

Greater Cambridge Local Plan (Draft) – Formal Representation

Respondent: Great Abington Parish Council

Policy: S/GF – Land adjacent to A11 and A1307 at Grange Farm

Position: **Object** – policy should be deleted from the Plan. An alternative strategy (prioritising brownfield/intensification and sites with demonstrably adequate infrastructure and water capacity) should be pursued.

1) Executive Summary (Decision Request)

GAPC objects to allocation S/GF (Grange Farm) on the basis that it conflicts with national policy and fails the tests of soundness (positively prepared, justified, effective, and consistent with national policy) for the following reasons:

Food security / Best and Most Versatile (BMV) land: The site comprises high-quality agricultural land in a county where productive chalklands make a nationally significant contribution. National policy expects plans to prefer poorer-quality land where significant development of agricultural land is necessary; the Plan and evidence base do not demonstrate that reasonable alternatives have been exhausted. [assets.pub...ice.gov.uk], [gov.uk]

Landscape and visual effects: The proposal would urbanise an open chalkland ridge landscape, with densities likely requiring mid-rise blocks that would be prominent on rising ground—contrary to the area’s East Anglian Chalk character of expansive views and simple rolling topography. [publicatio...and.org.uk], [nationalch...reas.co.uk]

Transport and deliverability risk: No access is proposed to the A11 due to trunk-road junction spacing constraints; the proposal relies on the Cambridge South East Transport (CSET) scheme (TWAO), which is not yet consented and has a public inquiry timetabled for 2026 at the earliest—creating significant delivery dependency and uncertainty. [standardsf...ways.co.uk], [greatercam...dge.org.uk], [scambs.mod...ngov.co.uk]

Water environment and chalk streams: The allocation sits above the River Granta chalk-stream catchment where ecological status is not good, and where regional plans recognise water scarcity and the need to avoid increases in abstraction until new strategic resources come on line. Large-scale development here risks run-off and water-quantity impacts on a nationally rare habitat. [rivercam.org.uk], [cambridges...ire.gov.uk], [anglianwater.co.uk], [cambridge-...ater.co.uk]

Settlement viability / phasing: Experience at comparable new settlements (e.g., Northstowe) shows slow build-out and delayed town-centre services; with Grange Farm’s dependency on unconsented transport infrastructure, risks to timely delivery of a self-sustaining community are material. [northstowe...cil.gov.uk], [telegraph.co.uk], [greatercam...anning.org]

Remedy sought: Delete S/GF. Re-allocate growth through (i) urban intensification and brownfield first, (ii) settlements with consented strategic transport and proven water capacity,

and (iii) a phasing approach contingent on the commissioning of regional water schemes. This approach aligns with the NPPF (Dec 2024) plan-making tests and with the natural environment and making-effective-use-of-land chapters. [assets.pub...ice.gov.uk]

2) Policy and Legal Context

NPPF (December 2024) – Plans must be positively prepared, justified, effective and consistent with national policy; apply a brownfield-first approach; protect the natural environment including soils/BMV; and ensure infrastructure (including water) can be delivered in step with development. [assets.pub...ice.gov.uk]

BMV protection / Planning Practice Guidance: Government guidance requires consideration of the economic and other benefits of BMV land (Grades 1, 2, 3a) and to seek poorer-quality land in preference where significant development of agricultural land is necessary. Natural England is a statutory consultee for large BMV losses. [gov.uk]

Biodiversity Net Gain (BNG): Major development must deliver minimum 10% BNG (in force for majors since 12 Feb 2024), with a Biodiversity Gain Plan approved pre-commencement—especially relevant where allocations affect chalk-stream catchments. [gov.uk], [legislation.gov.uk]

3) Food Security and Agricultural Land (BMV)

Issue: Grange Farm lies within a productive chalkland landscape that forms part of England's limited BMV resource. The Plan's rationale does not demonstrate that developing this land is a last resort after exhausting reasonable alternatives.

Why it matters:

The NPPF requires recognition of the economic and other benefits of BMV and a preference for lower-quality land. [assets.pub...ice.gov.uk] Government guidance to LPAs reiterates protection of BMV and statutory consultation triggers for its loss. [gov.uk]

The UK Food Security Report 2024 notes continuing risks from climate change, water insecurity and extreme weather to UK production; it also records ongoing dependence on imports for key foods—heightening the need to safeguard productive domestic land. [gov.uk]

Conclusion: Allocation S/GF is not justified given national policy's strong preference to avoid BMV loss where alternatives exist. [assets.pub...ice.gov.uk], [gov.uk]

4) Landscape and Visual Impact

Issue: The Draft Plan anticipates urban-scale densities at Grange Farm to meet dwelling numbers, implying mid-rise typologies on rising ground. On the East Anglian Chalk NCA, a highly open chalkland with expansive views and low vertical clutter, such massing would read as visually intrusive and urbanising.

Evidence base: Natural England's NCA 87 – East Anglian Chalk describes a visually simple, open chalk landscape of rolling hills and expansive views, sensitive to new urban form. [publicatio...and.org.uk], [nationalch...reas.co.uk]

The Plan's own S/GF policy page sets a strategic framework for a new settlement in this location (where achieving the dwelling target commonly requires higher densities). [consultati...anning.org]

Conclusion: In landscape terms, S/GF is not consistent with national policy on well-designed places and conserving and enhancing the natural environment, and is not justified given the character sensitivity of the chalk ridge. [assets.pub...ice.gov.uk]

5) Transport, Access and Deliverability

Issue 1 – Strategic road network constraints:

The allocation proposes no A11 junction—reflecting National Highways' junction spacing requirements on trunk roads. DMRB CD 122 sets the geometric design framework for grade-separated junction forms and their spacing; practical compliance typically constrains new access points. [standardsf...ways.co.uk]

Issue 2 – Dependence on unconsented mass-transit:

The scheme relies on the Cambridge South East Transport (CSET) guided busway extension and travel hub. The TWAO was submitted on 9 Jan 2025; a public inquiry is scheduled in 2026, and the outcome/timescales are uncertain. Any Grange Farm spur is not part of the current TWA application. [greatercam...dge.org.uk], [gov.uk]

Implications:

With two new signalised junctions expected on the A1307 plus a signalised CSET priority, the corridor's resilience risks further degradation. GCP's own materials show ongoing A1307 interventions (e.g., Hildersham crossroads) indicative of existing constraints along this section. [greatercam...dge.org.uk]

Conclusion: The allocation is not effective nor deliverable within the plan period without speculative assumptions about CSET consent, funding and build-out. [greatercam...dge.org.uk]

6) Water Environment, Chalk Streams and Water Supply

Issue 1 – Chalk streams (River Granta):

The Granta is a designated chalk-stream sub-catchment of international rarity; evidence indicates ecological status below "good" and ongoing pressures from abstraction, low summer flows and pollution. Large new upland development increases surface run-off, sediment/pollutant loads and hydrological stress unless exceptional mitigation is proven. [rivercam.org.uk], [cambridges...ire.gov.uk]

National partners (Defra/EA/Natural England) endorse the Chalk Stream Restoration Strategy, advocating action on the "trinity of ecological health" (flows, water quality, habitat) and reduced abstraction in sensitive catchments. [gov.uk]

Issue 2 – Regional water supply constraints:

Cambridge Water WRMP24 (Final, 2025) and Anglian Water WRMP24 both highlight the need for demand management and new strategic resources (e.g., Fens reservoir, transfers), many not available until the mid-2030s; regulators have also flagged delivery risks. In the interim, government recognises water scarcity in Greater Cambridge and is piloting credits/retrofit to avoid increased abstraction. [cambridge-...ater.co.uk], [anglianwater.co.uk], [ofwat.gov.uk], [gov.uk]

Policy context:

NPPF 2024 requires plans to ensure that infrastructure is deliverable and environmental impacts are avoided/minimised; BNG is now mandatory. Within chalk-stream catchments, the bar for demonstrating no deterioration in WFD terms is high. [assets.pub...ice.gov.uk], [gov.uk]

Conclusion: Given current water constraints and the sensitivity of the Granta, S/GF is not consistent with national policy for environmental protection and not effective unless tied to the commissioning of strategic water infrastructure—beyond the likely plan period. [assets.pub...ice.gov.uk], [cambridge-...ater.co.uk], [anglianwater.co.uk]

7) Settlement Viability, Phasing and Community Formation

Issue: Evidence from Northstowe (the area's current new town) demonstrates that when build-out is slow and transport/centre facilities lag, a self-sustaining settlement can take a decade or more to form, with residents dependent on neighbouring centres. As of May 2025 c. 1,700 homes were occupied and town-centre retail remained limited; meanwhile uses are only now being progressed to bridge gaps. [northstowe...cil.gov.uk], [greatercam...anning.org]

Implication for S/GF: With a comparable reliance on strategic transport (CSET) and constrained early-phase facilities, Grange Farm risks replicating “commuter-dormitory” dynamics rather than a balanced settlement—contrary to Plan objectives.

8) Tests of Soundness – Summary

Positively Prepared: The allocation does not demonstrably meet development needs within environmental and infrastructure limits, especially water and chalk-stream protection. [assets.pub...ice.gov.uk]

Justified: The Plan has not shown that reasonable alternatives (brownfield/intensification; less sensitive locations; phasing tied to water infrastructure) are inferior when assessed against the evidence and national policy regarding BMV and chalk streams. [assets.pub...ice.gov.uk], [gov.uk]

Effective: Delivery depends on unconsented CSET and medium-term water infrastructure, creating material risk to trajectory and infrastructure phasing. [greatercam...dge.org.uk], [cambridge-...ater.co.uk]

Consistent with National Policy: Conflicts arise on BMV land, natural environment/chalk streams, infrastructure deliverability, and BNG obligations. [assets.pub...ice.gov.uk], [gov.uk], [gov.uk]

9) Reasonable Alternatives (Direction of Travel)

Without prejudice to the Plan's overall housing requirement, GAPC supports the following strategic shifts, consistent with national policy:

Brownfield and urban intensification first, including estate renewal, airspace and town-centre living, with design-led density near rail and rapid bus—minimising greenfield/BMV take.

[assets.pub...ice.gov.uk]

Contingent phasing tied to commissioning of strategic water infrastructure (e.g., Fens Reservoir; regional transfers) and measurable demand reduction—avoiding reliance on increased abstraction from chalk aquifers. [anglianwater.co.uk], [cambridge-...ater.co.uk]

Focus on locations with consented or funded mass-transit and road access solutions, to ensure early delivery of centres and services. [assets.pub...ice.gov.uk]

10) Requested Modifications (Specific)

Delete Policy S/GF (Grange Farm) and remove the site from the policies map.

[consultati...anning.org]

Reallocate capacity to (i) urban/brownfield opportunities; (ii) sites with secured strategic transport; (iii) sites outside sensitive chalk-stream headwaters, or include explicit water-infrastructure gateways before any occupation. [assets.pub...ice.gov.uk], [cambridge-...ater.co.uk]

Strengthen Plan-wide policy text on BMV safeguarding and chalk-stream protection (explicit preference hierarchy for land quality; runoff and aquifer protection standards above baseline). [gov.uk], [gov.uk]

11) Conclusion

For the reasons above, allocation S/GF (Grange Farm) is unsound. GAPC respectfully requests its removal from the Draft Local Plan and adoption of the modifications set out in Section 10.

Sources (key references cited above)

National Planning Policy Framework (Dec 2024) – plan-making tests, natural environment, infrastructure. [assets.pub...ice.gov.uk]

Defra/UK Govt – Agricultural Land / BMV guidance (Natural England consultation triggers; preference for poorer-quality land). [gov.uk]

UK Food Security Report 2024 (Defra) – extreme weather impacts; import dependence; natural capital risk. [gov.uk]

Natural England – NCA 87 East Anglian Chalk – open chalk landscape characteristics. [publicatio...and.org.uk], [nationalch...reas.co.uk]

DMRB CD 122 – trunk-road grade-separated junction design/spacing context (A11). [standardsf...ways.co.uk]

CSET (GCP) TWAO status – application submitted 9 Jan 2025; PI in 2026. [greatercam...dge.org.uk], [gov.uk]

River Granta / Chalk streams – local catchment programme; moderate ecological status; need to reduce pressures. [rivercam.org.uk], [cambridges...ire.gov.uk]

WRMP24 (Cambridge Water; Anglian Water) – water scarcity; timing of strategic resources; regulator concerns. [cambridge-...ater.co.uk], [anglianwater.co.uk], [ofwat.gov.uk]

BNG mandatory (from Feb/Apr 2024) – statutory framework and practice guidance. [gov.uk], [legislation.gov.uk]

Northstowe – delivery/amenities – occupied homes (Town Council), town centre meanwhile uses (SCDC).

Submitted on behalf of Great Abington Parish Council by

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