justifies Green Belt release</li> <li>• supports vitality of rural communities</li> <li>• supports a range of housing types and sizes</li> <li>• Opportunity to address identified local housing needs including for affordable housing which won't be met by other means</li> </ul>	57301 (Mrs Ann Josephine Johnson)
<p>Objection to site S/RRA/MF in Oakington, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Removal of Green Belt is not justified in relation to harm to separation between Oakington and Northstowe</li> <li>• Harm to heritage and landscape</li> </ul>	56873 (J Prince)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>Floodrisk in the vicinity</li> </ul>	
<p>Concern that development at village sites such as Melbourn will exacerbate existing problems, noting that this village has seen significant development in recent years with no infrastructure and facilities, putting pressure on both schools and roads.</p>	58041* (Great and Little Chishill PC)
<p>Support for approach taken to meeting logistics sector needs along the A14, including the following points:</p> <ul style="list-style-type: none"> <li>Locating logistics facilities close to urban centres enables the use of electric fleet and cargo bikes for last mile deliveries</li> <li>The area has high accessibility to the strategic network</li> <li>The area along the A14 is served by large scale residential development providing a labour pool at short commuting distances</li> </ul>	59053 (Lolworth Developments Limited)
<p>Support for Policy S/RRA identifying two manufacturing and warehousing allocations around the Swavesey junction of the A14</p>	59053 (Lolworth Developments Limited)
<p>Support the proposals which exclude any development in Little Linton and the land between Little Linton and Linton.</p> <p>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</p>	57914* (H Lawrence-Foulds), 59432* (J Pearson)

Summary of issues raised in comments	Comments highlighting this issue
<p>individual character of each settlement. Land in this area is a valuable environmental resource, which should be protected.</p> <p>The direction of future development to other more sustainable locations is appropriate and will ensure that Little Linton and Linton retain their identity.</p>	

Sites not included in the First Proposals

Summary of issues raised in comments	Comments highlighting this issue
<p>Promotion of specific sites not included in the First Proposals, for a range of reasons including:</p> <ul style="list-style-type: none"> <li>• It accords with the strategy of the plan</li> <li>• Opportunity for development at a sustainable village</li> <li>• Opportunity to address identified local housing needs including for affordable housing which won't be met by other means</li> <li>• Support development of underutilised land and buildings</li> </ul>	<p><b>Individuals</b></p> <p>57063 (C Meadows), 57014 (J Francis), 58146 (J Manning)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>56713 (KB Tebbit Ltd), 56848 (Gonville and Caius College), 56902 (R. Cambridge Propco Limited), 56995 (Hastingwood Developments), 57051 (Cemex UK Properties Ltd), 57056 (Endurance Estates), 57083 (Shelford Investments), 57094 (RO Group Ltd), 57113 (Cambridge District Oddfellows)</p> <p>57121 (KG Moss Will Trust &amp; Moss Family), 57150 (Southern &amp; Regional Developments Ltd), 57195 (European Property Ventures)</p>



Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Limited contribution to Cambridge Green Belt purposes</li> <li>• Contributions that development will make to local infrastructure and facilities</li> <li>• Will be supported by planned Public Transport provision</li> <li>• Can meet identified employment sector needs</li> <li>• To maintain smooth delivery of housing throughout plan period</li> <li>• Support A10 Cambridge to Waterbeach corridor as a focus for growth</li> <li>• Contribute to NPPF paras 69 &amp; 79</li> <li>• Performs equitably or better than allocated sites</li> <li>• Provide as much choice as possible in terms of the location, size, type and tenure of housing that the plan can offer</li> <li>• Meets evidenced need for logistics land</li> </ul>	<p>(Cambridgeshire)), 57202 (MPM Properties (TH) Ltd and Thriplow Farms Ltd), 57310 (Deal Land LLP), 57346 (Clarendon Land), 57348 (Bloor Homes Eastern), 57376 (Deal Land LLP), 57427 (Mission Street Ltd), 57502 (Cambridgeshire County Council (as landowner)), 57557 (Cheveley Park Farms Limited), 57558 (Cheveley Park Farms Limited), 57559 (Cheveley Park Farms Limited) 57565, (Cheveley Park Farms Limited), 57636 (Dudley Developments), 57650 (Endurance Estates - Balsham Site), 57684 (Endurance Estates - Bassingbourn Sites), 57893 (Martin Grant Homes), 58003 (Imperial War Museum/Gonville and Caius College), 58187 (Enterprise Property Group Limited), 58195 (Terence O'Rourke Ltd), 58196 (Countryside Properties (UK) Ltd), 58237 (Hallam Land Management Limited), 58257 (Pembroke College), 58333 (Simons Developments Ltd), 58355 (Bridgemere Land Plc), 58400 (Trinity College), 58401 (Hawkswren Ltd), 58433 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58471 (Cheveley Park Farms Limited), 58488 (BDW Homes Cambridgeshire &amp; The Landowners (Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock &amp; Ms Hartwell), 58503 (Bloor Homes Eastern), 58512 (Hill Residential Limited), 58523 (Phase 2 Planning), 58561 (Grosvenor Britain &amp; Ireland), 58567 (MacTaggart &amp; Mickel), 58585 (Endurance Estates - Caxton Gibbet Site), 58600 (Hill Residential Ltd and</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p>Chivers Farms (Hardington) LLP), 58622 (Vistry Group and RH Topham &amp; Sons Ltd), 58629 (Hill Residential), 58647 (Deal Land LLP), 58668 (Wates Developments Ltd), 58676 (The Church Commissioners for England), 58693 (Wates Developments Ltd), 58704 (Grange Farm Partnership), 58899 (Axis Land Partnerships), 58900 (Varrier Jones Foundation), 58922 (Metro Property Unit Trust), 58923 (Clare College, Cambridge), 58929 (Carter Jonas), 58950 (North Barton Road Landowners Group), 58952 (Varrier Jones Foundation), 59020 (Peterhouse), 59040 (Axis Land Partnerships), 59048 (Emmanuel College), 59053 (Lolworth Developments Limited), 59082 (L&amp;Q Estates Limited and Hill Residential Limited), 59100 (Pace Investments), 59148 (Silverley Properties Ltd), 59252 (Croudace Homes), 59307 (Countryside Properties), 60263 (Gonville &amp; Caius College), 60284 Wheatley Group Developments Ltd), 60295 (Miller Homes – Fulbourn Site), 60302 (Miller Homes – Melbourn Site), 60709 (Vistry Group – Linden Homes), 60819 (Gonville &amp; Caius College), 57009* (KWA Architects), 60545* (Thakeham Homes Ltd), 58188* (Smithson Hill), 58297* (University of Cambridge), 58613* (MacTaggart &amp; Mickel), 58652* (Wates Developments Ltd), 57891* (Martin Grant Homes), 58265* (Pigeon Land 2 Ltd), 59053 (Lolworth Developments Limited), 59131* (Lolworth Developments Ltd), 58651* (Wates Developments Ltd), 60561 (W Garfit)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for the rejection of specific sites promoted to the plan, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Strain on local infrastructure</li> <li>• Traffic</li> <li>• Worsening flooding</li> </ul>	56789 (Shudy Camps PC), 56965 (Trumpington Residents Association)
<p>Objection to perceived incorrect assessment of site within the Strategy topic paper and HELAA</p>	57015 (KWA Architects)
<p>Request for clarity regarding inclusion or not of a specific site within the housing commitments identified in the First Proposals.</p>	57076 (R Wilson)
<p>Comment identifying the need to proactively plan for educational facilities when sites are actively being sought, and most specifically to provide a site for Cambridge Maths School.</p>	57477 (ESFA (Department for Education)), 57494 (ESFA - Department for Education)
<p>Objection to the proposed reclassification of Cottenham to Minor Rural Centre, due to its good services and facilities.</p>	57114 (Cambridge District Oddfellows)

## **S/SH: Settlement hierarchy**

### **Hyperlink for all comments**

Open this hyperlink - [Policy S/SH: Settlement hierarchy](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 98**

### **Abbreviations**

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

### **Executive Summary**

There was broad support for the settlement hierarchy policy approach from across the range of respondents. There were mixed views on the approach to limiting the scale of development according to the classification of settlement within the hierarchy. Suggestions for an alternative approach included taking into consideration 'made' Neighbourhood Plans, the context of the local area and available services and facilities and public transport, how settlements interact and support each other, supporting local communities and services, and that it should include business premises as well as housing.

There were mixed views on development thresholds with some supporting the proposed approach, some seeking higher thresholds and others wanting the thresholds removed or replaced. Concerns included that the thresholds are arbitrary, or that the proposed limits were not explained or justified and should better reflect the NPPF ambitions for making best use of land. There was also

concern that the thresholds only applied to individual sites and not the cumulative impacts and overall scale of development permitted within a village. Suggestions for alternative approaches included allowing development within settlement boundaries, using the thresholds as a guide but allowing more development on sustainable sites, replacing the limits with something in line with calculated windfall allowance, allowing more development in smaller villages where it would secure improved services.

A number of representors made village specific comments, including a number of Parish Councils generally supporting their village's classification and several developers suggesting changes to village classifications to a higher tier and greater flexibility on the scale of development permitted, with a number of developers promoting a range of sites for development.

**Table of representations: S/SH: Settlement hierarchy**

Summary of issues raised in comments	Comments highlighting this issue
Support Policy	<p><b>Individuals</b></p> <p>57036 (Dr W Harrold), 58109, (M Asplin), 60648 (P Fletcher)</p> <p><b>Public Bodies</b></p> <p>56862 (Bassingbourn-cum-Kneesworth PC), 57318 (Huntingdonshire DC), 57887 (Ickleton PC), 59468 (Shepreth PC), 59812 (Dry Drayton PC), 59852 (Barrington PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p><b>Third Sector Organisations</b></p> <p>56667 (The Ickleton Society), 58244 (Cambridge Past, Present &amp; Future)</p> <p><b>Other Organisations</b></p> <p>60445 (Anglian Water Services Ltd)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>58238 (Hallam Land Management Limited), 59834 (MCA Developments Ltd)</p>
Indicative maximum scheme sizes should include business premises as well as housing.	56862 (Bassingbourn-cum-Kneesworth PC)
Support the continuation of a threshold of 30 units of housing developments in minor rural centres.	56573 (Gamlingay PC)
<p>This policy should place limits on the size of individual windfall schemes. These should be:</p> <ul style="list-style-type: none"> <li>• in line with an adopted Neighbourhood Plan for the rural centre in question</li> </ul>	56804 (M Colville), 57705 (J Pavey), 57832 (D Lister)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>considered within context of the local area in aggregate of total impact</li> </ul>	
<p>The settlement hierarchy review appears to assess each settlement in terms of the services located within Parish boundaries rather than considering how different settlements interact and support each other (in line with paragraph 79 of the NPPF). For example, the village of Meldreth is closely supported by the facilities of Melbourn.</p>	57339 (HD Planning Ltd), 60311 (Gladman Developments)
<p>This approach fails to take account of situations where it is demonstrated there is a need for a larger amount of growth to support villages and local communities.</p> <p>The sustainability credentials of Group Villages should therefore be further reviewed, and a greater level of development allowed at and adjoining these villages</p>	57375 (Colegrove Estates)
<p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p>	57503 (Cambridgeshire County Council, as landowner)

Summary of issues raised in comments	Comments highlighting this issue
<p>The site size limits for each category of village should be deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages.</p>	
<p>The size of individual developments should be subject to limits until the effects of unprecedented growth already in the pipeline can be evaluated in relation to the provision of local services and facilities.</p> <p>Limits could be specified in line with the Windfall allowance calculated.</p>	57553 (Save Honey Hill Group), 57641 (J Conroy),
<p>Confusion over the use/definition of village and town (simply not a matter of size and facilities which are undefined).</p> <p>Concern over the legal definition and suggested ambition of being designated a Town.</p>	57646 (Histon & Impington PC)
<p>S/SH should also recognise and control within the hierarchy brown field sites that require Green Belt land take.</p>	58109 (M Asplin)
<p>Allow development in smaller villages with permission conditional on the provision of better services which often have excellent schools better suited to expansion than Cambridge.</p>	58168 (Dr S Kennedy)



Summary of issues raised in comments	Comments highlighting this issue
<p>The village hierarchy must reflect the provision of quality public transportation that provides a reasonable option to the car to and from places of work and study. That public transportation needs to be assessed by reference to frequency, hours of operation, and speed (relative to the car).</p>	<p>58177 (Cllr N Gough)</p>
<p>Several sewage treatment facilities upstream from Cambridge are unable to cope during periods of high rainfall (discharging raw sewage) contributing towards failing water quality.</p> <p>A policy is needed to ensure development in any villages served by such sewage treatment works should be conditional upon improvements to those facilities.</p>	<p>58244 (Cambridge Past, Present &amp; Future)</p>
<ul style="list-style-type: none"> <li>• Settlement hierarchy should be reconsidered in terms of the roles that settlements play in terms of service provision for neighbouring settlements and a settlement's proximity to other settlements that offer a range of services.</li> </ul> <p>Rural settlements should be considered for housing allocations proportionate to the size of the settlements</p>	<p>58246 (Bletsoes)</p>
<p>Support new settlements. Villages and minor rural centres should be the last resort in hierarchy of development which have already</p>	<p>58361 (Linton PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>taken more than their share, to the detriment of community, character and infrastructure.</p>	
<p>The approach to the scale of development in villages needs revisiting. The approach controls the size of individual developments, but not the overall scale of development at a village. E.g., in a Minor Rural Centre, 2 schemes of 29 dwellings are acceptable, but one of 31 is not. There is no logic or justification for such an arbitrary approach to the scale of development of individual sites.</p>	<p>58479 &amp; 58495 (Hill Residential Limited)</p>
<p>Proposed settlement hierarchy is ineffective at delivering required levels of growth to support the vitality of rural villages and gives insufficient weight to the sustainability of villages with railway stations.</p> <p>Current settlement boundaries are drawn too tightly preventing meaningful growth.</p> <p>A more flexible/relaxed approach to settlement boundaries is needed.</p> <p>These villages are not recognised as being considerably more sustainable than other locations despite the clear influence a station has on sustainable commuting patterns.</p>	<p>58593 (Artisan -UK- Projects Ltd)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The settlement hierarchy methodology and tiers are generally supported. Decisions on the status of specific settlements (excluding Cambridge and new settlements) should wait until the spatial strategy has been finalised.</p>	<p>58625 (Vistry Group and RH Topham &amp; Sons Ltd)</p>
<p>Object to policy that will limit the size of schemes within minor rural centres, group villages and infill villages.</p> <p>To set an indicative maximum scheme size fails to recognise the full potential of a site in such locations nor the potential benefits of such schemes in ensuring existing services remains sustainable into the long term. A more appropriate approach would be to reflect paragraph 124 and 125 of the NPPF to make the most effective use of land whilst taking into account housing needs, market conditions, infrastructure and serves as well as the character of the area.</p>	<p><b>Developers, Housebuilders and Landowners</b></p> <p>58656 (Abbey Properties Cambridgeshire Limited), 60170 (Home Builders Federation), 60220 (Thakeham Homes Ltd), 60311 (Gladman Developments), 60324 (Daniels Bros - Shefford- Ltd, 60543 (Beechwood Homes Contracting Ltd), 60548 (Thakeham Homes Ltd Land at Comberton Road, Comberton - HELAA site 40497)</p>
<p>The proposed limit of housing for settlements identified in the hierarchy should be reviewed with a view to increasing the development threshold and serve as a guide, with the relative sustainability of the site/settlement providing a basis for increasing the development threshold of a site.</p>	<p>59095 (A P Burlton Turkey's Ltd)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>The size of individual developments should be subject to limits, specified in line with the windfall allowance calculated.</p> <p>The Vision &amp; Aims of the Local Plan are at risk should there be no limit on the size and scale of schemes brought forward and approved.</p>	59886 (Fen Ditton PC)
<p>Growth levels attributed to Infill Villages too restrictive.</p>	58714 (LVA)
<p>The definition of Group Villages should be reinforced to restrict exceptional development of up to 15 dwellings only on brownfield sites.</p>	59852 (Barrington PC)
<p>Caxton, a highly sustainable location for growth with the proposed new railway station should have no limit on the scale of individual developments.</p>	56482 (V Chapman), 56490 (D & B Searle), 56500 (W Grain), 56518 (RJ & JS Millard), 58645 (R Grain), 58714 (LVA)
<p>Development in Teversham – a Group Village - would help facilitate a shift away from car use, and certainly reduce any journey times by car. However, no sites are proposed for allocation within the village.</p>	56896 (RWS Ltd)
<p>West Wickham Parish Council supports the infill village designation for West Wickham and Streetly End and the indicative maximum scheme size.</p>	56908 (Cllr. D Sargeant)

Summary of issues raised in comments	Comments highlighting this issue
<p>Babraham a proposed 'Group Village' has a primary school consistent with infrastructure in other Group Villages. The school is currently full to its capacity of 0.5FE/84 places and operates with four classes (it operates a Published Admission Number (PAN) of 12). The school's site and context mean that it has previously been determined that there is no scope for significant expansion beyond its current size.</p> <p>Some children currently attend from within Sawston catchment, so displacement of places back to Sawston should be borne in mind with development at Babraham.</p>	56924 (Cambridgeshire County Council - Education)
<p>Melbourn &amp; Meldreth should be allocated as a Rural Centre. The villages are performing the role already and should be moved up the hierarchy. High Quality Public Transport links and good range of shops, services/ education facilities and employment opportunities.</p>	57041 (Endurance Estates)
<p>The fourth bullet point restricts 'Minor Rural Centres', such as Linton to an 'indicative maximum scheme size of 30 dwellings'. This is not explained and unjustified. It should have this bullet point removed</p>	57073 (R Wilson)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>The status of Cottenham in the settlement hierarchy should remain as a Rural Centre. Cottenham is capable of providing larger schemes of more than 30 dwellings.</p>	<p>57115 (Cambridge District Oddfellows), 57151 (Southern &amp; Regional Developments Ltd), 57197 (European Property Ventures -Cambridgeshire)</p>
<p>Objection to Waterbeach being identified as a 'Minor Rural Centre'. Given the growth to the north and the sustainable pedestrian and green links between the settlement and the new town.</p> <p>Existing settlement of Waterbeach can provide larger schemes of +30 dwellings. Should be treated as a new town.</p>	<p>57151 (Southern &amp; Regional Developments Ltd), 57197 (European Property Ventures -Cambridgeshire)</p>
<p>Hardwick should be a Minor Rural Centre because of its location on the public transport corridor between Cambridge and Cambourne, proposed investment in East West Rail and Scotland Farm Park and Ride. Development here would fulfil more policy objectives. The limit on size of development schemes should be based on individual site circumstances.</p>	<p>58298 (Pigeon Land 2 Ltd)</p>
<p>The former Papworth Hospital Site provides an opportunity to deliver a healthcare development, +30 dwellings, in the form of a healthcare use (C2). Papworth Everard should be identified as a 'Rural Centre'.</p>	<p>58339 (DLP Planning Ltd)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>With existing and emerging considerations including facilities, services and infrastructure including sustainable transport improvements, Hauxton should be re-assessed and placed higher in the settlement hierarchy.</p>	<p>58380 (Bridgemere Land Plc)</p>
<p>We support that Sawston and Great Shelford with Stapleford are proposed to be identified as Rural Centres due to their good access to employment, services and facilities.</p> <p>Stapleford, in the Settlement Hierarchy Review should be amended to reflect that Great Shelford with Stapleford will have two stops on Phase 2 of the SE Cambridge Transport Route.</p>	<p>58386 (Deal Land LLP)</p>
<p>Cottenham should be identified as a Rural Centre to allow consideration for the merits of any future residential proposals towards the village's sustainability.</p>	<p>58491 (BDW Homes Cambridgeshire &amp; The Landowners)</p>
<p>Support Fowlmere's continued identification as a Group Village over and above an infill village. Not clear why the level of housing to come forward has a ceiling of 8 units or exceptionally 15.</p>	<p>58548 (Croudace Homes)</p>
<p>Councils should adopt a highly flexible approach to directing growth to the edge of sustainable villages, especially the Rural Centres. Histon &amp; Impington have sound and robust sustainability credentials.</p>	<p>58549 (Martin Grant Homes)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Support the identification of Cambourne as a new town within the emerging settlement hierarchy.	58678 (The Church Commissioners for England), 59156 (Cambourne TC)
<p>Objection: Whittlesford should be a Minor Rural Centre.</p> <p>The settlement hierarchy methodology should increase scoring of locations with excellent public transport, access to the City of Cambridge, employment and services; reinforcing its suitability as a sustainable location for growth.</p>	58706 (Grosvenor Britain & Ireland)
Bassingbourn and Kneesworth should be recognised as a single settlement within the Settlement Hierarchy due to their functional relationship and physical proximity.	58943 (Scott Properties)
Concern over the rate of growth of Cambourne. Landscape and habitat should be significant factors in the assessment of developments in group villages.	59812 (Dry Drayton PC)
Support Steeple Morden, a group village remaining in this category.	59996 (Steeple Morden PC)
Support Guilden Morden, a group village remaining in this category.	60078 (Guilden Morden PC)



Summary of issues raised in comments	Comments highlighting this issue
Fulbourn has a wide range of services & facilities and scores highly on the factors assessed. It should be re-classified as a Rural Centre.	60298 (Miller Homes - Fulbourn site)
Melbourn has a wide range of services & facilities and scores highly on the factors assessed. It should be re-classified as a Rural Centre.	60305 (Miller Homes - Melbourn site)

**Table of representations: S/SH: Settlement hierarchy – site related comments**

Summary of issues raised in comments	Comments highlighting this issue
<p>Land to the north east of Hurdleditch Road, Orwell (HELAA site 40383) / Land to the south west of Hurdleditch Road, Orwell (HELAA site 40378)</p> <p>Group Villages are capable of accommodating housing growth by virtue of their service provision and status in the settlement hierarchy.</p> <p>Orwell village has access to a number of facilities enabling residents to access services for their day-to-day needs. Orwell is an established sustainable settlement capable of accommodating proportionate levels of new housing growth to assist in preparation of a balanced and varied housing supply which in turn will support the economic growth of Greater Cambridge.</p>	56715 (K.B. Tebbit Ltd)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>44 North End and Land at Bury End Farm, North End, Meldreth (HELAA site 40284)</p> <p>Meldreth is a Group Village - Agree</p> <p>Few development opportunities within the settlement boundary for sites of 8 dwellings or more. Only small sites for one or two dwellings. Meldreth is a Group Village</p> <p>Site size thresholds for category of village are largely irrelevant and ineffective. Available sites fall below the threshold where affordable housing is required e.g. less than 10 dwellings.</p>	<p>56998 (Hastingwood Developments)</p>
<p>Land to the west of Malton Road, Orwell (HELAA site 40324)</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages. including at Orwell.</p>	<p>57052 (CEMEX UK Properties Ltd)</p>
<p>Land off Fenny Lane, Meldreth, Royston (HELAA site 40036)</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p>	<p>57072 (Elbourn Family)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Meldreth.</p>	
<p>Land off Hall Lane, Great Chishill (HELAA site 47879)</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Great Chishill.</p>	57096 (RO Group Ltd)
<p>1-3 Lodge Road, Thriplow (HELAA site 47379)</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limit for each category of village should be deleted or marked as indicative so that the policy is sufficiently flexible.</p>	57214 (MPM Properties (TH) Ltd and Thriplow Farms Ltd)
<p>Land off High Street, Little Eversden (HELAA Site 40211)</p>	57309 (Bletsoes)

Summary of issues raised in comments	Comments highlighting this issue
<p>The current adopted Local Plan (2018) identifies Little Eversden as an Infill Village, and this classification is to be carried forward through the GCLP.</p> <p>Little Eversden should be considered for modest scale housing allocations. To help deliver a broader range of housing stock including affordable housing.</p>	
<p>Land to the east of Ridgeway and Old Pinewood Way, Papworth Everard (HELAA site 40439)</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Papworth Everard.</p>	57350 (Bloor Homes Eastern)
<p>Land to the south-east of Cambridge Road, Foxton (HELAA site 40408) / Land to the north and east of Barrington Road, Foxton (HELAA site 40412)</p> <p>The proposed mixed-used development at Site HELAA Ref 40408 will continue to strengthen the village's employment offerings and support the wider rural economy. The scale of residential development proposed at Site HELAA Ref: 40412 is appropriate to the size of the village and would support the long term vitality of the village and provide the local community with housing choice.</p>	57519 (R2 Developments Ltd)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Land adjacent to Babraham (HELAA site 40297)</p> <p>We support this policy. We note that the emerging Plan seeks to classify Babraham as a ‘Group Village’ as it has a primary school. We consider Babraham has a pivotal role to play in promoting opportunities for employment in the southern cluster and that homes should be located adjacent to such opportunities. We consider that the Local Plan should seize this opportunity to co-locate employment opportunities and housing and allocate the subject site for mixed use development, as per the proposed development at this site. The boundary has not changed.</p>	<p>57573, 57574, 57575, 57576 &amp; 58487 (Cheveley Park Farms Limited)</p>
<p>Land to the east of Ridgeway and Old Pinewood Way, Papworth Everard (HELAA site 40439)</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Balsham.</p>	<p>57652 (Endurance Estates - Balsham Site)</p>
<p>Land off The Causeway, Bassingbourn (HELAA site 40228) &amp; Land off Poplar Farm Close, Bassingbourn (HELAA site 40230)</p>	<p>57685 (Endurance Estates - Bassingbourn Sites)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Bassingbourn.</p>	
<p>Land off Station Road, Willingham (HELAA site 40527): Object</p> <p>A capacity assessment is needed for all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Willingham.</p>	58147 (J Manning)
<p>Land at Pitt Dene Farm, Meadow Drift, Elsworth (HELAA site 40351)</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised</p>	58190 (Enterprise Residential Developments Ltd and Davison Group)

Summary of issues raised in comments	Comments highlighting this issue
development strategy that allocates suitable sites on the edge of existing sustainable villages including at Elsworth	
<p>Land between Balsham Road and Horseheath Road, Linton (HELAA site 40302) - Pembroke College</p> <p>Land north of Cambridge Road (A1307), Linton (HELAA site 51721) - Taylor Wimpey UK Ltd</p> <p>Linton benefits from a breadth of services and facilities</p> <p>The Cambridge South East Transport project seeks to provide better connections between Linton and Cambridge. Linton should therefore be a Rural Centre. New development can support improvement to existing services.</p>	<p>58260 (Pembroke College),</p> <p>60511 (Taylor Wimpey UK Ltd)</p>
<p>Land west of Linton (HELAA Site 51047)</p> <p>Few opportunities for 30 dwellings within existing Minor Rural Centres settlement boundaries; Linton is an example where there are no opportunities within the boundary for sites of 30 dwellings or more.</p> <p>The site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Linton.</p>	<p>58511 (Bloor Homes Eastern)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Papworth Everard, a minor rural centre, is highly sustainable and has real growth potential. Should be allowed to grow, in a sensitive manner, to provide new services and support and improve existing services.</p> <ul style="list-style-type: none"> <li>• Land at Crow's Nest Farm, Papworth Everard (HELAA (2021) Site Reference: 48096) would have excellent transport links and could provide a Rural Travel Hub to optimise and maximise the use of those links, making sustainable travel modes easier and more attractive than car travel for site residents and residents of Papworth Everard more generally.</li> </ul>	58544 (MacTaggart & Mickel)
<p>Land east of Cambridge Road, Hardwick (HELAA site 40414)</p> <p>Based on a current assessment, Hardwick Village should be re-classified as a 'Minor Rural Centre' within the Settlement Hierarchy.</p> <p>If the future development potential of the village is to be taken into consideration (as per Waterbeach New Town and Bourn Airfield New Village), then Hardwick Village should be identified as a 'Rural Centre' and a key location for sustainable development.</p> <p>Our proposed development site at land east of Cambridge Road (Site No. 40414) provides a strategic opportunity for the future sustainable development of the settlement.</p>	58597 (Hill Residential Ltd and Chivers Farms - Hardington- LLP)
<p>Land west side of London Road, High Street, Fowlmere (HELAA site 40116)</p> <p>Development should be assigned across settlement hierarchy. Policy direction includes restrictions on indicative maximum scheme sizes for each settlement tier. Coupled with overall</p>	58686 (Wates Developments Ltd)



Summary of issues raised in comments	Comments highlighting this issue
<p>development strategy for only small number of allocations within rural area, ability for sustainable developments to come forward is overly restrictive and unjustified.</p> <p>Fowlmere is “Group Village”. Concerned by lack of assessment in terms of its ability to accommodate growth.</p> <p>Failure of evidence base to consider all modes of transport and Fowlmere’s connectivity to surrounding settlements.</p> <p>To ensure employment growth is supported by sufficient housing, Fowlmere should accommodate housing sites, to meet criterion c) NPPF Paragraph 8</p>	
<p>Land South of Newington, Willingham would offer the opportunity for a site that benefits from sustainable travel opportunities, in addition to service and facilities within the village.</p>	<p>59154 (Silverley Properties Ltd)</p>
<p>East of Horningsea Road (HELAA site 47647) / West of Ditton Lane (HELAA site 40516)</p> <p>The adopted South Cambridgeshire Local Plan was supported by the Village Classification Report (2012). At this stage it appears that no similar assessment has been prepared to support the emerging Greater Cambridge Local Plan. It is considered that an updated assessment must be undertaken to support the emerging Plan and to ensure it is both justified and effective.</p>	<p>60569 (Countryside Properties - Fen Ditton site)</p>
<p>Land to the west of Cambridge Road, Melbourn (HELAA site 40489)</p> <p>The village of Melbourn remains as a Rural Centre within this emerging Local Plan and is supported having regard to the acknowledgement that the Council’s recognise the role that the</p>	<p>60643 (Bruntwood SciTech)</p>

Summary of issues raised in comments	Comments highlighting this issue
village can play in accommodating new development and in particular the allocation for a mixed use site on the eastern side of Melbourn Science Park	
<p>Land to the west of Cambridge Road, Melbourn (HELAA site 40490)</p> <p>Development should be assigned across settlement hierarchy. Policy direction includes restrictions on indicative maximum scheme sizes for each settlement tier. Coupled with overall development strategy for only small number of allocations within rural area, ability for sustainable developments to come forward is overly restrictive and unjustified.</p> <p>Support Melbourn as a 'Minor Rural Centre'.</p> <p>Object to restriction on quantum of dwellings for this tier in Settlement Hierarchy, which contradicts its position and identification as largest district within the south west of the district.</p>	58695 (Wates Developments Ltd)

## **S/SB: Settlement boundaries**

### **Hyperlink for all comments**

Open this hyperlink - [Policy S/SB: Settlement boundaries](#)> then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

**Number of Representations for this section:** 100

### **Abbreviations**

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

### **Executive Summary**

Broad support was expressed for the principle of the settlement boundaries policy. Elements commended by Parish Councils and individual respondents included the preservation of the character of village settlement edges, preservation of agricultural land and the policy's prevention of encroachment of settlements into the countryside. Suggested improvements to the policy included desire to increase the number and variety of permitted exceptions: garden centres, modern concepts of development such as co-housing and self-build, and employment areas. Additionally, there were aspirations to include minimum green separation between settlements (boundaries) and include parish councils in the development of the policy due their local knowledge.

Criticisms to the policy included suggestions that the policy is not compliant with the NPPF (para 69, 78 & 79). Some suggested that the policy wording needed tightening to avoid ambiguity as to when a settlement boundary would be drawn when building new

settlement. Some developers had concern over the lack of inclusion of proposed sites within the settlement boundaries of many villages and asked that the Cambridge settlement boundary be expanded to accommodate possible future expansions at Cambridge Biomedical Campus and Cambridge East. Other developers suggested a change of approach to create greater flexibility and growth in sustainable village edge locations, including within the Green Belt, with support for a criteria-based assessment and/or undertaking a capacity assessment of all villages to determine potential additional allocations.

**Table of representations: S/SB: Settlement hierarchies**

Summary of issues raised in comments	Comments highlighting the issue
<p>Support/Strongly support policy, for the following reasons:</p> <ul style="list-style-type: none"> <li>• relating to preserving the character of village settlement edges, as these are being eroded by inappropriate development</li> <li>• Important to reference role of Neighbourhood Plans and Village Design Guides.</li> <li>• helps preserve agricultural land and prevents unsustainable development in the countryside.</li> <li>• control of development in villages</li> <li>• difficult to prevent the encroachment of settlements on the countryside without policy.</li> <li>• Flood plains to be respected.</li> <li>• Support tightly drawn development boundaries to reduce encroachment.</li> <li>• Policy work should include Parish Councils at an appropriate stage in the development of the Policy because of their local knowledge and data.</li> </ul>	<p>56863 (Bassingbourn-cum-kneesworth PC), 56668 (The Ickleton Society), 56574 (Gamlingay PC), 56909 (Cllr D Sargeant), 57642 (J Conroy), 57710 (J Pavey), 58052 (Ickleton PC), 58362 (Linton PC), 59163 (Cambourne TC), 59997 (Steeple Morden PC), 60079 (Guilden Morden PC), 60112 (C Blakeley)</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<p>Objects to Policy</p> <ul style="list-style-type: none"> <li>• lacks detail on the point at which a new settlement boundary will be drawn which would allow for boundaries to be vague and subject to expedient drift.</li> </ul>	56850 (Save Honey Hill Group)
<ul style="list-style-type: none"> <li>• Policy S/SB would not comply with the aims of the Framework (para 78 NPPF), Policy 79.</li> </ul>	56558 (Bonnel Homes Ltd)
<ul style="list-style-type: none"> <li>• Approach overly restrictive and not accord with paragraph's 69 and 79 of the NPPF</li> <li>• Not allowing sufficient land within settlement boundaries for windfall sites is contrary to Paragraph 69 c) of the NPPF.</li> </ul>	60614 (Endurance Estates – Orwell sites)
<ul style="list-style-type: none"> <li>• Amend policy text to insert 'garden centres' to permitted exceptions outside settlement boundaries (at bullet point 3 in first proposals).</li> </ul>	58973 (Avison Young)
<ul style="list-style-type: none"> <li>• Amend policy: Employment areas in the Countryside should be referenced under the terms of this policy, clearly identify Granta Park.</li> <li>• Include Policy map to with Settlement boundaries drawn with draft submission.</li> </ul>	59289 (BioMed Realty)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>• Policy wording: When developments meet 'sufficient certainty regarding their exact boundaries, new settlement boundaries will be drawn' - careful wording is needed to clarify at what point certainty is attained.</li> </ul>	59898 (Fen Ditton PC)
<ul style="list-style-type: none"> <li>• Policy wording: policy S/SB should refer to rural exception sites and first homes exception sites to maintain consistency with policy HE/S.</li> </ul>	60169 (Home Builders Federation)
<ul style="list-style-type: none"> <li>• await the detailed maps.</li> <li>• consider the implications of any changes in national policy.</li> </ul>	58658 (Abbey Properties Cambridgeshire Ltd)
<ul style="list-style-type: none"> <li>• Implications for Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 5.</li> </ul>	56925 (Cambridgeshire County Council)
<ul style="list-style-type: none"> <li>• Settlement boundaries are essential for controlling development around villages.</li> </ul>	57585 (R Pargeter)
<ul style="list-style-type: none"> <li>• Want permitted development rights restricted in countryside so changes of use becomes conditional, other uses in the countryside require a planning application.</li> </ul>	58245 (Cambridge Past, Present & Future)
<ul style="list-style-type: none"> <li>• clear green separation between settlement boundaries. A minimum separation should be given.</li> </ul>	58320 (MA Claridge)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>• Comprehensively review settlement boundaries.</li> <li>• Allow for limited additional growth.</li> </ul>	56558 (Bonnell Homes Ltd)
<ul style="list-style-type: none"> <li>• Hinders sustainable development at the edge of villages. Growth in village locations contributes to housing delivery and the settlement boundaries policy should provide the flexibility.</li> </ul>	56958 (J Swannell)
<ul style="list-style-type: none"> <li>• Approach is acceptable.</li> <li>• Consider altering the parish boundaries between Sawston and Babraham, at development on the eastern edge of Sawston currently lies in Babraham parish but forms part of the village of Sawston.</li> </ul>	57017 (KWA Architects)
<ul style="list-style-type: none"> <li>• The way Settlement Boundaries have been used historically is out of date, provided an unnecessary restraint on development,</li> <li>• Maximise flexibility to future land supply do not apply settlement boundaries in sustainable locations – Minor Rural Centre and above.</li> </ul>	57059 (Endurance Estates)



Summary of issues raised in comments	Comments highlighting the issue
<ul style="list-style-type: none"> <li>• consider development in context of the overall suitability of the site when assessed against wider plan policies, not whether inside a settlement boundary.</li> </ul>	
<ul style="list-style-type: none"> <li>• Periodic reviews may need to be made to the policies map to ensure that the boundaries remain up to date in the event of windfall or rural exceptions development.</li> <li>• small clusters of buildings, isolated properties and hamlets should not be provided with a settlement boundary and should be considered as countryside.</li> </ul>	57319 (Huntingdonshire DC)
<ul style="list-style-type: none"> <li>• development boundaries should be removed and replaced with a criterion-based assessment</li> <li>• will add flexibility to the policy and allow for individual sites to be judged on their own merits</li> <li>• Flexible approach to allow for the sustainable credentials of each site to be evaluated rather than preventing development completely just because a site falls outside of a boundary line</li> <li>• Policy should take a flexible approach to development and growth within and on the edge of villages.</li> </ul>	57388 (HD Planning Ltd), 58551 (Croudace Homes), 60212 (Gladman Developments)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>• a more flexible and tolerant approach is needed towards development in the rural area.</li> <li>• The logical approach is to allocate further sites on the edge of sustainable villages.</li> <li>• Ensure maximum flexibility provided to ensure a pragmatic approach is adopted in drafting of settlement boundaries.</li> </ul>	57090 (C King), 57172 (Southern & Regional Developments Ltd), 57198 (European Property Ventures - Cambridgeshire), 57294 (C Sawyer Nutt), 60336 (F.C. Butler Trust), 60347 (F.C. Butler Trust)
<ul style="list-style-type: none"> <li>• policy severely restricts growth outside settlement boundaries</li> </ul>	58606 (Artisan (UK) Projects Ltd)
<ul style="list-style-type: none"> <li>• policy direction should not preclude growth in sustainable locations, which may include sites well related to settlements previously outside of settlement boundaries</li> <li>• past settlement boundaries have been drawn to tightly, and do not provide for many (if any) windfall opportunities</li> </ul>	60614 (Endurance Estates - Orwell site)
<ul style="list-style-type: none"> <li>• consider modern concepts of development that can be permitted outside of settlement boundaries, such as co-housing and self-build.</li> </ul>	58738 (LVA)
<ul style="list-style-type: none"> <li>• Employment areas in the Countryside should be referenced under the terms of this policy or in supporting text</li> </ul>	58723 (TWI)
<ul style="list-style-type: none"> <li>• No coalescence of settlements</li> </ul>	59813 (Dry Drayton PC)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>Review settlement boundaries of Minor Rural Centres (Gamlingay) and the provision of additional sites that have been put forward through the call-for-sites.</li> </ul>	56558 (Bonnell Homes Ltd)
<ul style="list-style-type: none"> <li>Green belt villages are relatively more sustainable, particularly Gt Shelford.</li> <li>Identify safeguarding land.</li> </ul>	58825 (Great Shelford (Ten Acres) Ltd)
<ul style="list-style-type: none"> <li>Settlement boundary of Sawston should be amended to include land adjacent Spring House, Church Lane, Sawston. Currently the settlement boundary cuts through client's land.</li> </ul>	57025 (H Kent)
<ul style="list-style-type: none"> <li>review of settlement boundaries, draw around properties that are considered to part of a village.</li> <li>Fowlmere along the west side of Chrishall Road. Appleacre Park, the development of 16 approved entry level house, Lanacre along Chrishall Road, and properties to the west of these properties, should all be included within the settlement boundary of Fowlmere.</li> </ul>	57379 (Colegrove Estates)
<ul style="list-style-type: none"> <li>Extend settlement boundary at Orwell to include built out development as identified in our main representation, (S/3870/18/RM), (S/2379/13/FL).</li> </ul>	56718 (K.B. Tebbit Ltd)

Summary of issues raised in comments	Comments highlighting the issue
<ul style="list-style-type: none"> <li>• Settlement boundary along Bourn Road at Caxton is out of date. Redraw to include the land to the west of the Telephone Exchange and wrap around the new replacement dwelling of 30 Bourn Road to match the houses on the northern side of Bourn Road. (S/4069/19/FL), (S/4023/18/FL), (21/02839/CLUED).</li> </ul>	56491 (D & B Searle)
<ul style="list-style-type: none"> <li>• Cottenham settlement boundary should be redrawn to include changes taking place to the west of the settlement, development under construction should be included, (S/2413/17/OL and S/1606/16/OL).</li> </ul>	56959 (S & D Jevon & R)
<ul style="list-style-type: none"> <li>• Amend Melbourn settlement boundary to include the 'Birchwood site' (S/2941/18/FL) already granted, north of Melbourn Science Park.</li> </ul>	58470 (TTP Campus Ltd)
<ul style="list-style-type: none"> <li>• Create looser settlement boundaries, to include small sites promoted for development on the edge of villages.</li> <li>• settlement boundaries need to be drawn more loosely, beyond outer Green Belt, to allow for speculative development.</li> <li>• Land to East Side of Cambridge Road offers sustainable location for residential growth Melbourn (HELAA site 47757).</li> </ul>	58606 (Artisan (UK) Projects Ltd), 58701 (Wates Development Ltd), 58702 (Wates Development Ltd), 59130 (Endurance Estates), 59265 (Endurance Estates), 60365 (H. J. Molton Settlement), 60374 (The Critchley Family), 60384 (Stephen & Jane Graves), 60395 (D Wright),

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>• Land West of London Road Fowlmere lies adjacent to existing settlement boundary is suitable Fowlmere (HELAA site 40116)</li> <li>• discourage development of less suitable sites and assist in delivery of affordable housing, such as in Linton</li> <li>• Such as Teversham (HELAA site 40250)</li> <li>• Tight settlement boundary for Orwell artificially constrains development. HELAA site 40496 abuts Orwell settlement boundary and site forms a logical extension.</li> </ul>	60476 (P, J & M Crow), 60614 (Endurance Estates – Orwell site)
<ul style="list-style-type: none"> <li>• settlement boundary for Steeple Morden is unsound, not justified and not consistent with national policy Steeple Morden (HELAA sites 40440 and 40442).</li> </ul>	60325 (Daniel Brothers (Shefford) Ltd)
<ul style="list-style-type: none"> <li>• Development outside of the settlement boundary should be considered via a series of criteria allowing development proposals to be assessed on its respective merits, and therefore consider Cottenham (HELAA site 59409).</li> </ul>	58497 (BDW Homes Cambridgeshire & The Landowners (Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock & Ms Hartwell))
<ul style="list-style-type: none"> <li>• Support broad development strategy of bringing jobs and homes closer together.</li> </ul>	58533 (Bruntwood SciTech)

Summary of issues raised in comments	Comments highlighting the issue
<ul style="list-style-type: none"> <li>• Support the allocation of mixed-use development on east side of Melbourn Science Park, Melbourn (HELAA site 40490)</li> </ul>	
<ul style="list-style-type: none"> <li>• object to the 'high risk' development strategy, dependent upon the delivery of some strategic, complex sites. Strategy should allocate sites that can deliver policy- compliant levels of affordable housing, Teversham (HELAA site 40250),</li> </ul>	59541 (Cheffins), 60268 (The White Family and Pembroke college),
<ul style="list-style-type: none"> <li>• limits the opportunity for suitable sites on the edge of settlements to meet the needs of Extra Care developments for which there is a current and future unmet need which helps tackle the affordability. Comberton (HELAA site 40261), Gamlingay (HELAA site 40030),</li> </ul>	59755 (Endurance Estates), 60285 (Wheatley Group Development Ltd),
<ul style="list-style-type: none"> <li>• Land south of Babraham Road and east of site H1c include within the revised Sawston boundaries, Sawston (HELAA site 40509).</li> </ul>	57017 (KWA Architects)
<ul style="list-style-type: none"> <li>• Supports defined settlement boundaries.</li> <li>• In defining the settlement boundary on the Eastern edge of Cambridge, consider safeguarding land east of Airport Way, in order to accommodate for the relocated park &amp; ride and allow</li> </ul>	58371 (Marshall Group properties)

Summary of issues raised in comments	Comments highlighting the issue
<p>for any future expansion of Cambridge East. Cambridge (HELAA site 40306).</p>	
<ul style="list-style-type: none"> <li>• Objection to the Settlement Boundary for Linton, Linton (HELAA site 40044)</li> </ul>	57078 (R Wilson)
<ul style="list-style-type: none"> <li>• Land at Fulbourn Road, Teversham, RWS Ltd, advocate including site within settlement boundary, Teversham (HELAA site 40295).</li> </ul>	56897 (RWS Ltd)
<ul style="list-style-type: none"> <li>• fig 4, page 22 of the Plan identifies the locations of proposed new housing development for the years 2021 to 2041, wants written confirmation that client's site at Bartlow Road Linton is included within the figure (HELAA site 40044).</li> <li>• Greater Cambridge Local Plan map shows layer 'settlement hierarchy Adopted 2018 Local Plan' with blue notation across the majority of Linton and boundaries to coincide with the settlement boundary which excludes site north and south of Bartlow Road, Linton (HELAA site 40044).</li> <li>• change or modify Plan to revise the settlement boundary around Linton as shown by the green pecked line in Appendix 8, include Linton (HELAA site 40044).</li> </ul>	57078 (R Wilson), 57079 (R Wilson), 57084 (R Wilson)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>include site within the settlement boundary of Hauxton for the provision of either a significantly increased quantity of housing, employment or a mixture of both. Hauxton (HELAA site 59400).</li> </ul>	58383 (Bridgemere Land Plc)
<ul style="list-style-type: none"> <li>Sawston (HELAA site 40547) and Stapleford (HELAA site 40368) include within the respective settlement boundaries, as agree with proposed policy direction to define the boundaries based on “the present extent of the built-up area as well as planned new development”.</li> </ul>	58403 (Deal Land LLP)
<ul style="list-style-type: none"> <li>settlement boundary should be amended to include this Site Impington (HELAA site 40061).</li> </ul>	58515 (Hill Residential Ltd)
<ul style="list-style-type: none"> <li>Adapt approach to include obvious development opportunities, such as large-scale farm buildings contiguous with existing settlements (HELAA site 40208).</li> </ul>	59112 (A P Burlton Turkey’s Ltd)
<ul style="list-style-type: none"> <li>Include site within Settlement Boundary for Willingham (HELAA site 59349).</li> </ul>	59161 (Silverley Properties Ltd)
<ul style="list-style-type: none"> <li>Submission demonstrates expansion to the SE and SW of the Addenbrookes Campus achieved without undermining Green</li> </ul>	58964 (Jesus College (and Pigeon Investment Management and Lands Improvement Holdings), a private landowner and St John’s College))



Summary of issues raised in comments	Comments highlighting the issue
Belt, and new boundaries for Cambridge set would enhance southern edge (HELAA site 40064).	
<ul style="list-style-type: none"> <li>• case for the settlement boundary amendment at Steeple Morden to include site within the development framework, (HELAA Site 40054).</li> </ul>	60330 (Steeplefield)
<ul style="list-style-type: none"> <li>• site should be included within the settlement boundary of Linton (HELAA site 51721).</li> </ul>	60512 (Taylor Wimpey UK Ltd)
<ul style="list-style-type: none"> <li>• Release site from Green Belt and include within settlement boundary of Fen Ditton as part of the allocation, Fen Ditton (HELAA site 47647), (HELAA site 40516)</li> </ul>	60570 (Countryside Properties - Fen Ditton Site)
<ul style="list-style-type: none"> <li>• Amend Horningsea village development framework to include site, Horningsea (new site 59410).</li> </ul>	60726 (M Asplin)
<ul style="list-style-type: none"> <li>• no objection to principle of settlement boundaries. Existing boundaries have remained largely unchanged, some cases to consider site allocations. Villages development opportunities limited constraints such as heritage assets.</li> <li>• Undertake capacity assessment of all villages in South Cambridgeshire to determine which potential housing sites</li> </ul>	<p><b>Individuals</b></p> <p>57064 (C Meadows), 57074 (Elbourn Family), 57105 (J Francis),58148 (J Manning)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>57218 (MPM Properties (TH) Ltd and Thriplow Farms Ltd), 57000 (Hastingwood Developments), 57053 (CEMEX UK</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>• No council assessment of capacity land within the existing settlement boundaries of villages undertaken. Should seek to allocate suitable sites on edge of sustainable villages and adjust settlement boundary.</li> <li>• If capacity assessment does not identify sites, then additional allocations should be made on the edge of those villages to deliver sufficient housing to meet the affordable housing need. Meldreth (HELAA Site 40284). Orwell (HELAA Site 40234), Meldreth (HELAA site 40277), Great Shelford (HELAA site 40529), Great Chishill (HELAA site 47879), Fen Ditton (HELAA site 48148), Fulbourn (HELAA site 40523), Fulbourn (HELAA site 40522), Papworth Everard (HELAA Site 40439), Balsham (HELAA site 40438), Bassingbourn (HELAA Site 40230), (HELAA Site 40228) and (HELAA Site 40227), Willingham (HELAA site 40527), Linton (HELAA site 40411), Elsworth (HELAA site 40514), Orwell (HELAA site 47890), Linton (HELAA Site 51047), Orwell (HELAA site 40324), Foxton (HELAA site 40159).</li> </ul>	<p>Properties Ltd), 57085 (Shelford Investment), 57097 (RO Group Ltd), 57122 (KG Moss Will Trust &amp; Moss Family), 57352 (Bloor Homes Eastern), 57405 (Cambridgeshire CC (landowner), 57654 (Endurance Estates – Balsham site), 57688 (Endurance Estates - Bassingbourn Sites), 58152 (Hill Residential), 58192 (Enterprise Residential Developments and Davison Group), 58430 (Hawkswren Ltd), 58517 (Bloor Homes Eastern), 58537 (Hill Residential Ltd).</p>

<b>Summary of issues raised in comments</b>	<b>Comments highlighting the issue</b>
<ul style="list-style-type: none"> <li>• include 'Honey Hill' where a large commercial development planned (CWWTPR), area between Fen Ditton and Horningsea.</li> <li>• Described in the NECAPP</li> </ul>	56850 (Save Honey Hill Group), 57609 (J Pratt), 59898 (Fen Ditton PC)
<ul style="list-style-type: none"> <li>• support the expansion of the Cambridge City settlement boundary for growth of Cambridge Biomedical Campus, including land identified to the south of the Campus as the potential Major Area of Change</li> </ul>	58746 (CBC Limited, Cambridgeshire County Council and a private family trust)