

20 October 2026

# Greater Cambridge Development Corporation Board Meeting



| STRATEGIC DIRECTION |                                                                                                                                                                                                                                                                                  |          |        |    |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------|----|
| ██████              | ████████████████████<br>██████████████████                                                                                                                                                                                                                                       | ██████   | ██████ | ██ |
| 10/26/12            | <a href="#">Engagement Approach to Inform 25 Year Vision</a>                                                                                                                                                                                                                     | Approval | 15.10  | KC |
| ██████              | ██████████████████                                                                                                                                                                                                                                                               | ██████   | ██████ | ██ |
| 10/26/14            | <a href="#">Local Plan Reg 19 and Minerals and Waste Response</a> <ul style="list-style-type: none"> <li>• <a href="#">Annex 1 - Response to GCSP Local Plan Reg 19</a></li> <li>• <a href="#">Annex 2 - Response to Minerals and Waste Plan Scoping Consultation</a></li> </ul> | Noting   | 15.35  | WN |
| 10/26/15            | <a href="#">Planning Function Update</a>                                                                                                                                                                                                                                         | Noting   | 15.40  | AH |
| 10/26/16            | <a href="#">Board Forward Plan</a>                                                                                                                                                                                                                                               | Noting   | 15.55  | PF |
|                     | Any Other Business and Close                                                                                                                                                                                                                                                     |          | 16.00  |    |
|                     | <b>Next Board Meeting Date: 02 December 2026</b>                                                                                                                                                                                                                                 |          |        |    |

## **Item 04: Minutes of July Board meeting**

# Minutes of Extra-Ordinary Board Meeting of Greater Cambridge Development Corporation

Board Date: 30 July 2026

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| <b>Present</b>                                                          | <b>Position</b>                                                                                 |
|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Peter Freeman                                                           | Chair of Greater Cambridge Development Corporation (GCDC)                                       |
| Baroness Sally Morgan of Huyton                                         | Deputy Chair                                                                                    |
| Professor, Sir John Aston                                               | Board member                                                                                    |
| Richard de Cani                                                         | Board member                                                                                    |
| Ros Kerslake CBE                                                        | Board member                                                                                    |
| Cllr Lucy Nethsingha                                                    | Board member (CCC)                                                                              |
| Paul Schofield                                                          | Board member                                                                                    |
| Cllr Katie Thornborrow                                                  | Board member (Cambridge City Council) (CCC)                                                     |
| <b>In Attendance</b>                                                    |                                                                                                 |
| James Butters                                                           | General Counsel, GCDC                                                                           |
| Gareth Caller                                                           | Finance Director, GCDC                                                                          |
| Beth Dugdale                                                            | Deputy CEO and COO, GCDC                                                                        |
| Cathy Francis                                                           | Director, New Towns, Infrastructure and Housing Delivery, MHCLG                                 |
| Janice Gotts (representing CPCA in absence of Paul Bristow, Rob Bridge) | Deputy CEO, CPCA                                                                                |
| Cllr Brian Milnes (representing SCDC in absence of Cllr Bridget Smith)  | Deputy Leader, SCDC                                                                             |
| Stanley Mukwenya                                                        | Assistant Company Secretary (Minute Taker) GCDC                                                 |
| Wendy Myers                                                             | Project and PMO Lead, GCDC                                                                      |
| Rebecca Sampins                                                         | Deputy Director, Cambridge Strategy Unit, New Towns, Infrastructure and Housing Delivery, MHCLG |
| <b>Apologies</b>                                                        |                                                                                                 |
| Mayor Paul Bristow                                                      | Board Member (CPCA)                                                                             |
| Cllr Bridget Smith                                                      | Board Member (SCDC)                                                                             |

|           |                                                                                                                                                                                                                                                                                                                                                                                                     |  |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>01</b> | <b>Declarations of Interest</b>                                                                                                                                                                                                                                                                                                                                                                     |  |
| 07/26/01  | The Chair welcomed everyone to the meeting                                                                                                                                                                                                                                                                                                                                                          |  |
| 07/26/02  | Beth Dugdale, James Butters, and Gareth Caller withdrew from the meeting during consideration of Agenda Item 4 (Appointments Approval) and took no part in the discussion or decision-making relating to this item.                                                                                                                                                                                 |  |
| <b>02</b> | <b>Appointments approval</b>                                                                                                                                                                                                                                                                                                                                                                        |  |
| 07/26/03  | The Board considered a report seeking approval of the day one officer appointments required to establish the Greater Cambridge Development Corporation and support its effective operation from commencement. It was noted that the proposals, developed by MHCLG and Homes England, would provide immediate executive, legal and financial leadership capacity.                                    |  |
| 07/26/04  | The Board noted the proposed appointment of four senior officers, including the Chief Executive, Deputy Chief Executive, General Counsel and Finance Director, subject to the completion of final contractual arrangements.                                                                                                                                                                         |  |
| 07/26/05  | Assurance was sought on arrangements for secondees transitioning to permanent appointments, with members highlighting the importance of ensuring future employment arrangements reflected both the interests of the individuals concerned and those of the Corporation.                                                                                                                             |  |
| 07/26/06  | In response, the Board was advised that discussions with the individuals concerned were ongoing and that all had expressed a willingness to undertake the proposed roles, with any permanent arrangements remaining subject to agreement. Members also sought assurance regarding the proposed remuneration levels, including appropriate performance expectations and accountability arrangements. |  |
| 07/26/07  | The Board was informed that the proposed salary ranges had been benchmarked against comparable roles within development corporations and the wider public sector, reflecting the scale and complexity of the positions.                                                                                                                                                                             |  |
| 07/26/08  | The Chair expressed strong support for the recommendations, highlighting the considerable experience and expertise of the proposed appointees, including their leadership, financial, legal and governance capabilities.                                                                                                                                                                            |  |

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| 07/26/09  | <p>Following discussion, the Board expressed support for the proposed appointments.</p> <p>The Board approved:</p> <ul style="list-style-type: none"> <li>• The appointment of David Hill as Chief Executive.</li> <li>• The appointment of Beth Dugdale as Deputy Chief Executive and Chief Operating Officer.</li> <li>• The appointment of James Butters as General Counsel.</li> <li>• The appointment of Gareth Caller as Finance Director.</li> </ul> |  |
| 07/26/10  | <p>The Board further approved:</p> <ul style="list-style-type: none"> <li>• The appointment of Beth Dugdale as Interim Accounting Officer until David Hill takes up the role of Chief Executive</li> <li>• The appointment of David Hill as Accounting Officer upon commencement of his appointment as Chief Executive.</li> </ul>                                                                                                                          |  |
| <b>03</b> | <b>Approval of the Corporation's Authorised Signatories and Seal</b>                                                                                                                                                                                                                                                                                                                                                                                        |  |
| 07/26/11  | The Chair invited comments on the report regarding authorised signatories and the Corporation's seal arrangements. No issues were raised, and the Board noted the proposed governance, control and legal execution processes.                                                                                                                                                                                                                               |  |
| 07/26/12  | <p>The Board:</p> <ul style="list-style-type: none"> <li>• Approved the authorised signatories list and adopted the Greater Cambridge Development Corporation's corporate seal.</li> </ul>                                                                                                                                                                                                                                                                  |  |
| <b>04</b> | <b>Arrangements for Corporate Services</b>                                                                                                                                                                                                                                                                                                                                                                                                                  |  |
| 07/26/13  | The Board received a report seeking approval of a Service Level Agreement with Homes England to provide finance, human resources, IT and digital, data protection, and other corporate support services during the Corporation's establishment phase. It was noted that the arrangement would provide operational continuity and resilience while longer term operating arrangements were developed.                                                        |  |
| 07/26/14  | Discussions were held on the duration of the SLA, future staffing implications, governance arrangements, digital systems, financial oversight and the Corporation's longer term operational independence. It was noted that the agreement was expected to operate for 18 months, with any future staff transfer arrangements subject to appropriate employment processes.                                                                                   |  |
| 07/26/15  | Clarification was sought on the governance relationship between the Development Corporation, Homes England and MHCLG. The Board was informed that the Corporation would operate as an independent body sponsored by MHCLG, with Homes England acting as a service provider through the Service Level Agreement.                                                                                                                                             |  |
| 07/26/16  | Assurance was sought that the SLA would not limit the Corporation's ability to develop future partnerships and service                                                                                                                                                                                                                                                                                                                                      |  |

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|           | arrangements. It was confirmed that the agreement was non-exclusive and would not prevent the Corporation from entering into additional agreements where appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |
| 07/26/17  | The importance of aligning significant contractual decisions with financial planning was highlighted and noted that detailed budget and financial information would be presented through future governance reporting arrangements. Discussion also covered IT access, security and document accessibility, and it was confirmed that an issue relating to the registration of the Corporation's name at Companies House had been resolved.                                                                                                                                                                                                                                                                          |  |
| 07/26/18  | The Board was advised that individual service lines within the SLA could be terminated with notice, providing flexibility to bring services in-house or procure alternatives as required. Members noted the importance of the Corporation progressively developing greater operational independence as it matured.                                                                                                                                                                                                                                                                                                                                                                                                  |  |
| 07/26/19  | <p>The Board:</p> <ul style="list-style-type: none"> <li>• Approved the Service Level Agreement with Homes England.</li> <li>• Noted that the agreement would provide corporate and operational support services during the Corporation's establishment phase.</li> <li>• Noted that the arrangement was intended to operate as a transitional agreement, initially for a period of up to 18 months.</li> <li>• Noted that the agreement was non-exclusive and would not prevent the Corporation from entering future arrangements with other organisations.</li> <li>• Noted the intention to develop increased operational independence and alternative service arrangements as appropriate over time.</li> </ul> |  |
| <b>05</b> | <b>Approval of Corporation Policies and Procedures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| 07/26/20  | The Board received a report seeking approval of a suite of governance and operational policies required to support the Corporation's establishment, compliance, and operational readiness from day one. It was noted that the policies had been adopted largely from existing Homes England arrangements as interim measures and would be reviewed and updated as the Corporation developed its own operating model and procedures.                                                                                                                                                                                                                                                                                 |  |
| 07/26/21  | The policies covered risk management, procurement, communications, intellectual property, data protection, human resources, health and safety, digital services, anti-money laundering, and whistleblowing. Discussions were held on the suitability of the policies for the Corporation's future needs and the importance of reviewing and tailoring them over time to reflect the                                                                                                                                                                                                                                                                                                                                 |  |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |
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|          | Corporation's objectives, governance arrangements, and stakeholder relationships.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
| 07/26/23 | The Board welcomed the policies as an appropriate interim framework but emphasised the need for further review, particularly of the communications and risk management policies, to ensure they reflected the Corporation's specific requirements and stakeholder relationships. It was confirmed that more bespoke arrangements would be developed for future consideration by the Board.                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |
| 07/26/24 | Clarification was sought on the development of the Corporation's Target Operating Model and future organisational structure. It was noted that further proposals would be brought forward alongside the business plan, budget, and wider organisational arrangements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |
| 07/26/25 | Discussions were held on the draft risk appetite framework, including the balance between value for money and the Corporation's place making, regeneration and growth objectives. It was noted that risk management arrangements should support both the Corporation's statutory responsibilities and wider strategic ambitions, and that the Audit and Risk Committee would undertake further consideration of the framework and risk appetite statements.                                                                                                                                                                                                                                                                                                                                                                          |  |
| 07/26/26 | <p>The Board:</p> <ul style="list-style-type: none"> <li>• Approved the adoption of the proposed governance and operational policies.</li> <li>• Noted that the policies were intended to operate as interim arrangements pending further review and refinement.</li> <li>• Agreed that further work should be undertaken on the communications protocol and risk management framework to ensure they reflected the specific requirements of the Development Corporation.</li> <li>• Noted that a Target Operating Model would be presented to a future meeting of the Board alongside the business plan and budget proposals.</li> <li>• Noted that the Audit and Risk Committee, once established, would undertake further consideration of the Corporation's risk management framework and risk appetite arrangements.</li> </ul> |  |
|          | <b>Audit and Risk and Nomination and Remuneration Committees</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |
| 07/26/27 | <ul style="list-style-type: none"> <li>• The establishment of the Audit and Risk Committee and the Nominations and Remuneration Committee was supported. Four members volunteered to form the initial membership of both committees. Paul was nominated Chair of the Audit and Risk Committee, with John, Peter</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |

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|           | and Lucy serving as members. The Chair of the Nominations and Remuneration Committee will be confirmed at a future meeting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
| 07/26/28  | <p>The Board:</p> <ul style="list-style-type: none"> <li>• The establishment of the Audit and Risk Committee and the Nominations and Remuneration Committee was supported. Four members volunteered to form the initial membership of both committees. Paul was nominated Chair of the Audit and Risk Committee, with John, Peter and Lucy serving as members. The Chair of the Nominations and Remuneration Committee will be confirmed once confirmed.</li> <li>• Noted the importance of effective governance, assurance, and risk oversight arrangements.</li> <li>• Agreed that formal proposals regarding Committee membership and terms of reference be prepared and submitted to a future meeting for approval.</li> </ul> |  |
| <b>06</b> | <b>Board Forward Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
| 07/26/29  | The Board noted that future meetings would consider key strategic and operational matters, including the Business Plan, budget and financial strategy, Target Operating Model, staffing and resourcing arrangements, governance documentation, strategic partnerships, public engagement arrangements, and the Corporation's long-term vision.                                                                                                                                                                                                                                                                                                                                                                                     |  |
| 07/26/30  | Clarification was sought on future public engagement and participation arrangements, highlighting the importance of transparency, accountability, and effective public scrutiny. It was noted that proposals would be developed to support meaningful public engagement while enabling the Board to operate effectively.                                                                                                                                                                                                                                                                                                                                                                                                           |  |
| 07/26/31  | Members highlighted the importance of establishing clear partnership arrangements with local authorities, the Combined Authority, and other key stakeholders. It was agreed that partnership working should form part of the Board's future work programme to support effective collaboration and alignment with existing governance structures.                                                                                                                                                                                                                                                                                                                                                                                   |  |
| 07/26/32  | The Board members emphasised the importance of developing a formal forward plan for Board business and aligning the Corporation's programme of work, where practicable, with key milestones being progressed by partner organisations. It was confirmed that a detailed forward plan would be developed and presented to the Board.                                                                                                                                                                                                                                                                                                                                                                                                |  |
| 07/26/33  | The Board:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                       |
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|          | <ul style="list-style-type: none"> <li>• Agreed to address transparency in ToR ,communication and partnership working.</li> <li>• Agreed that future meetings should consider the Business Plan, budget and financial strategy, Target Operating Model, staffing and resourcing arrangements, Governance Framework Document, strategic partnership arrangements, public engagement arrangements, and the Corporation's long-term strategic vision.</li> <li>• Noted that a detailed written forward plan would be developed and provided as a standing agenda item to future meetings of the Board.</li> </ul> |                                                       |
| 07/26/34 | <p>Actions:</p> <ul style="list-style-type: none"> <li>• Bring forward a discussion paper relating to partnership working</li> <li>• Prepare a detailed forward plan of Board business</li> <li>• Progress work on member remuneration and seek ministerial decision</li> </ul>                                                                                                                                                                                                                                                                                                                                | <p>Comms</p> <p>Governance</p> <p>Rebecca Sampins</p> |
| 07/26/35 | The Chair thanked everyone and closed the meeting.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                       |

## Item 05: Action log

## Matters Arising and Action Log

| Ref      | Meeting Date | Action Point                                                       | Owner           | Action Progress                                                                                                                 | Date Required | Status |
|----------|--------------|--------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------|---------------|--------|
| 07/26/34 | 30/07/26     | Bring forward a discussion paper relating to partnership working   | Comms           | Conversations with Board members taking place through Induction/briefing sessions. Live discussions with CPCA and GCSP and CSU. | 20/10/26      | Closed |
| 07/26/34 | 30/07/26     | Prepare a detailed forward plan of Board business                  | Nick Ward       | Forward Plan on Board Agenda                                                                                                    | 20/10/26      | Closed |
| 07/26/34 | 30/07/26     | Progress work on member remuneration and seek ministerial decision | Rebecca Sampins | Ongoing                                                                                                                         | 20/10/26      | Open   |

## **Item 06: Transparency Policy and Main Board Terms of Reference**

## Transparency Policy and Main Board Terms of Reference

|                           |                 |                 |
|---------------------------|-----------------|-----------------|
| <b>Board Date</b>         | 20 October 2026 |                 |
| <b>Item Number</b>        | 10/26/06        |                 |
| <b>Author / Presenter</b> | <b>Name</b>     | <b>Role</b>     |
|                           | James Butters   | General Counsel |

### 1 Executive Summary

1.1 This paper advises Board on:

1.1.1 the Development Corporation's proposed Transparency Policy governing the Development Corporation's activities and conduct; and

1.1.2 Terms of Reference (ToR) for the Main Board.

1.2 These items are presented together because the provisions of the Terms of Reference, while going wider than transparency issues, are a key part of giving effect to the principles of the Transparency Policy.

#### Recommendation

1.3 Board is invited to:

1.3.1 **Approve the Transparency Policy; and**

1.3.2 **Approve the Terms of Reference for Main Board.**

### 2 Transparency Policy

2.1 The Transparency Policy is drafted maintaining public confidence in the Development Corporation's activities and complying with the commitments made in the consultation for the establishment of the Development Corporation with regards to transparency and openness.

2.2 The Transparency Policy sets out the requirements identified to enable effective scrutiny of decision-making, demonstrating proper stewardship of public money and public assets, supporting ethical conduct by Board members, committee members, staff and advisers. Ensuring that communities, partners, public authorities, businesses and other stakeholders can understand GCDC's role, powers, priorities, performance and decisions.

- 2.3 The Policy establishes GCDC's transparency principles, its publication commitments, its approach to the Information Commissioner's approved model publication scheme, the handling of information requests, circumstances in which information may lawfully be withheld or redacted.
- 2.4 The Transparency Policy is a comprehensive document. It is a working document providing a legal basis and detailed description of the Development Corporation's commitment to openness. After adoption colleagues will be provided with support and check lists to ensure clarity as to how the Development Corporation will satisfy the policy.

### **3 Main Board Terms of Reference**

- 3.1 The Terms of Reference act as the articles of association and memorandum of understanding for the Development Corporation.
- 3.2 These Terms of Reference establish the protocols and rules for decision making and the conduct of meetings. The Terms of Reference also provide for public observance of the Board of the Development Corporation.
- 3.3 The Terms of Reference have been reviewing and edited to sit alongside and compliment the Transparency Policy.

# Annex 1 - Greater Cambridge Development Corporation ("GCDC")

## Transparency Policy

| Document control | Details                                            |
|------------------|----------------------------------------------------|
| Status           | Draft                                              |
| Date             | [●] 2026                                           |
| Approved by      | Board of Greater Cambridge Development Corporation |
| Review date      | [●] 2027                                           |
| Policy owner     | General Counsel                                    |
| Board oversight  | Audit and Risk Assurance Committee                 |

### 1. PURPOSE

- 1.1 Greater Cambridge Development Corporation ("**GCDC**") is committed to operating openly, transparently and accountably. This Transparency Policy ("**Policy**") sets out GCDC's approach to transparency and accountability. It also brings together and signposts the legal, governance and administrative requirements that support that approach.
- 1.2 The requirements referred to in this Policy arise from legislation, the Framework Document, the Board Terms of Reference and GCDC's other governance arrangements.
- 1.3 GCDC recognises that transparency is fundamental to maintaining public confidence in its activities, enabling effective scrutiny of decision-making, demonstrating proper stewardship of public money and public assets, supporting ethical conduct by Board members, committee members, staff and advisers, and ensuring that communities, partners, public authorities, businesses and other stakeholders can understand GCDC's role, powers, priorities, performance and decisions.
- 1.4 This Policy establishes GCDC's transparency principles, its proactive publication commitments, its approach to the Information Commissioner's approved model publication scheme, the handling of information requests, circumstances in which information may lawfully be withheld or redacted, and the governance arrangements

that support compliance with this Policy.

- 1.5 This Policy applies to all Board members, committee members, employees, secondees, contractors, consultants and advisers acting for or on behalf of GCDC.
- 1.6 This Policy is intended to operate as an umbrella transparency framework and should be read together with GCDC's supporting governance, financial, procurement, information governance, records management, complaints, whistleblowing, anti-fraud and market-sensitive information documents.
- 1.7 Persons to whom this Policy applies must:
  - 1.7.1 support the proactive publication of information where publication is lawful and proportionate;
  - 1.7.2 identify information that may require redaction, deferred publication or withholding;
  - 1.7.3 protect personal data, confidential information, legally privileged material, commercially sensitive information and market-sensitive information;
  - 1.7.4 comply with applicable records management and information governance requirements;
  - 1.7.5 assist GCDC in responding to requests under FOIA and EIR;
  - 1.7.6 maintain any registers, logs and records for which they are responsible; and
  - 1.7.7 raise any actual or potential breach of this Policy with the General Counsel.

## 2. **STATUS AND SCOPE**

- 2.1 GCDC will apply transparency standards appropriate to a public body and, where applicable, an MHCLG-sponsored arm's-length body or non-departmental public body.
- 2.2 Where GCDC is subject to a specific statutory, regulatory, sponsor department or framework document requirement, that requirement will take precedence over this Policy.
- 2.3 Where this Policy adopts requirements or standards by way of best practice, GCDC will apply them on a "comply or explain" basis. Where GCDC determines that a requirement is not applicable, is not proportionate, or cannot lawfully be met in full, the relevant accountable owner must record the reason and, where appropriate, publish an explanation.
- 2.4 Nothing in this Policy requires GCDC to publish information where publication would breach the law, prejudice the public interest, compromise legal privilege, disclose

personal data unlawfully, breach a duty of confidence, prejudice commercial negotiations, undermine procurement integrity, compromise security, create market abuse or inside information risks or impose an unreasonable administrative burden having regard to the resources of GCDC.

- 2.5 References in this Policy to “Board members” are references to members of the board of the corporation as defined in the GCDC’s Board Terms of Reference as updated by the Board from time to time.

### 3. **TRANSPARENCY PRINCIPLES**

#### 3.1 **Openness by default**

The information described in Schedule 1 should be published unless there is a lawful, proportionate and documented reason not to publish it.

#### 3.2 **Useful transparency**

Transparency should help the public understand what GCDC is for, how it is governed, how it makes decisions, how public money is used, how it performs, and how concerns or complaints may be raised.

#### 3.3 **Timeliness**

Information should be published promptly and in accordance with the publication schedule in Schedule 2.

#### 3.4 **Accessibility**

Information should be easy to find, understand, access and re-use. GCDC will publish information in accessible formats and will seek to use HTML, CSV, open spreadsheet formats and other open formats where appropriate. GCDC recognises that some members of the public may be unable to access an Open Meeting livestream because they do not have internet access or suitable technology. Where a person notifies GCDC of this difficulty, GCDC will, where reasonably practicable and having regard to the notice given and the resources available, use reasonable endeavours to make alternative arrangements to enable that person to observe the livestream. Any alternative arrangements will be determined by GCDC in the circumstances and need not include admission to the room in which the Open Meeting is taking place.

#### 3.5 **Accountability**

GCDC will identify accountable owners for key transparency obligations and will report performance to the Audit and Risk Assurance Committee and Board.

### 3.6 Integrity

GCDC will maintain arrangements to identify and manage conflicts of interest, gifts and hospitality, lobbying, procurement risks, fraud, bribery, corruption, market-sensitive information and inappropriate disclosure.

### 3.7 Proportionality and lawful restraint

GCDC will balance transparency against its legal duties and legitimate public interest considerations, including confidentiality, privacy, commercial sensitivity, legal privilege, security, procurement integrity and market-sensitive information and having regard to the resources available to GCDC.

## 4. LEGAL AND GOVERNANCE FRAMEWORK

### 4.1 GCDC will comply with all transparency and information governance requirements applicable to it, including, where relevant:

- 4.1.1 Freedom of Information Act 2000;
- 4.1.2 Environmental Information Regulations 2004;
- 4.1.3 Data Protection Act 2018 and UK GDPR;
- 4.1.4 Re-use of Public Sector Information Regulations 2015;
- 4.1.5 Procurement Act 2023 and related regulations and guidance;
- 4.1.6 Subsidy Control Act 2022;
- 4.1.7 applicable public records and records management requirements;
- 4.1.8 applicable sponsor department and framework document requirements;
- 4.1.9 applicable public body governance standards;
- 4.1.10 Bribery Act 2010;
- 4.1.11 applicable market abuse and insider dealing requirements; and
- 4.1.12 any further statutory or administrative requirements applying to GCDC's functions.

### 4.2 In applying this Policy, responding to information requests and making decisions relating to publication, disclosure, redaction or withholding of information, the General Counsel, the Data Protection Officer, the relevant information owner and any other person responsible for the relevant decision shall have regard to recognised public sector transparency standards and guidance, including:

- 4.2.1 the ICO model publication scheme and associated guidance;

- 4.2.2 the Local Government Transparency Code 2015, where relevant or adopted as best practice;
- 4.2.3 central government transparency publishing standards, where relevant;
- 4.2.4 best practice guidance applicable to arm's length bodies;
- 4.2.5 the Algorithmic Transparency Recording Standard, where relevant or adopted as best practice; and
- 4.2.6 guidance relating to the identification, management and disclosure of market sensitive or inside information.

The relevance of any particular standard or item of guidance will depend on the circumstances of the matter under consideration. The above list is illustrative and not exhaustive.

- 4.3 Although GCDC is not a local authority, it may adopt elements of local authority transparency practice where the Board considers that doing so supports openness, accountability and public confidence.

## 5. **ADOPTION OF THE ICO MODEL PUBLICATION SCHEME**

- 5.1 GCDC will adopt and maintain the Information Commissioner's approved model publication scheme and definition document for Non-Departmental Public Bodies.<sup>1</sup>
- 5.2 GCDC will maintain a public Guide to Information identifying the classes of information GCDC publishes or intends to publish, the specific information available within each class, where the information is published, the format in which it is available, how frequently it is updated, the accountable owner and whether any charge applies.
- 5.3 The Guide to Information is set out in Schedule 1.
- 5.4 GCDC will review the Guide to Information at least annually and whenever there is a material change to GCDC's functions, governance, structure, publication obligations or information holdings.
- 5.5 Where GCDC receives repeated requests for the same class of information, GCDC will consider whether that information should be added to the Guide to Information or otherwise published proactively.

## 6. **PROACTIVE PUBLICATION COMMITMENTS**

- 6.1 GCDC will proactively publish information falling within the following broad categories (subject to lawful redaction):
  - 6.1.1 who GCDC is and what it does;

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<sup>1</sup> [model-publication-scheme.pdf](#)

- 6.1.2 GCDC's governance, constitutional and legal framework;
- 6.1.3 GCDC's Board, committees, senior leadership and organisational structure;
- 6.1.4 GCDC's priorities, Strategic Vision, Corporate Plan, Business Plan and other Board-approved strategic documents;
- 6.1.5 GCDC's decision-making processes, including Board and committee papers, minutes and decisions;
- 6.1.6 GCDC's financial information, including budgets, annual reports, accounts, spending, grants, subsidies and contracts;
- 6.1.7 GCDC's procurement and contracting information;
- 6.1.8 GCDC's land, development, infrastructure and planning activities, subject to lawful restrictions;
- 6.1.9 GCDC's performance, risk and assurance information;
- 6.1.10 GCDC's policies and procedures;
- 6.1.11 public registers, including registers of interests and gifts and hospitality;
- 6.1.12 FOIA, EIR, complaints and transparency performance information;
- 6.1.13 data, digital and algorithmic transparency information; and
- 6.1.14 information about how members of the public, stakeholders and communities may engage with, contact, complain to or request information from GCDC.

6.2 Minimum publication commitments and frequencies are set out in Schedule 2.

## 7. **GOVERNANCE AND DECISION-MAKING TRANSPARENCY**

7.1 GCDC will conduct Board and committee business openly wherever reasonably practicable.

7.2 The conduct of Board meetings, including the holding of Open Meetings, public attendance rights, notice requirements, access to papers and the exclusion of members of the public where confidential or Exempt Information is to be considered, shall be governed by the GCDC's Board Terms of Reference and applicable legislation. Nothing in this Policy confers any right on members of the public to participate in meetings or to attend meetings other than in accordance with the Board Terms of Reference.

7.3 GCDC will publish:

- 7.3.1 the terms of reference and meeting dates of the Board and each Committee established by the Board;

- 7.3.2 the agenda and Papers for each Open Meeting in advance of the Open Meeting and in accordance with the Board Terms of Reference;
- 7.3.3 the agenda for each Board and Committee meeting that is not an Open Meeting as soon as reasonably practicable after the meeting has taken place;
- 7.3.4 the approved minutes of each Board and Committee meeting as soon as reasonably practicable after their approval, whether the minutes are approved at an Open Meeting or at another meeting;
- 7.3.5 such non-confidential Papers relating to Board and Committee meetings that are not Open Meetings as GCDC determines should be published, having regard to the nature of the matter under consideration, the public interest in publication and any confidentiality, commercial, legal or governance considerations;
- 7.3.6 decision records for significant decisions; and
- 7.3.7 a Forward Plan of significant decisions.

References in this paragraph to Committees are to Committees of GCDC and do not include committees or governing bodies of any subsidiary.

- 7.4 Where a document contains information that cannot lawfully or properly be published, GCDC shall, wherever reasonably practicable, publish the document with that information redacted. GCDC may withhold the document, or the relevant part of it, where redaction would not adequately protect that information or would render the published document materially misleading or unintelligible.
- 7.5 For the purposes of this Policy, references to confidential, exempt, restricted or protected information include any “Exempt Information” identified in the GCDC’s Board Terms of Reference. This Policy should be interpreted consistently with the Board Terms of Reference and does not limit any right or obligation to withhold information where disclosure would be prohibited or restricted by law.
- 7.6 GCDC will classify Board and committee papers in accordance with Schedule 3.
- 7.7 Where information is redacted or a document is withheld, GCDC will record the reason. Where the sensitivity is expected to be temporary, GCDC may also record a date or event for reviewing whether the information can subsequently be published.

A review date or event is not required where there is no reasonable prospect that the basis for redaction or withholding will cease to apply.

- 7.8 GCDC will avoid unnecessary use of confidential or private Board sessions. The fact that information is inconvenient, contentious or reputationally sensitive will not of itself justify withholding.

## **8. FINANCIAL, PROCUREMENT, CONTRACT AND SUBSIDY TRANSPARENCY**

- 8.1 GCDC will publish clear information about how public money is allocated, committed and spent.
- 8.2 GCDC will publish, subject to lawful redaction, annual report and accounts, budget information, expenditure data, procurement pipelines, tender and contract award information, a contracts register, grant and subsidy information, senior remuneration information, Board remuneration and expenses information, prompt payment performance where applicable, and other financial transparency information required by law, sponsor guidance, framework document or adopted best practice.
- 8.3 GCDC will comply with applicable procurement transparency requirements under the Procurement Act 2023, the Procurement Regulations 2024 and the Central Digital Platform / Find a Tender requirements.
- 8.4 Subject to the publication threshold approved by the Board from time to time, GCDC will publish procurement and contract information beyond the minimum required by law where this is proportionate and supports transparency in the use of public money. This may include lower-value procurement opportunities and awards, the contracts register and procurement pipeline information.
- 8.5 GCDC will publish subsidy and grant information in accordance with the Subsidy Control Act 2022 and any applicable transparency database requirements.
- 8.6 GCDC will not publish procurement or commercial information where disclosure would prejudice competition, undermine value for money, compromise negotiations, breach confidentiality, create an unfair advantage, or otherwise prejudice GCDC's or a third party's legitimate, commercial interests. Where such information is withheld, GCDC will consider whether it can publish a summary, redacted version or later disclosure once sensitivity has passed.

## **9. LAND, DEVELOPMENT, INFRASTRUCTURE AND PLANNING TRANSPARENCY**

- 9.1 GCDC recognises that transparency is particularly important in relation to land, development, infrastructure, planning, housing, investment, viability, funding and delivery activities.
- 9.2 Subject to lawful restrictions, GCDC will publish information contained in its approved corporate documents, Board and Committee Papers, minutes, decision records, statutory registers and other existing records concerning:
  - 9.2.1 its strategic objectives and development priorities;
  - 9.2.2 development strategies, infrastructure plans and masterplans;
  - 9.2.3 planning functions, policies, applications, decisions and registers;
  - 9.2.4 major projects, public funding commitments and delivery arrangements;

- 9.2.5 land and asset information;
- 9.2.6 development partner selection, procurement routes and contract awards;
- 9.2.7 consultation and engagement;
- 9.2.8 key performance indicators and delivery milestones; and
- 9.2.9 material changes to approved plans or programmes.

This commitment concerns the publication of information held by GCDC and does not require GCDC to create a separate document solely for publication under this Policy.

9.3 GCDC will not publish land, development, viability, negotiation, acquisition, disposal or commercial information where publication would prejudice GCDC's ability to secure value for money, compromise commercial negotiations, prejudice a third party's legitimate interests, disclose legally privileged advice, breach confidence, disclose personal data unlawfully, create market-sensitive information risks, or otherwise be contrary to the public interest.

9.4 Where information is withheld because sensitivity is time-limited, GCDC will consider publication once the relevant sensitivity has passed.

## 10. **FOIA, EIR AND INFORMATION REQUEST HANDLING**

10.1 GCDC will maintain clear arrangements for receiving and responding to requests for information under FOIA and EIR.

10.2 GCDC will publish on its website how to make an FOIA request, how to make an EIR request, contact details for information requests, how GCDC handles requests, how to request an internal review and how to complain to the Information Commissioner.

10.3 GCDC will ordinarily respond to FOIA and EIR requests within the applicable statutory timeframe.

10.4 GCDC will provide reasonable advice and assistance to applicants, including where a request is unclear, too broad or would exceed applicable cost limits.

10.5 GCDC will maintain records of information requests, including reference number, date received, statutory regime, responsible officer, response deadline, outcome, exemptions or exceptions relied upon, internal review, Information Commissioner involvement and lessons learned or proactive publication action arising from the request having regard to the nature and volume of requests received and available resources.

10.6 GCDC will maintain and publish a disclosure log for FOIA and EIR responses where there is wider public interest in the information disclosed, subject to the removal of

personal data, confidential information and other material that should not be published.

- 10.7 GCDC will report FOIA and EIR performance to the Audit and Risk Assurance Committee at least annually. The report should include request volumes, timeliness, internal reviews, complaints, common request themes and proactive publication improvements to the extent reasonably practicable having regard to GCDC's size, staffing and operational resources at the time of reporting.

## **11. RESTRICTIONS ON PUBLICATION AND DISCLOSURE**

- 11.1 GCDC will withhold information only where there is a lawful basis for doing so.
- 11.2 Information may be withheld, redacted or deferred where disclosure would or may disclose personal data unlawfully, breach confidence, prejudice commercial interests, prejudice procurement or contract negotiations, disclose legally privileged information, prejudice policy formulation or safe space for internal deliberation, undermine security or public safety, prejudice investigations, audit or enforcement activity, disclose market-sensitive or inside information, breach statutory restrictions, prejudice third-party rights or legitimate interests, be contrary to applicable FOIA or EIR exemptions or exceptions, or otherwise be contrary to the public interest.
- 11.3 Where an exemption or exception is subject to a public interest test, GCDC will apply that test carefully and record the reasons for its decision.
- 11.4 Where only part of a document is exempt or confidential, GCDC will consider whether the remainder can be disclosed.
- 11.5 Where information is withheld, GCDC will explain the basis for withholding so far as it is lawful and appropriate to do so.
- 11.6 GCDC will maintain an exceptions log for significant decisions not to publish information that would otherwise fall within this Policy, with the exception of FOIA and EIR requests where detailed decisions not to publish are held within case files.

## **12. MARKET-SENSITIVE INFORMATION AND INSIDE INFORMATION**

- 12.1 This section establishes GCDC's overarching requirements for the identification, control and disclosure of market-sensitive information and inside information. GCDC may maintain separate operational guidance explaining reporting routes, escalation procedures, document controls and practical responsibilities. Any such guidance shall support, and shall not displace, this Policy.
- 12.2 GCDC may, through its land, development, infrastructure, procurement, investment, planning, funding or commercial activities, receive or create confidential, non-public and valuable information.
- 12.3 Such information may be capable of affecting financial markets, the price or value of financial instruments, property values, investment decisions, listed company

securities, credit instruments, procurement outcomes, land transactions or counterparties' commercial positions.

- 12.4 GCDC will maintain appropriate controls for identifying, managing and disclosing market-sensitive information and, where relevant, inside information.
- 12.5 Board members, committee members, staff and advisers must treat potentially market-sensitive information with care, restrict access to those with a legitimate need to know, avoid selective disclosure, not use confidential or market-sensitive information for personal advantage or to benefit another person, comply with applicable law and GCDC protocols, report concerns about inappropriate disclosure immediately, and seek legal or governance advice where doubt arises.
- 12.6 Where information may constitute inside information or may create market abuse risk, GCDC will escalate the matter to the General Counsel, seek legal advice where appropriate, restrict circulation, maintain a restricted access or insider list where appropriate, mark relevant documents appropriately, consider whether disclosure should be delayed, controlled or made through a formal route, assess FOIA / EIR requests involving the information with particular care, and record the decision-making process.
- 12.7 GCDC will not use transparency obligations as a reason to make uncontrolled disclosure of market-sensitive information. Equally, GCDC will not withhold information merely because it is difficult, contentious or inconvenient. Decisions will be taken by reference to law, guidance, public interest and GCDC's governance protocols.

### 13. **CONFLICTS OF INTEREST AND DECLARATIONS**

- 13.1 GCDC will maintain robust arrangements for identifying, declaring, recording, managing and publishing interests.
- 13.2 All Board members, committee members, designated officers, and staff must declare relevant interests on appointment, annually, whenever a new interest arises, and at the start of any meeting where an agenda item may relate to an interest.
- 13.3 Relevant interests may include employment, office, trade, profession or vocation; directorships; shareholdings or other financial interests; land, property or development interests; significant contracts or business relationships; roles with developers, landowners, investors, contractors, consultants or representative bodies; political, charitable, community or other roles relevant to GCDC business; family or close personal relationships that may give rise to an actual or perceived conflict; and any other matter that could reasonably be regarded as affecting impartiality.
- 13.4 GCDC will maintain and publish a Board Register of Interests, a committee member Register of Interests, senior officer interest information where appropriate, and meeting-specific declarations recorded in minutes.

13.5 Where a person has an actual or perceived conflict of interest, GCDC will determine the appropriate management action. This may include recording the interest only, allowing participation but not decision-making, requiring withdrawal from discussion and decision, restricting access to papers, excluding the person from related communications, or taking any other action necessary to protect integrity and public confidence.

13.6 Failure to declare an interest may be treated as a governance breach and may be reported to the Chair, Chief Executive, General Counsel, Monitoring Officer equivalent, sponsor department or Audit and Risk Assurance Committee as appropriate.

#### **14. GIFTS AND HOSPITALITY**

14.1 This section establishes GCDC's overarching requirements relating to gifts and hospitality and applies to Board members, Committee members, staff, secondees, contractors and advisers. GCDC shall maintain operational guidance explaining the process for seeking approval, making declarations and maintaining the Gifts and Hospitality Register.

14.2 Gifts and hospitality must not influence, or appear to influence, GCDC decisions.

14.3 Gifts and hospitality should not be treated as part of usual business. Acceptance should be infrequent, modest, justifiable and capable of public scrutiny.

14.4 Offers of gifts, hospitality or benefits must normally be refused where they are connected with live procurement, planning decisions, land acquisition or disposal, development agreements, funding decisions, grant or subsidy awards, contract negotiations, regulatory or enforcement matters, lobbying activity, or any matter where acceptance could reasonably be perceived as compromising integrity.

14.5 Any gift or hospitality with an estimated value of [£50] or more must be declared within 28 days, including the recipient, provider, nature of the gift or hospitality, date offered and date received, estimated value, whether accepted, declined, returned or donated, reason for acceptance or refusal, and approval obtained.

14.6 Gifts or hospitality below [£50] must still be declared where they could reasonably be perceived as influencing, or seeking to influence, GCDC business.

14.7 Staff must obtain prior approval before accepting hospitality, and where practicable before accepting any gift. Hospitality or gifts offered by developers, landowners, contractors, bidders, investors, lobbyists or advisers should be treated with particular caution.

14.8 GCDC will maintain a Gifts and Hospitality Register covering accepted, declined, returned and donated offers.

14.9 GCDC will publish the Gifts and Hospitality Register quarterly. If quarterly publication is not reasonably practicable, the General Counsel shall record the

reason in the Exceptions Log and arrange publication as soon as reasonably practicable.

- 14.10 The Audit and Risk Assurance Committee will review the Gifts and Hospitality Register at least annually to identify patterns, risks or required improvements.

**15. WORKFORCE AND REMUNERATION TRANSPARENCY**

- 15.1 GCDC will publish information about its senior structure and accountability arrangements.

- 15.2 Subject to applicable legal requirements and data protection obligations, GCDC will publish:

15.2.1 its organisational structure;

15.2.2 Board membership and biographies;

15.2.3 senior leadership roles and responsibilities;

15.2.4 senior remuneration information;

15.2.5 Board remuneration and expenses;

15.2.6 pay multiple or equivalent remuneration information, where applicable;

15.2.7 gender pay gap information, where applicable;

15.2.8 appropriate equality, diversity and inclusion information; and

15.2.9 any other workforce information required by law, sponsor department guidance or adopted best practice.

The nature and level of detail published shall be proportionate to GCDC's size, resources and legal obligations.

- 15.3 GCDC will not routinely publish the names, personal contact details or other personal information of staff. Such information may be published where publication is required by law or is otherwise lawful, necessary and proportionate having regard to the individual's role and the public interest in disclosure. GCDC will publish appropriate corporate contact details to enable members of the public and stakeholders to contact relevant functions

**16. DATA PROTECTION, RECORDS MANAGEMENT, ACCESSIBILITY AND OPEN DATA**

- 16.1 GCDC will manage information so that it can be located, understood, retained, disclosed, redacted, archived or deleted in accordance with law and good records management practice.

- 16.2 GCDC will maintain appropriate records management procedures, retention and disposal schedules, information asset ownership arrangements, data protection impact assessment processes, privacy notices, information security arrangements and records of processing activity where required.
- 16.3 Proactive publication must comply with UK GDPR and the Data Protection Act 2018.
- 16.4 GCDC will publish information in formats that are open, searchable, accessible and capable of re-use wherever reasonably practicable. GCDC will also consider whether an alternative format or means of access is reasonably required where a person cannot access information or an online communication through the standard publication route.
- 16.5 Datasets should, where appropriate (having regard to available resources, the nature of the dataset and the proportionality of the requirement), be published in machine-readable formats, be accompanied by metadata explaining date, scope, owner and limitations, be version-controlled, identify the date of publication and date of next review, be published under the Open Government Licence or another appropriate licensing statement, and be accessible to users of assistive technology.
- 16.6 GCDC will maintain an archive or clear route to previous versions of key documents where appropriate and having regard to available resources and records management capacity.
17. **DATA, DIGITAL AND ALGORITHMIC TRANSPARENCY**
- 17.1 GCDC will be transparent about significant use of data analytics, algorithmic tools and AI-enabled systems in its operations and decision-making.
- 17.2 Where GCDC uses an algorithmic or AI-enabled tool to support a decision having a significant effect on individuals, communities, land, funding, planning, eligibility, enforcement, prioritisation or public services, GCDC will consider whether the tool is in scope of the Algorithmic Transparency Recording Standard, whether a public ATRS record or equivalent transparency statement should be published, whether a data protection impact assessment is required, whether an equality impact assessment or public law risk review is appropriate, whether the system has adequate human oversight, whether affected persons can obtain a meaningful explanation of decisions, and whether safeguards are sufficient to manage bias, error, discrimination, unfairness, opacity and accountability risks. The specified areas are intended to identify the principal categories of decisions requiring assessment and do not exclude assessment of another use that may have a significant effect.
- 17.3 Where GCDC is within scope of mandatory ATRS requirements, it will comply with those requirements. Where GCDC is not formally within scope, it will apply the ATRS as best practice unless there is a lawful, proportionate and documented reason not to do so.

- 17.4 Human accountability for GCDC decisions will always be maintained. GCDC will not treat an automated or algorithmic output as determinative without appropriate human review where the decision has significant consequences.

**18. COMPLAINTS, WHISTLEBLOWING AND PUBLIC FEEDBACK**

- 18.1 GCDC will publish a clear Complaints Procedure explaining who may complain, how complaints may be submitted, how complaints will be assessed, expected response stages, escalation routes and any relevant external review or oversight route.
- 18.2 GCDC will publish annual complaints information, subject to data protection and confidentiality, including complaint volumes, themes and learning points where appropriate.
- 18.3 GCDC will maintain a Whistleblowing Policy to enable concerns about wrongdoing, fraud, corruption, misconduct, health and safety, legal breach, environmental harm, improper disclosure, conflicts of interest or misuse of public funds to be raised safely.
- 18.4 GCDC will publish information explaining how concerns may be raised and how GCDC responds to them, while protecting confidentiality and whistleblower protections.
- 18.5 GCDC will provide routes for public feedback and stakeholder engagement, including in relation to strategic plans, consultations, development proposals, planning matters and community impact, where relevant.

**19. ROLES, RESPONSIBILITIES AND ESCALATION**

- 19.1 The Board is responsible for approving this Policy and setting the tone for transparency, openness and accountability.
- 19.2 The Audit and Risk Assurance Committee is responsible for overseeing compliance with this Policy, reviewing transparency risks and receiving regular assurance reports.
- 19.3 The General Counsel is the executive owner of this Policy and is responsible for:
- 19.3.1 maintaining and interpreting this Policy;
  - 19.3.2 overseeing the publication scheme and Guide to Information;
  - 19.3.3 overseeing FOIA and EIR governance;
  - 19.3.4 establishing and maintaining the registers, logs and governance controls required by this Policy;
  - 19.3.5 advising on confidentiality, legal privilege, data protection, market-sensitive information and disclosure risk;

19.3.6 coordinating the Legal Secretariat and other operational support required to implement this Policy; and

19.3.7 reporting material matters to the Audit and Risk Assurance Committee.

19.4 The Chief Executive is responsible for ensuring that GCDC's executive team implements this Policy across GCDC. The Chief Executive shall ensure that the General Counsel and each accountable owner have access to the resources and information reasonably required to discharge their responsibilities under this Policy.

19.5 Executive Directors and functional leads are responsible for ensuring that information within their areas is accurate, current, appropriately classified and published in accordance with this Policy.

19.6 Information owners are responsible for identifying, maintaining, updating and reviewing information falling within the Guide to Information.

19.7 All Board members, committee members, staff, secondees, contractors, consultants and advisers must comply with this Policy and must raise concerns where they become aware of potential non-compliance.

19.8 Material breaches, repeated failures or high-risk disclosure issues must be escalated to the General Counsel and, where appropriate, to the Chief Executive, Chair, Audit and Risk Assurance Committee, sponsor department, Information Commissioner or other relevant authority.

## 20. **MONITORING, ASSURANCE AND ANNUAL TRANSPARENCY REPORT**

20.1 GCDC will monitor compliance with this Policy through maintenance of the Guide to Information, publication schedule tracking, FOIA and EIR performance monitoring, disclosure log review, exceptions log review, register of interests review, gifts and hospitality register review, procurement and contract transparency review, data, digital and algorithmic transparency review, complaints and whistleblowing trend review, internal audit or assurance review where appropriate, and annual reporting to the Audit and Risk Assurance Committee and Board. GCDC will prioritise monitoring activities having regard to available resources, risk assessment, and the relative significance of each obligation. The frequency and depth of each monitoring activity will be determined by the General Counsel in consultation with the Audit and Risk Assurance Committee.

20.2 GCDC will publish an annual Transparency Report covering publication scheme compliance, changes to the Guide to Information, FOIA and EIR request volumes and performance, internal reviews and Information Commissioner complaints, use of exemptions and exceptions, disclosure log activity, Board and committee publication performance, register of interests compliance, gifts and hospitality declarations, procurement and contract transparency, subsidy and grant publication, complaints information, data, digital and algorithmic transparency records, market-sensitive information governance issues where disclosable, transparency breaches or improvement actions, and priorities for the following year.

GCDC will produce the Annual Transparency Report having regard to available resources, and may present information at a level of detail proportionate to the significance of the issues arising in the relevant reporting period. Where a topic has generated no material issues, GCDC may note this briefly rather than providing detailed analysis.

- 20.3 GCDC will consider whether transparency performance should be included in its annual report and accounts.

## 21. **REVIEW**

- 21.1 This Policy will be reviewed at least annually.
- 21.2 The review will consider legislative change, sponsor department requirements, Information Commissioner guidance, procurement transparency developments, public body governance standards, internal audit or assurance findings, FOIA / EIR performance, complaints and stakeholder feedback, technology, data and AI developments, market-sensitive information risks, and experience of operating the publication scheme.
- 21.3 Material amendments to this Policy require Board approval.
- 21.4 The General Counsel may make minor administrative updates, such as correcting links, job titles, document names and publication routes, provided the substantive obligations in the Policy are not changed.

## SCHEDULE 1 - GUIDE TO INFORMATION

This Guide supports GCDC's adoption of the Information Commissioner's approved model publication scheme. Information published online will ordinarily be free of charge. Where information is available in hard copy, GCDC may charge reasonable disbursement costs where permitted by law and where the charge is published in advance. The exact information to be published in each class detailed below is defined in the Information Commissioner's model publication scheme for Non-Departmental Public Bodies.

| ICO class                                | Information GCDC will publish                                  | Publication route                                            | Format           | Frequency                                                      | Owner                                        | Charge      |
|------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------------|------------------|----------------------------------------------------------------|----------------------------------------------|-------------|
| <b>Who we are and what we do</b>         | Establishment Order or enabling legislation                    | Website governance page                                      | HTML / PDF       | On adoption and on change                                      | General Counsel                              | Free online |
| <b>Who we are and what we do</b>         | Framework Document or sponsor agreement                        | Website governance page                                      | HTML / PDF       | On adoption and on change                                      | General Counsel                              | Free online |
| <b>Who we are and what we do</b>         | Standing Orders and Scheme of Delegation                       | Website governance page                                      | HTML / PDF       | On adoption and on change                                      | General Counsel                              | Free online |
| <b>Who we are and what we do</b>         | Board and committee terms of reference                         | Website governance page                                      | HTML / PDF       | On adoption and on change                                      | General Counsel                              | Free online |
| <b>Who we are and what we do</b>         | Board membership, biographies and roles                        | Website governance page                                      | HTML             | On appointment and on change                                   | GCDC Legal Secretariat                       | Free online |
| <b>Who we are and what we do</b>         | Senior leadership structure and organisational chart           | Website / annual report                                      | HTML / PDF       | On change and annually                                         | Chief Executive / HR Lead                    | Free online |
| <b>What we spend and how we spend it</b> | Annual report and accounts                                     | Website / relevant reporting route                           | HTML / PDF       | Annually                                                       | Finance Director                             | Free online |
| <b>What we spend and how we spend it</b> | Budget summary and spend data                                  | Website transparency page                                    | CSV / HTML / PDF | Annually / quarterly where practicable                         | Finance Director                             | Free online |
| <b>What we spend and how we spend it</b> | Procurement pipeline, tender opportunities and contract awards | Central Digital Platform / Find a Tender and/or GCDC website | HTML / CSV       | In accordance with procurement law and policy                  | Commercial Lead                              | Free online |
| <b>What we spend and how we spend it</b> | Contracts register                                             | Website procurement page                                     | CSV / HTML       | Quarterly, subject to the Board approved publication threshold | Commercial Lead                              | Free online |
| <b>What we spend and how we spend it</b> | Grant and subsidy information                                  | Website / subsidy database where applicable                  | HTML / CSV       | In accordance with law and at least annually                   | Finance Director / Programme Lead            | Free online |
| <b>What we spend and how we spend it</b> | Senior remuneration and Board remuneration / expenses          | Annual report / website                                      | PDF / HTML       | Annually                                                       | HR Lead / Finance Director / General Counsel | Free online |

|                                                     |                                                                                                                               |                                        |                  |                                                                                                                                                                                                                                            |                                      |             |
|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------|
| <b>What our priorities are and how we are doing</b> | Strategic Vision, Corporate Plan, and Business Plan                                                                           | Website                                | HTML / PDF       | On adoption / annually / on material change                                                                                                                                                                                                | Chief Executive / Programme Director | Free online |
| <b>What our priorities are and how we are doing</b> | Performance indicators and strategic risk summary                                                                             | Website / Board papers / annual report | HTML / PDF / CSV | Quarterly or annually as determined by Board                                                                                                                                                                                               | Performance Lead / Risk Lead         | Free online |
| <b>How we make decisions</b>                        | Board and Committee meeting dates, Open Meeting agendas and public Papers, and agendas for other Board and Committee meetings | Website                                | HTML / PDF       | Publish meeting dates annually and update on change. Publish Open Meeting agendas and public Papers in advance of the meeting. Publish agendas for other Board and Committee meetings as soon as reasonably practicable after the meeting. | GCDC Legal Secretariat               | Free online |
| <b>How we make decisions</b>                        | Approved minutes, decision records and Forward Plan                                                                           | Website                                | HTML / PDF       | Publish minutes as soon as reasonably practicable after approval. Publish significant decision records following the decision, subject to this Policy. Publish the Forward Plan quarterly or at another frequency approved by the Board.   | GCDC Legal Secretariat               | Free online |
| <b>How we make decisions</b>                        | Consultation documents and outcomes                                                                                           | Website / consultation portal          | HTML / PDF       | During and following consultation                                                                                                                                                                                                          | Programme Lead                       | Free online |
| <b>Policies and procedures</b>                      | Transparency Policy, Code of Conduct, interests, gifts, complaints, whistleblowing, procurement and privacy materials         | Website governance page                | HTML / PDF       | On approval and review                                                                                                                                                                                                                     | General Counsel                      | Free online |
| <b>Lists and registers</b>                          | Board, committee and senior officer interests                                                                                 | Website governance page                | HTML / PDF       | On appointment, on change and at least annually                                                                                                                                                                                            | GCDC Legal Secretariat               | Free online |
| <b>Lists and registers</b>                          | Gifts and Hospitality Register                                                                                                | Website governance page                | CSV / HTML / PDF | Quarterly                                                                                                                                                                                                                                  | GCDC Legal Secretariat               | Free online |

|                            |                                                                                                                     |                                          |                  |                                       |                                                                                                |             |
|----------------------------|---------------------------------------------------------------------------------------------------------------------|------------------------------------------|------------------|---------------------------------------|------------------------------------------------------------------------------------------------|-------------|
| <b>Lists and registers</b> | Contracts Register and land / asset information where publishable                                                   | Website procurement or transparency page | CSV / HTML / PDF | Quarterly / annually as applicable    | Commercial / Property / Finance Lead                                                           | Free online |
| <b>Services provided</b>   | Contact details, planning service information, funding or grant programmes, engagement routes and complaints routes | Website                                  | HTML / PDF       | On change / during relevant programme | Commercial / Property / Finance Lead / Communications / Planning / Programme / Complaints Lead | Free online |

## SCHEDULE 2 - PUBLICATION SCHEDULE

This Schedule sets minimum publication expectations. GCDC may publish more frequently where appropriate. Publication may be deferred, redacted or withheld where justified under this Policy.

| Information                                                                | Publication standard                                                                                                         | Responsible owner        |
|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>Establishment Order / enabling legislation</b>                          | Publish on adoption and update on change                                                                                     | General Counsel          |
| <b>Framework Document / sponsor agreement</b>                              | Publish on adoption and update on change                                                                                     | General Counsel          |
| <b>Standing Orders and Scheme of Delegation</b>                            | Publish on adoption and update on change                                                                                     | General Counsel          |
| <b>Board and committee terms of reference</b>                              | Publish on adoption and update on change                                                                                     | GCDC Legal Secretariat   |
| <b>Board biographies and membership</b>                                    | Publish on appointment and update on change                                                                                  | GCDC Legal Secretariat   |
| <b>Senior leadership structure</b>                                         | Publish on change and review annually                                                                                        | HR Lead                  |
| <b>Board meeting calendar</b>                                              | Publish annually and update on change                                                                                        | GCDC Legal Secretariat   |
| <b>Open Meeting agendas and public Papers</b>                              | Publish at least five clear Working Days before the Open Meeting in accordance with the Board Terms of Reference             | GCDC Legal Secretariat   |
| <b>Agendas for Board and Committee meetings that are not Open Meetings</b> | Publish as soon as reasonably practicable after the meeting has taken place                                                  | GCDC Legal Secretariat   |
| <b>Approved Board and Committee minutes</b>                                | Publish as soon as reasonably practicable after approval, whether approval takes place at an Open Meeting or another meeting | GCDC Legal Secretariat   |
| <b>Decision notices</b>                                                    | Publish following significant decisions, subject to review and redaction                                                     | General Counsel          |
| <b>Forward Plan</b>                                                        | Publish quarterly, or at another Board-approved frequency                                                                    | GCDC Legal Secretariat   |
| <b>Annual report and accounts</b>                                          | Publish annually                                                                                                             | Finance Director         |
| <b>Budget summary</b>                                                      | Publish annually and on material change                                                                                      | Finance Director         |
| <b>Spend data</b>                                                          | Publish quarterly where operationally practicable                                                                            | Finance Director         |
| <b>Procurement pipeline</b>                                                | Publish quarterly where appropriate                                                                                          | Commercial Lead          |
| <b>Tender opportunities and contract awards</b>                            | Publish in accordance with procurement law and policy                                                                        | Commercial Lead          |
| <b>Contracts register</b>                                                  | Publish quarterly where operationally practicable                                                                            | Commercial Lead          |
| <b>Grants and subsidies</b>                                                | Publish in accordance with legal requirements and at least annually where applicable                                         | Finance / Programme Lead |
| <b>Corporate Plan</b>                                                      | Publish on adoption and review                                                                                               | Chief Executive          |
| <b>Business Plan</b>                                                       | Publish annually                                                                                                             | Chief Executive          |

|                                                               |                                                                     |                                                           |
|---------------------------------------------------------------|---------------------------------------------------------------------|-----------------------------------------------------------|
| <b>Performance indicators</b>                                 | Publish quarterly or annually, as determined by Board               | Performance Lead                                          |
| <b>Strategic risk summary</b>                                 | Publish annually, subject to redaction                              | Risk Lead                                                 |
| <b>Register of Interests</b>                                  | Publish on appointment, on change and annually                      | GCDC Legal Secretariat                                    |
| <b>Gifts and Hospitality Register</b>                         | Publish quarterly                                                   | Finance Director                                          |
| <b>FOIA / EIR contact information</b>                         | Publish and update on change                                        | General Counsel                                           |
| <b>Disclosure log</b>                                         | Update periodically, subject to redaction                           | General Counsel                                           |
| <b>FOIA / EIR annual performance</b>                          | Publish quarterly                                                   | General Counsel                                           |
| <b>Complaints Procedure and annual complaints information</b> | Publish and update annually / on change, subject to confidentiality | Complaints Lead                                           |
| <b>Transparency Report</b>                                    | Publish annually                                                    | General Counsel                                           |
| <b>AI / algorithmic transparency records</b>                  | Publish when qualifying tools are adopted or materially changed     | Digital / Data Lead (in conjunction with General Counsel) |
| <b>Publication scheme review</b>                              | Review annually                                                     | General Counsel                                           |

### SCHEDULE 3 - BOARD AND COMMITTEE PAPER CLASSIFICATION PROTOCOL

This Protocol governs the classification of Board and committee papers for transparency and publication purposes. It is intended to ensure that GCDC publishes Board and committee information wherever appropriate, while protecting information that must lawfully or properly remain confidential.

| Classification                                        | Description                                                                                                                                                  | Publication approach                                                                                                                                                                                                                                                     |
|-------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Part 1: Public</b>                                 | Paper can be published without redaction.                                                                                                                    | Publish in accordance with the governance and decision-making transparency provisions of this Policy. Papers for an Open Meeting shall be published in advance. Papers for other meetings shall be published only where GCDC determines that publication is appropriate. |
| <b>Part 1A: Public with redactions</b>                | Most of the paper can be published but specific parts must be withheld.                                                                                      | Where the relevant Paper is to be published under this Policy, publish a redacted version and indicate the general basis for the redaction where appropriate.                                                                                                            |
| <b>Part 2: Confidential</b>                           | Paper cannot be published without causing prejudice, breaching legal obligations or disclosing protected information.                                        | Do not publish unless and until confidentiality falls away or a redacted version is possible.                                                                                                                                                                            |
| <b>Part 2M: Market Sensitive / Inside Information</b> | Paper may affect financial markets, financial instruments, investment decisions, property values, listed entities, land transactions or market participants. | Restricted circulation and legal / governance review where appropriate.                                                                                                                                                                                                  |
| <b>Part 2L: Legally Privileged</b>                    | Paper contains or reveals legal advice, litigation advice or privileged communications.                                                                      | Restricted circulation. Do not publish without legal clearance.                                                                                                                                                                                                          |

| Code      | Reason                                  | Code       | Reason                                          |
|-----------|-----------------------------------------|------------|-------------------------------------------------|
| <b>C1</b> | Personal data                           | <b>C7</b>  | Market-sensitive / inside information           |
| <b>C2</b> | Commercial sensitivity                  | <b>C8</b>  | Confidential third-party information            |
| <b>C3</b> | Procurement sensitivity                 | <b>C9</b>  | Policy formulation / internal deliberation      |
| <b>C4</b> | Land acquisition / disposal sensitivity | <b>C10</b> | Audit, investigation or enforcement sensitivity |
| <b>C5</b> | Legal privilege                         | <b>C11</b> | Statutory restriction                           |
| <b>C6</b> | Security / public safety                | <b>C12</b> | Other lawful reason, to be specified            |

The author of a Board or committee paper must propose a classification. The Board Secretary / Governance Team must review the classification. The General Counsel must review papers classified as Part 2M, Part 2L, or any paper involving significant disclosure risk. Information shall remain confidential only for so long as there is a continuing lawful or proper basis for maintaining confidentiality. A review date or event need only be recorded where the relevant sensitivity is reasonably expected to end.

This Classification Protocol governs the classification, redaction, withholding and publication of Board and Committee Papers. The Board Terms of Reference govern the conduct of Meetings, public attendance and the exclusion of the public. The two documents shall be interpreted consistently. If there is any inconsistency concerning the classification or publication of information, this Policy shall prevail. If there is any inconsistency concerning the conduct of a Meeting, the Board Terms of Reference shall prevail.

## SCHEDULE 4 - TRANSPARENCY COMPLIANCE CHECKLIST

| Area                                | Assurance question                                                                                                                                                                                                           | Owner                                      | Status | Action required |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------|-----------------|
| <b>Publication Scheme</b>           | Has GCDC adopted and maintained the ICO model publication scheme?                                                                                                                                                            | General Counsel                            | [•]    | [•]             |
| <b>Guide to Information</b>         | Has the Guide to Information been reviewed and updated?                                                                                                                                                                      | General Counsel                            | [•]    | [•]             |
| <b>Publication Schedule</b>         | Are publication commitments being met?                                                                                                                                                                                       | General Counsel                            | [•]    | [•]             |
| <b>Board papers</b>                 | Are agendas, papers and minutes published in accordance with the classification protocol?                                                                                                                                    | GCDC Legal Secretariat                     | [•]    | [•]             |
| <b>Confidential papers</b>          | Are Part 2 classifications justified and, where confidentiality is expected to be temporary, reviewed at the appropriate time?                                                                                               | GCDC Legal Secretariat and General Counsel | [•]    | [•]             |
| <b>FOIA / EIR</b>                   | Are requests answered within statutory timeframes?                                                                                                                                                                           | FOI Officer                                | [•]    | [•]             |
| <b>Disclosure log</b>               | Is the disclosure log maintained and published appropriately?                                                                                                                                                                | General Counsel                            | [•]    | [•]             |
| <b>Exceptions log</b>               | Are decisions not to publish recorded and justified?                                                                                                                                                                         | General Counsel                            | [•]    | [•]             |
| <b>Register of Interests</b>        | Are interests declared, updated and published?                                                                                                                                                                               | GCDC Legal Secretariat                     | [•]    | [•]             |
| <b>Gifts and Hospitality</b>        | Is the register complete, reviewed and published?                                                                                                                                                                            | General Counsel                            | [•]    | [•]             |
| <b>Procurement</b>                  | Are opportunities, awards and contracts published as required?                                                                                                                                                               | Commercial Lead                            | [•]    | [•]             |
| <b>Subsidies and grants</b>         | Are subsidies and grants published where required?                                                                                                                                                                           | Finance / Programme Lead                   | [•]    | [•]             |
| <b>Spend data</b>                   | Is spend data published in accordance with the schedule?                                                                                                                                                                     | Finance Director                           | [•]    | [•]             |
| <b>Land and development</b>         | Is publishable land, development and project information available?                                                                                                                                                          | Property / Programme Lead                  | [•]    | [•]             |
| <b>Market-sensitive information</b> | Are inside information and market-sensitive risks identified and controlled?                                                                                                                                                 | General Counsel                            | [•]    | [•]             |
| <b>AI / algorithms</b>              | Are qualifying algorithmic tools assessed and recorded?                                                                                                                                                                      | Digital / Data Lead                        | [•]    | [•]             |
| <b>Accessibility</b>                | Is information published in accessible and reusable formats where practicable, and are reasonable alternative arrangements considered where a person cannot access an Open Meeting livestream or other online communication? | Communications / Digital Lead              | [•]    | [•]             |
| <b>Annual Transparency Report</b>   | Has an annual Transparency Report been prepared and published?                                                                                                                                                               | General Counsel                            | [•]    | [•]             |

## **SCHEDULE 5 - DISCLOSURE LOG PROTOCOL**

GCDC will maintain a disclosure log to support proactive publication, reduce repeat requests and improve public access to information.

GCDC will publish FOIA and EIR responses on the disclosure log where the information disclosed is likely to be of wider public interest or may assist in reducing repeated requests. Before publication, GCDC shall remove information identifying the applicant and any other information that should not lawfully or properly be published.

The FOI Officer is responsible for maintaining the disclosure log under the oversight of the General Counsel.

## SCHEDULE 6 - EXCEPTIONS LOG

The Exceptions Log records significant decisions not to publish information that would otherwise fall within this Policy.

| Matter to record                         | Detail                                                                                   |
|------------------------------------------|------------------------------------------------------------------------------------------|
| Information not published                | Description of information withheld or deferred                                          |
| Publication commitment affected          | Relevant policy clause or schedule item                                                  |
| Reason for non-publication               | Legal, policy or public interest reason                                                  |
| Decision-maker                           | Name / role approving non-publication                                                    |
| Date of decision                         | Date decision was made                                                                   |
| Review date or trigger, where applicable | When confidentiality will be reconsidered if the sensitivity is expected to be temporary |
| Partial publication considered           | Whether redaction or summary was considered                                              |
| Escalation                               | Whether Audit and Risk Assurance Committee consideration is needed                       |

The Exceptions Log should be reviewed at least annually by the General Counsel and reported to the Audit and Risk Assurance Committee. Where information can be published following the expiry of sensitivity, GCDC should publish it as soon as reasonably practicable.

## **SCHEDULE 7**

### **ANNUAL TRANSPARENCY REPORT TEMPLATE**

#### **1. INTRODUCTION**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

#### **2. PUBLICATION SCHEME AND GUIDE TO INFORMATION**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

#### **3. PUBLICATION SCHEDULE PERFORMANCE**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

#### **4. FOIA AND EIR PERFORMANCE**

- 4.1 number of FOIA and EIR requests received;
- 4.2 percentage responded to within statutory deadline;
- 4.3 number of internal reviews and Information Commissioner complaints;
- 4.4 common request themes;
- 4.5 exemptions and exceptions most frequently relied upon; and
- 4.6 proactive publication improvements arising from requests.

#### **5. DISCLOSURE LOG**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

#### **6. BOARD AND COMMITTEE TRANSPARENCY**

- 6.1 number of public meetings;
- 6.2 publication of agendas, papers and minutes;
- 6.3 number of confidential / Part 2 papers;
- 6.4 common reasons for confidentiality; and
- 6.5 review of confidential papers for later publication.

#### **7. INTERESTS, GIFTS AND HOSPITALITY**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

8. **FINANCIAL, PROCUREMENT AND CONTRACT TRANSPARENCY**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

9. **LAND, DEVELOPMENT, INFRASTRUCTURE AND PLANNING TRANSPARENCY**

To include proportionate reporting on information published concerning approved strategies and plans, major projects, planning functions and decisions, land and asset information, public funding commitments, development partner selection, consultation and engagement, performance indicators and material changes to approved programmes. The report should identify any significant information withheld or deferred and the general reason for doing so.

10. **DATA, DIGITAL AND AI TRANSPARENCY**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

11. **MARKET SENSITIVE INFORMATION**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

12. **COMPLAINTS AND FEEDBACK**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

13. **BREACHES, ISSUES AND REMEDIAL ACTIONS**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

14. **PRIORITIES FOR NEXT YEAR**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

## SCHEDULE 8 - ROLES AND RESPONSIBILITIES MATRIX

| Area                                               | Executive owner                      | Operational owner           | Board oversight                            |
|----------------------------------------------------|--------------------------------------|-----------------------------|--------------------------------------------|
| <b>Transparency Policy</b>                         | General Counsel                      | GCDC Legal team             | Board / Audit and Risk Assurance Committee |
| <b>Publication Scheme and Guide to Information</b> | General Counsel                      | GCDC Legal Secretariat      | Audit and Risk Assurance Committee         |
| <b>FOIA / EIR</b>                                  | General Counsel                      | FOI Officer                 | Audit and Risk Assurance Committee         |
| <b>Disclosure Log</b>                              | General Counsel                      | FOI Officer                 | Audit and Risk Assurance Committee         |
| <b>Exceptions Log</b>                              | General Counsel                      | GCDC Legal Secretariat      | Audit and Risk Assurance Committee         |
| <b>Board papers</b>                                | Chair and Chief Executive            | GCDC Legal Secretariat      | Board                                      |
| <b>Financial transparency</b>                      | Finance Director                     | Finance Team                | Audit and Risk Assurance Committee         |
| <b>Procurement transparency</b>                    | Finance Director                     | Procurement Team            | Audit and Risk Assurance Committee         |
| <b>Contracts register</b>                          | General Counsel                      | Procurement Team            | Audit and Risk Assurance Committee         |
| <b>Grants and subsidies</b>                        | Finance Director                     | Programme Team              | Audit and Risk Assurance Committee         |
| <b>Land and asset transparency</b>                 | Property / Development Director      | Property Team               | Board / Audit and Risk Assurance Committee |
| <b>Planning transparency</b>                       | Planning Director / Lead             | Planning Team               | Board / relevant committee                 |
| <b>Register of Interests</b>                       | General Counsel                      | GCDC Legal Secretariat      | Chair / Audit and Risk Assurance Committee |
| <b>Gifts and Hospitality</b>                       | Finance Director                     | Finance Director            | Audit and Risk Assurance Committee         |
| <b>Complaints and whistleblowing</b>               | Chief Executive and General Counsel  | GCDC Legal team             | Audit and Risk Assurance Committee         |
| <b>Records management and data protection</b>      | General Counsel and DPO or Data Lead | Information Governance Team | Audit and Risk Assurance Committee         |
| <b>Open data and accessibility</b>                 | Digital / Communications Lead        | Digital Team                | Executive Team                             |
| <b>AI / algorithmic transparency</b>               | Digital / Data Lead                  | System Owner                | Audit and Risk Assurance Committee         |
| <b>Market-sensitive information</b>                | General Counsel                      | GCDC Legal team             | Chair / Audit and Risk Assurance Committee |
| <b>Annual Transparency Report</b>                  | General Counsel                      | GCDC Legal Secretariat      | Board / Audit and Risk Assurance Committee |

## **SCHEDULE 9 - MARKET SENSITIVE INFORMATION ESCALATION CHECKLIST**

### **1. INITIAL ASSESSMENT QUESTIONS**

- 1.1 Is the information confidential?
- 1.2 Is the information non-public?
- 1.3 Is the information specific or precise?
- 1.4 Could the information affect financial instruments, listed securities, debt, investment decisions, property values or market behaviour?
- 1.5 Does the information relate to a listed company, investor, lender, developer, contractor or other market participant?
- 1.6 Does the information relate to a major land transaction, acquisition, disposal, procurement, funding decision or development agreement?
- 1.7 Could selective disclosure give someone an unfair advantage?
- 1.8 Could disclosure prejudice GCDC's commercial position?
- 1.9 Could disclosure create insider dealing, unlawful disclosure or market manipulation risk?
- 1.10 Has legal or governance advice been obtained?

### **2. CONTROLS TO CONSIDER**

- 2.1 restricted circulation;
- 2.2 document marking;
- 2.3 secure storage;
- 2.4 need-to-know access;
- 2.5 restricted access list or insider list;
- 2.6 Board paper classification as Part 2M;
- 2.7 communications controls;
- 2.8 external adviser confidentiality arrangements;
- 2.9 FOIA / EIR handling note;
- 2.10 legal advice;
- 2.11 sponsor department notification, if appropriate;
- 2.12 disclosure timing and route; and
- 2.13 review date.

- 2.14 Any concern about market-sensitive information must be escalated to the General Counsel. Where the matter is significant, the General Counsel should consider escalation to the Chief Executive, Chair, Audit and Risk Assurance Committee, sponsor department or external legal advisers.

## SCHEDULE 10 - CHANGE CONTROL AND REVIEW RECORD

| Version | Date         | Approved by      | Summary of change |
|---------|--------------|------------------|-------------------|
| 0.1     | 13 July 2026 | Draft for review | Initial draft     |
| 1.0     | [●] 2026     | Board            | Approved policy   |
|         |              |                  |                   |

## **Annex 2 - Greater Cambridge Development Corporation Terms Of Reference**

**Adopted By The Board On [Tbc] 2026**

### **1. INTRODUCTION**

- 1.1 These Terms regulate the conduct of business of the Greater Cambridge Development Corporation.
- 1.2 These Terms are adopted pursuant to GCDC's statutory powers and shall be read in conjunction with:
  - 1.2.1 GCDC's establishing legislation in accordance with Part XVI and Schedule 26 of the Local Government, Planning and Land Act 1980;
  - 1.2.2 any regulations or directions made thereunder;
  - 1.2.3 the Framework Document agreed between GCDC and MHCLG; and
  - 1.2.4 any applicable government standards and guidance.
- 1.3 In the event of any inconsistency, the order of precedence shall be:
  - 1.3.1 primary legislation;
  - 1.3.2 secondary legislation and directions;
  - 1.3.3 the Framework Document; and
  - 1.3.4 these Terms.
- 1.4 The Transparency Policy governs the classification, publication, redaction, deferred publication and withholding of information relating to Board, Committee and Sub-Committee business. These Terms govern the conduct of Meetings, public attendance and the exclusion of the public. The two documents shall be interpreted consistently.

## 2. INTERPRETATION

### 2.1 In these Rules:

|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>“Accounting Officer”</b>          | means the officer designated by HM Treasury as the Accounting Officer responsible for the proper stewardship of GCDC’s funds, including ensuring regularity, propriety and value for money in the use of its resources as set out in <b>paragraph 15.1</b>                                                                                                                                                                                                                                       |
| <b>“Authorised Signatories”</b>      | means a list of individuals authorised to sign documents on behalf of GCDC prepared by the General Counsel and approved by the Board                                                                                                                                                                                                                                                                                                                                                             |
| <b>“Board”</b>                       | means the Board of Members of GCDC                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>“Committee”</b>                   | means any Committee established by the Board in accordance with <b>paragraph 14</b>                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>“Business Plan”</b>               | means GCDC's annual delivery plan for a Financial Year, setting out in detail the activities to be undertaken during that year, including the key milestones, budget priorities, performance measures and resources required to deliver the objectives and outcomes of the Corporate Plan. The Business Plan shall be prepared in accordance with Managing Public Money, shall require the approval of the MHCLG Senior Responsible Owner, and shall be published on GCDC's website              |
| <b>“Chair”</b>                       | means the person appointed by the Secretary of State as chair of GCDC                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>“Chief Executive”</b>             | means the chief executive officer of GCDC (who shall also act as Accounting Officer unless otherwise directed)                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>“Corporation”</b>                 | means the Greater Cambridge Development Corporation, established by article 3 of the Establishment Order                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>“Corporate Plan”</b>              | means GCDC's primary strategic planning document, setting out its objectives, priorities, key activities and expected outcomes for a period of three to five Financial Years and providing the strategic framework for the preparation of the Business Plan. The Corporate Plan shall be reviewed and updated annually on a rolling basis, prepared in accordance with Managing Public Money, approved by the Secretary of State and published on GCDC's website                                 |
| <b>“Data Protection Legislation”</b> | means all applicable data protection and privacy laws in force from time to time in the United Kingdom, including: <ul style="list-style-type: none"> <li>(a) the UK General Data Protection Regulation (UK GDPR);</li> <li>(b) the Data Protection Act 2018;</li> <li>(c) the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended); and</li> <li>(d) any other applicable laws and regulations relating to the processing of personal data and privacy</li> </ul> |

|                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>“Delegated Financial Authorities”</b> | <p>means the framework approved from time to time by the Board with the prior written consent of MHCLG which specifies the:</p> <ul style="list-style-type: none"> <li>(a) delegations, limits, thresholds, approvals and conditions applicable to: <ul style="list-style-type: none"> <li>(i) expenditure;</li> <li>(ii) commitments;</li> <li>(iii) investments;</li> <li>(iv) disposals; and</li> <li>(v) other financial transactions undertaken by or on behalf of GCDC; and</li> </ul> </li> <li>(b) requirements necessary to ensure compliance with: <ul style="list-style-type: none"> <li>(i) Managing Public Money;</li> <li>(ii) HM Treasury requirements; and</li> <li>(iii) any applicable spending controls, including those relating to transactions which are novel, contentious or repercussive.</li> </ul> </li> </ul> |
| <b>“Delegated Financial Authority”</b>   | means any delegation, limit, threshold, approval or condition specified in the Delegated Financial Authorities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>“Deputy Chair”</b>                    | means the person appointed by the Secretary of State as deputy chair of GCDC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>“Entitled Members”</b>                | means those Members entitled to vote on the relevant resolution being members who are not subject to any conflict of interest or other restriction that would prevent them from voting in accordance with these Terms and/or applicable legislation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>“Establishment Order”</b>             | means the Greater Cambridge Development Corporation (Establishment) Order 2026 (SI 2026/902), made under sections 134 and 135 of the Local Government, Planning and Land Act 1980, which designates the Urban Development Area and establishes GCDC <sup>1</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>“Executive Member”</b>                | means a Member who is also an employee, officer or office-holder of GCDC, including the Chief Executive                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>“Exempt Information”</b>              | <p>means information which may lawfully or properly be redacted, withheld or subject to restricted circulation under the Transparency Policy, including:</p> <ul style="list-style-type: none"> <li>(a) personal data;</li> <li>(b) commercially sensitive information;</li> <li>(c) procurement-sensitive information;</li> <li>(d) information relating to land acquisition or disposal;</li> <li>(e) legally privileged information;</li> <li>(f) information relating to security or public safety;</li> <li>(g) market-sensitive information or inside information;</li> <li>(h) confidential third-party information;</li> </ul>                                                                                                                                                                                                    |

<sup>1</sup> [The Greater Cambridge Development Corporation \(Establishment\) Order 2026](#)

|                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                  | <ul style="list-style-type: none"> <li>(i) information relating to policy formulation, internal deliberation, the development of proposals or options, or draft, incomplete or work in progress documents where disclosure could reasonably prejudice effective decision making, inhibit the provision of candid advice or otherwise undermine the proper conduct of GCDC's affairs;</li> <li>(j) information relating to audit, investigations or enforcement activity, including planning enforcement;</li> <li>(k) information subject to a statutory restriction on disclosure; and</li> <li>(l) any other information that may lawfully or properly be withheld from publication or disclosure</li> </ul> |
| <b>"Finance Director"</b>        | means the senior officer of GCDC responsible for GCDC's finance function.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>"Framework Document"</b>      | means the framework document entered into between GCDC and MHCLG dated [ ] 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>"Financial Year"</b>          | means each period of 12 months ending on 31 March, except that the first Financial Year shall commence on the date on which GCDC is established and end on the following 31 March                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>"General Counsel"</b>         | means the senior legal adviser of GCDC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>"Local Authority Leaders"</b> | <p>means:</p> <ul style="list-style-type: none"> <li>(a) the Mayor of Cambridgeshire and Peterborough;</li> <li>(a) the Leader of Cambridge City Council;</li> <li>(b) the Leader of South Cambridgeshire District Council; and</li> <li>(c) the Leader of Cambridgeshire County Council,</li> </ul> <p>and, where paragraph 4.3 applies, includes any elected member of a successor or replacement local authority nominated in accordance with that authority's governance arrangements and approved by the Secretary of State</p>                                                                                                                                                                           |
| <b>"Local Authority Members"</b> | <p>means a Member appointed to the Board pursuant to paragraph 4.2, being either:</p> <ul style="list-style-type: none"> <li>(a) a Local Authority Leader; or</li> <li>(b) an alternate nominated by a Local Authority Leader and approved by the Secretary of State in accordance with paragraph 4.2</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>"Member"</b>                  | means a member of the Board                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>"Meeting"</b>                 | means any meeting of the Board convened in accordance with these Terms                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>"MHCLG"</b>                   | means the Ministry of Housing, Communities & Local Government (or a successor department)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                                   |                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>“Nolan Principles”</b>         | means the Seven Principles of Public Life, namely selflessness, integrity, objectivity, accountability, openness, honesty and leadership, as published by the Committee on Standards in Public Life and as amended, supplemented or replaced from time to time, being the principles that underpin standards of conduct for those exercising public functions |
| <b>“Non-Executive Member”</b>     | means a Member who is not an employee, Officer or [office-holder] of GCDC                                                                                                                                                                                                                                                                                     |
| <b>“Officers”</b>                 | means the Deputy Chief Executive, the Finance Director and the General Counsel                                                                                                                                                                                                                                                                                |
| <b>“Open Meeting”</b>             | has the meaning given in <b>paragraph</b> Error! Reference source not found.                                                                                                                                                                                                                                                                                  |
| <b>“Other Member”</b>             | means a member who is not a Local Authority Member                                                                                                                                                                                                                                                                                                            |
| <b>“Papers”</b>                   | means reports, presentations and other materials provided to Members for consideration at or in connection with a Meeting                                                                                                                                                                                                                                     |
| <b>“Planning Functions Order”</b> | (when in place) means the Greater Cambridge Development Corporation (Planning Functions) Order [2026] (SI [2026]/[ ]), made under section 149 of the Local Government, Planning and Land Act 1980, which confers specified local planning authority functions on GCDC in respect of the Urban Development Area                                                |
| <b>“Scheme of Delegation”</b>     | means the scheme of delegation set out in <b>Schedule 2</b>                                                                                                                                                                                                                                                                                                   |
| <b>“Secretary of State”</b>       | means the Secretary of State for Housing, Communities and Local Government (or their successor from time to time)                                                                                                                                                                                                                                             |
| <b>“Strategic Vision”</b>         | means GCDC’s long term document covering the period of twenty five years from the date of presentation to the Board, describing the strategic ambition of the Board and informing the more detailed activities set out in the Corporate and Business Plans.                                                                                                   |
| <b>“Sub-Committee”</b>            | means any Sub-Committees established by the Board in accordance with <b>paragraph 14</b>                                                                                                                                                                                                                                                                      |
| <b>“Service Level Agreement”</b>  | means an agreement for the provision of services to GCDC                                                                                                                                                                                                                                                                                                      |
| <b>“Terms”</b>                    | means these Terms of Reference                                                                                                                                                                                                                                                                                                                                |
| <b>“Transparency Policy”</b>      | means the Transparency Policy as approved and amended by the Board from time to time                                                                                                                                                                                                                                                                          |
| <b>“Urban Development Area”</b>   | means the area designated as an urban development area by article 3 of the Establishment Order pursuant to section 134 of the Local Government, Planning and Land Act 1980                                                                                                                                                                                    |

## 2.2 References to any statute or statutory provision include any modification, extension or re-enactment thereof.

### 3. **ROLE OF THE BOARD**

- 3.1 The Board is responsible for the overall direction and control of GCDC and shall exercise its functions in accordance with:
- 3.1.1 GCDC's statutory objects and powers;
  - 3.1.2 the Framework Document;
  - 3.1.3 any applicable directions or guidance issued by MHCLG;
  - 3.1.4 the Scheme of Delegation; and
  - 3.1.5 the Delegated Financial Authorities.
- 3.2 Without limiting paragraph 3.1, the Board shall:
- 3.2.1 oversee the governance of GCDC, including safeguarding the reputation of GCDC and maintaining effective relationships with MHCLG and other key stakeholders;
  - 3.2.2 oversee the delivery of the Strategic Vision, the Corporate Plan, and the Business Plan;
  - 3.2.3 approve the Corporate Plan and submit the Corporate Plan to the MHCLG Minister and MHCLG for approval in accordance with Schedule 1;
  - 3.2.4 approve GCDC's Business Plan, including its output targets and key performance indicators, and submit it to MHCLG for approval in accordance with Schedule 1;
  - 3.2.5 approve and maintain the Scheme of Delegation;
  - 3.2.6 approve and maintain the Delegated Financial Authorities;
  - 3.2.7 approve GCDC's annual budget and major investment decisions, consistent with the Business Plan, and submit the annual budget to MHCLG for approval in accordance with Schedule 1;
  - 3.2.8 approve the Annual Report and Accounts for submission to Parliament;
  - 3.2.9 receive reports from Committees and consider any matters referred to the Board by them;
  - 3.2.10 oversee the effectiveness of GCDC's governance, risk management (including oversight of mitigation strategies) and internal control arrangements;
  - 3.2.11 support the Accounting Officer in securing the proper, economic, efficient and effective use of public funds;

- 3.2.12 monitor GCDC's performance against its objectives, targets and key performance indicators;
- 3.2.13 ensure that appropriate arrangements are in place for stakeholder engagement, public participation and public accountability;
- 3.2.14 ensure that appropriate arrangements are established to facilitate engagement with local stakeholders (including local residents and business owners) within the Urban Development Area and to communicate relevant feedback to MHCLG
- 3.2.15 establish and maintain policies to ensure effective governance of GCDC; and
- 3.2.16 oversee compliance with all applicable statutory and administrative requirements.

#### 4. **COMPOSITION**

- 4.1 The composition of the Board, including the minimum number of Members, shall be determined in accordance with the Local Government, Planning and Land Act 1980 (or any successor legislation), and any applicable public appointments processes.
- 4.2 Upon receiving written notification from the Secretary of State that a Member has been appointed or removed, GCDC shall take all administrative steps necessary to give effect to that appointment or removal.
- 4.3 Subject to **paragraph 4.1**, each Local Authority Leader shall be eligible for appointment by the Secretary of State as a Local Authority Member.
- 4.4 Each Local Authority Leader may nominate one alternate.
- 4.5 Any alternate nominated under **paragraph 4.4**:
  - 4.5.1 must be a member of the cabinet or executive of the relevant Local Authority; and
  - 4.5.2 shall not act as an alternate unless approved by the Secretary of State.
- 4.6 Subject to **paragraph 4.1**, such other persons as the Secretary of State may determine may be appointed as Other Members.
- 4.7 No Other Member may nominate or appoint an alternate.
- 4.8 In the event of any reorganisation, merger, abolition or replacement of a local authority within the Urban Development Area, or any change to its governance arrangements, the Board shall seek to ensure that there are at all times not fewer than four Local Authority Members.
- 4.9 Subject to **paragraph 11.1**, the Board may, with the prior approval of MHCLG, appoint an individual to serve as Chief Executive of GCDC.

- 4.10 The Chief Executive shall be appointed as a Member only with the approval of the Secretary of State.
- 4.11 Subject to **paragraph 11.1**, the Board may, with the prior consent of MHCLG, remove the Chief Executive and appoint a successor.

## 5. **ATTENDANCE**

- 5.1 The following persons shall be entitled to attend Meetings, vote on matters before the Board and count towards the quorum:
  - 5.1.1 the Chair;
  - 5.1.2 the Deputy Chair;
  - 5.1.3 the Chief Executive or, where the Chief Executive is unable to attend, a deputy who has been approved as a Member by the Secretary of State;
  - 5.1.4 all Local Authority Members; and
  - 5.1.5 all Other Members.
- 5.2 The following persons shall be entitled to attend Meetings but shall not be entitled to vote on matters before the Board or count towards the quorum:
  - 5.2.1 the Deputy Chief Executive (when not attending in place of the Chief Executive pursuant to **paragraph 5.1.3**);
  - 5.2.2 the General Counsel, their nominee or, where that office is vacant, an interim appointee designated by the Chief Executive or the Chair;
  - 5.2.3 the Finance Director, their nominee or, where that office is vacant, an interim appointee designated by the Chief Executive or the Chair;
  - 5.2.4 a representative of MHCLG; and
  - 5.2.5 such other persons as the Chair may invite.
- 5.3 Until the Local Authority Leaders have been appointed as Members, they shall be invited to attend all Meetings as non-voting attendees.
- 5.4 A Local Authority Member may attend a Meeting personally or by their alternate, provided that the alternate has been appointed in accordance with **paragraph 4.4** and **paragraph 4.5**.
- 5.5 A Local Authority Member and their alternate may not both participate in the same Meeting.

- 5.6 Where both a Local Authority Member and their alternate attend a Meeting, only the Local Authority Member shall be entitled to participate, vote and count towards the quorum.

## 6. QUORUM

- 6.1 A Meeting shall not be quorate unless:
- 6.1.1 the General Counsel, their nominee or, where that office is vacant, an interim appointee designated in accordance with **paragraph 5.2.2**, is present throughout the Meeting; and
  - 6.1.2 the Finance Director, their nominee or, where that office is vacant, an interim appointee designated in accordance with **paragraph 5.2.3**, is present throughout the Meeting.
- 6.2 Until the Local Authority Leaders have been appointed as Members, a Meeting shall be quorate only if at least three Members are present, comprising:
- 6.2.1 the Chair or, in the Chair's absence, the Deputy Chair; and
  - 6.2.2 any two Other Members, which may include the Deputy Chair where the Chair is present.
- 6.3 Following the appointment of the Local Authority Leaders as Members, **paragraph 6.2** shall cease to apply.
- 6.4 Thereafter, a Meeting shall be quorate only if at least five Members are present, comprising:
- 6.4.1 the Chair or, in the Chair's absence, the Deputy Chair;
  - 6.4.2 not fewer than two Local Authority Members; and
  - 6.4.3 not fewer than two Other Members, which may include the Deputy Chair where the Chair is present.
- 6.5 If a Meeting ceases to be quorate, no further business shall be transacted and the Meeting shall be adjourned.

## 7. MEETINGS

- 7.1 The Board shall hold such Meetings as are necessary for the proper discharge of its functions and, in any event, not fewer than six Meetings in each Financial Year.
- 7.2 **Convening Meetings**

The Chair may convene a Meeting at any time.

7.3 The Chair shall convene a Meeting upon the written request of any three Members.

#### 7.4 **Notice and agenda**

Notice of each Meeting shall:

7.4.1 be given to all persons entitled to attend the Meeting pursuant to **paragraph 5**; and

7.4.2 specify the date, time, place and proposed agenda for the Meeting.

7.5 Except in cases of urgency, the notice, agenda and Papers for a Meeting shall be circulated to the persons entitled to receive them pursuant to **paragraph 7.4.1** at least five clear Working Days before the Meeting.

7.6 An accidental failure to give notice of a Meeting, circulate the agenda or Papers, or the non receipt of any such document by a person entitled to receive it, shall not invalidate the proceedings of the Meeting.

#### 7.7 **Late Papers**

Where it is not reasonably practicable to circulate Papers in accordance with **paragraph** Error! Reference source not found., the Papers may be circulated later with the approval of the Chair.

7.8 Any notice accompanying Papers circulated under **paragraph 7.7** shall explain the reason for the late circulation.

7.9 The late circulation of Papers shall not invalidate the proceedings of the Meeting.

#### 7.10 **MHCLG attendance**

The notice, agenda and Papers for each Meeting shall be provided to MHCLG.

#### 7.11 **Additional agenda items**

The Board may consider an item of business which does not appear on the agenda if the Chair determines that:

7.11.1 the item is routine and substantially uncontroversial; or

7.11.2 urgent consideration is required and it was not reasonably practicable to include the item on the agenda.

#### 7.12 **Remote Meetings**

Meetings shall ordinarily be held in person.

7.13 If the Chair determines that it is not reasonably practicable for a Meeting to be held in person, the Meeting may instead be held:

7.13.1 by telephone conference;

7.13.2 by video conference; or

7.13.3 by a combination of such means.

#### 7.14 **Chairing Meetings**

The Chair shall preside at Meetings.

7.15 If the Chair is absent, the Deputy Chair shall preside.

7.16 If both the Chair and the Deputy Chair are absent, the Members present shall appoint one of their number to chair the Meeting.

### 8. **AGENDA AND PAPERS**

8.1 The Chair shall approve the agenda for each Meeting.

8.2 Any Member may request that an item be included on the agenda for a Meeting by notifying the Chair before the agenda for that Meeting is finalised.

8.3 The Chair shall determine whether an item requested under **paragraph 8.2** is included on the agenda.

8.4 Papers submitted for consideration by the Board shall be sufficiently detailed to enable informed decision making.

8.5 Board Papers shall clearly identify:

8.5.1 the decision requested of the Board;

8.5.2 the reasons supporting the recommendation;

8.5.3 any material legal, financial, operational, reputational or governance risks associated with the recommendation; and

8.5.4 where relevant, any alternative options considered and the reasons for recommending the proposed course of action.

### 9. **DECISION-MAKING AND VOTING**

9.1 Each Entitled Member present at a Meeting shall have one vote.

9.2 Decisions shall be taken by a simple majority of the Entitled Members present and voting.

9.3 In the event of an equality of votes, the person chairing the Meeting shall have a second or casting vote.

9.4 A decision of the Board may be taken by a written resolution.

- 9.5 A written resolution shall be passed where it is approved by a simple majority of the Entitled Members.
- 9.6 Approval of a written resolution may be evidenced by signature, including electronic signature.
- 9.7 A written resolution may take the form of a single document or counterpart documents.
- 9.8 A written resolution shall take effect on the date on which the required approvals have been received, unless a later date is specified in the resolution.
- 9.9 A written resolution and the record of its approval shall be published, redacted, deferred or withheld in accordance with the Transparency Policy.

## 10. **DECLARATION OF INTERESTS**

- 10.1 This paragraph 10 applies to each Member and each member of a Committee.
- 10.2 Each person to whom this **paragraph 9.9** applies shall:
  - 10.2.1 comply with GCDC's Code of Conduct; and
  - 10.2.2 declare any direct or indirect interest in a matter to be considered at a Meeting or by written resolution.
- 10.3 GCDC shall record each interest declared under **paragraph 10.2.2** in its register of interests.
- 10.4 Subject to **paragraph 10.5**, a person who has declared an interest shall not:
  - 10.4.1 participate in any discussion relating to the relevant matter;
  - 10.4.2 vote on the relevant matter;
  - 10.4.3 count towards the quorum for consideration of the relevant matter; or
  - 10.4.4 approve a written resolution relating to the relevant matter.
- 10.5 The Board may permit a person who has declared an interest to participate in the consideration of the relevant matter if the Board is satisfied that:
  - 10.5.1 the interest is not material;
  - 10.5.2 the participation is unlikely to give rise to a real or perceived risk of bias; and
  - 10.5.3 the participation is in the best interests of GCDC.
- 10.6 Where the Board permits participation under **paragraph 10.5**, it may permit:
  - 10.6.1 full participation; or

10.6.2 participation subject to any restrictions that the Board considers appropriate.

10.7 The Board shall have particular regard to conflicts arising from GCDC exercising functions as both:

10.7.1 a planning authority; and

10.7.2 a developer or landowner.

10.8 The minutes of the relevant Meeting, or the record of the relevant written resolution, shall record:

10.8.1 the interest declared;

10.8.2 the Board's decision under **paragraph 10.5**; and

10.8.3 any restrictions imposed under **paragraph 10.6.2**.

10.9 GCDC shall maintain its register of interests and review it at least annually.

## 11. **TRANSPARENCY AND CONFIDENTIALITY**

11.1 GCDC shall conduct its business in an open and transparent manner.

11.2 Agendas, Papers, minutes, written resolutions and decision records shall be published, redacted, deferred or withheld in accordance with the Transparency Policy.

### 11.3 **Open Meetings**

GCDC shall hold not fewer than four Meetings in each Financial Year that are open to observation by members of the public ("**Open Meetings**").

11.4 Open Meetings shall be livestreamed and may be observed remotely by members of the public. Where a member of the public is unable to access the livestream because they do not have internet access or suitable technology, GCDC shall consider alternative arrangements in accordance with the Transparency Policy. Nothing in this provision confers a right to attend the room in which the Open Meeting takes place.

11.5 At least five clear Working Days before each Open Meeting, GCDC shall publish on its website:

11.5.1 notice of the Open Meeting;

11.5.2 the agenda; and

11.5.3 the Papers classified for publication under the Transparency Policy.

The classification, redaction and withholding of Papers shall be governed by the Transparency Policy.

11.6 Members of the public may submit questions to the Board up to 48 hours before an Open Meeting.

11.7 The Chair may allocate time during an Open Meeting for the Board to consider and respond to questions submitted under **paragraph 11.5**.

#### 11.8 **Exclusion of the public**

The Board may resolve to exclude the public from all or part of an Open Meeting where Exempt Information is to be considered.

#### 11.9 **Conduct of Open Meetings**

11.10 The Chair may take such steps as the Chair reasonably considers necessary to:

11.10.1 ensure the safety of persons attending an Open Meeting; and

11.10.2 secure the proper and orderly conduct of an Open Meeting.

11.11 The powers available to the Chair under **paragraph 11.9** may include:

11.11.1 refusing entry to an Open Meeting; or

11.11.2 requiring a person to leave an Open Meeting,

11.12 where the Chair reasonably considers that the person's conduct is, or is likely to be, disruptive, threatening or otherwise prejudicial to the proper conduct of the Open Meeting.

### 12. **MHCLG RESERVED MATTERS**

GCDC and the Board shall not undertake any of the matters referred to in **Schedule 1** without the prior written consent of MHCLG.

### 13. **DELEGATION**

13.1 The Board may, subject to any limitations imposed by law, these Terms, the Scheme of Delegation, the Framework Document or MHCLG, delegate any of its functions to:

13.1.1 a Committee;

13.1.2 the Chair;

13.1.3 [the Deputy Chair;]

13.1.4 the Chief Executive; or

13.1.5 an Officer of GCDC.

- 13.2 The Board shall adopt and maintain and periodically review a Scheme of Delegation setting out:
  - 13.2.1 matters reserved to the Board; and
  - 13.2.2 matters delegated to Committees and Officers.
- 13.3 All delegations shall be exercised in accordance with:
  - 13.3.1 the Scheme of Delegation;
  - 13.3.2 applicable financial controls including (but not limited to) the Delegated Financial Authorities; and
  - 13.3.3 any conditions imposed by the Board.

## 14. **COMMITTEES**

- 14.1 The Board shall establish and maintain:
  - 14.1.1 an Audit and Risk Assurance Committee;
  - 14.1.2 an Investment Committee;
  - 14.1.3 a Nomination and Remuneration Committee; and
  - 14.1.4 upon the coming into force of the Planning Functions Order, a Planning Committee.
- 14.2 The Board may establish such other Committees as it considers necessary for the discharge of GCDC's functions.
- 14.3 **Audit and Risk Assurance Committee**

The Audit and Risk Assurance Committee shall be established and operated in accordance with:

  - 14.3.1 the HM Treasury Audit and Risk Assurance Committee Handbook;
  - 14.3.2 the Code of Good Practice for Corporate Governance; and
  - 14.3.3 any applicable government guidance on corporate governance.
- 14.4 The Audit and Risk Assurance Committee shall:
  - 14.4.1 be chaired by an independent Non Executive Member; and
  - 14.4.2 not include any Executive Members.

#### 14.5 **Nomination and Remuneration Committee**

The Nomination and Remuneration Committee shall support the Board in relation to senior appointments, succession planning, remuneration and such other matters as are specified in its terms of reference.

- 14.6 The Nomination and Remuneration Committee shall not make a decision reserved to the Board, MHCLG or the Secretary of State unless the relevant authority has expressly delegated that decision to it.

#### 14.7 **Planning Committee**

The Board shall ensure that the membership, terms of reference and procedures of the Planning Committee support the effective management of conflicts arising from GCDC exercising functions as both:

14.7.1 a planning authority; and

14.7.2 a developer or landowner.

#### 14.8 **Governance of Committees**

The Board shall keep under review the effectiveness of each Committee and the adequacy of GCDC's arrangements for governance, risk management and internal control.

- 14.9 Each Committee shall have:

14.9.1 terms of reference approved by the Board;

14.9.2 a defined membership;

14.9.3 quorum requirements; and

14.9.4 reporting obligations to the Board.

#### 14.10 **Committee members**

GCDC may appoint persons who are not Members to serve on a Committee, subject to the prior consent of the Secretary of State.

#### 14.11 **Sub-Committees**

A Committee may establish one or more Sub-Committees in accordance with its terms of reference.

- 14.12 A Sub-Committee may include Members and such other persons as the relevant Committee considers appropriate.

- 14.13 The appointment of a person who is not a Member to a Sub-Committee shall be subject to the prior consent of the Secretary of State. The classification, publication, redaction, deferred publication and withholding of Committee and Sub-Committee

agendas, Papers, minutes and decision records shall be governed by the Transparency Policy.

## **15. EXECUTION OF DOCUMENTS**

### **15.1 GCDC may execute a document:**

15.1.1 under its common seal, authenticated by an Authorised Signatory; or

15.1.2 by such Authorised Signatories as are authorised to execute that document in accordance with the Authorised Signatories list approved by the Board.

### **15.2 The Board shall approve and maintain:**

15.2.1 the Authorised Signatories list prepared by the General Counsel; and

15.2.2 the Delegated Financial Authorities.

### **15.3 GCDC shall not enter into any financial commitment unless:**

15.3.1 it is authorised in accordance with the Scheme of Delegation;

15.3.2 it complies with the Delegated Financial Authorities and all other applicable financial controls; and

15.3.3 where applicable, any approval required under Schedule 1 has been obtained.

## **16. ACCOUNTING OFFICER**

### **16.1 As provided in the Framework Document, the Chief Executive shall act as the Accounting Officer unless otherwise directed.**

### **16.2 The Accounting Officer shall be responsible for:**

16.2.1 ensuring propriety and regularity in the use of public funds;

16.2.2 securing value for money in the use of GCDC's resources; and

16.2.3 maintaining effective systems of governance, risk management and internal control.

### **16.3 The Accounting Officer shall comply with all reporting, assurance and accountability requirements applicable to GCDC, including those set out in the Framework Document and Managing Public Money.**

## 17. MINUTES AND RECORDS

- 17.1 Minutes shall be taken of all Meetings.
- 17.2 Minutes shall record:
  - 17.2.1 the names of those present;
  - 17.2.2 declarations of interests and any decisions made by the Board under **paragraph 10.5**;
  - 17.2.3 the substance of discussions; and
  - 17.2.4 decisions taken.
- 17.3 Draft minutes shall be circulated to the Board promptly and submitted for approval at the next Meeting.
- 17.4 Approved minutes shall be retained as part of GCDC's official records and published, redacted, deferred or withheld in accordance with the Transparency Policy.
- 17.5 Written resolutions and associated decision records shall be published, redacted, deferred or withheld in accordance with the Transparency Policy.

## 18. REVIEW AND VARIATIONS OF THE TERMS

- 18.1 The Board shall review its effectiveness and these Terms at least annually.
- 18.2 Any amendment to these Terms shall require approval by a simple majority of the Entitled Members present and voting at a Meeting.
- 18.3 The agenda and Papers for any Meeting at which an amendment to, or revocation of, these Terms is proposed shall include the full text of the proposed resolution and the proposed amendments to these Terms.
- 18.4 The resolution set out in the agenda and Papers for the relevant Meeting may not be amended at that Meeting or at any adjournment of that Meeting, except to correct a manifest typographical, clerical or cross reference error.

## 19. **GENERAL**

19.1 Members shall at all times act in accordance with:

19.1.1 the Nolan Principles;

19.1.2 GCDC's Code of Conduct and any other applicable codes of conduct; and

19.1.3 their legal duties.

19.2 These Terms shall take effect on the date of adoption by the Board.

## SCHEDULE 1 - MHCLG RESERVED MATTERS

GCDC will not undertake any of the activities set out below in relation to GCDC without the prior approval in writing of MHCLG.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Approve or make any amendments to the Corporate Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Approve GCDC's annual budget and Business Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Appoint/remove the Chief Executive                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Appoint/remove Members (Ministerial appointment)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Carry out any property acquisitions and disposals above the thresholds set out in the Framework Document                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Carry out any borrowing and financing transactions above the thresholds set out in the Framework Document                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>Approve GCDC's remuneration framework applying to employees and Officers, including any performance-related pay or bonus arrangements outside of the framework contained in GCDC's HR policy.</p> <p>Where the Board proposes to make any payments to Officers and/or staff of GCDC outside of GCDC's HR policies (including its remuneration policy), it shall give prior written notice to MHCLG. The notice shall specify a period within which MHCLG may object to the proposed payment(s) and any such objection must be made within that period.</p> |
| Termination of any Service Level Agreement, which would result in the transfer of the terms of that agreement.                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Approve amendments to the Framework Document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## SCHEDULE 2 - SCHEME OF DELEGATION

### PART 1 - BOARD RESERVED MATTERS

| Action/Decision                                                                              | Authority Responsible                                                             | Threshold/Conditions                                                      |
|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| Adoption of the Corporate Plan                                                               | Board (following MHCLG's approval as per <b>Schedule 1</b> )                      | N/A                                                                       |
| Adoption of the annual Business Plan and annual budget                                       | Board (following MHCLG's approval of the annual budget as per <b>Schedule 1</b> ) | N/A                                                                       |
| Appointment/removal of the Chief Executive                                                   | Board (with MHCLG approval as per <b>Schedule 1</b> )                             | As per Framework Document                                                 |
| Adoption or amendment of the Terms, Scheme of Delegation, or Delegated Financial Authorities | Board                                                                             | Subject to compliance with Framework Document and other relevant guidance |
| Significant contracts or investments                                                         | Board                                                                             | Above threshold established by the Delegated Financial Authorities        |
| Establishment of Committees and Sub-Committees                                               | Board                                                                             | N/A                                                                       |
| Approval of organisational and governance policies for GCDC                                  | Board (Board can delegate as it sees fit from time to time)                       | N/A                                                                       |

### PART 2 - BOARD DELEGATED MATTERS

| Action/Decision                                 | Delegated to                                                  | Conditions/Limitations                                                    |
|-------------------------------------------------|---------------------------------------------------------------|---------------------------------------------------------------------------|
| Routine operational decisions                   | Chief Executive                                               | Subject to Board policies and budget                                      |
| Procurement of goods and services               | Chief Executive and Officers                                  | Up to thresholds established by the Delegated Financial Authorities       |
| Execution of documents not requiring Board seal | Authorised Signatories                                        | As set out in <b>paragraph 15</b> of these Terms (Execution of Documents) |
| Minor property deals                            | Chief Executive                                               | Up to thresholds established by Delegated Financial Authorities           |
| Engagement with stakeholders and partners       | Chief Executive (Chief Executive can delegate as appropriate) | On behalf of the Board in accordance with GCDC's Communications Protocol  |

# **Item 07: Audit, Risk and Assurance arrangements**

## Audit, Risk and Assurance arrangements

|                           |                 |                  |
|---------------------------|-----------------|------------------|
| <b>Board Date</b>         | 20 October 2026 |                  |
| <b>Item Number</b>        | 10/26/07        |                  |
| <b>Author / Presenter</b> | <b>Name</b>     | <b>Role</b>      |
|                           | Gareth Caller   | Finance Director |

### 1 Executive Summary

1.1 This paper advises Board on the Terms of Reference for the Development Corporation's Audit and Risk Assurance Committee (ARAC) and highlights specific areas where ARAC departs from central government Audit and Risk Committee Assurance Handbook to reflect the specific characteristics of our work.

**1.2 Board is asked to approve the Terms of Reference for ARAC as drafted.**

### 2 Introduction

2.1 The first meeting of the Board:

- Supported the establishment of an Audit and Risk Committees. Paul Schofield agreed to become Chair with Lucy Nethsingha and John Aston as Members. Peter Freeman will attend but not be a member.
- Noted the importance of effective governance, assurance, and risk oversight arrangements.
- Agreed that formal proposals regarding Committee membership and terms of reference be prepared and submitted to a future meeting for approval.

2.2 The terms of reference for ARAC have been drafted based on the requirements in the central government Audit and Risk Committee Assurance Handbook. There are three areas of departure from those requirements:

- 2.2.1 As set out in Schedule 31 of the Local Government Planning and Land Act 1980 (the 1980 Act"), the Secretary of State is required to appoint the external auditor. The terms of reference require the ARAC to recommend an appointment to the Secretary of State;
- 2.2.2 The provisions related to the appointment of an external auditor have been modified to reflect the fact that the Dev Corp needs to grow a little before it becomes economically viable to support an external audit function;

- 2.2.3 The handbook requires a minimum of four meetings per annum. This will not be possible in the first year of operation but will be accepted practice from 2027-28.
- 2.3 Most central government bodies are required to prepare their accounts under the Government Resources and Accounts Act 2000 (“the GRAA”). The GRAA appoints the Comptroller and Auditor General (“C&AG”) as the external auditor. However, the GRAA does not apply to the Dev Corp, which follows the provisions of the 1980 Act. The 1980 Act stipulates that the external auditor is required to be qualified to audit Companies Act accounts. The C&AG is not so qualified. This means that it will be necessary to run a market selection process. The plan is to run the process before the end of the calendar year, focusing on firms with a presence in the Greater Cambridge area. Irrespective of financial audit arrangements, the C&AG does have the right to request evidence from the Dev Corp to feed into Value for Money Studies. This is because the C&AG has the statutory right to request information from any entity primarily funded by public money.

### **3 Programme of work**

- 3.1 The attached Terms of Reference (ToR) outline the operation and focus of the Committee. The ToR have been reviewed by Paul Schofield (albeit subsequently tidied and made consistent with the Board terms of reference) who will develop the Committee’s programme of work with Committee members and Senior Leadership team.

# Annex 1 - Audit and Risk Committee

## DRAFT Terms of Reference

### 1. Definitions

In this Terms of Reference, the following terms are used:

|                                    |                                                                                                                                                                                                                                                         |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>“Accounting Officer”</b>        | means the officer designated by MHCLG’s Principal Accounting Officer as the accounting officer of GCDC responsible for the proper stewardship of GCDC’s funds, including ensuring regularity, propriety and value for money in the use of its resources |
| <b>“Board”</b>                     | The board of GCDC                                                                                                                                                                                                                                       |
| <b>“Chair”</b>                     | The chair of the Board                                                                                                                                                                                                                                  |
| <b>“Committee Chair”</b>           | The chair of the Committee                                                                                                                                                                                                                              |
| <b>“Committee”</b>                 | The Audit and Risk Committee established by the Board                                                                                                                                                                                                   |
| <b>“Deputy Chief Executive”</b>    | The deputy chief executive officer of GCDC                                                                                                                                                                                                              |
| <b>“Finance Director”</b>          | The finance director of GCDC                                                                                                                                                                                                                            |
| <b>“GCDC”</b>                      | Greater Cambridge Development Corporation                                                                                                                                                                                                               |
| <b>“GCDC’s Terms of Reference”</b> | The Terms of Reference of GCDC adopted by the Board as amended from time to time                                                                                                                                                                        |
| <b>“General Counsel”</b>           | The senior legal adviser to GCDC                                                                                                                                                                                                                        |

Capitalised terms used in these Terms of Reference but not otherwise defined shall have the meanings given to them in GCDC’s Terms of Reference.

### 2. Purpose

The Committee is a committee of the Board established to provide independent assurance and advice to the Board on:

- The adequacy and effectiveness of GCDC's systems of governance, risk management and internal control
- The integrity of financial reporting and financial management
- Arrangements for securing economy, efficiency and effectiveness in the use of resources
- The effectiveness of internal and external audit functions
- The management of strategic, operational, financial, development, health and safety, environmental and reputational risks

The Committee shall support the Board and the Accounting Officer in ensuring that GCDC maintains sound governance arrangements and a robust framework for identifying, assessing and managing risk.

### **3. Authority**

The Committee is authorised by the Board to:

- Investigate any activity within its terms of reference
- Obtain any information it requires from directors, officers, employees, contractors or advisers of GCDC
- Require attendance of any employee, adviser or contractor at Committee meetings as necessary
- Co-opt additional existing members of the Board for a period not exceeding a year to provide specialist skills, knowledge and experience. To co-opt additional external candidates as members of the Committee, Secretary of State approval will be required in accordance with GCDC's Terms of Reference.
- Obtain independent professional advice at GCDC's expense, subject to any Board-approved procurement requirements

The Committee shall not determine any matter reserved to the Board, MHCLG, the Secretary of State or another appointing authority unless the relevant authority has expressly delegated that matter to the Committee.

### **4. Membership**

#### **4.1 Composition**

The Committee shall comprise of at least three members of the Board, all of whom shall be Non Executive Members. The Committee members shall be appointed by the Board.

The Chair may not be a member of the Committee or Committee Chair.

Unless otherwise determined by the Board, the duration of appointments of nominated members of the Committee shall be for a period of up to three years, which may be extended by the Board for an additional three years.

#### **4.2 Chair**

The Board shall appoint the Committee Chair. The Chair shall be an independent and appropriately qualified non-executive member of the Board.

The Committee Chair may appoint a member of the Committee to act as their deputy who shall chair the meeting in the absence of the Committee Chair.

## **5. Attendance**

The following may attend meetings though the Committee may meet privately without any non-members present for all, or part, of a meeting if they so wish:

- The Accounting Officer
- Deputy Chief Executive
- Finance Director
- General Counsel
- External audit representative
- The Head of Internal Audit

The Committee Chair may invite such other officers, advisers, consultants or other persons as they consider appropriate to attend a meeting of the Committee.

Members of the Committee and other attendees shall comply with the declaration of interests provisions in GCDC's Terms of Reference and Code of Conduct.

Attendees shall not be members of the Committee, shall not vote and shall not count towards the quorum.

The Committee may ask any or all individuals who would normally attend meetings to withdraw from all or part of a meeting where they have an actual, potential or perceived conflict of interest.

The Head of Internal Audit and the external audit representative shall have free and confidential access to the Committee Chair.

## **6. Quorum**

The quorum for a meeting of the Committee shall be the greater of:

- two members; or
- where the Committee has more than three members, one-third of the Committee's members.

The quorum must include either the Committee Chair or a member of the Committee nominated by the Committee Chair to act as their deputy.

No business shall be transacted unless a quorum is present.

## **7. Meetings**

The Committee shall meet not less than four times a year, with the exception being the first 6 months from the date of establishment of the GCDC where Committee shall meet not less than two times.

The Committee Chair may convene additional meetings where necessary.

The Board and/or the Accounting Officer may ask the Committee to convene additional meetings to discuss particular issues on which they require the Committee's advice.

Decisions should normally be made by consensus and, where necessary, by majority vote.

The Committee Chair shall have a casting vote in the event of equality of votes.

The provisions of GCDC's Terms of Reference relating to notice, agendas, Papers and minutes shall apply to the Committee. The classification, publication, redaction, deferred publication and withholding of the Committee's agendas, Papers, minutes and decision records shall be governed by the Transparency Policy.

## **8. Responsibilities**

### **8.1 Financial Reporting**

The Committee shall:

- Review annual accounts and financial statements before submission to the Board
- Consider the appropriateness of accounting policies, estimates and judgements
- Review significant financial reporting issues and management responses
- Consider whether the annual report provides a fair, balanced and understandable assessment of GCDC's position and performance
- Review management representations made in relation to financial statements

### **8.2 Risk Management**

The Committee shall:

- Review and monitor GCDC's risk management framework
- Recommend GCDC's risk appetite and tolerance for Board approval
- Review the corporate risk register and key strategic risk exposures
- Monitor management actions to address significant risks

- Review emerging and horizon risks relevant to GCDC's development and regeneration activities
- Assess risks associated with major projects, development programmes, funding structures, partnerships and joint ventures
- Review arrangements for business continuity and crisis management

### **8.3 Internal Control and Governance**

The Committee shall:

- Monitor the adequacy and effectiveness of internal control, risk management and governance systems
- Review governance arrangements and compliance with relevant codes of corporate governance
- Consider reports on control failures, fraud, irregularities or significant governance issues
- Proposals for tendering for audit services
- Review the procedures for detecting fraud, obtaining assurances on compliance, and the systems and controls in place for the prevention of bribery
- Monitor management responses to recommendations arising from audits, investigations and reviews
- Review policies relating to delegated authority and financial controls

### **8.4 Internal Audit**

The Committee shall:

- Recommend to the Board the point at which the appointment of an internal auditor is required
- Consider the remuneration, appointment, removal or replacement of internal audit providers where relevant
- Approve the internal audit mandate, charter, plan, budget and resource plan.
- Review internal audit reports and management responses
- Monitor implementation of agreed audit recommendations
- Review the effectiveness and independence of the internal audit function

- Receive an annual report from internal audit regarding governance, risk management and control arrangements

## **8.5 External Audit**

The Committee shall:

- Make recommendations to the Board regarding the appointment, reappointment or removal of the external auditor and oversee the selection process for a new external auditor where required.
- Satisfy itself that there are no relationships between the external auditor and the firm (other than in the ordinary course of business) which could adversely affect the auditor's independence and objectivity, including monitoring the fees paid to the external auditor compared to the overall fee income of the firm, office and partner and assess these in the context of relevant legal, professional and regulatory requirements, guidance and applicable ethical standards.
- Review the external audit plan and scope
- Consider findings, management letters and audit reports
- Monitor management's response to audit recommendations
- Assess the effectiveness, independence and objectivity of the external auditor

## **9. Reporting**

The Committee shall:

- Formally report to the Board and the Accounting Officer (either verbally or in writing) following each meeting
- Escalate material concerns promptly to the Board
- Provide a written, annual report to the Board on its activities timed to support finalisation of the accounts and GCDC's annual Governance Statement, summarising its conclusions on the effectiveness of the control framework in place from the work it has done during the year
- Recommend actions requiring Board approval

## **10. Review of Effectiveness**

The Committee shall:

- Review its effectiveness annually
- Review these Terms of Reference at least annually
- Recommend any amendments to the Board for approval
- Ensure members receive appropriate induction and ongoing training on audit, risk and governance matters

## **11. Secretariat**

The Secretariat function shall act as secretary to the Committee and shall:

- Circulate agendas and papers in advance of meetings
- Prepare minutes and records of decisions
- Maintain an action log and monitor progress against agreed actions

## **12. Delegation**

The Committee may exercise only the authority delegated to it by the Board. Any matter not expressly delegated to the Committee remains reserved to the Board, MHCLG, the Secretary of State or the relevant appointing authority, as applicable.

The Committee may establish working groups or Sub-Committees, or assign specific tasks to designated individuals, where appropriate. Any Sub-Committee shall be established in accordance with GCDC's Terms of Reference, including the requirement for the prior consent of the Secretary of State to the appointment of any person who is not a Member. Responsibility for matters within the Committee's remit shall remain with the Committee unless the Board has expressly authorised a further delegation.

## **13. Information Requirements**

For each meeting, unless otherwise agreed, the Committee shall be provided (at an agreed time in advance of the meeting) with:

- a report summarising any significant changes to GCDC's strategic risks and a copy of GCDC's strategic/corporate Risk Register;
- a progress report (written or verbal) from the Head of Internal Audit if relevant;

- a progress report (written or verbal) from the external audit representative summarising work done and emerging findings if relevant;
- management assurance or changes to the control environment reports; and
- reports on the management of major incidents, “near misses” whistleblowing cases and lessons learned.

As and when appropriate and requested by the Committee (at an agreed time in advance of a meeting), the Committee shall also be provided with:

- proposals for the review of terms of reference of internal audit / the internal audit mandate and charter;
- the internal audit strategy;
- the Head of Internal Audit’s annual overall conclusion and report;
- quality assurance reports on the internal audit function;
- the draft annual report and accounts;
- GCDC’s draft annual Governance Statement;
- a report on any changes to accounting policies;
- external audit’s annual plan;
- external audit’s management letter;
- a report on any proposals to tender for audit functions;
- an update on co-operation between internal and external audit;
- GCDC’s Risk Management Strategy and
- relevant reports from any other assurance providers.

## **Item 08: Nominations and Remuneration Committee**

## Nominations and Remuneration Committee

|                           |                 |                  |
|---------------------------|-----------------|------------------|
| <b>Board Date</b>         | 20 October 2026 |                  |
| <b>Item Number</b>        | 10/26/08        |                  |
| <b>Author / Presenter</b> | <b>Name</b>     | <b>Role</b>      |
|                           | Gareth Caller   | Finance Director |

### 1 Executive Summary

1.1 This paper advises Board on the Terms of Reference for the Development Corporation's Nominations and Remuneration Committee (N&R).

1.2 **Board is invited to approve the Terms of Reference for N&R as drafted.**

### 2 Introduction

2.1 The first meeting of the Board:

- Supported the establishment of a Nominations and Remuneration Committees. Ros Kerslake has agreed to become interim Chair with Lucy Nethsingha, John Aston and Peter Freeman as Members.
- Noted the importance of effective governance, assurance, and risk oversight arrangements.
- Agreed that formal proposals regarding Committee membership and terms of reference be prepared and submitted to a future meeting for approval.

2.2 The terms of reference for N&R have been drafted and shared with Ros Kerslake.

### 3 Programme of work

3.1 In line with the TOR the main initial focus of the Committee is likely to be:

- In our start-up phase, establishing the wider employment offer (e.g. salary bands, benefits, pension arrangements, and other T&Cs) for employment by the Dev Co ahead of employing direct staff. The committee would be asked to consider proposals for a set of principles taking account of what we think best from Homes England and/or the Department and/or LLDC/Old Oak Development Corporation, and/or the local authorities. When the Corporation is fully up and running, the focus will be on arrangements for senior staff.
- Once those are in place to deal with the aspects of senior officer appointments which were left pending such T&C's.

# Annex 1 - Nominations and Remuneration Committee

## DRAFT Terms of Reference

### 1. Definitions

In this Terms of Reference, the following terms are used:

|                                    |                                                                                  |
|------------------------------------|----------------------------------------------------------------------------------|
| <b>“Board”</b>                     | The board of GCDC                                                                |
| <b>“Chief Executive”</b>           | The chief executive officer of GCDC                                              |
| <b>“Chair”</b>                     | The chair of the Board                                                           |
| <b>“Committee Chair”</b>           | The chair of the Committee                                                       |
| <b>“Committee”</b>                 | The Nominations and Remuneration Committee established by the Board              |
| <b>“Deputy Chief Executive”</b>    | The deputy chief executive officer of GCDC                                       |
| <b>“Finance Director”</b>          | The finance director of GCDC                                                     |
| <b>“GCDC”</b>                      | Greater Cambridge Development Corporation                                        |
| <b>“GCDC’s Terms of Reference”</b> | The Terms of Reference of GCDC adopted by the Board as amended from time to time |
| <b>“General Counsel”</b>           | The senior legal adviser to GCDC                                                 |

Capitalised terms used in these Terms of Reference shall have the meanings given to them in GCDC’s Terms of Reference.

### 2. Purpose

The Committee is a committee of the Board established to:

- Support the Board in ensuring that the Board, its committees and senior executives have the appropriate balance of skills, experience, independence, diversity and knowledge to fulfil their responsibilities effectively;
- Support the process for appointments and succession planning for Board members, committee members and senior executives;
- Oversee remuneration arrangements for the Chief Executive and senior executives;
- Ensure remuneration policies support GCDC's strategic objectives, values and public accountability obligations;
- Promote high standards of corporate governance, equality, diversity and inclusion.

### **3. Authority**

The Committee is authorised by the Board to:

- Consider and make recommendations to the Board on matters within its remit
- Obtain information from officers, advisers and external consultants as necessary
- Commission independent advice on remuneration, recruitment, governance or other matters relevant to its responsibilities
- Access sufficient resources to fulfil its duties

The Committee shall not determine any matter reserved to the Board, MHCLG, the Secretary of State or another appointing authority unless the relevant authority has expressly delegated that matter to the Committee.

### **4. Membership**

#### **4.1 Composition**

The Committee shall comprise at least three members of the Board. The Committee members shall be appointed by the Board.

A majority of members shall be Non-Executive Members where practicable.

The Chair may be a member of the Committee but shall not be appointed as Committee Chair.

The Chief Executive shall not be a member of the Committee.

#### **4.2 Chair**

The Board shall appoint the Committee Chair.

The Committee Chair may appoint a member of the Committee to act as their deputy who shall chair the meeting in the absence of the Committee Chair.

### **5. Attendance**

The following may attend meetings:

- Chief Executive
- Deputy Chief Executive
- Finance Director
- General Counsel

The Committee Chair may invite such other officers, advisers, consultants or other persons as they consider appropriate to attend a meeting of the Committee. Invited attendees shall not be members of the Committee, shall not vote and shall not count towards the quorum.

Members of the Committee and other attendees shall comply with the declaration of interests provisions in GCDC's Terms of Reference and Code of Conduct. A person shall not participate in the consideration of any matter relating to their own appointment, performance, succession planning or remuneration, except to provide information requested by the Committee.

## **6. Quorum**

The quorum for a meeting of the Committee shall be the greater of:

- two members; or
- where the Committee has more than three members, one-third of the Committee's members.

The quorum must include:

- the Committee Chair or a member of the Committee nominated by the Committee Chair to act as their deputy; and
- at least one Non-Executive Member.

No business shall be transacted unless a quorum is present.

## **7. Meetings**

The Committee shall meet not less than two times in each financial year.

The Committee Chair may convene additional meetings where necessary.

Decisions should normally be made by consensus and, where necessary, by majority vote.

The Committee Chair shall have a casting vote in the event of equality of votes.

The provisions of GCDC's Terms of Reference relating to notice, agendas, Papers and minutes shall apply to the Committee. The classification, publication, redaction, deferred publication and withholding of the Committee's agendas, Papers, minutes and decision records shall be governed by the Transparency Policy.

## **8. Responsibilities**

### **Nominations**

The Committee shall:

#### **8.1 Board Composition**

- Keep under review the structure, size and composition of the Board and its committees
- Assess the balance of skills, knowledge, experience and diversity required
- Recommend changes to Board composition where appropriate

#### **8.2 Recruitment and Appointment**

- Lead processes for Board and committee appointments, where delegated
- Develop role descriptions and person specifications
- Oversee fair, transparent and merit-based selection procedures
- Make recommendations to the Board and relevant appointing authority on appointments and reappointments

The Committee's role in relation to appointments and reappointments is advisory and does not affect any appointment or approval power vested in the Board, the Secretary of State, MHCLG or any other appointing authority.

#### **8.3 Succession Planning**

- Keep succession plans under review for:
  - The Chair;
  - Board members;
  - Committee Chair;
  - Chief Executive;
  - Senior executive roles.
- Identify senior executive development requirements and talent pipelines

#### **8.4. Diversity and Inclusion**

- Monitor the diversity of the Board and senior executives;
- Promote equality, diversity and inclusion in appointment processes;
- Consider diversity objectives and progress against them.

## **9 Remuneration**

The Committee shall:

### **9.1. Remuneration Framework**

- Review and recommend remuneration policies for senior executives.
- Ensure remuneration supports:
  - Delivery of corporate objectives
  - Good governance
  - Long-term sustainable performance
  - Public accountability and value for money

### **9.2. Chief Executive**

- Recommend to the Board:
  - Chief Executive remuneration
  - Any changes to salary
  - Performance-related arrangements, where applicable
  - Severance terms and compensation arrangements

### **9.3. Senior Executives**

- Review remuneration arrangements for executive directors and senior management
- Consider recruitment and retention requirements alongside affordability and market practice

### **9.4. Reward and Benefits**

- Oversee:
  - Salary structures
  - Pension arrangements
  - Benefits
  - Incentive arrangements, where applicable
- Ensure compliance with relevant public sector pay guidance and statutory requirements

Any recommendation relating to remuneration, performance-related pay, benefits, severance or compensation shall be subject to the Framework Document, the MHCLG

Reserved Matters, GCDC's applicable HR policies and any approval or notification requirement applying to the matter.

## **10. Performance and Objectives**

The Committee shall:

- Consider the annual appraisal outcomes for the Chief Executive
- Review arrangements for assessing senior executive performance
- Ensure performance assessment supports strategic delivery and organisational values

## **11. Reporting**

The Committee shall:

- Report to the Board following each meeting
- Provide a written, annual report to the Board on its activities and effectiveness
- Recommend actions requiring Board approval

## **12. Review of Effectiveness**

The Committee shall:

- Review its effectiveness annually
- Review these Terms of Reference at least annually
- Recommend any amendments to the Board for approval

## **13. Secretariat**

The Secretariat function shall act as secretary to the Committee and shall:

- Circulate agendas and papers in advance of meetings
- Prepare minutes and records of decisions
- Maintain an action log and monitor progress against agreed actions

## **14. Delegation**

The Committee may exercise only the authority delegated to it by the Board. Any matter not expressly delegated to the Committee remains reserved to the Board, MHCLG, the Secretary of State or the relevant appointing authority, as applicable.

The Committee may establish working groups or Sub-Committees, or assign specific tasks to designated individuals, where appropriate. Any Sub-Committee shall be established in accordance with GCDC's Terms of Reference, including the requirement for the prior consent of the Secretary of State to the appointment of any person who is not a Member. Responsibility for matters within the Committee's remit shall remain with the Committee unless the Board has expressly authorised a further delegation.

# **Item 09: Establishing an Investment Committee**

## Establishing an Investment Committee

|                           |                 |                 |
|---------------------------|-----------------|-----------------|
| <b>Board Date</b>         | 20 October 2026 |                 |
| <b>Item Number</b>        | 10/26/09        |                 |
| <b>Author / Presenter</b> | <b>Name</b>     | <b>Role</b>     |
|                           | James Butters   | General Counsel |

### 1 Proposal

- 1.1 In line with its objectives, budgets and delegated authorities, the Corporation expects to make decisions on proposals for investments in infrastructure, land acquisition, development and disposal. Over time, it is likely we will consider establishing a subsidiary vehicle to deliver this part of our activity.
- 1.2 Initially, we propose establishing a sub-committee of Board to consider any proposals. Attached are draft Terms of Reference for the sub-committee. The committee will need a Chair and at least 2 other members to be quorate.
- 1.3 Terms of reference for the investment committee will be drafted, aligning it with the other committees of the Corporation.

### 2 Recommendation

- 2.1 That Board:
  - 2.1.1 Discuss and agree to establish an investment committee
  - 2.1.2 Identify a Chair and at least 2 other members to serve on the committee
  - 2.1.3 Set the date for the presentation and consideration of the terms of reference (at point 1.3).

## **Item 12: Engagement Approach to Inform 25 Year Vision**

# Establishing the Corporation's engagement approach to inform a 25-year strategic vision and long-term plan

|                           |                 |                                  |
|---------------------------|-----------------|----------------------------------|
| <b>Board Date</b>         | 20 October 2026 |                                  |
| <b>Item Number</b>        | 10/26/12        |                                  |
| <b>Author / Presenter</b> | <b>Name</b>     | <b>Role</b>                      |
|                           | Karen Clarke    | Head of Strategic Communications |

## 1. Purpose

- 1.1. This paper seeks Board endorsement of a phased engagement programme to open a transparent public conversation about the long-term future of Greater Cambridge and begin to establish lasting foundations for community participation in the Development Corporation's work.

## 2. Recommendations

- 2.1. **Provide detailed comments** on the draft and, subject to final Board review and approval, agree to publish the proposed Statement of Intent (a revised draft following initial round of comments will be recirculated to the Board).
- 2.2. **Note** the aim to coordinate engagement between the Development Corporation and key partners (specifically the CPCA) and within statutory planning processes.
- 2.3. **APPROVE** the engagement approach and indicative timetable for public launch subject to procurement (see timing note below).

## 3. Background and context

- 3.1. The Development Corporation ("Corporation") is a new statutory delivery body responsible for maximising the economic potential of Greater Cambridge by coordinating the funding and delivery of infrastructure to enable long-term sustainable and inclusive growth.
- 3.2. Ahead of establishment, the government stated that the Corporation will provide clarity and certainty through "a clear vision for place, supported by embedded powers, including planning powers, and a stable governance framework". It confirmed that it expects the Development Corporation to be an "exemplar of excellent community engagement, and it will be established with objectives that require it to work closely with local government, communities and local partners to ensure that growth is shaped by these priorities at formative stages..."

- 3.3. In its draft Statement of Intent (circulated separately to Board members), the Corporation sets out its mission, ways of working brigaded into the six core objectives and preliminary set of milestones. This includes engaging widely with residents and stakeholders to set out a 25-year+ [2060] vision and long-term strategic plan.
- 3.4. Underpinning the Corporation's early activities is strategic growth analysis commissioned by the Cambridge Growth Company. This provides an independent, consultant-led technical baseline of the opportunities, constraints and the broad infrastructure implications of growth. It is based on the significant body of evidence prepared by the Greater Cambridge Shared Planning Service for the joint Local Plan and is designed to inform a long-term vision for an economically optimised growth scenario beyond the emerging Local Plan timeframe.

#### **4. Where we need to get to and why**

- 4.1. The Development Corporation needs a clear articulation of what success should look like for Greater Cambridge and the contribution it intends to make to achieve it. Without this, there is a risk that the Corporation's individual plans and programmes do not add up to a coherent set of long-term outcomes.
- 4.2. The 25-year strategic vision will provide a guiding star for the Board and executive, creating a consistent basis for setting priorities and navigating choices and trade-offs. It will provide continuity across corporate plans, creating a clear line of sight between the 25-year ambition and shorter-term priorities, investment and delivery.
- 4.3. The findings of the Government's consultation on establishing the Development Corporation, identified significant concerns among respondents about local democratic accountability, communities' ability to influence decisions, and the impact of growth on existing communities. There has been a significant amount work undertaken by local councillors to engage local residents about place-making and priorities for growth, alongside many place-based, and grassroots initiatives to encourage and deepen community engagement. An independent report commissioned by the Cambridge Growth Company into the history of engagement in Greater Cambridge identified many examples of good practice, however it also found fragmented activity, suggested that links between participation and decision-making could be clearer and raised issues around the consequences of limited institutional memory. The continuing demand for public participation is reflected in a recent petition calling for greater public influence over transport, planning and development, which has attracted more than 2,000 signatures.
- 4.4. The Development Corporation's approach must achieve more than raising awareness of its role or securing acceptance of its work. It must demonstrate what communities and stakeholders can influence, how their insights will inform the Board's decisions and how the Development Corporation will account publicly for its response. Without a coordinated approach and visible feedback loop, further engagement risks reinforcing rather than addressing low public trust.

4.5. Together, these factors create three linked imperatives for the Development Corporation:

- 4.5.1. to broaden the evidence available to the Board by combining the technical work undertaken with lived experience, local knowledge, community priorities and stakeholder expertise;
- 4.5.2. to present the technical work undertaken in a planned, transparent and appropriately contextualised way in order for residents and stakeholders to make informed representation; and
- 4.5.3. to demonstrate a credible and sustained commitment to participation, influence and accountability from the outset, recognising and including the many stakeholders who have already shaped and are articulating their vision for place.

4.6. Timing, coordination and cooperation among all delivery partners remains key.

- The Development Corporation is phasing its work to follow on from the draft Local Plan, due to be submitted for public examination at the end of year. In line with government's intention for the Corporation to build on the growth ambitions in the Local Plan, the Corporation seeks to engage with residents to shape the next phase of strategic place-making, assuming the draft Local Plan within its baseline work.
- The Cambridgeshire and Peterborough Combined Authority's Local Growth Plan and emerging Spatial Development Strategy embeds economic development ambitions in a new plan-led system led by Mayors. The CPCA is progressing work on the Local Growth Delivery Plan, including an investment funding strategy. The CPCA is seeking to use the evidence, engagement and priorities already established through adopted regional strategies, including the CPCA Shared Ambition, Local Growth Plan and Local Nature Recovery Strategy, alongside relevant local and partner documents, to create a single coherent but multi-faceted Spatial Development Strategy vision. Once adopted, the Spatial Development Strategy will set a statutory strategic framework, including growth ambitions, to which lower tier plans, including future Local Plans will be required to conform.
- The Corporation is establishing its role as a new statutory delivery body within a complex and changing environment. The Government has made clear that community participation should be embedded in the Development Corporation's work from the outset. Demonstrating that communities and stakeholders can meaningfully influence its priorities and decisions alongside beginning to build public confidence before expected statutory planning powers take effect, will be critical to its legitimacy.

## **5. Community engagement proposal**

- 5.1. The proposal is to package the Corporation's commitments to sustainable growth articulated in the Board's Statement of Intent, with independently developed good growth principles and baseline evidence, into an accessible conversation pack, and use it as the starting point for facilitated public discussion.



- 5.2. This is the first step into a wider conversation about delivering infrastructure-led growth across Greater Cambridge, covering the priorities, conditions and trade-offs to inform the first phase of work to outline what success for Greater Cambridge should look like over the Corporation's 25-year lifetime.
- 5.3. The engagement will progress from place-based and targeted engagement through to independently recruited representative deliberation, generating insight to inform the long-term strategic vision, future strategic and statutory plans.
- 5.4. The proposed engagement programme has five objectives:
1. **Support an informed conversation:** present relevant technical and contextual information in an accessible way, enabling communities and stakeholders to consider the opportunities and implications of growth for Greater Cambridge.
  2. **Build the evidence needed to inform the vision:** bring together the work commissioned by Cambridge Growth Company, existing plans and strategies, previous engagement, lived experience, local knowledge and stakeholder expertise to identify shared priorities, areas of difference and evidence gaps.
  3. **Establish the Development Corporation's role and build confidence:** improve understanding of its remit and relationship with partners, while demonstrating a transparent, inclusive and credible approach to engagement.
  4. **Shape the long-term approach to participation:** test and develop the methods, relationships, governance, capability and resources required to embed meaningful participation in the Development Corporation's future work, with a clear commitment to building community readiness into our engagement approaches.
  5. **Demonstrate influence and support decision-making:** establish a clear route through which engagement evidence will inform the Board's decisions, supported by transparent reporting and a formal response to the findings.
- 5.5. The engagement programme will be developed and delivered in close cooperation with the Corporation's strategic partners and specifically the Mayor's team leading the Spatial Development Strategy, and the Planning Authority, drawing on the shared engagement and joint governance approaches established for work on the Greater Cambridge Transport Strategy and emerging Strategic Outline Business Case for Mass Rapid Transit.
- 5.6. Delivery will require dedicated internal capacity, with commissioned specialist technical input and external engagement support.
- 5.7. The programme will comprise five phases:

**Phase 0: Programme development and procurement assurance and decision gateways**

[indicative timeline Oct-Nov 2026]



**Phase 1: Scoping, oversight and stakeholder engagement**

- Finalising narrative and peer review of materials, developing scenarios:
- Inclusion and reach strategy development
- Elected representatives and stakeholder deep dive briefings to establish oversight and inform the public engagement process

[Indicative timeline Dec 2026 - March 2027]

**Phase 2: Designing and delivering representative deliberation**

- Executing civic lottery to establish membership of assembly representative of diversity of place and communities,
- deploying hyper-local peer research and capacity building at grassroots level

[Indicative timeline May- August]

**Phase 3: Analysis and response development**

- Reviewing and analysing evidence from all phases of engagement and different stakeholder groups

[Indicative timeline August-September]

**Phase 4: Publication, Dev Corp response and next steps**

- Production of findings reports in accessible formats
- Recommendations to Board

[Indicative timeline Sept - October 2027]

**Phase 5: Lessons learned and recommendations for future participation arrangements – long term corporate engagement policy adoption**

[Indicative timeline Oct-Dec 2027]

5.8. Initial market testing indicates that specialist engagement support to establish robust community participation models and fulfil the core activities for this commission is likely to cost around £220,000.

5.9. An indicative programme budget for F/Y 2027-28 of approximately £250,000 is identified within existing budgets to include community grants to assist audience participation to cover likely travel and other associated costs.

## **Item 14: Local Plan Reg 19 and Minerals and Waste Response**

## Greater Cambridge Development Corporation's response to:

- the Greater Cambridge Local Plan Reg. 19 Consultation; and
- the Reg. 45 Cambridgeshire & Peterborough Minerals and Waste Local Plan Scoping Consultation

|                           |                 |                            |
|---------------------------|-----------------|----------------------------|
| <b>Board Date</b>         | 20 October 2026 |                            |
| <b>Item Number</b>        | 10/26/14        |                            |
| <b>Author / Presenter</b> | Name            | Role                       |
|                           | Will Nichols    | Head of Planning and Place |

### 1. Purpose

- 1.1 This report provides Board with an update on representations that the Greater Cambridge Development Corporation has prepared in respect of recent consultation exercises.
  - 1.1.1 The Greater Cambridge Local Plan Regulation 19 consultation; and
  - 1.1.2 The Cambridgeshire and Peterborough Minerals and Waste Local Plan Regulation 45 Scoping Consultation.
- 1.2 Given the date of this Board meeting, and the strict deadline by which the representations on the Greater Cambridge Local Plan Reg. 19 Consultation were required to be submitted (25th September 2026), as agreed by the Chair, representations have had to be submitted prior to the meeting of the Board and have already been shared with Board, as well as being appended to this report. 19 Consultation were required to be submitted (25th September 2026), as agreed by the Chair, representations have had to be submitted prior to the meeting of the Board and have already been shared with Board, as well as being appended to this report.
- 1.3 Similarly, the representations made to the Cambridgeshire and Peterborough Minerals and Waste Local Plan Scoping Consultation were required to be submitted by 12th October 2026. Given the timings very close to the finalisation of Board reports and the early scoping stage, these have not been circulated to Board prior to issue of this Board report. All representations have been reviewed by lawyers.
- 1.4 This report sets out the Greater Cambridge Development Corporation's broad support for both documents and demonstrates a firm commitment to collaborative and constructively working with partners on their respective planning documents.
- 1.5 It should also be noted that the Cambridge Growth Company, the predecessor body to the Greater Cambridge Development Corporation, submitted representations to the Greater Cambridge Shared Planning Service (GCSP) on 27th March 2026 supporting the proposed Community Infrastructure Levy (CIL). On 12th October

2026, an officer representing the Corporation attended the CIL Examination in support of these representations and to answer any related questions that the Examiner might have.

## **2. Recommendations**

2.1 It is recommended that Board Members note the formal consultation responses that have been submitted by the Corporation:

2.1.1 Greater Cambridge Local Plan Regulation 19 consultation; and

2.1.2 Cambridgeshire and Peterborough Minerals and Waste Local Plan Scoping Consultation.

## **3. Greater Cambridge Local Plan Reg. 19 Consultation**

3.1 Cambridge City Council and South Cambridgeshire District Council recently consulted on their joint Greater Cambridge Local Plan. The consultation commenced on 3rd August 2026 and ran until 25th September 2026.

3.2 Upon adoption of their separate local plans in October 2018 and September 2018 respectively, Cambridge City Council and South Cambridgeshire District Council chose to prepare a joint Local Plan covering both local authority areas given the significant functional relationship between them in relation to homes, jobs, and infrastructure

3.3 The Corporation welcomed the publication of the Local Plan and the opportunity to make constructive and broadly supportive representations ahead of its submission and examination. The Corporation continues to actively engage with the Councils through its joint planning service, GCSP. These representations are the views of the Corporation and not necessarily those of the Secretary of State or the Government more widely.

3.4 The Corporation has registered its interest at attending and speaking at the Local Plan examination, with specific regard to policies relating to the Cambridge Biomedical Campus and Cambridge East.

3.5 The Corporation has expressed its support for the Local Plan, which it considers takes a positive approach to achieving growth and delivering sustainable new development. While there are a small number of matters where the Corporation suggests that minor amendments could be made to improve the Local Plan, overall, it concludes that the GCSP has effectively cooperated with the Corporation to address strategic matters and that the Local Plan should be considered as legally compliant and achieves a sound strategy, on which to build upon. It should be noted that the Local Plan is a baseline on which the Development Corporation will further develop in due course in response to the Government's growth agenda for Greater Cambridge, reflected in the six Development Corporation objectives.

3.6 The Corporation notes that it is a 'legacy plan' being prepared under the previous plan-making system and that under the transitional arrangements it will be considered against the tests of soundness set out in the National Planning Policy Framework (December 2024), rather than under the new plan-making system

established in the Town and Country Planning (Local Planning) (England) Regulations 2026. All plans submitted after 31st December 2026, will be required to be examined under the new regulations and in accordance with the National Planning Policy Framework (July 2026) The Corporation believes that the Plan is consistent with national policy, is justified, has been positively prepared, and meets the area's objectively assessed housing need.

- 3.7 The Corporation commented on a series of specific parts of the Local Plan setting out its support for the overall development strategy (Policy S/DS), and several key strategic development sites including Land at Clifton Road (including Cambridge Junction and Cambridge Leisure (Policy S/C/LCR), Cambridge East (Policy S/CE), Land adjacent to A11 and A1307 at Grange Farm (Policy S/GF), Waterbeach New Town (Policy S/WNT), Cambourne North (Policy S/CBN), and at North East Cambridge (Policy S/AMC/NEC).
- 3.8 The Corporation's response has taken a very supportive approach to these policies on the key strategic sites. However, small amendments are recommended in relation to the Cambridge Biomedical and Cambridge East policies.
- 3.9 In relation to Policy S/CBC: Cambridge Biomedical Campus, the Corporation has recommended that the wording for the preparation of the Campus Masterplan be amended from 'developed with input from existing landowners' to 'developed with demonstrable collaboration between existing landowners'.
- 3.10 In relation to Policy S/CE: Cambridge East, the Corporation has recommended some minor wording amendments – replacing 'approximately 8,000 homes' with 'a minimum of 8,000 homes' to better reflect the site's significant additional development potential for higher densities, the landowners' aspirations, the accelerating impact of a new railway station (Cambridge East) as part of East West Rail. In addition, wording changes have suggested that homes could be delivered by 2032 'or earlier' subject to the necessary water infrastructure being available.
- 3.11 Additionally, the Corporation supports the GCSP's commitment to sustainable development and climate change, and net zero carbon new buildings, and embedding water efficiency in new developments, as well as setting out a policy to protect and enhance green infrastructure.
- 3.12 Finally, the Corporation has demonstrated its support for the space standards set out in Policy H/SS: Residential Space Standards and accessible homes, and the infrastructure and sustainable transport policies set out in Policies I/ID: Infrastructure and delivery and Policy I/ST: Sustainable transport and connectivity.
- 3.13 Following the consultation, all comments will be reviewed by officers before being submitted to the Government alongside the Local Plan and its supporting documents and evidence. In line with the deadline established by Government, these will be submitted to the Secretary of State by 31st December 2026. An independent examination of the Local Plan is expected to commence in Spring 2027. It is anticipated that following receipt of the inspector's final report, the Local Plan will be adopted in late 2027 or early 2028.

#### **4. Cambridgeshire & Peterborough Minerals and Waste Local Plan Scoping Consultation**

- 4.1 Cambridgeshire County Council and Peterborough City Council recently consulted on their joint Cambridgeshire & Peterborough Minerals and Waste Local Plan Scoping Consultation (under Regulation 45 of the Town and Country Planning (Local Planning) (England)). The consultation commenced on 3rd August 2026 and ran until 12th October 2026 and involves asking consultees whether the proposed strategy focuses on the right issues as well as inviting landowners to submit sites for future minerals and waste operations.
- 4.2 Cambridgeshire County Council and Peterborough City Council are the Minerals and Waste Planning Authorities for Cambridgeshire and Peterborough. They are responsible for preparing a minerals and waste plan, which allocates sites for the quarrying of minerals, identifies previously quarried areas to be restored and determines the future need for different types of waste and where these needs can be met.
- 4.3 The current Cambridgeshire & Peterborough Minerals and Waste Local Plan was adopted by Cambridgeshire County Council and Peterborough City Council in July 2021 and forms part of the development plan alongside Cambridgeshire's five districts' local plans and Peterborough City Council's local plan. The Government requires minerals and waste plans to be reviewed and if necessary, updated every five years.
- 4.4 The Town and Country Planning (Local Planning) (England) Regulations 2026 established a new plan-making system for England requiring minerals and waste planning authorities to prepare, have examined, and adopt new plans within a 30-month timetable. Cambridgeshire County Council and Peterborough City Council's timetable anticipates examination in February to July 2029, and adoption between July and August 2029.
- 4.5 The scoping consultation document was written before the new NPPF was published and refers to the pre-adoption version of NPPF (December 2024) which underwent consultation in December 2025. In the document, the Councils provide a useful interpretation for how the waste and minerals plan needs to respond to relevant changes proposed in the NPPF. The next iteration of the plan will respond to the published NPPF (published in August 2026).
- 4.6 The document explains that the Councils want to maintain the current strategy of using existing sites and operational facilities to deal with waste and mineral needs. The document also sets out how it will identify future need for waste and minerals and it provides an assessment methodology to evaluate new sites submitted by landowners.
- 4.7 The Government set up the Corporation to deliver six core objectives including one of 'delivering transformational economic growth'. Turning this objective into reality will require substantial levels of new construction, which will bring an associated increase in the need for aggregates and minerals, and once these have been constructed, a corresponding rise in waste will need to be managed.

- 4.8 The Corporation has expressed an interest in continuing to collaborate and work constructively with the Councils to support the progress of their plan. The key issue that we have raised is that we are keen to ensure that the 'identified need' is accurate. In the scoping document they currently refer to data from Cambridgeshire Insights and a report from Oxford Economics which explored different growth scenarios. We have commented that there should be closer alignment with emerging or recently adopted local plans that may be utilising more recent and therefore accurate housing and economic projections.

#### **Annex 1: Representation to Greater Cambridge Shared Planning Service's Local Plan Regulation 19**

- 1.1 Covering Letter
- 1.2 Appendix A: Detailed comments

#### **Annex 2: Representation to Cambridgeshire and Peterborough Minerals and Waste Local Plan Scoping Consultation**

- 1.3 Covering Letter
- 1.4 Appendix A: Detailed comments from the Greater Cambridge Development Corporation.

# Representation to Greater Cambridge Shared Planning Service's Local Plan- Regulation 19

## Covering letter

### Introduction

Thank you for providing the Greater Cambridge Development Corporation (GCDC) the opportunity to comment on the Regulation 19 version of Greater Cambridge Shared Planning Service's (GCSP) Local Plan. The Greater Cambridge Development Corporation (GCDC) welcomes the publication of the Plan and the opportunity to make representations ahead of its submission and examination.

The ongoing engagement and cooperation between the Councils through the joint planning service and with the GCDC as the Development Corporation and future planning authority, is also welcomed.

This letter and accompanying schedule of comments is the written response of GCDC to the Regulation 19 consultation. We have submitted comments on your consultation platform and, as noted on the platform, GCDC would like to register its interest to speak at the Plan's examination in relation to the Cambridge East and Cambridge Biomedical Campus policies. GCDC would also be happy to participate in relevant hearing sessions if the appointed Inspector considers this to be appropriate. It should be noted that while GCDC is a centrally-led development corporation, this response only represents the views of the development corporation, and not those of the Secretary of State or Government more widely.

### Summary of our position

GCDC would like to express its support for the Plan, which takes a positive approach to achieving growth and delivering sustainable new development. Notwithstanding the specific matters raised in individual representations, it is considered that, overall, GCSP has effectively co-operated with GCDC to address strategic matters within the Plan, and that the Plan achieves a sound strategy for the area within the Plan Period.

It is noted and recognised that the Plan is a 'legacy plan' being prepared under the previous plan-making system. Under the transitional arrangements this means that it will be considered in the light of the tests of soundness that feature in the National Planning Policy Framework (NPPF), which was published in December 2024.

In this context we view the Plan as being consistent with national policy, and sound, positively prepared, meeting the area's objectively assessed needs and projects an annual housing delivery rate which will meet the government's own annual housing delivery rate, as set out in the Standard Method (2026). We also consider it to be 'justified' based on proportionate evidence to reach an appropriate strategy. In this context, the following should be noted in relation to the GCDC's role, purpose and objectives.

## What is the role of GCDC?

GCDC was legally established as a centrally-led urban development corporation on 23 July 2026, following a public consultation that took place between 4 February 2026 and 1 April 2026. Alongside its statutory purposes the Government response to the consultation set out six updated objectives for the Development Corporation:

### **Transformational economic growth**

- Drive a step change in the sustainable and inclusive economic development of Greater Cambridge, commensurate with its status as a critical national growth area. Deliver a significant increase in high-quality jobs and homes, cement Greater Cambridge's status as a global centre for science, technology, and innovation. In delivering growth, recognise the importance of high-quality placemaking that respects Greater Cambridge's distinctive character, heritage and natural environment, creating beautiful, well-designed places where people want to live, work, study and visit. Provide current and future generations living and working in Greater Cambridge with a high quality of life.

### **Infrastructure-led development**

- Coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability. Work with stakeholders and local partners, including utility companies, to identify infrastructure solutions for the region so that planning for future demand is aligned with forecasts for growth.

### **Innovative investment**

- Establish Greater Cambridge as the UK's flagship for public-private investment into infrastructure and housing, unlocking significant capital. Front-load infrastructure funding to accelerate delivery of well-planned, sustainable communities that go beyond current and draft local plan ambitions. Drawing on the government's track record for attracting private investment at 5 times the level of public funding, this investment would support delivery at major strategic locations.

**Environment and climate**

- Deliver environmentally sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets. Collaborate with local partners, statutory agencies and communities through the planning system and other processes to enable biodiversity net gain, nature recovery, improved air quality and public access to nature.

**Inclusion and opportunity**

- Reduce inequality between people and places in Greater Cambridge, maintaining a high rate of affordable housing delivery. Establishing a progressive skills and talent agenda that links local communities to the growing opportunities across the innovation ecosystem, and so reduces unemployment in all age categories.

**Local representation, participation and transparency**

- Ensure that community representation is embedded in the work of the Development Corporation. Make engagement accessible, transparent, and involve communities and local organisations at formative stages from making decisions to developing plans.

Following its establishment, GCDC is expected to receive planning powers in 2027, subject to Parliamentary approval, with specific arrangements and the date on which these powers will transfer likely to be confirmed in late 2026. In the consultation on establishing the Development Corporation and the subsequent response, the Government set out its intention to enable the Development Corporation to make decisions on strategic scale planning applications. The Government also set out its intention that GCDC should assume plan-making powers. This could involve the Secretary of State directing this power back to the two councils from the transfer date, to enable the councils to continue progressing the Local Plan through examination and to adoption. It is likely that GCDC will be the planning authority with responsibility for local plan making when the local plan is next up for review.

**Transformational Growth**

A key objective for GCDC is to achieve transformational growth and it is considered that the growth planned for in this Local Plan represents an effective opportunity for this within the Plan period. Nevertheless, the GCDC will be working within the scope of its powers and with partners and stakeholders to support and where possible increase that delivery. It has also undertaken some work to consider the potential for significant additional economic led growth supported by early infrastructure delivery, building on the growth identified in the Local Plan and over a longer time frame through to 2050-2060 to make this truly transformational and to understand the level of infrastructure and other investment that will be necessary to achieve this longer-

term objective. GCDC intend to work closely with the Mayor and the Cambridge and Peterborough Combined Authority (CPCA) as they develop the Cambridgeshire and Peterborough SDS and with these two Councils in any future plan making activities.

## **Statement of Common Ground**

Notwithstanding the individual representations that are made in this response, given the statutory purposes that GCDC already has and its geographical scope, it is recommended that a Statement of Common Ground is prepared to help explain our relationship with GCDC, GCSP, and CPCA, and how we intend to work together in addition to addressing any relevant specific matters in the representations.

I trust that this helps to explain the approach to the GCDC's specific representations on the publication version of the Local Plan and provides useful context for consideration during the examination of the Plan. I look forward to continuing close working and cooperation as the Plan progresses.

**Yours sincerely,**

**Anthony Hollingsworth**  
**Director of Planning & Place**

## Appendix: A) Detailed comments

| Paragraph / Reference                      | Suggested amendments to wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Development Strategy - Introduction</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1.17                                       | We work closely with bodies like the Cambridgeshire and Peterborough Combined Authority, who are the Local Transport Authority responsible for preparing the Local Transport Plan for the county, and Cambridgeshire County Council, who are the Highway Authority and responsible for a range of issues such as education. <b>We will collaborate with the CPCA on their emerging Spatial Development Strategy which does not influence this Plan but will be integral to local plan reviews and successor local plans.</b> | Yes                                                             | Yes                                                 | GCDC has included a minor comment to improve this section.<br><br>In paragraph 1.17 – ‘regional context’ - there is no mention of the emerging Spatial Development Strategy (SDS) that is being produced by the Cambridgeshire and Peterborough Combined Authority. The SDS will not influence GCSP’s Plan, but future local plan reviews and successor local plans must be in general conformity with the SDS. Therefore, GCDC think a reference should be made to the CPCA’s emerging SDS. |
| 1.21                                       | <b>On 23 July 2026, the government established the Greater Cambridge Development Corporation The</b>                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes                                                             | Yes                                                 | GCDC has included a minor comment to improve this section.<br><br>It is amended to reflect recent governance changes.                                                                                                                                                                                                                                                                                                                                                                        |

| Paragraph / Reference            | Suggested amendments to wording                                                                                                                                                                                                                                                                                                                                                                                                                                   | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                  | <p><del>government has established the Cambridge Growth Company</del> to work with local partners to develop and start to deliver an ambitious plan for delivering high- quality sustainable growth in Cambridge. Their work is focused on unlocking and accelerating development, preparing the evidence base to support development of an infrastructure-first growth plan, and identifying solutions to complex planning constraints that effect the area.</p> |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>S/DS Development Strategy</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1                                | No suggested amendments                                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>GCDC is of the view that the Plan uses up-to-date, proportionate and objective evidence, including the Greater Cambridge Employment and Housing Evidence Update 2025, CPCA Local Growth Plan (2025), Government's Standard Method (2026) and Review of Economic Data, Context and Representations Report (2026) to inform its strategy. We view the Plan as being positively prepared and it will meet the area's objectively assessed needs.</li> </ul> |

| Paragraph / Reference | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------|---------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       |                                 |                                                                 |                                                     | <ul style="list-style-type: none"> <li>Through its use of the CPCA's Local Growth Plan (2025), GCSP also demonstrate that their Plan is informed by collaboration with other authorities.</li> <li>In relation to question of whether the Plan is 'effective' and whether it deliverable by 2045 (the end of the Plan period), on page 46 the Plan states that: "a sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period due to the sustainable development strategy set out in this plan and the infrastructure constraints relating to water and transport (for which improvements are not anticipated to be delivered until later in the plan period)". We recognise that GCSP has made considered spatial choices that deliver their objectively assessed jobs and housing needs. We therefore view the Plan as taking a justified and effective strategy, consistent with national policy.</li> </ul> |
| 2                     | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>In GCDC's view, the Plan takes a positive approach to delivering sustainable development by ensuring new housing and employment delivery connects to existing and planned-for infrastructure and takes advantage of committed-to public investment. Schemes such as Cambridge South East Transport (CSET) Phase 1 and Phase 2, the relocation of Waterbeach railway station, the Cambourne to Cambridge guided busway, and East West Rail offer significant opportunities to deliver new</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                |

| Paragraph / Reference | Suggested amendments to wording                             | Do GCDL consider the Local Plan policy to be legally compliant? | Do GCDL consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------|-------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       |                                                             |                                                                 |                                                     | <p>development in highly sustainable locations. Furthermore, significant public investment has already been committed to sites such as Northstowe, Bourn Airfield and Waterbeach. From GCDL's perspective, it is right that the Plan seeks to utilise these opportunities because this approach will maximise value for money to taxpayers. It is also the correct approach, because it builds upon significant work which has already occurred and therefore offers a quicker route to delivery.</p> <ul style="list-style-type: none"> <li>GCDL will continue to collaborate with GCSP and other local partners to ensure that, collectively, we utilise existing infrastructure and new infrastructure interventions to deliver sustainable growth.</li> </ul> |
| 2.62                  | No suggested amendments                                     | Yes                                                             | Yes                                                 | <p>GCDL supports this policy.</p> <ul style="list-style-type: none"> <li>In the Cambridge Growth Company's representation to the Regulation 18 version of the Plan, CGC stated that: "the confirmation of green belt release for strategic site allocations is welcomed, but CGC considers that it would be beneficial to further review whether grey belt opportunities in sustainable locations may provide opportunities for additional site allocations which could accommodate future growth".</li> <li>GCDL is the organisation now established with a formal regeneration role; GCDL is satisfied that GCSP has assessed additional grey belt opportunities for this Plan.</li> </ul>                                                                      |
| 2.8                   | The continuing strength of the nationally important Greater | Yes                                                             | Yes                                                 | GCDL has included a minor comment to improve this policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Paragraph / Reference                                                                            | Suggested amendments to wording                                                                                                                                                                                                                                                                                                                        | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                                                                                                  | <p>Cambridge economy provides justification for exploring higher employment and related housing figures.</p> <p>The Greater Cambridge Development Corporation's core function is to secure the regeneration of its area which includes ensuring that housing and social facilities are available to encourage people to live and work in the area.</p> |                                                                 |                                                     | <ul style="list-style-type: none"> <li>This section does not make any reference to the potentially transformative role that GCDC could play in infrastructure delivery. The government's response to the development corporation consultation (3 June 2026) set GCDC's second objective as facilitating 'infrastructure-led development' involving "the delivery of a radical upgrade to infrastructure in Greater Cambridge". Achieving this will enable nationally significant levels of growth to be delivered in Greater Cambridge. It could also mean that key infrastructure constraints are removed so that delivery can occur at an earlier date. GCDC and local partners will work together to plan infrastructure interventions which require a significant level of organisation and funding. We recognise that these interventions will take time to realise, but the Plan should explain that the establishment of GCDC could transform infrastructure delivery in Greater Cambridge and accelerate housing delivery beyond the rates included within the draft plan housing trajectory.</li> </ul> |
| <b>Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)</b> |                                                                                                                                                                                                                                                                                                                                                        |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                                                                                | No suggested amendments                                                                                                                                                                                                                                                                                                                                | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>GCDC support the redevelopment of this area and want to participate in ongoing conversations about how this site can be developed with densities that take advantage of its highly sustainable location.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Paragraph / Reference              | Suggested amendments to wording                                                                                                                                                                                                                                    | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                    |                                                                                                                                                                                                                                                                    |                                                                 |                                                     | <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that "the Development Corporation will unlock investment into social infrastructure and public spaces through a variety of routes". GCDC share the Plan's aspiration to secure the long-term enhancement of the Cambridge Junction, which is a vital regional cultural venue.</li> <li>The delivery of a future eastern entrance to the Cambridge railway station offers an excellent opportunity to capitalise upon the opportunity of East-West Rail to regenerate this area. We recognise that there is an important task for the developer and public sector bodies to align timelines for the planning application to regenerate the area and the application for the new entrance. We are keen to work with GCSP and the developer on this task.</li> </ul> |
| <b>Policy S/CE: Cambridge East</b> |                                                                                                                                                                                                                                                                    |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1.                                 | A new city district of <b>approximately a minimum of</b> 8,000 homes delivered <b>from 2032, or earlier</b> , subject to the necessary water infrastructure being available, significant employment floorspace in use classes E(g) and approximately 20,000 square | Yes                                                             | No                                                  | <p>As the policy is currently written, GCDC do not currently think it is sound.</p> <ul style="list-style-type: none"> <li>In the Cambridge Growth Company's representation to the Regulation 18 version of the Plan, it was previously stated that a "degree of flexibility" should be encouraged "within both policy and allocations to allow for housing growth beyond the current levels currently identified in the draft</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Paragraph<br>/<br>Reference | Suggested amendments to wording                                                                                                                                                                                                                                                                                                             | Do GDCDC<br>consider the<br>Local Plan policy<br>to be legally<br>compliant? | Do GDCDC<br>consider the<br>Local Plan policy<br>to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                             | metres gross internal area (GIA) of B2/B8 employment floorspace, with a range of supporting services and facilities, including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the Site Allocation boundary identified on the Policies Map. |                                                                              |                                                               | <p>Plan and encourage the acceleration of delivery where the identified infrastructure constraints on growth can be alleviated”.</p> <ul style="list-style-type: none"> <li>Noting that GDCDC is the organisation now established with a formal regeneration role, we think that this comment is still relevant. We understand that Hill and Homes England – who are now joint owners of the site- are undertaking substantial evidence gathering to explore issues such as transport, housing density and social infrastructure in greater detail. After speaking to GCSP, we recognise there has been a sequencing issue in terms of this evidence gathering occurring in parallel to the Regulation 19 consultation, when ideally this evidence would have been completed before the Regulation 19 consultation to inform any relevant representations. It is possible that this evidence could conclude that higher densities are achievable on the site above 8,000 homes, especially once the positive impact of the new East West railway station is accounted for on the site. We would ask that GCSP change the word ‘approximately’ to ‘minimum’ to provide a pragmatic solution to addressing this sequencing issue, which would help the site to achieve its potential.</li> <li>GDCDC would like GCSP to caveat the ‘from 2032.’ It is appropriate for GCSP to consider water constraints across the Plan, including through its site allocations. However, GCSP, GDCDC and the wider Water Scarcity Group are collaborating to deliver water interventions which will address water constraints. We want the policy to be more</li> </ul> |

| Paragraph / Reference | Suggested amendments to wording                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound?                              | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                 |                                                                                  | flexible to consider the possibility that this work might address infrastructure constraints and allow for earlier delivery. <ul style="list-style-type: none"> <li>GCDC are keen to speak at the Examination to discuss this policy.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                 |
| 4                     | Cambridge East will be a vibrant, inclusive new city district that reflects the spirit of Cambridge while helping to shape its future. <del>Through the new railway station being delivered by the East West Rail project, the city district will become a highly accessible destination.</del> Rooted in a unique setting, Cambridge East will offer welcoming, walkable neighbourhoods which support an intergenerational community to live well, work purposefully, learn, and thrive. | Yes                                                             | No (but this comment is not related to soundness, it is only a minor suggestion) | GCDC has included a minor comment to improve this section of the policy. <ul style="list-style-type: none"> <li>GCDC think that the new East West Rail station offers a great opportunity to maximise sustainable travel at Cambridge East and it should have a central role in the 'objectives and place identity' section of the policy. In the Policy S/CBN: Cambourne North within the 'objectives and place identity', the new East West Rail station plays a central role in the policy, and GCDC thinks there should be consistency across the Plan's policies, i.e. it should also be prominent in the Cambridge East policy.</li> </ul> |
| 7                     | a. <del>Approximately</del> A minimum of 8,000 homes (to deliver 3,950 dwellings to 2045 subject to the necessary water infrastructure being available) of a range of sizes,                                                                                                                                                                                                                                                                                                              | Yes                                                             | No                                                                               | See points made above in relation to part 1: <ul style="list-style-type: none"> <li>GCDC think that 'minimum' provides more flexibility and would provide a pragmatic solution to the sequencing issue.</li> <li>GCDC is keen to register to speak at the Examination to discuss this policy.</li> </ul>                                                                                                                                                                                                                                                                                                                                         |

| Paragraph / Reference | Suggested amendments to wording                                                                                                                                                                                                                                                         | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound?                              | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                       | types and tenures to meet the identified diverse housing needs and to support a mixed and balanced intergenerational community, specifically, including:                                                                                                                                |                                                                 |                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 9                     | <p>b. Integrates well with established and new neighbouring communities, including Marleigh and Springstead Village.</p> <p>c. Consider how the site can integrate with the nearby site allocation - Land South of Coldham's Lane (Policy S/C/SCL) to create an innovation cluster.</p> | Yes                                                             | No (but this comment is not related to soundness, it is only a minor suggestion) | <p>GCDC has included a minor comment to improve this section of the policy.</p> <ul style="list-style-type: none"> <li>The Cambridge Growth Company submitted a representation to GCSP's Regulation 18 version of the Plan. In this representation, CGC stated that they would like to see the Plan "more explicitly recognise the value of intensifying and expanding the identified innovation clusters to fully realise growth potential and agglomeration benefits". GCDC is the organisation now established with a formal regeneration role. GCDC notes there is no reference to the adjacent allocation - 'Land South of Coldham's Lane, Cambridge'. The two sites have the potential to create an innovation cluster. This should be referred to in the site allocation.</li> </ul> |
| 17                    | Ensure an exemplar approach to movement and transport within and through the site, transforming the wider connectivity of the eastern edge of Cambridge <del>and promoting</del> capitalising on the new East West                                                                      | Yes                                                             | No (but this comment is not related to soundness, it is only a                   | <p>GCDC has included a minor comment to improve this policy.</p> <ul style="list-style-type: none"> <li>GCDC think that the new East West Rail station offers a great opportunity to maximise sustainable travel at Cambridge East and it should have more prominence in the policy.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Paragraph / Reference                                             | Suggested amendments to wording                                                                                                                                      | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                                                                   | <b>Rail station to promote</b> a low car living approach where 'walking and wheeling' are the first choice for most residents, workers and visitors from the outset, |                                                                 | minor suggestion)                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm</b> |                                                                                                                                                                      |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1</b>                                                          | No suggested amendments                                                                                                                                              | Yes                                                             | Yes                                                 | <p>GCDC support this policy.</p> <ul style="list-style-type: none"> <li>The proposal represents a positive approach to maximising the opportunity presented by the Cambridge South East Transport Phase 2 scheme, albeit GCDC notes that this will require an extension to the proposed route. GCDC will continue to work with GCSP and other local partners to deliver new infrastructure interventions for key sites, such as Grange Farm, in the Plan.</li> </ul>                        |
| <b>Policy S/WNT: Waterbeach New Town</b>                          |                                                                                                                                                                      |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1</b>                                                          | No suggested amendments                                                                                                                                              | Yes                                                             | Yes                                                 | <p>GCDC support this policy.</p> <ul style="list-style-type: none"> <li>In relation to Policy S/WNT: Waterbeach New Town, we support this site allocation. Homes England has committed considerable funding to accelerate the Waterbeach New Town development. This includes over £23m to relocate the railway station, in addition to providing a £61 million loan. GCDC are pleased to see the Plan capitalising upon the substantial public investment which has already been</li> </ul> |

| Paragraph / Reference                                                               | Suggested amendments to wording                                                                                                                                                       | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                              |
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|                                                                                     |                                                                                                                                                                                       |                                                                 |                                                     | committed at the site. We will continue to work with GCSP, Homes England and other local partners to ensure that this site fulfils its potential.                                                                                                                                                                                                                                                  |
| <b>Policy S/BA: Bourn Airfield New Village</b>                                      |                                                                                                                                                                                       |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>1</b>                                                                            | No suggested amendments                                                                                                                                                               | Yes                                                             | Yes                                                 | <p>GCDC support this policy.</p> <ul style="list-style-type: none"> <li>GCDC would like to express support for the policy. The Juniper partnership— which includes Homes England — acquired Bourn Airfield in March 2025. GCDC will continue to work with GCSP, the Juniper Partnership and other local partners to deliver new infrastructure interventions for key sites in the Plan.</li> </ul> |
| <b>Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)</b> |                                                                                                                                                                                       |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>2</b>                                                                            | No suggested amendments                                                                                                                                                               | Yes                                                             | Yes                                                 | <p>GCDC supports this section of the policy.</p> <ul style="list-style-type: none"> <li>The section under 'objectives and place identity' captures the unique nature of the Campus and why its continued success is so important to Greater Cambridge and our national economy.</li> </ul>                                                                                                         |
| <b>10</b>                                                                           | In order to achieve this, a whole Campus Masterplan developed with <del>demonstrable input</del> <b>collaboration from</b> <del>between</del> existing landowners and major occupiers | Yes                                                             | No, but the objection does not relate to this       | <p>GCDC supports this section of the policy but propose a minor tweak.</p> <ul style="list-style-type: none"> <li>The landowner and tenant organisations play an integral role in the functioning of CBC. Research from Cambridge</li> </ul>                                                                                                                                                       |

| Paragraph / Reference | Suggested amendments to wording                                                                                                                                                                                                                                                                                                                                                            | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound?                                     | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                       | across the Campus, will be required                                                                                                                                                                                                                                                                                                                                                        |                                                                 | section of the policy.                                                                  | Ahead has shown that proximity to other similar organisations is a key motivating factor for retaining and attracting organisations to CBC. It is therefore right that landowners and tenant organisations play an important role in discussions about how CBC can be improved and expanded.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>22</b>             | Make a minor amendment to the Green Belt boundary to remove the land that would be required for the delivery of a new junction that would be essential to enable delivery of a viable site access to development land on the Biomedical Campus. A more specific map of the land that would be required will be provided at the time of completing the intended Statement of Common Ground. | Yes                                                             | No, unless the suggested amendment is included within the Plan and on the Policies Map. | <ul style="list-style-type: none"> <li>In the previous representation to GCSP's Regulation 18 version of the Plan, CGC submitted this representation to the CBC policy:</li> </ul> <p>"CGC supports this policy and the allocation for expansion through release of land from the Green Belt for future phases to support the future development of the Biomedical Campus. CGC recommends that further consideration is given to the boundary of this allocation in relation to the proposed access. The access as shown on the Spatial Framework plan figure 63 appears not to be deliverable due to the consented scheme to the north of Babraham Road. Therefore an alternative redline for the proposal allocation should be considered to allow for alternative access arrangements."</p> <p>GCDC is the organisation now established with a formal regeneration role. GCDC note that the maps haven't substantially changed from Regulation 18 to Regulation 19 and that access remains an issue. We therefore think that</p> |

| Paragraph / Reference | Suggested amendments to wording                                                                                                                                                                    | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound?                                     | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                       |                                                                                                                                                                                                    |                                                                 |                                                                                         | CGC's comment remains relevant. Addressing the issue of access arrangements to CBC from Babraham at this stage will support the overarching delivery of the site and avoid delaying the submission of the planning application. GCDC are willing to undertake some work detailing how much Green Belt release would be required. This could be agreed through the Statement of Common Ground.                                                                                                                                                                           |
| 22c                   | No suggested amendments                                                                                                                                                                            | Yes                                                             | No, unless the suggested amendment is included within the Plan and on the Policies Map. | GCDC supports the policy. <ul style="list-style-type: none"> <li>GCDC notes that Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital) has been written to capitalise on the opportunity that Cambridge South East Transport Phase 2 offers. GCDC support this approach, which will help achieve the aim of delivering new development in sustainable locations. We agree that CSET2 is required to ensure that existing and new workers can travel to this world-class Campus via sustainable more sustainable methods of transport.</li> </ul> |
| 31b                   | b. Set out the layout, mix and scale of uses, including the relationship with the existing Campus composition, <b>ensuring there is a balance of uses across the existing and expanded Campus;</b> | Yes                                                             | No, but the objection does not relate to this section of the policy.                    | GCDC supports the policy and has included a minor suggestion to improve the policy. <ul style="list-style-type: none"> <li>Through the new masterplan, GCDC are keen to see a fair balance of uses across the site and are keen to help facilitate discussions between occupiers, GCSP and landowners to achieve this outcome.</li> </ul>                                                                                                                                                                                                                               |

| Paragraph / Reference                | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                      |                                 |                                                                 |                                                     | <ul style="list-style-type: none"> <li>GCDC notes that the expansion of the Campus will require a substantial amount of a wide range of new infrastructure. GCDC would like to note that we are committed to working with the landowners, CBC Ltd, GCSP and other local partners on the emerging masterplan and infrastructure delivery plan.</li> </ul>                                                                                                                                                                                             |
| <b>Policy S/CBN: Cambourne North</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>1</b>                             | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>GCDC agrees with GCSP's explanation in the supporting information to this policy in paragraph 3.3.3 that the new station which will be delivered by East West Rail presents a significant opportunity to expand the town further, in a way that is both sensitive to local landscape character and ecological sites but also supports the existing town so that it becomes more sustainable and can offer the services and facilities required of a modern town.</li> </ul> |
| <b>16b</b>                           | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>GCDC supports the requirements for developers to pay a financial contribution to the delivery of an enhanced EWR station. We agree with this aspiration to make the new station a key component of the Station Quarter, Cambourne North, and the wider town.</li> </ul>                                                                                                                                                                                                     |

| Paragraph / Reference | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                       |                                 |                                                                 |                                                     | <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the Development Corporation an objective of achieving 'infrastructure-led development', to "coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability." To achieve this objective in Cambourne, GCDC will work with East West Rail, GCSP and other local partners to deliver the new station.</li> <li>It should also be noted that officials in GCDC are collaborating with the GCSP, CPCA and Cambridgeshire County Council to produce the Greater Cambridge Transport Strategy (GCTS), a 'sub-strategy' to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan, which will help to support the Plan's ambitions to deliver new development in sustainable locations, including the new station for Cambourne.</li> </ul> |

| Paragraph / Reference                         | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <b>Policy S/AMC/NEC: North East Cambridge</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1                                             | No suggested amendments         | Yes                                                             | Yes                                                 | <ul style="list-style-type: none"> <li>GCDC supports changing this from a site allocation to an 'area of Major Change'.</li> <li>GCDC agree with the continued identification of this area for regeneration. It has excellent transport connections to other parts of the city and new development in this area would harness the Cambridge Science Park's legacy of innovation.</li> <li>In July 2026 the Housing Minister submitted a letter to the Chief Executive of the Planning Inspectorate requesting that inspectors take a pragmatic and proportionate approach when assessing viability and deliverability evidence. In this letter, the Housing Minister stated that: "with the benefits of up-to-date local plans firmly in mind, it is important that local plan deliverability and viability challenges be considered in a broad context, especially when economic conditions are volatile and are causing fluctuations to market conditions and heightening development risk and associated costs. As such, allocations should generally be assessed against their prospects of delivery over the plan period as a whole, rather than solely against current market conditions". Noting that this is not a site allocation, GCDC perceive this passage to be relevant to North East Cambridge. GCDC agrees that it is right to continue to prioritise this area for regeneration, and we agree with the expressed sentiment in paragraph 2.58, where it states 'the Councils will continue to engage with</li> </ul> |

| Paragraph / Reference                                                  | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                                                        |                                 |                                                                 |                                                     | relevant partners to confirm a refined position for that later plan-making stage’.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Policy CC/SD: Sustainable development and the climate emergency</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1                                                                      | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy</p> <ul style="list-style-type: none"> <li>The government’s response to the consultation ‘Establishing a Development Corporation in Greater Cambridge’ noted that: “working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge’s unique heritage, natural environment, climate resilience and nature recovery, and this integrated approach will be central to the Development Corporation’s purpose”. GCDC, therefore supports this policy because embedding the principles of climate change mitigation and adaption in development is an important way that we will help to address the causes of climate change.</li> </ul> |
| <b>Policy CC/NZ: Net zero carbon new buildings</b>                     |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1                                                                      | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy</p> <ul style="list-style-type: none"> <li>The government’s response to the consultation ‘Establishing a Development Corporation in Greater Cambridge’ noted that: “working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge’s</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                     |

| Paragraph / Reference                                     | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                                                           |                                 |                                                                 |                                                     | unique heritage, natural environment, climate resilience and nature recovery, and this integrated approach will be central to the Development Corporation's purpose". GCDC, therefore supports this policy because the proposed hierarchal approach to reducing heat and power demands, along with supplying energy demand onsite, will enable new development to help to address the causes of climate change.                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Policy CC/WE: Water efficiency in new developments</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1                                                         | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>GCDC recognises the ambitions in this policy and agrees that achieving these standards will be an important way to reduce demand on water in the area.</li> <li>The GCDC are participants of the Water Scarcity Group, which is an independent advisory group formed in 2023 to tackle water scarcity and resource issues in Greater Cambridge. Collectively the group is working to resolve existing wastewater capacity and continues to engage with a range of delivery partners to deliver new water savings measures to reduce water demand in the short-medium term.</li> <li>GCDC will continue to work through the Water Scarcity Group to improve water efficiency, support water-saving and retrofit campaigns, and explore new water resource</li> </ul> |

| Paragraph / Reference                                                                    | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                                                                          |                                 |                                                                 |                                                     | <p>options. We will continue to support water companies in delivering their long-term supply plans, while testing innovative ideas such as capturing and storing excess winter water for later use, working with farmers, the Middle Level Commissioners and Water Resources East.</p> <ul style="list-style-type: none"> <li>The Cambridge Growth Company agreed a statement of common ground with GCSP to address water infrastructure issues. GCDC is the organisation now established with a formal regeneration role. GCDC is seeking to agree a new Statement of Common Ground with GCSP to renew our shared commitment to addressing water infrastructure constraints.</li> </ul> |
| <b>Policy CC/IW: Integrated water management, sustainable drainage and water quality</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1                                                                                        | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>Achieving integrated water management is essential to delivering sustainable growth in Greater Cambridge.</li> <li>The GCDC are participants of the Water Scarcity Group, which is an independent advisory group formed in 2023 to tackle water scarcity and resource issues in Greater Cambridge. Collectively the group is working to resolve existing wastewater capacity issues and engage with a range of delivery partners to deliver new water savings</li> </ul>                                                                                                                                        |

| Paragraph / Reference                    | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                                          |                                 |                                                                 |                                                     | <p>measures to reduce water demand in the short-medium term.</p> <ul style="list-style-type: none"> <li>GCDC will continue to work through the Water Scarcity Group to improve water efficiency, support water-saving and retrofit campaigns, and explore new water resource options. We will continue to support water companies in delivering their long-term supply plans, while testing innovative ideas such as capturing and storing excess winter water for later use, working with farmers, the Middle Level Commissioners and Water Resources East.</li> <li>The Cambridge Growth Company agreed a statement of common ground with GCSP to address water infrastructure issues. GCDC is the organisation now established with a formal regeneration role. GCDC is seeking to agree a new Statement of Common Ground with GCSP to renew our shared commitment to addressing water infrastructure constraints.</li> </ul> |
| <b>Policy CC/FM: Managing flood risk</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                        | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy</p> <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that: "working with local partners, and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Paragraph / Reference                                             | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                                                                   |                                 |                                                                 |                                                     | <p>relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge's unique heritage, natural environment, climate resilience and nature recovery, and this integrated approach will be central to the Development Corporation's purpose". GCDC, therefore supports this policy because embedding the principles of climate change mitigation and adaption in development is an important way we will address the causes of climate change.</p> <ul style="list-style-type: none"> <li>The Cambridge Growth Company agreed a statement of common ground with GCSP to address water infrastructure issues. GCDC is the organisation now established with a formal regeneration role. GCDC is seeking to agree a new Statement of Common Ground with GCSP to renew our shared commitment to addressing water infrastructure constraints.</li> </ul> |
| <b>Policy CC/RE: Renewable energy projects and infrastructure</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>1</b>                                                          | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy</p> <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that: "working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge's unique heritage, natural environment, climate resilience and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Paragraph / Reference                                          | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                |                                 |                                                                 |                                                     | nature recovery, and this integrated approach will be central to the Development Corporation's purpose". GCDC agrees with GCSP's assertion that "increasing the use of renewable and other low-carbon energy technologies will be a key means of achieving the emissions reductions targets set by the Government and meeting increased energy demands." GCDC therefore supports the policy.                                                                                                                                                                                                                               |
| <b>Policy BG/GI: Green Infrastructure</b>                      |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1                                                              | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>In the government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge', under the 'environment and climate' objective, the Development Corporation was set the task of delivering "environmentally sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets". We share GCSP's ambition to protect and enhance green infrastructure, therefore, GCDC supports the policy.</li> </ul> |
| <b>Policy WS/CF: Community, sports, and leisure facilities</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1                                                              | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Paragraph / Reference                                    | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                                                          |                                 |                                                                 |                                                     | Cambridge' noted that "the Development Corporation will unlock investment into social infrastructure and public spaces through a variety of routes". GCDC will work with GCSP to achieve our shared ambition for delivering new community, sports, and leisure facilities.                                                                                                                                                                                                                                                                                                                                |
| <b>Policy GP/PP: People and place responsive design</b>  |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1                                                        | <b>No suggested amendments</b>  | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>In CGC's representation to the Regulation 18 version of the Plan, CGC commented that "CGC supports the commitment to high-quality, well-designed places and buildings as set out in relevant placemaking policies in the Plan. Well-designed and well-built places are essential components of the good growth which CGC supports". GCDC would like to repeat this previous expression of support; well-designed places and buildings are essential components of good growth and therefore GCDC supports the policy.</li> </ul> |
| <b>Policy J/NE: New employment development proposals</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1                                                        | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the first objective of the Development</li> </ul>                                                                                                                                                                                                                                                                                                                                                                |

| Paragraph / Reference                                                    | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                          |                                 |                                                                 |                                                     | Corporation as delivering ‘transformational economic growth’, by driving “a step change in the sustainable and inclusive economic development of Greater Cambridge, commensurate with its status as a critical national growth area”. GCDC will continue to work with GCSP to ensure that employers can find the right location to expand or establish new businesses in the Greater Cambridge area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Policy J/EP: Supporting a range of facilities in employment parks</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1                                                                        | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>Greater Cambridge is home to exceptional employment parks, and we want to see these places become even better places to work. In the government’s response to the consultation ‘Establishing a Development Corporation in Greater Cambridge’ under the first objective ‘transformational economic growth’, the Development Corporation was set the task of delivering ‘transformational economic growth’ and noted that this growth should “recognise the importance of high quality placemaking that respects Greater Cambridge’s distinctive character, heritage and natural environment, creating beautiful, well-designed places where people want to live, work, study and visit”. GCDC will continue to work with GCSP to ensure that Greater Cambridge continues to be an exceptional place to work.</li> </ul> |

| Paragraph / Reference                                                | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy H/AH: Affordable housing</b>                               |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                                                    | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the Development Corporation an objective of achieving 'inclusion and opportunity'. As part of this objective, GCDC should "reduce inequality between people and places in Greater Cambridge, maintaining a high rate of affordable housing delivery". GCSP's Plan sets a positive aspiration for affordable housing delivery which GCDC will help to achieve.</li> </ul>                                                                                                                                                |
| <b>Policy H/SS: Residential Space Standards and accessible homes</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                                                    | No suggested amendments         | Yes                                                             | Yes                                                 | <p><b>GCDC supports this policy</b></p> <ul style="list-style-type: none"> <li>In the government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge', under the 'innovative investment' objective, the Development Corporation was set the task of front-loading "infrastructure funding to accelerate delivery of well-planned, sustainable communities that go beyond current and draft local plan ambitions sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets". Delivering high-quality well-planned new housing will form a</li> </ul> |

| Paragraph / Reference                                      | Suggested amendments to wording | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                            |                                 |                                                                 |                                                     | core component of this objective. We therefore support GCSP's policy. GCDC would also like to note that as we strengthen our capacity, we will consider how we can integrate the ambition for high-quality design into our own programme of work. GCDC will seek to build-upon the high standards that that the Greater Cambridge Design Review Panel and the Cambridgeshire Quality Panel have set for new development in the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Policy I/ST: Sustainable transport and connectivity</b> |                                 |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1                                                          | No suggested amendments         | Yes                                                             | Yes                                                 | <p>GCDC supports this policy.</p> <ul style="list-style-type: none"> <li>The infrastructure-first, vision-led approach to transport is supported, given transport constraints remain one of the key limitations on growth. The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the Development Corporation an objective of achieving 'infrastructure-led development', to "coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability." This will also involve working "with stakeholders and local partners, including utility companies, to identify infrastructure solutions for the region so that planning for future demand is aligned with forecasts for growth".</li> <li>Officials in GCDC are collaborating with officers in GCSP, CPCA and Cambridgeshire County Council to produce the</li> </ul> |

| Paragraph / Reference                           | Suggested amendments to wording                                                                                                                                                                                                   | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                 |                                                                                                                                                                                                                                   |                                                                 |                                                     | <p>Greater Cambridge Transport Strategy (GCTS), a 'sub-strategy' to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan, which will help to support the Plan's ambitions to deliver new development in sustainable locations.</p> <ul style="list-style-type: none"> <li>As noted in our comments to policy S/DS: Development Strategy, GCDC think that the Plan takes a positive, sensible approach to taking advantage of existing and planned-for infrastructure. Schemes such as Cambridge South East Transport (CSET) Phase 1 and Phase 2, the relocation of Waterbeach Station, the Cambourne to Cambridge guided busway, and East West Rail offers significant opportunities to deliver new development in highly sustainable locations. It is right that the Plan seeks to maximise such opportunities and GCDC will continue to collaborate with GCSP and other local partners to ensure that collectively we take advantage of these transformative infrastructure proposals.</li> </ul> |
| <b>Policy I/ID: Infrastructure and delivery</b> |                                                                                                                                                                                                                                   |                                                                 |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10.74                                           | For the Greater Cambridge area, the infrastructure needed to support planned growth over the plan period, and deliver the spatial strategy, is set out the IDP, which has been informed through engagement with relevant services | Yes                                                             | Yes                                                 | GCDC has included a minor comment to improve this policy. GCDC is the organisation now established with a formal regeneration role and have proposed wording to clarify the role that we might play in infrastructure delivery.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Paragraph / Reference | Suggested amendments to wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Do GCDC consider the Local Plan policy to be legally compliant? | Do GCDC consider the Local Plan policy to be sound? | Comment / Explanation |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------|-----------------------|
|                       | <p>providers. Where appropriate, account has been had to ongoing management and maintenance, the need to fund initial establishment costs, and any monitoring requirements. The infrastructure identified in the IDP will be delivered through a combination of public and private sector investment, including through the use of Community Infrastructure Levy (CIL) and planning obligations.</p> <p>The Greater Cambridge Development Corporation's core functions include providing or facilitating the provision of infrastructure and it will play an important convening and co-ordination role in infrastructure delivery.</p> |                                                                 |                                                     |                       |

# Representation to Cambridgeshire and Peterborough Minerals and Waste Local Plan Scoping Consultation

## Covering letter

### Introduction

Thank you for providing the Greater Cambridge Development Corporation (referred to hereafter as 'The Corporation') the opportunity to comment on the Regulation 45 scoping consultation on the Cambridgeshire and Peterborough Minerals and Waste Local Plan review.<sup>1</sup> The ongoing engagement and cooperation between the Councils and the Corporation is welcomed.

This letter and accompanying schedule of comments is the written response of the Corporation to the consultation. It should be noted that while the Corporation is a centrally-led development corporation, this response only represents the views of the development corporation, and not those of the Secretary of State or Government more widely.

### Summary of our response

The Corporation broadly agrees that the scope of the plan is appropriate. We have provided a few detailed answers to your questions, which we trust will help enhance the quality of the plan as it progresses. These include:

- **National Planning Policy Framework.** We note that the scoping consultation was prepared when the National Planning Policy Framework (NPPF) was still undergoing consultation and we have provided a few comments where the forthcoming plan will need to conform to the policies in the now adopted NPPF.
- **Identified need.** In Cambridgeshire and Peterborough, there are several local plans that are either being prepared, are about to be submitted, or have been recently adopted. It could be useful to compare how the cumulative housing and employment projections within these local plans compare with Cambridgeshire Insights data to ensure that the most accurate forecasts of population and job creation are being used to project future waste and mineral needs. We also note that Cambridgeshire Insights report 'the East of England

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<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2026

Forecast Model' was published in 2019. The Corporation suggests that a refreshed look at job creation and waste/mineral needs produced by job growth should also be considered. We are happy to collaborate with officers from Cambridgeshire County Council and Peterborough City Council on this issue.

- **Delivering national economic needs.** The Government has set up the Development Corporation to deliver the objective of 'transformational economic growth'. Turning this objective into reality will significantly influence the requirement for aggregates and minerals in addition to the generation of both construction and post-occupancy waste beyond the current Plan period. The Development Corporation would welcome the opportunity to build on initial discussion and cooperation to help ensure that the Plan is able to reflect these ambitions.
- **Water.** The Corporation would welcome adding more detail about the various strategies, plans and approaches to water management which are progressing or are now adopted.
- **Waste.** The Corporation has suggested that an addition could be made to the waste hierarchy to include waste prevention.
- **Minerals.** The Corporation supports post-extraction restoration in line with Local Nature Recovery Strategies. Mineral restoration can play a supporting role in delivering landscape-scale environmental enhancement and habitat creation.
- **OxCam Environment Principles (2025).** This was a substantial, recently completed piece of work which contains relevant information and could be referred to.

## What is the role of the Corporation?

The Corporation was established as a centrally-led urban development corporation on 23 July 2026, following a public consultation that took place between 4 February 2026 and 1 April 2026. Alongside its statutory purposes the Government response to the consultation set out six updated objectives for the Development Corporation:

### Transformational economic growth

- Drive a step change in the sustainable and inclusive economic development of Greater Cambridge, commensurate with its status as a critical national growth area. Deliver a significant increase in high-quality jobs and homes, cement Greater Cambridge's status as a global centre for science, technology, and innovation. In delivering growth, recognise the importance of high-quality placemaking that respects Greater Cambridge's distinctive character, heritage and natural environment, creating beautiful, well-designed places where people want to live, work, study and visit. Provide current and future generations living and working in Greater Cambridge with a high quality of life.

### **Infrastructure-led development**

- Coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability. Work with stakeholders and local partners, including utility companies, to identify infrastructure solutions for the region so that planning for future demand is aligned with forecasts for growth.

### **Innovative investment**

- Establish Greater Cambridge as the UK's flagship for public-private investment into infrastructure and housing, unlocking significant capital. Front-load infrastructure funding to accelerate delivery of well-planned, sustainable communities that go beyond current and draft local plan ambitions. Drawing on the government's track record for attracting private investment at 5 times the level of public funding, this investment would support delivery at major strategic locations.

### **Environment and climate**

- Deliver environmentally sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets. Collaborate with local partners, statutory agencies and communities through the planning system and other processes to enable biodiversity net gain, nature recovery, improved air quality and public access to nature.

### **Inclusion and opportunity**

- Reduce inequality between people and places in Greater Cambridge, maintaining a high rate of affordable housing delivery. Establishing a progressive skills and talent agenda that links local communities to the growing opportunities across the innovation ecosystem, and so reduces unemployment in all age categories.

### **Local representation, participation and transparency**

- Ensure that community representation is embedded in the work of the Development Corporation. Make engagement accessible, transparent, and involve communities and local organisations at formative stages from making decisions to developing plans.

Following its establishment, the Corporation is expected to receive new planning powers in 2027, subject to Parliamentary approval, with specific arrangements and the date on which these powers will transfer likely to be confirmed in late 2026. In the consultation on establishing the Development Corporation and the subsequent response, the Government set out its intention to enable the Development

Corporation to make decisions on strategic scale planning applications. The Government also set out its intention that the Corporation should assume plan-making powers. This could involve the Secretary of State directing this power back to the two councils from the transfer date, to enable Cambridge City Council and South Cambridgeshire District Councils to continue progressing their Local Plan through examination and to adoption. It is likely that the Corporation will assume plan-making powers following adoption of the Local Plan.

## Next steps

I trust that this helps to explain the approach the Corporation is taking to this Regulation 45 version consultation. I look forward to continuing close working and cooperation as the Plan progresses.

**Yours sincerely,**

**Anthony Hollingsworth**  
**Director of Planning & Place**

## Appendix A: Detailed comments from the Greater Cambridge Development Corporation to main scoping document

| Question within consultation                                                                                                                       | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <p>Q1. Are there other areas of growth that will affect minerals and waste management provision that should be considered as part of the Plan?</p> | <ul style="list-style-type: none"> <li>• We recommend adding a reference to the establishment of the Greater Cambridge Development Corporation, which occurred on the 23 July 2026. The Corporation has been established to work with local partners to develop and start to deliver an ambitious plan for delivering high- quality sustainable growth in Cambridge. Our work is focused on unlocking and accelerating development, preparing the evidence base to support development of an infrastructure-first growth plan, and identifying solutions to complex planning constraints that effect the area. As noted in our cover letter, the Corporation has been set six objectives by Government. To help achieve our objectives, we are keen to continue collaborating with Cambridgeshire County Council and Peterborough City Council on key issues, including waste and minerals.</li> <li>• We note that Cambridgeshire Insights report ‘the East of England Forecast Model’ was created in 2019. A lot of growth has taken place since then. The Corporation suggests that a refreshed look at job creation and waste/mineral needs produced by job growth should be considered.</li> <li>• In relation to paragraphs 2.7 and 2.8, under ‘current forecasts’, we note that there are several emerging local plans within Cambridgeshire &amp; Peterborough aiming to submit for examination by 31<sup>st</sup> December 2026. These include the Greater Cambridge Local Plan (covering Cambridge and South Cambridgeshire), Huntingdonshire, and Peterborough. While local plans for East Cambridgeshire and Fenland are not at an advanced stage, they may have population projections that would be useful to include. It could be useful to compare how the cumulative</li> </ul> |

| Question within consultation | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                              | <p>housing and employment projections within the various local plans compare with the information provided by Cambridgeshire Insights.</p> <ul style="list-style-type: none"> <li>• In paragraph 2.10, the document references a report from Oxford Economics which the document correctly notes was an independent report that explores different growth scenarios. Section 2.12 then compares its projections to the figure produced by Cambridgeshire Insight, noting that: “the baseline used by Oxford Economics differs from Cambridgeshire Insights in both the number of dwellings expected, time periods involved, and the areas covered by each forecast, making direct comparison of the numbers difficult.” The Corporation is committed to working with Cambridgeshire County Council and Peterborough Council to support the task of planning for waste and minerals, whether that is through sharing data, or discussing future infrastructure needs.</li> <li>• In addition to the above comments, we also recommend referring to the Government’s ‘Standard Method’ for housing need which was updated in 2026.</li> <li>• The Government has set up the Development Corporation to deliver the objective of ‘transformational economic growth’. Turning this objective into reality will require substantial levels of new construction which will bring an associated increase in aggregates and minerals needs, and, once new neighbourhoods are constructed, there will also be a corresponding rise in waste that will need to be managed. The Corporation will be considering, and in due course, planning for the levels of growth within Greater Cambridge beyond the scope and time period of the emerging Local Plan. It will be important for the Development Corporation to work closely with the County Council to ensure that the Plan takes the latest planned growth scenarios into account. Embedding sustainability principles, including carbon reduction will also be important. Local minerals and aggregates extraction and use can contribute to this alongside approaches to construction and post-occupancy waste reduction can contribute to this.</li> </ul> |

| Question within consultation                                                                                      | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p>Q2. Are there any additional topics that should be considered as part of the context for the revised Plan?</p> | <ul style="list-style-type: none"> <li>• The Corporation recommends referring to the OxCam (Oxford-Cambridge) Arc environmental principles (2025) which consist of five overarching goals designed to guide sustainable growth and natural recovery across the region spanning Oxford, Milton Keynes, and Cambridge. These principles are not planning documentation, and do not have a statutory basis, but they do provide broader policy context that underpins and informs planning policy.</li> <li>• The Corporation suggests adding more detail about water to the document. This could include references to water resource management plans, catchment-based approaches to water management, recovery of chalk streams and strategic infrastructure requirements. We also suggest that the work of the Water Scarcity Group should be referenced.</li> </ul>                                       |
| <p>Q3. Do you have any comments on the Planning Policy Context section?</p>                                       | <ul style="list-style-type: none"> <li>• The Corporation notes that on 17 August 2026, the new NPPF was adopted by Government and we anticipate that you are aware that references to the NPPF and interpretation of its policies in your plan will need to be updated.</li> <li>• The Corporation notes the reference to Cambridgeshire and Peterborough Combined Authority's Spatial Development Strategy. The Corporation agrees that this will be a vital document to shape subsequent planning documents. The Corporation is keen to work with local bodies to ensure that the SDS helps to drive sustainable, ambition growth in the area.</li> <li>• As above, the Corporation suggests referring to the OxCam (Oxford-Cambridge) Arc environmental principles (2025) which consist of five overarching goals designed to guide sustainable growth and natural recovery across the region</li> </ul> |

| Question within consultation                                                                                                                                                                    | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                                                                                                                                                                                                 | <p>spanning Oxford, Milton Keynes, and Cambridge. The Corporation also suggests referring to the Government's Land Use Framework Plan (2026) and the Environmental Improvement Plan (2025). These documents are not planning documentation, but they do provide broader context that underpins and informs planning policy.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>Q4. Are there locally specific minerals and waste development matters in relation to sustainable development that are not addressed through the national decision-making policies above?</p> | <ul style="list-style-type: none"> <li>The Corporation notes that on 17 August 2026, the new NPPF was adopted by Government, and we anticipate that you are aware that references to the NPPF and interpretation of its policies in your plan will need to be updated.</li> </ul> <p>As above, the Corporation suggests referring to the OxCam (Oxford-Cambridge) Arc environmental principles (2025) which consist of five overarching goals designed to guide sustainable growth and natural recovery across the region spanning Oxford, Milton Keynes, and Cambridge. The Corporation also suggests referring to the Government's Land Use Framework Plan (2026) and the Environmental Improvement Plan (2025).</p>                                                                                   |
| <p>Q5. Are there locally specific minerals and waste development matters in relation to climate change that are not addressed through the national decision-making policies above?</p>          | <ul style="list-style-type: none"> <li>The Corporation notes that on 17 August 2026, the new NPPF was adopted by Government, and we anticipate that you are aware that references to the NPPF and interpretation of its policies in your plan will need to be updated. In policy PM4, the NPPF includes a section about how supplementary plans will be incorporated into the new system and replace previous supplementary planning documents. We think that this section should consider how the wider changes to the planning system will influence future documents such as design guides and consider what statutory basis these documents will have in the new plan-making system.</li> <li>The Corporation suggests adding in a long-term commitment to stewardship of restored sites.</li> </ul> |

| Question within consultation                                                                                                                                                                                                         | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <p>Q6. In addition to ensuring a sufficient supply of minerals to meet current and projected future need, and providing for the sustainable management of all wastes, what priorities would you like to see included the vision?</p> | <ul style="list-style-type: none"> <li>• The Corporation notes that in the current plan's vision, there is no mention of wastewater. We agree with the statement in the question, that the plan's vision should account for 'all wastes', including wastewater.</li> <li>• The Corporation considers that the decarbonisation of the delivery of waste and minerals would require a modal shift in logistics, especially in support of initiatives aiming to delivery significant levels of growth. Officials at the Corporation are collaborating with the Greater Cambridge Shared Planning Service, the Cambridgeshire and Peterborough Combined Authority, and Cambridgeshire County Council to produce the Greater Cambridge Transport Strategy (GCTS), a 'sub-strategy' to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan, which will help to support ambitions to deliver new development in sustainable locations. We recognise that that this is a separate strategy, distinct from the waste and minerals plan, but clearly the two plans will need to complement each other, and we are keen to help support this aim.</li> </ul> |
| <p>Q7. What outcomes do you think the new Minerals and Waste Plan should be retained, removed or added, and what should they be measured against?</p>                                                                                | <ul style="list-style-type: none"> <li>• In relation to 2, this could be tweaked to include: "Commitment to a waste hierarchy that includes prevention of waste."</li> <li>• In relation to 3, it should be noted that the effects of climate change are known, so we suggest removing 'potential effects'.</li> <li>• In relation to 4, we suggest closer alignment with the OxCam Environment Principles, i.e. the objective could include "contribute to sustainable management or water, and recover water ecosystems".</li> <li>• In relation to 5, we suggest including "ensure ecologically resilient and productive landscapes".</li> <li>• In relation to 9, we suggesting adding: "improve interconnectedness of nature and promote recovery of ecosystems".</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                       |

| Question within consultation                                                                                                                     | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Q8. Do you have any comments on the proposed content of the Providing for Minerals?                                                              | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Q9. Do you have any comments on the proposed content of the Providing for Waste?                                                                 | <ul style="list-style-type: none"> <li>As stated in our response to Q1, the Corporation is interested in understanding what constitutes 'identified need'. We are keen to participate in discussions around this issue to help ensure that, collectively, we can meet the future needs of Greater Cambridge and the wider Cambridgeshire and Peterborough region.</li> <li>The Corporation recommends that the waste hierarchy should also include waste prevention.</li> </ul>                                                                                                                                                                     |
| Q10. Do you have any comments on the proposed spatial strategy for minerals?                                                                     | <ul style="list-style-type: none"> <li>In relation to 7.33, in later iterations of the plan, we suggest adding more explanation about how mineral sites should be restored with commitment to long-term stewardship of sites.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                            |
| Q11. Do you have any comments on the proposed spatial strategy for waste?                                                                        | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Q12. Are there other locational specific restoration requirements that should be considered for inclusion in a restoration and aftercare policy? | <ul style="list-style-type: none"> <li>In relation to 7.65, we recommend adding more detail about opportunities to promote subsequent aquifer recharge. We also suggest adding detail about opportunities for nature recovery and establishment of nature corridors.</li> <li>The Corporation supports post-extraction restoration in line with the Cambridgeshire and Peterborough Local Nature Recovery Strategy. Minerals can play an important role play in delivering landscape-scale environmental enhancement and habitat creation (especially wetland). We recommend aligning this approach of the OxCam Environment Principles.</li> </ul> |

| Question within consultation                                                                                                                                              | Greater Cambridge Development Corporation comment                                                                                                                                                                    |
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| Q13. Do you have comments on the proposed approach to restoration and aftercare?                                                                                          | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                        |
| Q14. Should the new Plan include a policy that requires the prior extraction of safeguarded mineral resources for developments located outside of local plan allocations? | <ul style="list-style-type: none"> <li>The Corporation supports the policy of requiring the prior extraction of safeguarded mineral resources for developments located outside of local plan allocations.</li> </ul> |
| Q15. Do you have comments on the proposed approach to safeguarding minerals and minerals infrastructure?                                                                  | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                        |
| Q16. Do you have comments on the proposed approach to safeguarding waste sites?                                                                                           | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                        |
| Q17. Do you have comments on the proposed approach to safeguarding transport infrastructure?                                                                              | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                        |
| Q18. Do you have any comments on the proposed approach to the identification of Consultation Areas?                                                                       | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                        |
| Q19. Do you have any comments on the proposed approach to local                                                                                                           | <ul style="list-style-type: none"> <li>The Corporation has no additional comments.</li> </ul>                                                                                                                        |

| Question within consultation                                                                                                                                                  | Greater Cambridge Development Corporation comment                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| policies for achieving a well-designed place?                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Q20. Do you have any comments on the proposal approach to pollution, public protection and security section of the new Plan?                                                  | <ul style="list-style-type: none"> <li>• The Corporation has no additional comments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |
| Q21. Do you have any comments on the proposed approach to local policies for conserving and enchanting the natural environment?                                               | <ul style="list-style-type: none"> <li>• The Corporation has no additional comments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |
| Q22. Do you have any comments on the Block Fen / Langwood Fen Master Plan as found in Appendix 2 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021)? | <ul style="list-style-type: none"> <li>• The Corporation has no additional comments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |
| Q23. Do you have any comments on the proposal to update the RECAP Design Guide or the Waste Location Design Guide?                                                            | <ul style="list-style-type: none"> <li>• The Corporation note that on 17 August 2026, the new NPPF was published by Government. In Policy PM4: Supplementary plan, the NPPF includes a section about how supplementary plans will be incorporated into the new system and replace supplementary planning documents. This section should consider how the wider changes to the planning system will influence the RECAP Design Guide and Waste Location Design Guide.</li> </ul> |
| Q24. Do you have any comments on the proposed approach to                                                                                                                     | <ul style="list-style-type: none"> <li>• The Corporation has no additional comments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |

| Question within consultation                         | Greater Cambridge Development Corporation comment                                                |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| monitoring or what should be included / focussed on? |                                                                                                  |
| Q25. Do you have any other comments?                 | <ul style="list-style-type: none"> <li>• No additional comments from the Corporation.</li> </ul> |

DRAFT

# Item 15: Planning Function Update

# Update on the Greater Cambridge Development Corporation's Planning Functions Set-Up

|                           |                       |                                |
|---------------------------|-----------------------|--------------------------------|
| <b>Board Date</b>         | 20 October 2026       |                                |
| <b>Item Number</b>        | 10/26/15              |                                |
| <b>Author / Presenter</b> | Anthony Hollingsworth | Director of Planning and Place |

## 1 Summary

- 1.1 This paper provides Board with an update on progress towards the Greater Cambridge Development Corporation (the Corporation) becoming a planning authority. The paper covers the latest position on the preparation of the statutory instrument (SI) to grant planning powers, progress on operational set-up, including dependencies, and engagement with key partners.
- 1.2 To date, public communications have stated that the SI i.e. the planning functions order, will occur in Autumn, with development management powers transferring to the Corporation in early 2027. Plan making powers are expected to follow the adoption of the emerging Greater Cambridge Shared Planning Service (GCSP) Local Plan – anticipated to be in 2028/29, based on expected submission to the Planning Inspectorate for examination in December 2026.
- 1.3 Progress has been made with MHCLG, Greater Cambridge Shared Planning Service (GCSP) and Cambridgeshire County Council (CCC) on draft criteria to be included within a definition of 'strategic sites,' which will enable drafting of the planning functions SI to commence. Following the joint work on this definition, the Corporation is beginning detailed engagement with GCSP and CCC on resourcing options to support the set-up of its planning function. This is one of the key dependencies which informs a robust critical path and timeline for the switch on of planning powers.

## 2 Recommendation

- 2.1 This paper seeks Board Members agreement to:
  - note the proposed draft criteria-based definition for strategic sites to inform the SI for the Corporation's planning functions;
  - endorse the continued proactive engagement to support set-up and maintain options on delivery models, in particularly the Corporation's development management function, with a gateway decision expected at December Board; and
  - note the urgent work being progressed to clarify the dependencies with wider Corporation set-up, to ensure a robust and realistic critical path for operationalising planning functions, including indicative timing.

### 3 Statutory Instrument - powers and programme

- 3.1 The Government's response to the consultation on establishing a centrally led development corporation for Greater Cambridge stated that prior to the point of defining strategic sites for the planning SI, minimum thresholds as a proxy will be used. These were indicatively identified at 250 homes and 5,000 sqm of commercial floorspace. There was a commitment to work with the relevant local authorities and the Corporation on the draft of that definition.
- 3.2 Since the summer, there has been continuing engagement with MHCLG on the development management powers, including a 'strategic sites' definition. Most recently (24th September), the Corporation, MHCLG, GCSP and CCC had a workshop, facilitated by lawyers Pinsent Masons, specifically on the definition of 'strategic sites.'
- 3.3 The workshop concluded that a spatial definition in the SI (i.e. identifying specific sites) would be discounted, as it is not future proofed, and based on legal advice would be likely to trigger the requirement for Strategic Environmental Assessment. A hybrid of criteria/thresholds plus a spatial approach was also discounted for the same reasons. A criteria-based approach was therefore agreed, as both clear and legally sound.
- 3.4 Based on discussion at the workshop and earlier feedback from GCSP, CCC and the Corporation, a set of draft criteria/thresholds are set out in a draft strategic sites' definition (see table below). The proposed definition aims to strike a balance between responsibility for genuinely strategic development and infrastructure, necessary for the Corporation to achieve its objectives. While also reflecting the fact that there may be smaller scale development of significance, given its proximity to a strategic site and/or station for which it would be appropriate for the Corporation to determine. It is envisaged that the Corporation would have the right to determine planning applications meeting the definition, when development management powers transfer.

|    | Type of development                                                                                                                                    | Threshold                                                                                                                                      | Comment                                                                                                                                                          |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Residential development                                                                                                                                | A minimum of 1,000 houses, flats or houses and flats                                                                                           | Agreed following meeting on 24 September.                                                                                                                        |
| 2. | Utility or infrastructure development proximate to a Strategic Site                                                                                    | Any utility or infrastructure development located either wholly or partly within [500 metres] <sup>1</sup> of the boundary of a Strategic Site | To pick up any infrastructure that may be necessary to deliver the Strategic Site.<br><br>The size of the buffer to be informed by relevant technical expertise. |
| 3. | With the exception of Use Class B8 (Storage and distribution) all non-residential development or mixed-use development containing non-residential uses | Floorspace is 20,000 sq. m. or greater                                                                                                         | To allow for Use Class B8 to fall within its own category                                                                                                        |

<sup>1</sup> TBC

|    | Type of development                                                                                                                                                 | Threshold                                                                                                                                                                                                                                                                                                                                                                            | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4. | Development for uses directly associated with the processing, storage, distribution and transportation of goods, alongside supporting infrastructure <sup>2</sup> . | Floorspace is 50,000 sq. m or greater                                                                                                                                                                                                                                                                                                                                                | To acknowledge that in order to be significant/strategic Use Class B8 development needs to be higher than other non-residential floorspace.                                                                                                                                                                                                                                                                                                                                                                                   |
| 5. | Development within the Railway Station Development Zones                                                                                                            | 250 houses, flats or houses and flats                                                                                                                                                                                                                                                                                                                                                | Corporation team agreed to prepare the plan. This will need to be referenced in the planning functions order.                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6. | Major/strategic infrastructure site                                                                                                                                 | <p>Infrastructure comprises<sup>3</sup>:</p> <p>(a) roads and other transport facilities;</p> <p>(b) flood defences;</p> <p>(c) schools and other educational facilities;</p> <p>(d) medical facilities;</p> <p>(e) sporting and recreational facilities; and</p> <p>(f) open spaces;</p> <p>[(g)<sup>4</sup> development for the undertaking of utility activities<sup>5</sup>]</p> | <p>What is included and thresholds will likely need to be applied to ensure only properly strategic infrastructure is caught. Relevant technical specialists are being engaged to advise.</p> <p>For infrastructure which forms part of a wider development triggering the threshold for housing/mixed use etc, we would anticipate dealing with both outline and subsequent detailed applications, but not for stand-alone applications, such as for schools or other infrastructure which does not meet the thresholds.</p> |

**Notes:**

- Floorspace areas to be gross external area.

3.5 The draft definition is currently undergoing a final check, particularly on the appropriate thresholds for strategic infrastructure in part 6 of the table. However, MHCLG is now factoring this working definition into legal instructions to inform legislative drafting. In parallel, work on the specific development management powers within the Town and Country Planning Acts and related planning legislation available to the Corporation, which reflects the approach set out in the strategic sites' definition, is also being prepared.

3.6 The final decision on definition sits with the Minister and then is subject to parliamentary approval. Although a revised criteria-based approach has begun to be socialised with the Minister. MHCLG expects the SI to be laid in Parliament, using a negative procedure, the timeline is under review given the complexity.

<sup>2</sup> Definition taken from the NPPF – "Freight and logistics"

<sup>3</sup> For discussion but as a starting point this list is taken from section 216(2) of the Planning Act 2008

<sup>4</sup> This is not included in s.216(2) PA 2008 and has been added to cover utilities

<sup>5</sup> For discussion but could be cross-referenced to this term as defined in the Procurement Act 2003 which covers – gas and heat, electricity, water, transport, ports and airports and extraction of oil and gas

- 3.7 MHCLG has indicated a rough target of late spring for the coming into force date of the Corporation's development management powers. The programme needs to reflect the lessons learned from the initial Corporation set-up, to allow for sufficient time between the anticipated approval of the SI and powers coming into force. The Corporation's current programming indicates that a May date for switch on of powers reasonably reflects known operational set-up requirements, but the Corporation will continue to work with MHCLG colleagues on this and Board will receive regular updates on progress.
- 3.8 The SI will also include confirmation that the Corporation will have plan making responsibilities, although these are not expected to transfer until the emerging draft Greater Cambridge Local Plan is adopted (expected in 2028/29). It is expected that responsibility for preparing Minerals and Waste Plans would remain with CCC.
- 3.9 While the establishment of the Corporation's planning functions do not change or reduce the new plan making functions of the Cambridgeshire and Peterborough Combined Authority (CPCA), the relationship between the Corporation and the Mayor/CPCA remain crucial, particularly in terms of the development of the Mayor's Spatial Development Strategy (SDS). The Corporation's officers are actively working with CPCA counterparts to engage and support the early work on the SDS, including production of joint evidence where possible.

## **4 Joint working & delivery model/pathway**

- 4.1 Alongside ongoing work to determine the shape of the Corporation's powers, work is progressing in parallel to ensure the Corporation is ready to accept development management responsibilities. This is wide ranging in scope but includes the ability to accept planning applications and fees, including the systems to support sufficient people resource to be able to undertake effective pre-application engagement and manage planning applications and a planning committee to determine planning applications.
- 4.2 It is important to stress that in taking initial action to prepare for planning powers switch on, our focus is on working collaboratively and constructively with GCSP and CCC to reach a workable solution for all parties. There have been helpful workshop and meeting sessions with GCSP and CCC.
- 4.3 However, GCSP has confirmed that it will only engage in detail on delivery models once the implications for people are clearer. This has required a draft definition of strategic sites to be in place and agreed between the parties to meaningfully assess any implications for any employees of the existing planning authorities. This has, however, increased the risk of delays with set-up. We remain hopeful engagement can now progress at pace. On the basis that we have agreed a draft definition. A formal request has been issued to respond to a TUPE questionnaire, to enquire as to whether they consider that the conditions for TUPE may exist.

- 4.4 Our current operational timeline is informed by three main areas of work: 1) people considerations; 2) systems and processes (including digital); and 3) governance. From the lessons learned reviews undertaken following the set-up of the Corporation, it is essential for the reputational and operational success of the Corporation that adequate preparation is undertaken to ensure that it can assume effective development management responsibilities in a timely manner. Ensuring that the Corporation's planning function is sufficiently resourced, that a Planning Committee is appointed and trained and that systems and processes to receive and manage planning applications are in place are all necessary prior to the commencement of planning powers. The risks associated with each of these dependencies have informed the Corporation's position on the operational timeline for switch on of powers.
- 4.5 Regarding people resource for the planning function, there is currently a team of 9 full-time equivalent (FTE) members of staff in the Corporation's Planning & Place team. There is available budget to recruit to further posts in the Directorate but that is currently on hold whilst the implications of the strategic site definition are understood and the implications for staff transfer, and potential service-level agreement (SLA) arrangements are discussed with GCSP and CCC.
- 4.6 People strategy workshops with the Corporation, MHCLG, GCSP and CCC are being scheduled for late October. The Corporation has recently tendered for specialist technical consultant support to its Planning & Place function, which provides resilience if required.

## **5 Work to support planning powers switch on**

- 5.1 While work is being progressed to ensure the Corporation is ready for any delivery model. There are, however, several wider set-up programme dependencies (not all within the Corporation's control) that Board should be aware of, which impact the critical path and timeline for planning powers set-up. These, together with its lessons learned review from the Corporation's initial set-up, has informed its view on the switch on date for planning powers. Dependencies include:
- Clarity on SI timeline from MHCLG, including when commencement of powers will occur (the latter should be informed by Corporation readiness to be able to undertake those responsibilities).
  - Detailed understanding for undertaking Planning Committee appointments against the SI timeline from MHCLG.
  - Establishment of a bank account (needing MHCLG and HMT approvals) and operational systems.
  - Sufficient funds to deliver the development management services required, which is informed by the delivery model selected.
  - The indicative timeline for either a SLA/contracting and/or TUPE process to support the delivery model chosen, which has a clear relationship with ongoing engagement with GCSP and CCC.

- 5.2 Notwithstanding these dependencies, action is being progressed across all planning set-up sub workstreams. This includes a brief for possible digital systems and processes; early preparation of planning governance products (e.g. Planning Committee Terms of Reference); along with the aforementioned tender which will also support early engagement activities and ensure resilience in our approach.

## **6 Next steps**

- 6.1 Board members will receive an update report in December setting out progress including on delivery model/pathway.

# Item 16: Board Forward Plan

## Board forward plan

|                           |                 |             |
|---------------------------|-----------------|-------------|
| <b>Board Date</b>         | 20 October 2026 |             |
| <b>Item Number</b>        | 20/10/16        |             |
| <b>Author / Presenter</b> | <b>Name</b>     | <b>Role</b> |
|                           | Beth Dugdale    | DCEO, COO   |

### 1. Purpose

The next Board meeting is scheduled for 2 December 2026. This paper proposes meeting date options for 2027. The options have been identified with regard to half-term periods, public holidays and members' known commitments.

### 2. Recommendation

Board members are asked to review the proposed date options below and raise any known conflicts. Following the Board's initial review, the Secretariat will contact members' offices with a poll to identify the preferred date for each meeting.

Final dates and venues will be confirmed once availability has been assessed.

### Proposed 2027 Board date options

The intention is for a minimum of 6 meetings a year so not all of the following suggested dates may be needed.

| Meeting month                   | Proposed all-day date options                                    | Scheduling note                                                         |
|---------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------|
| <b>February 2027</b>            | Tuesday 2, Wednesday 3 or Thursday 4 February                    | Before half-term                                                        |
| <b>March 2027</b>               | Tuesday 16 or Thursday 18 March                                  | Before the Easter holiday and bank holiday period                       |
| <b>April 2027</b>               | Tuesday 20, Wednesday 21 or Thursday 22 April                    | After the Easter holiday                                                |
| <b>June 2027</b>                | Wednesday 9 or Thursday 10 June                                  | After the summer half-term period                                       |
| <b>July 2027</b>                | Wednesday 21, Thursday 22 or Friday 23 July                      | Coincides with or follows the end of the maintained-school summer term. |
| <b>September 2027</b>           | Tuesday 7 or Thursday 9 September                                | After the summer holiday period                                         |
| <b>October 2027</b>             | Monday 18, Wednesday 20 or Thursday 21 October                   | Before half-term                                                        |
| <b>November / December 2027</b> | Tuesday 30 November, Wednesday 1 December or Thursday 2 December | Avoids the Christmas holiday period                                     |

### 3. Scheduling considerations and next steps

Individual commitments will differ and therefore be tested through the availability poll.

Once responses have been received, the Secretariat will identify the option with the strongest availability for each meeting and confirm the final schedule.

Venues remain to be confirmed and will be notified alongside the agreed dates.

#### Potential future agenda items

| Meeting         | Proposed agenda items                                                                                                                                                                                                                                                                |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Dec 2026</b> | <ul style="list-style-type: none"><li>• Business Plan and Budget</li><li>• Nomination and Rems update</li><li>• Programme Performance update</li><li>• Planning Delivery model update</li><li>• Project Eagle</li><li>• Water Update</li><li>• Investment Committee update</li></ul> |
| <b>Feb 2027</b> | <ul style="list-style-type: none"><li>• Infrastructure Delivery Strategy</li><li>• Planning Committee ToR,</li><li>• Target Operating Model</li><li>• Quality Framework</li></ul>                                                                                                    |