

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

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## GP: Great Places

### Hyperlink for all comments

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

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

### Notes

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

### Abbreviations

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

### Executive Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## GP/PP: People and place responsive design

### Hyperlink for all comments

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

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

### Abbreviations

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

### Executive Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Hyperlink for all comments**

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

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

### **Abbreviations**

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

### **Executive Summary**

Many respondents generally supported the policy direction.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Hyperlink for all comments

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

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

### Abbreviations

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

### Executive Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## GP/QD: Achieving high quality development

### Hyperlink for all comments

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

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

### Abbreviations

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

### Executive Summary

Many respondents expressed support for the policy.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Hyperlink for all comments

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

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

### Notes:

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

### Abbreviations

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

### Executive Summary

Many respondents expressed general support for the policy.

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

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

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

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

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

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

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

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

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

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

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

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

Hyperlink for all comments

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

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

Number of Representations for this section: 36

### Abbreviations

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

### Executive Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hyperlink for all comments

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

Number of Representations for this section: 14

### Abbreviations

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

### Executive Summary

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

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

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

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

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

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

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

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

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

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