REPORT TITLE: Submission of Greater Cambridge Local Plan

To: Cabinet 17 November 2026

Lead Cabinet Member Cllr Katie Thornburrow

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Wards affected: All.

Director Approval: Stephen Kelly, Director of Planning confirms that the report author has sought the advice of all appropriate colleagues and given due regard to that advice; that the equalities impacts and other implications of the recommended decisions have been assessed and accurately presented in the report; and that they are content for the report to be put to the Cabinet for decision.

1.	**Recommendations**
1.1	It is recommended that Cabinet recommends that Full Council: a. Notes the main issues raised by representations made to the Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation, and agree with this report's assessment that these support a conclusion that the Proposed Submission Greater Cambridge Local Plan (Regulation 19) satisfies the tests of a sound and legally compliant plan; b. Agrees to 'submit' the Proposed Submission Greater Cambridge Local Plan (Regulation 19) (Appendix A), and Proposed Submission Policies Map (Appendix B) for examination in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), together with: i. the Sustainability Appraisal (Appendix C), Habitats Regulations Assessment (Appendix D), Equalities Impact Assessment (Appendix E); and ii. the Greater Cambridge Local Plan Regulation 22 Statement of Consultation (Appendix F).

	c. Delegate any subsequent minor amendments and editing changes to the submission documents that do not materially affect the content to the Director of Planning in consultation with the Lead Members for Planning, and any subsequent material amendments to the Lead Cabinet Member for Planning and Transport in Cambridge City Council (in consultation with the Chair of the Performance and Assets Scrutiny Committee and Opposition Spokes) and Lead Cabinet Member for Planning at South Cambridgeshire District Council; d. Delegate approval and submission of all other supporting documents and evidence documents that are relevant to the preparation of the Local Plan to the Director of Planning in consultation with the Lead Members for Planning; e. Ask the person appointed to carry out the independent examination of the Plan to recommend such "main" modifications to it that would make the plan sound and/or legally compliant, in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended); f. Authorise the Director of Planning to: i. Prepare and submit evidence, reports, proofs of evidence, technical papers, written statements, statements of common ground and other such documents required in the presentation of the local plan through the examination process, and to make oral representations at the Hearing sessions, reflecting the Council's agreed position on these matters, and to take such other steps as are conducive or incidental to the submission and examination of the local plan; and ii. Agree such main and "additional" modifications to the Local Plan during the examination in public process as may be necessary to make the Local Plan sound and legally compliant, in accordance with section 20(7C) of the 2004 Act (as amended); (except where changes would, in the view of the Director of Planning, be of such significance as to substantially alter the meaning of a policy or allocation).
2.	**Purpose and reason for the report**

2.1	**Introduction** Cambridge City Council and South Cambridgeshire District Council are producing a Joint Local Plan for the Greater Cambridge area (under Section 28 of the Planning and Compulsory Purchase Act 2004). The role of a local plan is to provide a vision for the future development of the area by identifying development needs, developing a strategy for where they should be met, identifying infrastructure needed to support the development, and setting policy requirements to guide the form of development. When it is adopted, the new Local Plan will replace each Council's 2018 Local Plan and earlier Area Action Plans as part of the statutory "Development Plan" for the area and will guide future decisions on planning applications. **Reasons for Recommendations** This report asks Cabinet to recommend to Full Council that the Greater Cambridge Local Plan is ready to submit to government for independent Examination. As a joint Local Plan, a mirror report is being taken to Cambridge City Council including the same recommendations. Cambridge City Council and South Cambridgeshire District Council are preparing a joint local plan: the Greater Cambridge Local Plan. The Local Plan proposes a vision for the future of Greater Cambridge. It identifies the development needs of the area for homes and jobs, and a development strategy for how those needs can be met sustainably. The Plan has been informed by extensive engagement and several rounds of public consultation, taking place between 2019 and 2026. In July 2026 both Cambridge City Council Cabinet and South Cambridgeshire District Council Cabinet agreed to publish the Proposed Submission (Regulation 19) version of the Local Plan and carry out a public consultation. The Proposed Submission (Regulation 19) consultation was held between 3 August and 25 September 2026, giving people the opportunity to comment on its soundness and legality. 2,863 representations were received from 778 individuals or organisations.

	Representations are published on the Greater Cambridge Shared Planning website. This report includes a summary of the issues raised in representations. Officers, having considered all of the individual representations, are of the view that the Proposed Submission Plan remains “sound” and legally prepared, and therefore is ready for submission. The decision to submit the Plan for Examination has to be made by Full Council, and as such this report asks Cabinet to recommend to Full Council that the Plan is ready to submit. If the Councils approve submission of the plan, it will meet the original deadline set by government for plans using the current plan making system to be submitted by the end of 2026. All of the representations made to the Regulation 19 consultation would accompany the plan when submitted to the Secretary of State, and will be considered by the independent planning Inspector who will be appointed to examine the plan. The Inspector will determine if the plan is sound and can be adopted. The Councils adopted Local Development Scheme (Local Plan timetable) plans for submission by the end of 2026. This responded to the governments deadline for plans being prepared under the legacy system. The government recently wrote to all Councils directing that plans being prepared under the legacy system will be given a three-month extension to allow for administrative tasks and governance to take place. However, it is advised by the Planning Advisory Service (PAS) that authorities should continue to submit their plans as soon as possible, particularly those plans that have already completed Regulation 19 consultations. To enable submission of the Local Plan to meet the original deadline set by the government for local plans under the current plan making system it is necessary for Full Council to agree to submit the Local Plan at the forthcoming meeting on 8 December to allow sufficient time for the Local Plan process to conclude with the submission of a joint Greater Cambridge Local Plan to the Government by the end of 2026. If approved, the next step for the plan making process is to submit the Plan and supporting documents, together with all representations made to this summer’s

	Proposed Submission (Regulation 19) consultation, to the Secretary of State. Following submission, the plan will be subject to examination by an independent planning inspector appointed by the Planning Inspectorate. The Inspector will determine if the plan is legally compliant and sound (as explained previously) and can therefore be adopted. It is recommended that the Councils formally request the Inspector to recommend such modifications as may be necessary to make the plan sound. If this approach was not agreed, it would significantly increase the risk of the plan being found unsound. The examination will include consideration of representations received at the Regulation 19 stage. The inspector will hold a series of public hearings and is also likely to request statements and responses to questions on a range of matters. Recommendations f.i and f.ii are included to provide the necessary flexibility for officers and consultants to engage constructively and responsively throughout this process on behalf of the Councils.
3.	**Alternative options considered**
3.1	Option 1: to recommend that Full Council submits the Local Plan for examination in its current form. This is the recommended option as explained under Reasons for Recommendations. Option 2: to propose Major Modifications to the Plan (such as re-word policies to change their meaning, add new sites or delete existing ones). This option is not recommended as it is considered that the plan is 'sound' and ready for submission. Making main modifications to the submission plan would require further public consultation on specific changes or potentially a replacement plan depending on the extent and significance of the changes, before submitting the plan for examination. It would therefore not enable the Councils to meet the Government's deadline for submitting local plans for examination under the current system. Any suggested modifications accompanying the submission plan would be at the discretion of the inspector to consider, and would only likely be considered where they consider the submitted plan unsound and it would make

	the plan sound. Option 3: to recommend that Full Council that the local plan is not progressed. This option is not recommended, as it is considered that the plan is 'sound' and ready for submission. It would leave the Councils without having an up-to-date local plan. In addition, the Secretary of State (and Ministry of Housing, Communities and Local Government) holds statutory powers to intervene in local planning authorities (LPAs) in England if they fail to make adequate progress on their local plans, or attempt to withdraw plans inappropriately.
4.	**Background and key issues**
4.1	**Background** The process for preparing the Greater Cambridge Local Plan started around 6 years ago. Three main stages of public consultation and engagement were carried out at the Regulation 18 Plan Preparation stage. The final stage of consultation, known as the Proposed Submission (Regulation 19) consultation, was held between 3 August and 25 September 2026. The Regulation 19 consultation was required to focus on whether the Plan has been prepared in accordance with legal and procedural requirements and whether the plan is 'sound', as defined in the National Planning Policy Framework 2024. The four tests of soundness require the Local Plan to be: • Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified - an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;

- Effective - deliverable over the plan period and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The 2026 Regulation 19 consultation resulted in a total of 2,863 representations being submitted from 778 individuals or organisations. These representations are published in full on the Greater Cambridge Shared Planning website. The largest number of comments were on the Development Strategy chapter, and on site allocations including the Cambridge Biomedical Campus, Cambourne North, and Land Adjacent to A11 and A1307 at Grange Farm.

The current stage

If approved, the next step for the plan making process is to submit the Local Plan and supporting documents, together with all representations made to this summer's Proposed Submission (Regulation 19) consultation, to the Secretary of State. The Councils adopted Local Development Scheme (Local Plan timetable) plans for submission by the end of 2026, to meet the original deadline set by government for plans using the current plan making system.

Before submitting the Local Plan, the Councils are required to review the main issues raised in the Regulation 19 consultation to consider whether these raise issues which would mean the plan is not considered sound in its current form, or otherwise provide a reason for not submitting the Proposed Submission Plan for examination. The rest of this report therefore identifies the main issues raised and assesses whether these issues generate any concerns for soundness. This draws on a more detailed summary and assessment included in the Greater Cambridge Local Plan Regulation 22 Statement of Consultation (Appendix F of this Cabinet Report).

	The Proposed Submission Local Plan The Greater Cambridge Proposed Submission Local Plan (Regulation 19) is included as Appendix A to this report. The following section of this report highlights the key issues raised and responses.
4.2	**Summary of the Main issues raised in the Proposed Submission Local Plan consultation and how they have been taken into account**
4.3	**Plan-making process (legal compliance test)** Main issues raised relating to the plan-making process: • Concerns that the Councils have not followed appropriate plan making processes, including the consultation process and procedural requirements for meaningful engagement, and has not considered all needs in the Equalities Impact Assessment (EqIA); and • Concern that the plan does not reflect the most recent National Planning Policy Framework (NPPF) that was adopted in August 2026. **Assessment** • Officers have reviewed the representations received and consider that the plan has followed required processes for preparing a local plan. The Councils have involved residents and key stakeholders in preparing the plan in accordance with legislative requirements at Regulation 18 and Regulation 19 stages (and generally). The consultations have also been undertaken in accordance with the Councils' jointly adopted Statement of Community Involvement (SCI) 2024. An EqIA was prepared and updated to accompany each consultation stage, and has now been reviewed to consider comments received, including to further reflect needs for working-age disabled adults. • When it published the updated NPPF in 2026, the Government made clear that for legacy plans (such as this plan) which have reached an advanced stage of

	preparation, the Plan will be examined against the 2024 NPPF and not the most recent NPPF published in the summer. The new NPPF and its policies will inform the development of the next local plan for the area.
4.4	**Development strategy** **Identifying and meeting Greater Cambridge's employment land needs** The main issues raised relating to identifying and meeting Greater Cambridge's employment land needs include: • Concerns that the Local Plan's employment provision is too low, and that it does not reflect the Councils' evidence for higher jobs growth, regional growth aspirations, or the Development Corporation's ambitions for Greater Cambridge; • Comments stating there is evidence of an immediate need for floorspace for Mid-tech uses and for industry and warehousing that is not satisfied by the Local Plan's allocations and strategy; • Concerns that the Plan is overly restrictive in seeking to limit large warehousing units and needs to allocate more sites to unlock the area's wider employment potential; and • Comments noting that the strategic locations must accommodate the full ecosystem necessary to commercialise innovation, generate economic value, and avoid a narrow interpretation of appropriate economic uses where complementary activity is required for successful clusters. **Assessment** The officers' assessment of the main issues raised relating to Greater Cambridge's employment land needs is as follows: • The jobs figure included in Policy S/JH represents the most likely forecast for jobs, which the Councils' consultant Iceni has confirmed remains robust. The Councils' evidence (prepared by consultants Iceni) considers a higher employment scenario to be less likely for Greater Cambridge, thus the Councils

	have rejected this scenario as it is not considered to represent an objectively assessed need for development; • The requirement for industrial and warehousing space has been developed considering a range of factors which are compliant with the Government's planning practice guidance and take a positive approach to industrial needs that respond to local market demands; • The development strategy and the wider approach to the development of employment land across Greater Cambridge, including the proposed site allocations, provide an appropriate approach to meeting identified needs; • Allocations in the Plan provide a flexible employment land supply that provides headroom above the identified objectively needs, which is sufficient to support substantial employment growth over and above the most likely jobs forecast; • The Local Plan includes sufficient allocations in priority locations that meet identified demands for mid-tech floorspace in Greater Cambridge; • The future Cambridgeshire and Peterborough Spatial Development Strategy (SDS) is the appropriate means by which regional and sub national demands for logistics space are resolved spatially in Cambridgeshire and Peterborough. This Local Plan provides allocation that are considered to meet the identified needs for this sector in advance of the SDS and the next Local Plan process.
4.5	**Identifying and meeting Greater Cambridge's housing needs** The main issues raised relating to identifying and meeting Greater Cambridge's housing needs include: • Comments suggesting the Local Plan's growth assumptions are too conservative given the Government's commitment to accelerating growth; • Concerns that the Local Plan is not consistent with national policy as it does not identify sufficient housing land to meet housing needs; • Comments suggesting that the strategy is too reliant on windfall development to meet Greater Cambridge's housing needs, giving rise to delivery uncertainty; and

	• Comments suggesting that the Councils cannot currently demonstrate a five-year supply and that the buffer used to calculate the Local Plan's housing numbers should respond to the latest Housing Delivery Test results. **Assessment** The officers' assessment of the main issues raised relating to identifying and meeting Greater Cambridge's housing needs is as follows: • The housing figure included in Policy S/JH is based on the up-to-date Standard Method calculation of housing need set by Government, which is the minimum housing need that the Councils are required to plan for. The Councils haves repeatedly tested whether another housing figure is appropriate - having regard to the economic performance of the Greater Cambridge area. That evidence demonstrates that the housing figure is consistent with the most likely future forecast for jobs; • The Local Plan identifies a supply of specific, deliverable and developable sites for the plan period, including an appropriate level of additional "headroom" supply to deliver flexibility. The Local Plan sites include a further 24,000 homes anticipated beyond the plan period adding to the plans flexibility; • The Housing Delivery Study – Addendum (June 2026) confirms that the recommendations in the Housing Delivery Study (October 2021 and October 2025) for the windfall allowance are realistic and reliable for use in plan-making in the Greater Cambridge area; and • The Councils forecast based on detailed evidence that the Housing Delivery Test result for Greater Cambridge at the date of plan adoption will continue to result in a 5% buffer needing to be added to the five-year supply calculation, and that the housing trajectory within the Plan will maintain a five-year supply throughout the plan period.
4.6	**Distribution of development** The main issues raised relating to the development strategy's distribution of development include:

	• Concerns raised that the Local Plan relies too heavily on strategic sites and new settlements to deliver on local housing needs; • Comments suggesting that the Local Plan does not allocate enough development in villages or the rest of the rural area; and • Concerns that the Plan focuses on Cambridge and that the settlement hierarchy is not a robust enough basis for determining relative suitability of rural settlements or scale of growth they should accommodate. **Assessment** The officers' assessment of the main issues raised relating to the development strategy's distribution of development is as follows: • The spatial strategy and site allocations have been subject to considerable consultation and assessment throughout the plan preparation process, including Sustainability Appraisal, which has taken into account reasonable alternatives for development dispersal across Greater Cambridge, and is based on proportionate evidence that accords with national planning policy and the Councils' objectives for Greater Cambridge; • The development strategy focuses on the most sustainable locations to create vibrant, self-sustaining communities with a range of facilities and services, supported by planned high-quality public transport, and delivering homes to meet the needs of a variety of groups; • The Housing Delivery Study – Addendum (June 2026) considered the certainty and timing regarding the key infrastructure that each strategic site relies upon, to inform its conclusion that the trajectory for each site and the trajectory as a whole is deliverable; and • The strategy provides flexibility by directing development to a range of locations, including smaller village sites, to meet local needs and ensure a consistent supply of housing delivery. Development sites at sustainable villages submitted as part of the plan-making process were considered for allocation individually.
4.7	**Infrastructure impacts and infrastructure needs**

	The main issues raised relating to the infrastructure needs and impacts of the development strategy include: • Concerns that the Councils and the Water Scarcity Group have not provided sufficient certainty that there will be adequate water supply, and that the Plan relies heavily on major water projects with delivery risks; • Concerns that there is insufficient certainty that adequate wastewater infrastructure will be delivered to sustain proposed levels of growth; • Concerns that the strategy is too reliant on uncertain transport schemes that are not supported by an adopted Combined Authority Transport Strategy; and • Comments suggesting that the Local Plan fails to reconcile growth with critical constraints, including healthcare and green infrastructure deficits. **Assessment** The officers' assessment of the main issues raised relating to the infrastructure needs and impacts of the development strategy is as follows: • The Local Plan has appropriately considered water supply issues. The growth trajectory has been aligned with the anticipated water availability trajectory working with the Water Scarcity Group; • Anglian Water have been engaged across all stages of plan making to address the Plan's wastewater treatment capacity needs. Through the Draft Statement of Common Ground, it has also been agreed that, subject to appropriate infrastructure planning and funding being provided for the required need, wastewater treatment capacity does not represent a barrier to delivering the Local Plan; • The final Greater Cambridge Transport Strategy (GCTS) published for approval by the Combined Authority Board in November 2026 supports all the strategic transport schemes required to deliver the strategic sites identified in the Local Plan's development strategy; and • The Infrastructure Delivery Plan sets out for the plan as a whole and for each strategic scale allocation the infrastructure required to mitigate the impacts of development, including identifying funding and delivery timings needed to support the Local Plan.

4.8	**Green Belt and grey belt** The main issues raised relating to the development strategy's consideration of Green Belt and grey belt include: • Concerns that the Green Belt and grey belt land has not been assessed appropriately, with comments citing changes to national planning policy since the publication of the Greater Cambridge Green Belt Assessment (2021); • Comments suggesting exceptional circumstances exist for the development of Green Belt land in the Greater Cambridge area and suggesting that Green Belt release on the edge of Cambridge or villages is needed for more sustainable development; and • Comments suggesting that it is unclear how grey belt has been weighted to inform the Local Plan's development strategy and approach to the site allocations. **Assessment** The officers' assessment of the main issues raised relating to the Plan's consideration of Green Belt and grey belt land is as follows: • The Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance (2026) makes clear how the approach to Green Belt parcelling and the assessment of individual parcels conforms with national planning policy and guidance, and how grey belt has been identified; • National planning policy is clear that exceptional circumstances need to be demonstrated to justify the release of Green Belt land during plan making, regardless of the land's classification as grey belt. Changes in national Green Belt policy have not altered the position regarding the Local Plan's preferred development strategy; • Justifications for location-specific exceptional circumstances have been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. However, outside of these location-specific circumstances, exceptional circumstances that justify further Green Belt release to meet general development needs have not been identified through the plan-making process; and

	• Details of how Green Belt and grey belt were considered during plan making are set out in the Development Strategy Topic Paper (2026), and in Appendix 4 of that Development Strategy Topic Paper.
4.9	**Greater Cambridge's settlement hierarchy** The main issues raised relating to the Local Plan's settlement hierarchy include: • Concerns that, when combined with the development strategy's site-selection methodology, lower tier village classifications can exclude sustainable small sites from allocation consideration; • Concerns that the settlement hierarchy limits growth in rural locations and smaller villages; • Concerns that the Plan focuses on Cambridge and that the settlement hierarchy is not a robust enough basis for determining relative suitability of rural settlements or scale of growth they should accommodate; and • Comments suggesting the Policy S/SH is ineffective as it does not represent a comprehensive assessment of settlement roles and inter-relationships. **Assessment** The officers' assessment of the main issues raised relating to the Local Plan's settlement hierarchy is as follows: • The settlement hierarchy forms one part of the development strategy, which has carefully considered the approach to directing development to sustainable locations; • The categorisation of settlements in a particular hierarchy category has been informed by the Settlement Hierarchy Study 2025, which draws on a range of evidence regarding the relative sustainability of villages and justifies the approach taken; • National policy and the Local Plan including Policy S/SH directs growth to those settlements which can support most growth sustainably, provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development; and

	• A strategy alternative including focusing development at villages was assessed, consulted on, and rejected as being unsustainable. Alternative development sites proposed to the plan-making process at villages were properly considered.
4.10	**Defined development extents** The main issues raised relating to defined development extents include: • Concerns that the boundary alignments for settlements are not a logical or defensible settlement edge, have not been updated, and absent of an evidenced extent; and • Concerns that village boundary extents mean housing and affordable housing needs are not met. **Assessment** The officers' assessment of the main issues raised relating to the defined development extents is as follows: • Defined development extents are necessary to ensure that the countryside is protected from gradual encroachment on the edges of villages and to help guard against incremental growth in unsustainable locations. Defined development extent boundaries have been reviewed through the plan-making process, accounting for circumstances where planning permissions have been largely completed, so the approach is based on an up-to-date understanding of the extent of the built-up areas of settlements; and • The Plan has demonstrated how identified development needs are to be met; defined development extents play a role in directing growth to the most sustainable locations across Greater Cambridge, working in conjunction with Policy S/SH.
4.11	**Other development strategy matters** The main issues raised relating to other development strategy matters include:

	• Concerns that proposed growth will have significant harm on the area's special character, with some suggesting the Plan lacks environmental and spatial capacity testing for the city and immediate hinterland; • Concerns that the proposed approach to monitoring is reactive and therefore prohibitive of an effective approach to accelerating housing supply or addressing deficiencies in wider delivery; and • Comments suggesting amendments to policies and the strategy to facilitate collaboration with working partners and other third parties during decision making. **Assessment** The officers' assessment of the main issues raised relating to other development strategy matters is as follows: • The Local Plan's vision and strategic priorities recognise the unique character and identities of Cambridge and South Cambridgeshire. To ensure future growth respects the area's historic character, extensive technical assessment work (Heritage Impact Assessment, Landscape Character Assessment, and Skyline and Tall Building analysis) has been prepared to inform the Local Plan's site allocations and policy requirements; • The process for reviewing the Local Plan and the implementation of its policies and strategy through the proposed monitoring framework is aligned with national guidance; and • The Greater Cambridge Proposed Submission Plan Duty to Cooperate - Statement of Compliance evidences how the Councils have met national policy requirements in relation to maintaining effective cooperation. The Greater Cambridge Proposed Submission Plan Draft Statement of Common Ground provides a succinct record of key areas of common and uncommon ground with relevant partners on strategic cross-boundary matters.
4.12	**Site allocations and policies in the Plan** **Cambridge urban area** Summary of the main issues raised relating to these policies:

	Site Allocations • Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) – Support for the opportunity the site can provide, and recognition of the value of the Junction, but also comments that the policy should increase provision of community spaces. Concern was expressed that detailed policy requirements could delay individual developments coming forward. Other comments sought greater specificity regarding building heights and expressed concern whether the range of uses could be achieved without compromising the character of the area; • Policy S/C/NCA: North Cambridge Academy, 108 Arbury Road – comments submitted regarding the impact of development on the school and playing field; • Policy S/C/MRG: Milton Road Garages and Policy S/C/SRW: Station Road West – site promoters seek greater flexibility regarding future uses; and • Detailed comments on a number of sites sought refinements to the site capacity, boundary, proposed uses, or to references to local heritage assets, or to specific policy requirements. **Areas of Major Change** • Policy S/C/AMC: Cambridge Areas of Major Change - imposes overly prescriptive and unjustified requirements for implementation plans, masterplans and phasing strategies; • Policy S/AMC/NEC: North East Cambridge Area of Major Change – some support for the approach, but also objections to the allocation being turned into a policy framework. Anglian Water confirmed their intention to invest in the current wastewater site. Other comments were concerned that policy is too long, complex and prescriptive, and should be more flexible regarding quantity of development. Transport impacts, use of the trip budget, impact on parking in the local area, and impact on the highway network were also raised. Need to address heritage assets and their setting and impacts on the wider landscape and key views; • Policy S/AMC/AS: Abbey Stadium Area of Major Change – Cambridge United request that the plan acknowledge the future potential relocation of the Club.

	• S/AMC/BC: Beehive Centre Area of Major Change – Network Rail supports the strategic objectives and delivery of the Cambridge East Station. Concern from another respondent about the loss of retail uses; and • S/AMC/SCL: South of Coldham's Lane Area of Major Change - Policy should recognise that the proposed station at Cambridge East is a step change in public transport connectivity. **Public Realm Improvement Areas** • Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge – concerns about overarching policy requirements and how they would be implemented; • Policy S/PRIA/MC: Mitcham's Corner – comments considered it should do more to support active travel, and others that measures should not restrict the flow of vehicles; • Policy S/PRIA/MR: Mill Road – More should be done to widen pavement and improve usability for residents. Another comment said the bus gate should be removed; and • Policy S/PRIA/OPML: Old Press/Mill Lane – Comments consider policy should be more flexible, and others that it should be more specific around retention of specific historic buildings. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that the Cambridge Urban Area policies provide a sound approach, justified by an appropriate and proportionate evidence base. The policy wording for the Cambridge Urban Area allocations is site specific to ensure development proposals address on-site and local impacts and optimise the efficient use of brownfield land. Officers do not consider it necessary or appropriate to refine the policies or provide additional flexibility; • The Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) sets out a clear vision and the need for comprehensive and coordinated development, including responding positively to the proposed new

	station entrance. The policy does not prohibit development coming forward as it sets out clear expectations for the development management process including identifying what is required to understand and mitigate development impacts on local and wider sensitivities; • Through engagement with the local education authority, Policy S/C/NCA: North Cambridge Academy, 108 Arbury Road is considered to be sound and deliverable. In combination with other policies in the plan, there are clear requirements that the applicant will need to address regarding the loss of former playing fields and the phasing of new and enhanced sports provision. • A Heritage Impact Assessment has been prepared for the policies to manage impacts on heritage assets and their setting, including views. This has informed the site capacity testing, the outputs of which were set out in an appendix to the Sites Topic Paper. Any increase in capacity would need to be assessed in the context of the local character and impact on heritage assets. The Councils' will be led by the inspector if these capacities need to be reviewed on specific sites; • There are minor factual amendments suggested by Historic England that are not considered soundness issues, but are amendments that can be discussed through the course of the Examination at the discretion of the Inspector. • More broadly, the policy requirements for these sites outline what is required by the applicant at the planning application stage in order to identify and manage the impacts of development. This includes a range of thematic issues including transport, landscape and townscape character, the historic environment and environmental matters. Additionally, the Local Plan should be read as a whole, and therefore broader policy requirements are not repeated in the individual site policies; • Policy S/AMC/NEC: North East Cambridge Area of Major Change is a significant policy area and in multiple land ownership. Officers consider the policy requirements to be justified and proportionate given the anticipated scale of change; • Policy S/AMC/AS: Abbey Stadium Area of Major Change sets out a positive approach to guide any potential redevelopment of the existing football ground. Should the ground no longer be required due to the relocation of the club, then

	the wider Local Plan provides an appropriate policy context for subsequent development proposals; and • The comments relating to the other Areas of Major Change and Public Realm Improvement Areas are either addressed by other policies of the plan, are broadly consistent with the plan and/or are matters outside of the plan, such as the Mill Road Bus Gate. Officers consider these policies to achieve the appropriate balance in terms of setting out clear policy requirements and guidelines alongside providing sufficient flexibility.
4.13	**Edge of Cambridge** Summary of the main issues raised relating to these policies: • Policy S/CE: Cambridge East – Many comments focus on infrastructure provision, with support for inclusion of facilities like a swimming pool, but also some requests for reference to other facilities. Other comments considered the policy should be more flexible, including that the policy should be flexible around the boundaries of the green corridor. The site capacity should be set as a minimum rather than as an approximate figure reflecting the opportunities of the site. The policy wording should better reflect the opportunities that the new East West rail station offers; • Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital) - Some comments supported the policy proposals and considered that the need for further campus development had been demonstrated. Other comments object to the policy on the basis that the case for exceptional circumstances had not been made for green belt release. Concern from site promoters that the policy was overly prescriptive. Clearer mechanisms were requested for the master planning requirements and how joint working would be achieved. The importance of healthcare should be emphasised. Greater Clarity needed around what is required form the Strategic Enhancement area. Some comments seek greater specificity regarding key views, building heights, and approach to heritage assets. Comments also reference the need for specific infrastructure improvements, such as specific facilities and transport measures, and that the plan should be clear about developer contributions to achieve this;

	• Policy S/ED: Eddington and Policy S/WC: West Cambridge – comments sought changes to reflect recent planning consents and to not introduce new requirements; and • Other sites: various comments seeking clarifications, such as on references to nearby heritage assets. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that the Edge of Cambridge policies provide a sound approach, justified by an appropriate and proportionate evidence base; • Specifically for Policy S/CE: Cambridge East, the infrastructure required in the policy is informed by the Local Plan Infrastructure Delivery Plan. The policy sets key policy parameters but also provides an appropriate level of flexibility to support a high-quality development. The capacity for the site has been subject to sensitivity testing and is a robust figure to include in the plan. It is stated as an approximate figure to allow flexibility for when issues are explored in greater detail at the planning application stage. The policy wording provides positive and appropriate support for integrating the opportunity provided by Cambridge East station; • Specifically for Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital), the vision and policy sets out a comprehensive approach to the redevelopment and expansion of the Cambridge Biomedical Campus. The policy contains clear requirements in order to achieve this including the timely preparation of a comprehensive campus-wide masterplan and other supporting plans and strategies informed by stakeholder and community engagement. It would be contrary to the objectives of the policy to split the land uses and/or quantum of development between different phases of the Campus; • The quantum of development is considered to be robust and deliverable and has been informed by extensive stakeholder engagement through the plan making process. The policy is worded flexibly so that this can adapt to respond to

	campus related needs where necessary. The case for Green Belt release has been clearly set out in the Supporting Information to the policy as well as the Development Strategy and Site Allocations Topic Papers; • A significant amount of evidence, transport modelling and stakeholder engagement has been undertaken to support the allocation and identified mitigation measures. These will need to be refined further for future planning applications and involve a range of stakeholders at the appropriate stage. This relates to transport, ecology and other detailed, technical, matters. • The policy also sets out the vision and purpose of the Strategic Enhancement Area and Landscape Improvement Area related to this site. This is based on evidence as well as stakeholder engagement and is considered appropriate in terms of providing the necessary mitigation measures to address the impacts of campus growth and expansion; • Policy S/ED: Eddington and Policy S/WC: West Cambridge - The policies have been prepared to create a policy position for future planning applications for these sites and reflect current needs, council ambitions and other material circumstances. It is therefore likely that the proposed policy is not fully aligned with the existing planning permissions for the sites. Nevertheless, the policies are considered to be sufficiently flexible to take account of future needs and market conditions; and • Where there are minor factual amendments between the outline planning permissions and the spatial frameworks for the sites that are not considered soundness issues, then these will be discussed through the course of the Examination at the discretion of the Inspector.
4.14	**New settlements** **Policy C/CBN: Cambourne North** Summary of the main issues raised relating to Policy C/CBN Cambourne North: • A number of comments relating to the transport evidence and proposed policy approach, including mitigation measures. Comments suggested gaps in the evidence and questioned deliverability and phasing of transport interventions. Some comments noting the need for community engagement through future planning application processes;

	• Some comments relating to direct and in-direct ecological impacts of the proposal, including on designated sites and habitats and species. Some support for policy amendments and evidence undertaken since draft (Regulation 18) Local Plan consultation; • A number of comments regarding the Strategic Enhancement Area including the red line boundary, its deliverability including how it is linked to the phasing of development, long term management, how it will achieve visual separation from the villages, flood risk and the proposed uses within it; • A limited number of comments on heritage impacts, mainly focused on archaeological considerations and the setting of the conservation areas of the nearby settlements; • Comments relating to housing types and delivery including around the location of Gypsy and Traveller pitches and how a flexible approach is required for specialist accommodation; • Support for employment uses in order to reduce commuting and make Cambourne a business location; • Concerns about the timely provision of services and facilities and wider infrastructure including retail, health, water supply and energy; • Detailed comments from the site promoters seeking refinements to the site capacity, boundary, proposed uses and greater flexibility for the Spatial Framework; and • Site promoters identified alternative sites or identify that their sites should have been allocated instead of those included in the plan. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that Policy C/CBN Cambourne North provides a sound approach, justified by an appropriate and proportionate evidence base; • The policy wording has been prepared to be site specific to ensure that the vision for Cambourne North is realised through a comprehensive approach to masterplanning and delivery. In order to achieve this, the policy requires a

	number of evidence studies, strategies and plans to be prepared during the life cycle of the development by the site promoters/applicants; • A significant amount of evidence, transport modelling and stakeholder engagement has been undertaken to support the allocation and identified mitigation measures. These will need to be refined through future planning application processes and involve a range of stakeholders at the appropriate stage. This relates to transport, ecology and other detailed technical matters; • The policy sets a clear vision for the Strategic Enhancement Area and its role and function and this, along with the proposed boundary, has been based on evidence and stakeholder engagement. The delivery of the SEA and its long term management and maintenance will require a multi-stakeholder approach, and the policy sets out a number of requirements for this to be progressed and agreed; • The policy has been informed by the Infrastructure Delivery Plan, which sets out what is required to support the development. The phasing of development will need to be aligned with the timely provision of infrastructure to ensure residents have adequate accessibility to necessary facilities and key utilities. This will need to be considered and secured through legal agreements/CIL funding at the planning application stage; and • Given the extensive evidence base that has been prepared to support the policy, it is not proposed to amend the policy in relation to the site boundary, the quantum of development or proposed land uses.
4.15	**Policy C/CB: Cambourne** Summary of the main issues raised relating to Policy C/CB: Cambourne: • Broad support for the allocation, noting that Cambourne and Cambourne North should be considered and planned holistically and include community engagement with young people; • Some comments on the protection of employment land and that new homes should be designed for all stages of people's lives; • Comments relating to the need for an infrastructure first approach and some clarification around the wording in the policy related to health and emergency services provision;

	• Comments related to movement, related to rights of way, connections over the A428 and the Cambourne to Cambridge project. • Comments on the Cambourne North Strategic Enhancement Area, including the need for it to be multi-functional and that its long-term management and maintenance need to be considered; and • Site promoters identified alternative sites or identify that their sites should have been allocated instead of those included in the plan. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that Policy C/CB Cambourne provides a sound approach, justified by an appropriate and proportionate evidence base; • The policy sets an appropriate and positive approach to development and is broadly consistent with emerging development proposals and approved applications whilst setting a positive vision for Cambourne High Street and how the existing town and Cambourne North will need to integrate with each other through new active travel and public transport connections. Given Cambourne is largely built out and Cambourne West is currently being implemented, officers are of the view that the Spatial Framework set out in the policy is adequate for the purposes of integrated and coordinated growth at this stage; • Some of the comments relating to protecting employment land and the provision of infrastructure are addressed by other policies in the plan and are therefore not repeated; and • Omission sites have been considered as part of the Development Strategy of the Local Plan.
4.16	**Policy S/GF: Land Adjacent to A11 and A1307 Grange Farm** Summary of the main issues raised relating to Policy S/GF: Grange Farm: • Objections to the overall principal of development at Grange Farm and its allocation in the Local Plan;

	• Objections to the location of the site and identification of other alternative locations that are suitable for development, including North East Cambridge; • Concerns raised about the assessment of the site and its suitability for development, including transparency of the HELAA process; • A number of objections raised about impacts on the local road network and congestion, particularly along the A1307, Fourwentways roundabout and A11; • Objections to the connection to and deliverability of the Cambridge South East Transport scheme (CSET), and the phasing of this development and impact it may have on the local road network; • Objections to the impact on the River Granta and the chalk stream and chalk aquifers, including depletion of water and contamination; • Concerns raised around managing flood risk and run off from the new development with risk to surrounding settlements; • Objections to the construction impacts on roads and existing settlements; • Objections raised to the impacts on the landscape topography, impact on local landscape character, local and long distance views and the skyline across the wider countryside; • Concerns raised around housing density and the quantum of development; • Objections to the impact of development on the rural village identities, character, community cohesion and physical separation of Little Abington, Great Abington and other surrounding villages; • Concerns raised around impacts on heritage assets including listed buildings, Scheduled Monuments and Conservation Areas in Great and Little Abington; • Objections to the loss of high quality agricultural land and farmland resulting in loss of food security; • Concerns for the purpose and limitations of the Strategic Enhancement Area with the green infrastructure not providing enough of a buffer to existing surrounding settlements; • Objections to the impacts of development on ecology, wildlife, and the wider recreational impacts particularly on SSSIs and nature sites near to the site; • Objections to the potential impacts on archaeology on the site and nearby and protection of the Roman Road to the north of the site;

	• Objections raised to availability of utilities including water supply and waste water with objections to the phasing and delivery that is dependent on external delivery mechanisms that should be determined before development can proceed; • Objections to the transport assessments and reliance on the Cambridge South East Transport phase 2 scheme; • Concerns for the capacity of existing infrastructure, services and amenities in nearby settlements that would not cope with additional pressure of new residents and that phasing and delivery will not provide in a timely manner; and • Concerns around employment provision at Grange Farm with existing campuses not at capacity and no guarantee that people will live and work in the same place. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that Policy S/GF: Land adjacent to A11 and A1307 Grange Farm provides a sound approach, justified by an appropriate and proportionate evidence base; • The rationale for allocating the site in the plan is set out in the Proposed Submission Development Strategy Topic Paper which explains how the plan-making process, including Sustainability Appraisal, has considered the merits of alternative strategies and site allocation options. It is considered that the development strategy set out in the local plan provides an appropriate strategy, which has taken into account the reasonable alternatives, and is based on proportionate evidence; • The Councils maintain their long-term ambition to see the Cambridge Waste Water Treatment Plant (CWWTP) relocated to realise comprehensive redeveloped of the NEC area but recognise this may not be possible within the current plan period due to the lack of funding. In order for sites to be allocated for development in a Local Plan, national planning policy requires, in part, for sites to be available for development and achievable (financially viable). Given the CWWTP is operational, Anglia Water have committed to upgrading the facility and there is no funding to relocate it, allocating North East Cambridge for

	residential development would mean the Local Plan is inconsistent with national planning policy and therefore unsound; • The site scored an overall Red for suitability in the HELAA assessment. This is not untypical for large scale strategic sites where impacts on matters such as landscape will be significant compared with the existing baseline situation. Officers have considered the impacts on landscape amongst the other impacts this development would generate. Site specific evidence and engagement with key stakeholders have identified how these impacts can be mitigated as much as possible and this will be refined through future studies and assessments at the planning application stage. This includes requirements for a Landscape Visual Impact Assessment, Historic Landscape Characterisation Study and Landscape Character Assessment to be prepared by the applicant. Through these additional studies, stakeholder engagement, the masterplanning process and the introduction of mitigation measures, it is considered that the landscape impacts of the development can be adequately mitigated and that this will not significantly impact the character of nearby villages, the local landscape or setting of heritage assets; • In relation to the submission of the site to the councils' as part of the Local Plan process, the site was initially submitted by a site promoter (acting on behalf of the landowner) in 2021. At the draft Local Plan stage (2026), the site was promoted directly by the landowner and therefore the previous site promoter's submission documents were withdrawn by the landowner from the Local Plan process as that initial proposal was no longer deliverable. It is not uncommon for sites or submission documents to be withdrawn or superseded by landowners and site promoters during the Local Plan process; • The policy wording has been prepared to be site specific to ensure that the vision for Grange Farm is realised through a comprehensive approach to masterplanning and delivery. In order to achieve this, the policy requires a number of evidence studies, strategies and plans to be prepared during the life cycle of the development by the site promoters/applicants; • Evidence, transport modelling and stakeholder engagement has been undertaken to support the allocation and identified mitigation measures in consultation with statutory consultees, namely Historic England, Natural

	England, the Highways Authority and National Highways to manage the sensitive heritage context, SSSIs and impacts on the road network; • The policy sets a clear vision for the Strategic Enhancement Area and its role and function and this, along with the proposed boundary, has been based on evidence and stakeholder engagement considering the need to maintain buffers, enhance SSSIs close to the site and protect the setting of adjacent Conservation Areas, listed assets and Scheduled Monuments, including the Roman Road. The specified uses for the SEA aim to also manage impacts on the landscape. The delivery of the SEA and its long term management and maintenance will require a multi-stakeholder approach, and the policy sets out a number of requirements for this to be progressed and agreed; • Through engagement with Cambridgeshire County Council's Historic Environment Team and Historic England, the policy sets out a clear approach for the planning application process to consider currently unknown archaeological remains. This is supplemented by Policy GP/AR: Archaeology; • The policy has been informed by the Infrastructure Delivery Plan, which sets out what is required to support the development. The phasing of development will need to be aligned with the timely provision of infrastructure to ensure residents have adequate accessibility to necessary facilities and key utilities. This will need to be considered and secured through legal agreements/CIL funding at the planning application stage; • Through a package of transport measures, the planning application stage will need to explore options to deliver transport mitigation for the site that will align with the indicative trip budget that has been identified, which will ensure that impacts on the wider transport network are minimised. This includes the timely provision of connections to the CSET scheme and South East Travel Hub; • The site is in close proximity to a number of established and expanding employment campuses such as the Wellcome Genome Campus and Babraham Research Campus. It will also be well connected to Cambridge and the Cambridge Biomedical Campus via CSET Phase 2. It will therefore be well connected to several employment sites by both active travel and public transport. Additionally, 35,000 sqm of employment floorspace has been identified to create an appropriate mix of uses and employment opportunities within the site;

	• The Councils have been liaising with Cambridge Water, Anglian Water, the Environment Agency and other stakeholders through the Water Scarcity Group. The policy identifies that conditions are likely to be necessary to limit first occupations of new dwellings until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, which is consistent with other sites across the Local Plan. The policy requires a foul drainage strategy and site-specific Flood Risk Assessment to be prepared by the applicant in line with the Climate and Sustainability Innovation Delivery Plan. • The Managing Water, Carbon and Finite Resource (June 2026) evidence states that the landowners are committed to ensuring any water discharged to ground or surface water will only be released once it meets stringent regulator-approved quality standards, thereby safeguarding the River Granta and its sensitive chalk stream ecology; • The policy as well as other policies of the plan identify how development will need to identify and mitigate the risk of flooding both within the site and the wider area; and • Given the extensive evidence base that has been prepared to support the policy, it is not proposed to amend the policy in relation to the site boundary, the quantum of development or proposed land uses.
4.17	**Existing new settlements** **Policy S/WNT Waterbeach New Town, Policy S/BA Bourn Airfield New Village and Policy S/NST Northstowe New Town** Summary of the main issues raised relating to these policies: • Concern from the landowners/promoters that the policies sought to introduce additional policy requirements that are not consistent with the approved planning applications, notably the requirements for Gypsy and Traveller pitches and specialist accommodation. They were also concerned about the rigidity of the policy, the quantums of development proposed and the differences between the

	approved outline applications and the spatial frameworks set out in the Local Plan; • Some support for the proposed Strategic Enhancement Areas for these sites from a range of stakeholders but some wording amendments suggested to address matters relating to ecology; • For Policy S/WNT Waterbeach New Town, there were comments made regarding the retention of the existing Waterbeach railway station as well as concerns about the proposed wastewater strategy. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that these policies provide a sound approach, justified by an appropriate and proportionate evidence base; • The provision of Gypsy and Traveller as well as specialist accommodation is to ensure that the Local Plan meets its housing needs for the plan period. This approach is a continuation of the existing approach established by the adopted Local Plans and confirmed through conditions attached to the existing planning permissions for these sites. Therefore, the proposed policy approach remains unchanged; • The policies have been prepared to create a policy position for future planning applications where these are required and reflect current needs, the councils' ambitions and other material circumstances. It is therefore justified that the proposed policies are not fully aligned with the existing planning permissions for these sites. Nevertheless, the policies are considered to be sufficiently flexible to take account of future needs and market conditions; • Where there are minor factual amendments between the outline planning permissions and the spatial frameworks for the sites that are not considered soundness issues, then these will be discussed through the course of the Examination at the discretion of the Inspector;

	• The policies currently address ecological requirements, and it is not considered necessary to add further detail on this in relation to the Strategic Enhancement Areas; and • The relocation of Waterbeach Station is being progressed by the Greater Cambridge Partnership and is subject to its own planning processes outside of the Local Plan, whilst the policy has been prepared on the evidence available at the present time in relation to the wastewater strategy for the site, as set out by Anglian Water as the responsible body.
4.18	**Rural southern cluster** Summary of the main issues raised relating to these policies: • Concerns regarding the cumulative impacts of growth in the area, including on transport and congestion; • Policy S/RSC/WGC: Wellcome Genome Campus - Expansion Land, Hinxton and Policy S/AMC/WGC: Wellcome Genome Campus, Hinxton Area of Major Change – comments noted that the policy is overly prescriptive and concerns about landscape mitigation measures; • Policy S/RSC/BRC: Babraham Research Campus and Policy S/AMC/GP: Granta Park Area of Major Change – refinements sought around site mitigation measures, and the management of landscape impacts; • Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston – Policy needs to address active travel connections, and to secure protection and access to the open space on the site. There were also objections from the landowner regarding the policy approach to protecting the Scheduled Monument and its setting; • Policy S/AMC/WHD: Whittlesford Parkway Station Area, Whittlesford Bridge Area of Major Change – Provide greater clarity about how station enhancements will be secured; • Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change – There was a request to recognise the existing masterplan that had been prepared for the site, and calls for both more flexibility and greater

	specificity in the policy. Concerns about the transport impacts of development proposals were also raised; and • Site promoters identify alternative sites, or identify that their sites should have been allocated instead of those included in the plan. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that these policies provide a sound approach, justified by an appropriate and proportionate evidence base. The policies for the southern business parks and Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change provide appropriate policy frameworks to support their continued evolution; • The plan includes policies seeking measures to deliver appropriate connectivity from new developments, which will ensure transport issues are appropriately considered at the planning application stage. Despite planning applications coming forward on these sites, the wording of the policy is designed to set a standard for any future development or resubmission of applications to set out the constraints and mitigations that should be managed onsite; and • For Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston, officers have considered heritage issues through engagement with Historic England.
4.19	**Rest of rural area** Summary of the main issues raised relating to these policies: • Policy S/RRA/SHF: Land north of A1307, Bar Hill (Slate Hall Farm) – objections raise concerns regarding the environmental impacts of the site, including on landscape, flood risk, loss of agricultural land, and the cumulative impact with other sites, including transport impacts. The mix and scale of units was also raised in comments, seeking greater flexibility;

	• Policy S/RRA/SCS: Land to the South of Cambridge Services, A14 – the promoter highlights the need for lorry parking, and seeks a number of policy amendments. Comments also noted that transport impacts need to be resolved; • Policy S/RRA/ML: The Moor, Moor Lane, Melbourn – an objection that the site not well related to Meldreth Station and that there is known flood risk associated with this site; • Policy S/AMC/PH: Papworth Hospital, Papworth Everard Area of Major Change – should have greater flexibility to allow residential uses. • A range of comments received on the other allocations seeking policy amendments or greater flexibility. • Site promoters identify alternative sites, or identify that their sites should have been allocated instead of those included in the plan; and • Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites – Objections noted that the policy needs to be clearer on what is being sought, why only Smithy Fen and Chesterton Fen have been identified and no other sites, and the need for stronger mitigation measures. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that these policies provide a sound approach, justified by an appropriate and proportionate evidence base; • The policy wording for the Rest of Rural Area allocations is site specific to ensure development proposals address on-site and local impacts and optimise the efficient use of land. Officers do not consider it necessary or appropriate to refine the policies or provide additional flexibility; • Transport, ecology, flooding and other detailed technical matters were considered during plan preparation, and mitigation measures identified where appropriate, as set out in the allocation policies; • Policy S/RRA/SCS: Land to the South of Cambridge Services and Policy S/RRA/SHF: Land north of A1307, Bar Hill (Slate Hall Farm) are proposed to

	meet the identified local need for B2 and B8 development. This location is appropriate for these uses due to the connection to the Strategic Road Network and proximity to Cambridge and Northstowe (in the case of Policy S/RRA/SHF). The policies set requirements regarding transport mitigation, informed by engagement with the transport authorities; • Omission sites have been considered as part of the Development Strategy of the Local Plan; and • The purpose of Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites is to reconfigure sites to provide an improvement in health, safety and living conditions for Gypsy and Travellers and to make pitches available for those meeting the definition of Gypsy and Travellers. It applies to all sites of half a hectare and not just Chesterton Fen Road (Milton)and Smithy Fen (Cottenham). The Local Plan also identifies that Gypsy and Traveller accommodation must also be provided on strategic housing allocations. The Local Plan should also be read as a whole, and therefore other mitigation measures are already addressed by other policies in the plan and not repeated in this policy.
4.20	**Climate change** Summary of the main issues raised relating to the Climate Change policies: • Broad support for the policies and the ambitions of the chapter; • Comments suggesting the Climate Change chapter's policies depart from the plan-making policies in the NPPF (December 2026); • Policy CC/SD: Sustainable development and the climate emergency – Concerns that sustainability statement requirements are either excessive and exceed national requirements, or they do not go far enough and should make reference to the natural environment and sustainable transport; • Policy CC/DC: Designing for a changing climate – Broadly supported but some comments consider the requirements are unclear, not sufficiently flexible, and go beyond national policy requirements; • Policy CC/NZ: Net zero carbon new buildings – Concerns regarding flexibility, impact on viability, policy justification, and that the policy duplicates or departs from national standards;

	• Policy CC/WE: Water efficiency in new developments - Support for approach, including from the water companies and Environment Agency, but objections from some developers, particularly to the higher standard for larger developments which would require water recycling measures; • Policy CC/IW: Integrated water management, sustainable drainage and water quality - Support for approach, but also concern from some developers that it is putting responsibility on developers to demonstrate wastewater capacity; • Policy CC/RE Renewable Energy - Suggestions that mitigation requirements should be strengthened; and • Policy CC/CE: Supporting a circular economy and sustainable resource use – concerns regarding excessive information requirements, and that presumption against demolition risks preventing sustainable redevelopment. **Assessment** Officers have reviewed the representations received and consider that the Climate Change policies provide a sound approach, justified by an appropriate and proportionate evidence base. Officers' assessments of the main issues raised relating to the Climate Change policies are as follows: • The Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024. It is considered that the climate change policies provide a sound approach, justified by an appropriate and proportionate evidence base. Policies can also be justified against the NPPF 2026; • Local plans should actively contribute to the management and mitigation of the impacts of climate change. Sustainability Statements are an effective method of presenting and securing the information needed to demonstrate a proposal's compliance with the Development Plan; • It is unnecessary for the Local Plan to repeat requirements across policies and chapters. Instead, Policy CC/SD makes reference to the Sustainability Checklist that applicants should use to ensure that their planning applications meet planning validation requirements;

	• Policy CC/DC is focused on reducing overheating risk in new buildings through the prioritisation of design-led approaches to reducing overheating risk. The approach outlined is already applied to developments across Greater Cambridge; • The requirements of Policy CC/NZ have been thoroughly tested, as set out in the Climate Change Topic Paper, and the requirements' costs have compared to compliance with Part L of the Building Regulations. The evidence demonstrates that Policy CC/NZ is technically feasible and viable; • Robust evidence and engagement with water companies and the Water Scarcity Group has informed Policy CC/WE. Evidence has shown that community-scale reuse is more cost effective and could be implemented in addition to water efficient fixtures and fittings, which has informed the Plan's water efficiency standards; • Policy CC/IW's requirements for applicants to demonstrate adequate wastewater infrastructure capacity prior to occupation provides a safeguard to protect the environment. It does not place a responsibility on a developer to deliver infrastructure as this is the statutory function of water companies who must produce a Drainage and Wastewater Management Plan looking at long-term future infrastructure needs; • Policy CC/RE will be applied alongside all other relevant requirements of the Development Plan – it would be ineffective for the policy to repeat requirements set out in other local and national planning policies. • The Local Plan's evidence sets out the role that managing embodied carbon through material / structural reuse and repurposing will play in meeting statutory climate objectives. Circular Economy Statements will provide decision makers with information on embodied carbon management in new development; and • Policy CC/CE's approach to demolition does not seek to inhibit sustainable redevelopment – wider economic, environmental and social benefits of development proposals will still be important considerations for planning decision making and can be used to justify that demolition would be the most appropriate pathway for a particular site's redevelopment. The use of circular economy principles ensures that materials, building elements and buildings are re-used and recycled onsite or offsite to reduce embodied carbon emissions.

4.21	**Biodiversity and green spaces** Summary of the main issues raised relating to these policies: • Policy BG/BG: Biodiversity and geodiversity - Support for the 20% biodiversity net gain target, but also objections on the basis that it goes beyond the national 10% requirement, would impact on viability, and had not been justified. Objections to the onsite requirements. It should have greater specificity regarding monitoring and enforcement; • Policy BG/GI: Green infrastructure - Support for the Green Infrastructure policy ambitions. Concerns regarding the impact on viability, and that it should have allocated more specific green infrastructure sites rather than relying on securing funding to ensure the Green Infrastructure initiatives are delivered. It should do more to protect public rights of way and equestrian routes, • Policy BG/UGF: Urban Greening Factor - The use of the urban greening factor was supported by some, but concerns were also raised about the impact on viability, whether it duplicated other standards like biodiversity net gain, and how it would be enforced. • Policy BG/TC: Tree canopy cover and the tree population - Whether the plan was specific enough on how tree canopy cover would be measured and enhanced. Some considered the policy needed greater flexibility, while other comments consider that the requirements need to be strengthened. • Policy BG/RC: River corridors - Support for the policy on river corridors and protection of chalk streams. Views ranged from seeking strengthening and clarifying the role of river corridors, through to seeking greater flexibility. • Policy BG/PO: Protecting open spaces - generally supported, but some comments consider it should be strengthened. • Policy BG/EO: Providing and enhancing open spaces - standards too high, namely for accessible open space, which will impact on deliverability and viability, and standards not justified. Objection to requirements being placed on employment developments.

	Assessment Officers have reviewed the representations received and consider that the Biodiversity and Green spaces policies provide a sound approach, justified by an appropriate and proportionate evidence base. Officers' assessments of the main issues raised relating to the biodiversity and green spaces policies are as follows: • The Councils have provided robust justification (in the Biodiversity and Green Spaces Topic Paper) for the policy approach for 20% BNG for major development and 10% for minor development in Greater Cambridge, through evidence, analysis of local data and reasoned justification of the implementation of the policy in practice. The Councils have also appropriately tested the viability of seeking 20% BNG on site and all the green infrastructure standards included within this chapter, alongside other policy requirements and developer obligations. It is therefore considered to be fully justified and deliverable (noting the requirements of NPPF 2026); • The approach to green infrastructure delivery is set out in various Local Plan policies, including site-specific allocations that identify measures to support relevant green infrastructure initiatives, such as Policy BG/EO. A range of policies across the Plan protect and support public rights of way and equestrian routes. ; • The green infrastructure standards have been reviewed acknowledging the potential for overlapping requirements, hence the removal of the tree canopy cover standard to have a Biodiversity Net Gain requirements and Urban Greening Factor, which are much more standard metrics and calculations for increasing greening. The urban greening factor does not duplicate the Biodiversity Net Gain metric, the two cover some of the same surface cover types, but different planting is rewarded in each metric and therefore using the two simultaneously ensures even in more urban areas greening is delivered and secured for the lifespan of a development; • Tree policy requirements are mainly qualitative, with support for quantitative future tree retention provided by BNG and UGF requirements, which have nationally set measurement approaches;

	• Policy BG/PO provides robust protection for open spaces that meet the policy criteria, supported by detailed evidence; and • The open space standards are based on robust local evidence in accordance with national guidance, including the requirement for relevant commercial space to provide open space to meet the needs of employees. The accessible greenspace standard has been designed to create new spaces to manage the impacts of recreational pressure.
4.22	**Wellbeing and social inclusion** Summary of the main issues raised relating to the Wellbeing and Social Inclusion policies: • Policy WS/HD: Creating healthy new developments – Broadly supported, but some concern that policy would need to be applied flexibly, and challenge to the thresholds for when health impact assessments are required; • Policy WS/NC: Meeting the needs of new and growing communities - Objection to the assessment requirements placed on developers, and to some of the standards which it includes, including to the requirements for community and sports provision from large commercial developments; • Policy WS/IO: Creating inclusive employment and business opportunities through new developments - supported in principle but calls for clarification regarding implementation and greater flexibility at both the construction and operational phases; • Policy WS/HS: Pollution, health and safety - some comments that it was overly prescriptive, particularly in relation to light pollution and air quality, and other comments saying it did not go far enough on setting air quality requirements. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that the Wellbeing and social inclusion provide a sound approach, justified by an

	appropriate and proportionate evidence base. The plan sets an appropriate framework for seeking to deliver healthy places. • It is important that the needs of new communities are fully explored and responded to at the application stage, and the policies sets standards justified by evidence, and information requirements that are necessary to demonstrate development is sustainable.
4.23	**Great places** Main issues raised relating to the Great Places policies comprise: • Broad support for the policies but some comments about duplication between policies in this chapter; • Policy GP/HD: Housing density – calls for flexibility to be able to respond to specific site circumstances, to recognise the need for differing levels of parking in different locations, and to changes to national policy regarding development near railway stations; • Policy GP/ST: Skyline and tall buildings – comments that height limits should be applied more robustly, but also views that the policy needs to be applied flexibly to recognise a changing skyline; • Policy GP/QP: Establishing high-quality landscape and public realm – Comments that public art requirements should be applied flexibly, the policy should do more to support active travel, and meet the needs of equestrians; • Policy GP/LC: Protection, conservation and enhancement of landscape character – some comments argue policy should be strengthened around requiring developments to consider local landscape character, other comments consider the policy goes beyond national policy as that focuses on valued landscapes. Comments seek removal of some important countryside frontages and the addition of others; • Policy GP/HE: Historic environment – Historic England welcome the positive strategy for the historic environment, but other comments consider the plan does not provide the positive heritage strategy which recognises the international heritage significance of Cambridge.

Assessment

Officers' assessment of the main issues raised is as follows:

- Officers have reviewed the representations received and consider that the Great Places policies provide a sound approach, justified by an appropriate and proportionate evidence base;
- The suite of policies address matters relating to the built, including historic, and natural environment and reflect local priorities. They will be applied on a case by case basis depending on the nature of the development proposal but nevertheless set clear requirements and expectations for high design standards across Greater Cambridge;
- Policy GP/HD: Housing density identifies that in highly sustainable locations, a reduction in car parking provision may be acceptable, which is broadly consistent with the comments received;
- Policy GP/ST: Skyline and tall buildings, in combination with Appendix H of the plan, sets out clear and consistent requirements for taller building proposals. This will ensure a consistent approach is taken to designing and assessing schemes of this nature whilst greater consideration of impacts will be necessary in sensitive locations;
- The councils have reviewed Important Countryside Frontages as part of the preparation of the Plan and the approach taken to identify these designations is considered to be robust. Additionally, Policy GP/LC: follows a landscape character approach to ensure that new developments respect local landscape character and features;
- The preservation and enhancement of Greater Cambridge's historic environment has been positioned as a central pillar of the Local Plan's wider development strategy. Policy GP/HE provides a strategic-level framework that outlines how the various heritage assets and systems that embody Greater Cambridge's wider historic environment will need to be mobilised to balance the growth of Greater Cambridge's world-renowned industries with the preservation of Greater Cambridge's historic character and its globally recognised landmarks; and

	• Some of the comments relating to public rights of way and connectivity are addressed by other policies in the plan and are therefore not repeated.
4.24	**Jobs** Main issues raised relating to the Jobs policies comprise: • Policy J/NE: New employment development proposals - The plan should offer greater support to meeting unmet regional needs for warehousing and logistics; • Policy J/RE: Supporting the rural economy - Plan should provide more support for rural equestrian and other land-based businesses; • Policy J/AL: Protecting the best agricultural land - Views that the plan is both overly restrictive and not restrictive enough on the use of agricultural land to meet development needs; • Policy J/AW: Affordable workspace and creative industries - Objections to the policy requirements, including views that it is not justified in the Cambridge context, the policy requirements are too high or not viable, it is not appropriate on all sites, it should exclude some types of use, and it should be applied more flexibly; • Policy J/RC: Retail and other complementary town centre uses - Should be more flexible on requirements related to loss of retail; and • Policy J/VA: Visitor accommodation, attractions and facilities - Plan should be more flexible regarding the loss of visitor accommodation sites. A more comprehensive tourism strategy is needed. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that the Jobs policies provide a sound approach, justified by an appropriate and proportionate evidence base; • The approach to regional logistics was refined in the proposed submission plan to recognise that regional need would be best assessed at the county level

	through the upcoming Cambridgeshire & Peterborough Combined Authority Spatial Development Strategy; and • Requiring an element of affordable workspace as part of major employment proposals is justified in the context of the Cambridge economy, and the policy has been informed by a detailed evidence study which accompanied the proposed submission local plan. The requirements were also tested through the Local Plan Viability Assessment.
4.25	**Homes** Summary of Main issues raised relating to the Homes policies: • General support on a range of the housing policies, including for delivering affordable housing; • Policy H/AH: Affordable housing – Some comments consider that requirements should be strengthened, such as by increasing requirements for affordable rent tenures. Other comments seek greater flexibility to allow for developments to respond to a variety of circumstances, including local demand, site-specific constraints, and viability; • Policy H/ES: Exception sites for affordable housing – Broad support for the approach, comments on allowance for market homes responding to viability, eligibility criteria, and objection to the requirement to name Registered Providers in S106 agreements; • Policy H/HM: Housing mix – comments objecting to the policy seek greater flexibility; • Policy H/SS: Residential space standards and accessible homes - Concerns that requirements for accessible and adaptable homes standards and external amenity space standards are overly onerous on developers; • Policy H/SH: Specialist housing – Representor considers that more specificity needed in relation to accommodation for disabled adults, particularly a delivery mechanism to ensure that this type of accommodation is provided; • Policy H/CB: Self and Custom Build homes - Objections to requirement for provision, and requests that the number of custom and self build plots required

	on a single development should be capped, and that unsold self and custom build plots should not be required to be transferred to a Registered Provider; • Policy H/BR: Build to Rent homes, Concerns raised about impacts of harmful concentration and need to be responsive to local housing need. • Policy H/CO: Co-living Similar concerns were raised about harmful concentrations, and querying the rationale for the threshold for co-living development; • Policy H/MO: Houses in Multiple Occupation (HMOs) – A specific definition of harmful concentration or over concentration is needed. Representations considered that policy should impose a 10% limit on HMOs in a defined area, similar to the approach taken in a number of other cities. Greater clarity was also needed on how the policy would be applied; and • Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots - Need to safeguard existing traveller sites and consider all sources of pitch and plot supply in meeting our identified needs. Request to meet some of Uttlesford District Council's (UDC) un-met need for traveller sites. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that the Homes policies provide a sound approach, justified by an appropriate and proportionate evidence base. The Local Plan seeks to deliver its strategic priority for homes, which is to plan for enough housing to meet needs, including significant quantities of housing that is affordable and providing different kinds of homes to suit diverse communities; • There is sufficient flexibility within the policies to account for a variety of circumstances, and applicants have the ability to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy for their proposal; • Given there is a substantial overall housing need in Greater Cambridge, co-living developments should not compromise the delivery of self-contained homes, and

	therefore the number of units within a Co-living development must be evidenced by need for this form of development in Greater Cambridge; • With respect to harmful concentration of Built to Rent and Co-Living, the policy criteria provides guidance on how these issues should be considered; • Policies regarding Houses in Multiple Occupation (HMOs) respond to evidence gathered to inform the Local Plan, and seek to ensure that proposals are of a suitable quality, amenity impacts are managed, and requiring appropriate management arrangements to be demonstrated. Whilst some local planning authorities have planning policies restricting HMOs where the concentration goes above a certain threshold, this would restrict HMOs from areas where they may be suitable, and could have unintended consequences regarding knock on impacts for other areas, and on the affordability of accommodation. Separate from the Local Plan process, a non-immediate Article 4 is being prepared which would mean small HMOs require planning permission and would be considered using the proposed policies; and • Permanent Gypsy and Traveller pitches and Travelling Showpeople plots are safeguarded in Policy S/DS, and the Councils have considered all sources of supply in identifying how the accommodation needs of travellers can be met within Greater Cambridge. It is not practicable for the Councils to address UDC's un-met need for traveller sites at this late stage in the plan-making process. In addition, UDC have not submitted evidence as to why the need cannot be met in their district, and have not yet considered whether they can meet the identified need within their own district through a review of their development plan.
4.26	**Infrastructure** Summary of the main issues raised relating to the Infrastructure policies: • Policy I/ST: Sustainable transport and connectivity - Support for strong objectives and policies around active travel, public transport and sustainable movement, and comments identified the need for continued cooperation with transport bodies and neighbouring authorities. Some comments seek to strengthen the policy requirements to support delivery and funding or public transport and active travel measures. The effectiveness of trip budgets was also challenged.

	Comments identify other transport infrastructure that should be identified in the plan; • Policy I/CV: Cycle and vehicle parking – Support for cycle provision, with detailed comments on how the policy could be amended to better achieve this. Some respondents considered car parking standards should be more specific or set as minimum standards, as there is a risk it could lead to inadequate provision. Others considered there should be more flexibility in the policy. • Policy I/SI: Safeguarding important infrastructure – support for safeguarding important infrastructure from a number of providers, who also noted their safeguarded area may need to be updated as schemes develop; • Policy I/EI: Energy infrastructure masterplanning – Concerns about the importance of power infrastructure, and developers highlight statutory responsibilities of National Grid and DNOs; and • Policy I/ID: Infrastructure and delivery – Representors highlight the need for significant infrastructure investment to deliver the strategy, but there was objection from some developers regarding impact on viability and the cumulative burden of standards set by the plan alongside infrastructure requirements. Comments expressed concern about lack of funding for infrastructure to support growth, and also about the reliance on third parties to deliver necessary infrastructure, including in relation to water infrastructure. There was a need for greater clarity around transport infrastructure delivery, particularly south of Cambridge. Timely delivery of infrastructure, and the need to monitor its delivery were also raised. Some infrastructure providers, such as emergency services, consider that their infrastructure needs have not been adequately reflected. Highways England raise issues around impacts on the strategic road network that need further assessment. **Assessment** Officers' assessment of the main issues raised is as follows: • Officers have reviewed the representations received and consider that the infrastructure policies provide a sound approach, justified by an appropriate and proportionate evidence base;

	• Policies require development to be designed through a vision-led approach, around the principles of walkable neighbourhoods to maximise accessibility by sustainable modes. The transport measures set out, including trip budgets, enable proposals to respond effectively to site specific circumstances and are supported by the relevant local highways and transport authorities. The policy on car parking delivers appropriate guidance whilst retaining a degree of flexibility to respond to site specific circumstances; • The Local Plan is accompanied by an Infrastructure Delivery Plan, which provides a comprehensive schedule of critical, essential and place-making infrastructure, anticipated costs, funding sources, responsible delivery bodies and timescales. The IDP is a live document and is intended to be a tool to manage the delivery of infrastructure alongside growth and will be reviewed and updated periodically. The plan is reliant on strategic infrastructure that will help assess water supply needs. However, there is evidence that this infrastructure can be delivered to enable growth to come forward as the local plan anticipates; and • The Plan has also been subject to a viability assessment, and the policy requirements of the plan are considered to be viable.
4.27	**Appendices to the Plan** A number of representations were also made against the Appendices of the Proposed Submission Local Plan. Broadly, the comments relate to matters that have been addressed in earlier sections of this report, including the proposed housing trajectory and the application of Policy GP/ST: Skyline and tall buildings in relation to Appendix H.
4.28	**Sustainability Appraisal** Summary of the main issues raised relating to the Sustainability Appraisal (SA) of the Local Plan: • Concerns that the SA has failed to consider higher growth level alternatives; • Comments suggesting the SA should give further consideration to the social and economic implications of different levels of growth within the villages;

	• Comments suggesting that a site should be allocated because it has scored positively in the HELAA and the SA; • Comments noting that sites have been tested and allocated despite negative assessment outcomes in the HELAA; and • Comments suggesting that the SA should be updated to appraise various scenarios of delay to large sites, account for market absorption rates and model the impact that would have on the Local Plan delivering against objectives. **Assessment** Officers have reviewed the representations received and consider that the Sustainability Appraisal provides a proportionate and sound assessment of the Local Plan. The officers' assessments of the main issues raised relating to the Sustainability Appraisal are as follows: • The reasons for discounting the minimum and maximum growth scenarios, selecting the preferred growth level, and choosing the preferred spatial strategy are set out in the SA. In relation to the appraisal of options that would achieve higher numbers of jobs and level of homes, this approach was rejected based on evidence, as it is not considered by the Councils to be the most likely future scenario. The Councils do not consider that it represents Greater Cambridge's objectively assessed need and it would therefore not be a reasonable alternative • Planning practice guidance states that reasonable alternatives should be realistic options and should be sufficiently distinct to highlight the different sustainability implications so that meaningful comparisons can be made. The SA has assessed a range of reasonable alternatives throughout plan preparation, including spatial distribution and site options at village locations. • Whilst positive outcomes in the SA are significant factors in the decision to allocate sites, allocation decisions have also been guided by the Councils' strategic objectives, the evidence of needs across Greater Cambridge, and wider infrastructure and constraints testing; and • The SA considers the likely sustainability effects of the proposed strategy and reasonable alternatives at a strategic level. Detailed delivery risks and

	infrastructure timing assumptions are considered through the wider evidence base supporting the Plan.
4.29	**Habitat Regulation Assessment (HRA)** Summary of the main issues raised relating to the Habitat Regulation Assessment of the Local Plan: • The Appropriate Assessment for the Eversden and Wimpole Woods Special Area of Conservation (SAC) fails to address the in-combination effects of the housing development in the Local Plan with East West Rail (EWR) on the SAC's barbastelle bat colony and does not meet legal requirements; The Local Plan should recognise which sites may have particular sensitivities to EWR in-combination effects; • Natural England consider that wording about residual in-combination effects and mitigation for these should be included before they can agree with the conclusion of no adverse effect on integrity on Eversden and Wimpole Woods SAC. Additional consideration of water issues is also needed. Natural England anticipate these HRA matters will be able to be resolved and believe the Plan itself to be sound; • The HRA needs to include air quality assessment identified as being required in the HRA accompanying the Regulation 19 Local Plan; • The HRA must not rely on surveys or mitigation deferred to at the application stage; • The HRA must consider other in-combination effects relating to rail freight and traffic associated with proposals at Cambourne; • The HRA should be updated to consider impacts on Hardwick Wood in relation to barbastelle bats and the shared foraging area with the SAC; • Legal duty on competent authorities to ensure plans will not adversely affect European protected sites and sensitive watercourses. Unsustainable water abstraction risks breaching these statutory environmental limits unless non-abstractive supply solutions are guaranteed prior to occupation; and

	• The safeguards for environmental protection are not sufficiently policed by the council who should outsource the outcomes of the policy to a more neutral observer. **Assessment** Officers have reviewed the representations received. The updated Habitats Regulations Assessment at (Appendix D) has been amended to respond to representations made. Officers consider that with these amendments, the Habitats Regulations Assessment provides a legally compliant assessment of the Local Plan: • Further consideration and assessment of residual in-combination effects in relation to EWR have been added to the Appropriate Assessment of the HRA. This is based upon the information published so far by the promoter of the EWR scheme which demonstrates that they are aware of the potential impact on Eversden and Wimpole Woods SAC and its barbastelle bat colony and intend that this will be fully assessed (including through its own HRA) and mitigated as part of that scheme. The HRA concludes no residual in-combination effects from the Local Plan or East West Rail associated with physical damage or loss of functionally linked habitat and/or non-physical disturbance to bats using functionally linked land; • Although the policies in the Reg.19 Local Plan are considered sufficient to achieve collaboration and joined up design between the mitigation for the EWR scheme and future applications associated with the relevant allocations within the Local Plan, given Natural England's representations on this topic, the Councils are open to making modifications to the Local Plan during the Examination stage to address those representations. The HRA concludes no residual in-combination effects from the Local Plan or East West Rail associated with physical damage or loss of functionally linked habitat and/or non-physical disturbance to bats using functionally linked land; • As described below, the HRA has been updated to incorporate the findings of an air quality assessment which showed that adverse effects on integrity have been ruled out;

	• The HRA is a strategic document and more detailed survey work will take place at the more detailed planning application stage; • Work supporting the EWR scheme indicates that the current proposals would allow for up to two new freight services per day in each direction from Felixstowe via Cambridge through to Oxford and beyond, but decisions about freight services are outside of the scheme's scope, and there is no publicly available detail on this issue to assess. The unconfirmed increase in freight on the Newmarket rail line has not been assessed in the HRA as the HRA only assesses committed or reasonably certain plans or projects. There is no certainty about an increase in rail freight and there are no applications, permissions or licenses to consider; • With regards to development at Cambourne, the Cambridge to Cambourne busway and future East West Rail station in Cambourne should reduce future car dependency. These schemes have been accounted for in transport modelling supporting the Local Plan, which informed where air quality assessment should be carried out in line with Natural England's Standard Advice for Air Quality Impacts for Local Plans; • Mitigation measures proposed to protect the foraging areas for bats of the SAC will also help to protect bats from other maternity colonies such as in Hardwick Wood. The HRA concluded that recreational pressure from the Local Plan could be ruled out on the basis of safeguards in policies in the Local Plan; • The HRA considers water quantity and found that adverse effects on integrity were ruled out because of legislative safeguards and additional measures in policies in the Local Plan; and • The same compliance monitoring and enforcement mechanisms apply to all developments within Greater Cambridge.
4.30	**Updated and additional evidence base documents** The Background documents to this report include a list of the evidence and background documents that have informed the local plan. Further updates will continue through the examination process where necessary. Important additions at this stage include:

	Final Greater Cambridge Transport Strategy (GCTS): Following publication of a draft GCTS in summer 2026 supporting the Proposed Submission Local Plan consultation, on 4 November 2026 the Cambridgeshire and Peterborough Combined Authority Transport Committee recommended the final GCTS for approval by the Combined Authority Board on 25 November 2026. Further to the draft GCTS, the final version is supported by modelling and connectivity analysis which demonstrates that the package of Strategy interventions can provide the necessary enhanced connectivity in the area, including within Cambridge, to enable delivery of the development included within the Local Plan. In addition, the Capital Delivery Programme within the GCTS provides additional clarity regarding delivery of interventions, particularly for those needed within the earlier years of the Plan. As such, the final GCTS fulfils its role in supporting a sound Greater Cambridge Local Plan, alongside the suite of other Local Plan transport evidence. Updated Habitats Regulations Assessment (HRA): As detailed earlier in this report, the HRA has been updated to incorporate the findings of an additional air quality assessment, and to respond, where appropriate, to comments received on the Regulation 19 version of the HRA. The conclusions have been updated to reflect the further work referred to above. The HRA concludes that there will be no adverse effects on the integrity of any of the habitats sites considered.
5.	**Corporate plan**
5.1	The Local Plan is a key corporate priority. Having an up-to-date Local Plan is an important element to meeting housing and employment land supply requirements. Climate change is one of the key themes driving the Local Plan. Relative sustainability of different locations has informed the development strategy. Transport is the biggest generator of carbon from new development, and the development strategy principles focus development where there are opportunities for travel by active modes or public transport. The plan would require development standards above normal national standards on a number of issues.

	Policies seek to protect and enhance biodiversity and support resilience to climate change. The plan has been subject to a detailed Sustainability Appraisal to consider the impact of policies and proposals. It has also been informed by evidence including a Net Zero Carbon Study. A range of policies focus on supporting the creation of healthy, active and happy communities, identifying the infrastructure and facilities they will need and how they should be designed to support healthy living and good quality of life for all. The Sustainability Appraisal includes a Health Impact Assessment to determine the impacts of the Local Plan on people's health and well-being. Policies in the plan were also informed by a review of the findings and recommendations of the Healthy Places Cambridgeshire Joint Strategic Needs Assessment. The Local Plan has been informed by the Greater Cambridge Housing Strategy, and a suite of evidence exploring different aspects of housing need and what needs to be planned for. Policies are proposed to address needs for affordable housing, the mix of homes, and the need for specialist housing, including for older people and sites for Gypsies and Travellers. The Local Plan is accompanied evidence including an Infrastructure Delivery Plan and a Viability Assessment. Policies will require new development to contribute towards delivery of new infrastructure in response to the needs that it generates. By providing a long-term vision for the area, it allows the Councils to plan ahead for where development will be taking place in the future.
6.	**Consultation, engagement and communication**
6.1	A Local Plan is accompanied by a Statement of Consultation at each stage in its preparation to set out what consultation has taken place in preparing the next version of the plan. The Regulation 22 Statement of Consultation supporting the Proposed Submission Greater Cambridge Local Plan is Appendix F to this report. It sets out the stages of consultation that were carried out at the Regulation 18 Plan Preparation stage between 2019 and 2016, including who was consulted and how, the main issues raised in representations, and how those

	representations were taken into account. It then provides an overview of the regulation 19 consultation, and identifies the main issues raised in representations.
7.	**Anticipated outcomes, benefits or impact**
7.1	Cambridge City Council and South Cambridgeshire District Council are preparing a joint Greater Cambridge Local Plan under section 28 of the Planning and Compulsory Purchase Act 2004. This Proposed Submission Local Plan marks the next stage in the plan making process. The plan has been informed by consideration a wide range of issues including feedback from previous rounds of consultation, national planning policy, and the Local Plan evidence base. To enable submission of the Local Plan to meet the deadline set by the government for local plans under the current plan making system it will be necessary for the Plan to be submitted in December 2026.
8.	**Implications**
8.1	**Relevant risks**
	The Local Plan is a key corporate priority. Having an up-to-date Local Plan is an important element to meeting housing land supply requirements, so the delivery of the plan against the timetable will continue to be monitored. The Council's Strategic Risk Register currently contains risks such as the ability to deliver the Local Plan due to limitations on water, sewage and utilities. These are areas where external stakeholders need to deliver if growth needs are to be met. It also contains other risks that relate closely to the Local Plan, including some where the development of the Local Plan is an important mitigation activity. This includes risks relating to the delivery (with partners) of key infrastructure such as transport. These risks will continue to be monitored and updated to account for the latest developments as the Local Plan process progresses.
	Local Government Reorganisation (LGR)

8.2	Having an up-to-date plan in place will be important to any future Local Planning Authority arrangements.
	Financial Implications
8.3	Currently the Local Plan is funded by both Cambridge City Council and South Cambridgeshire District Council equally. Both Councils have been able to build up a reserve to fund potential future overspends against the annual budget reflecting the nature of the local plan process that expenditure varies depending on the stage. In years where spending is above the annual budget it is envisaged that it would be funded by those reserves, and we would be limited by the amount available in reserves before becoming a pressure for the councils to mitigate.
	Legal Implications
8.4	The legal implications of preparing the statutory Local Plan have been considered in the writing of this report.
	Equalities and socio-economic Implications
8.5	The Proposed Submission Local Plan has been subject to an Equalities Impact Assessment (see Appendix E). The EqIA has been updated since the previous consultation concluded in August 2026 to reflect the submission stage and to address any comments received during the consultation.
	Net Zero Carbon, Climate Change and Environmental implications
8.6	Climate change is one of the key themes driving the Local Plan. Policies proposed in the Local Plan would seek to reduce emissions from buildings including embodied and whole life carbon using whole life cycle carbon assessments and operational carbon using energy efficiency targets. Relative sustainability of different locations has informed the development strategy. Transport is the biggest generator of carbon from new development, and the development strategy principles proposed seeks to focus development where

	there are opportunities for travel by active modes or public transport. Policies in the Proposed Submission Local Plan would seek to require development standards above normal national standards on a number of issues. The plan has been subject to a detailed Sustainability Appraisal to consider the impact of policies and proposals. It has also been informed by evidence including a Net Zero Carbon Study. The plan proposes policies for climate mitigation and adaptation, including policies on overheating and managing heat risk, requirements for biodiversity net gain, urban greening factor and protection for trees, as well as water management and innovative water management to respond to current and future climate challenges.
	Procurement Implications
8.7	N/A
	Community Safety Implications
8.8	Health and wellbeing is a major theme for the local plan. A range of policies focus on supporting the creation of healthy communities, identifying the infrastructure and facilities they will need and how they should be designed to support healthy living. Design polices also address safety.
9.	**Background documents** Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985
9.1	A full list of Background Papers in relation to the report is included as Appendix G, which includes: • The Proposed Submission Local Plan and Policies Maps, • Key Supporting Documents for the Proposed Submission Local Plan and from previous stages of plan making;

- Supporting Topic Papers;
- Evidence Base and Other Supporting Documents; and
- Other Adopted Development Plan Documents.

Documents from previous stages:

The Greater Cambridge Local Plan Proposed Submission Stage 2026

- Responses received to the Proposed Submission Local Plan consultation can be viewed in full at Proposed Submission Greater Cambridge Local Plan | Greater Cambridge Shared Planning.

The Greater Cambridge Local Plan Draft Plan Stage 2025

- Responses received to the Draft Local Plan consultation can be viewed in full on the Draft Local Plan consultation page.

The Greater Cambridge Local Plan First Proposals Stage 2021

- Responses received to the First Proposals consultation can be viewed in full on the First Proposals website. We also asked for comments using an anonymous quick questionnaire, results are in the form of a spreadsheet, and drawn out some of the key results in our report on the consultation. Call for sites submissions can be found on the Call for Sites page. The documents and evidence library from that stage is available at Greater Cambridge Local Plan – First Proposals document library, November 2021

The Greater Cambridge Local Plan Development Strategy Update Stage 2023

- Documents published include a Development Strategy Update, Topic Paper, Sustainability Appraisal and consultation statement. The documents from that stage are available at Greater Cambridge Local Plan - Development Strategy Update document library, January 2023

The Greater Cambridge Local Plan Updates following First Proposals

- Greater Cambridge Local Plan: updates following First Proposals | Greater Cambridge Shared Planning

	The North East Cambridge Area Action Plan • Documents related to the North East Cambridge Area Action Plan can be viewed on at the following website: North East Cambridge Area Action Plan. The Draft Proposed Submission Document Library includes the Proposed Submission North East Cambridge Area Action Plan Regulation 19 November 2021, supporting documents and evidence base. **Meetings of the Joint Planning Advisory Group** • Agendas minutes and recordings of meetings can be viewed on the South Cambridgeshire District Council website for meetings after 2021, and on the Cambridge City Council website for meetings in 2021 and earlier. **Committee meetings considering the Local Plan** • Meetings of South Cambridgeshire Cabinet: Committee details - Cabinet • Meetings of South Cambridgeshire Overview and Scrutiny Committee: Browse meetings - Scrutiny and Overview Committee • Meetings of Cambridge Performance, Assets and Strategy Overview and Scrutiny Committee (for meetings from June 2025): Browse meetings - Performance, Assets and Strategy Overview and Scrutiny Committee - Cambridge Council • Meetings of Cambridge Planning and Transport Scrutiny Committee (for meetings between 2020 and May 2025): Committee details - Planning and Transport Scrutiny Committee - Cambridge Council
10.	**Appendices**
10.1	All appendices can be found in the Cabinet Pack: Cabinet and Council Pack | Greater Cambridge Shared Planning. These are: • Appendix A - Proposed Submission Greater Cambridge Local Plan (Regulation 19) • Appendix B - Proposed Submission Policies Map (and 103 inset maps listed individually in the Cabinet Pack link)

	• Appendix C - Sustainability Appraisal (with non-technical appraisal and seven appendices listed in the Cabinet Pack link) • Appendix D - Habitats Regulations Assessment • Appendix D - Appendix F of the Habitats Regulations Assessment: Habitats Regulations Assessment (Appendix F) • Appendix D - Appendix F, Annex 1 of the Habitats Regulations Assessment: Habitats Regulations Assessment (Appendix F, Annex 1) • Appendix E - Equalities Impact Assessment • Appendix F - Greater Cambridge Local Plan Regulation 22 Statement of Consultation • Appendix F - Appendix 1: Statement of Consultation for Proposed Submission North East Cambridge Area Action Plan • Appendix F - Appendix 2: Report on workshops held in summer 2019 • Appendix F - Appendix 3: Sustainability Appraisal Scoping Report – Statutory Consultee Comments • Appendix F - Appendix 4: Report on the First Conversation consultation 2020 • Appendix F - Appendix 5: Report on Autumn 2020 stakeholder workshops • Appendix F - Appendix 6: Report on the First Proposals Consultation published in 2022 • Appendix F - Appendix 7: Representations received on First Proposals consultation 2021 • Appendix F - Appendix 8: Greater Cambridge Local Plan Consultation Statement – Development Strategy Update • Appendix F - Appendix 9: Responses to First Proposals Representations • Appendix F - Appendix 10: Draft Local Plan Consultation Background Documents • Appendix F - Appendix 11: Greater Cambridge Local Plan: Proposed Submission Local Plan Consultation Statement (August 2026) • Appendix F - Appendix 12: Regulation 19 - Additional Information (August 2026) • Appendix F - Appendix 13: Regulation 19 Representation Summaries and Responses (November 2026) • Appendix G - Background Documents List (including weblinks to previous documents)

	To inspect the background papers or if you have a query on the report please contact: Jonathan Dixon, Planning Policy Manager, Telephone: (01954) 713194, email: Jonathan.Dixon@greatercambridgeplanning.org