



The countryside charity  
Cambridgeshire  
and Peterborough

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GREATER CAMBRIDGE SHARED PLANNING

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28 January 2026

Dear Sir/Madam

**CPRE Cambridgeshire and Peterborough  
Submission to the Draft Greater Cambridge Local Plan Consultation (Regulation 19)**

**1. Introduction**

CPRE Cambridgeshire and Peterborough is a registered charity working to protect and enhance the countryside, heritage, and communities of Cambridgeshire and Peterborough for present and future generations. Our work is grounded in the principles of sustainable development set out in the **Town and Country Planning Act 1990** and the **National Planning Policy Framework (NPPF)**.

We welcome the opportunity to comment on the draft Greater Cambridge Local Plan. While we support its ambitions to address climate change and deliver sustainable growth, the Plan must be **positively prepared, justified, effective, and consistent with national policy**, as required by Section 20 of the **Planning and Compulsory Purchase Act 2004**.

This submission includes a **formal objection to the proposed development at Grange Farm**, together with wider comments on environmental protection, inclusive development, infrastructure delivery, digital connectivity, and water resources.

**2. Development Strategy, Spatial Strategy and Site Selection  
Brownfield First and Inclusive Growth**

Policy **S/2 (Spatial Strategy)** should demonstrate a clear “brownfield first” approach, consistent with **NPPF paragraphs 11 and 119**, prioritising the reuse of previously developed land, empty homes, and under-used buildings.

Growth should not be directed to locations where inclusive access cannot be delivered. Development in areas lacking accessible pavements, crossings, or step-free routes risks excluding disabled people and conflicts with the **Public Sector Equality Duty (Section 149, Equality Act 2010)**.

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#### **Formal Objection: Proposed Development at Grange Farm**

CPRE Cambridgeshire and Peterborough formally objects to the inclusion of Grange Farm as a proposed development site. The allocation is **not positively prepared, not justified, not effective, and not consistent with national policy**, including **NPPF paragraphs 11, 119, and 137-140**, and draft Policies **S/2 and S/3**.

In addition, the Plan fails to demonstrate that inclusive access, adequate infrastructure, environmental protection, and water resource safeguards could be delivered at this location.

We therefore request that Grange Farm is removed from the Plan or only reconsidered where exceptional circumstances are clearly demonstrated and all reasonable alternatives exhausted.

#### **3. Green Belt, Countryside and Environmental Protection**

Policy **S/3 (Green Belt)** must be fully aligned with **Section 13 of the NPPF**, which affords strong protection to Green Belt land. The Green Belt supports biodiversity, food security, climate resilience, and public health, including access to nature for disabled people.

Policies **CC/1 (Climate Change Mitigation)** and **CC/7 (Biodiversity and Green Infrastructure)** must ensure compliance with the **Conservation of Habitats and Species Regulations 2017** and the **Wildlife and Countryside Act 1981**, as required by **NPPF paragraph 174**.

#### **4. Chalk Streams, Waterways and Environmental Contamination Protection of Chalk Streams**

Chalk streams are internationally rare and highly sensitive ecosystems. Policies **CC/5 (Water Quality)** and **CC/7** must provide explicit and robust protection for chalk streams, consistent with:

- **NPPF paragraph 174**,
- the **Water Framework Directive**, and
- the **Environment Act 2021**.

The Plan should require development proposals to demonstrate no adverse impact on chalk streams, including from abstraction, wastewater discharge, surface water runoff, or cumulative effects.

#### **Contamination of Land and Waterways**

Policy **CC/6 (Water Quality)** must require rigorous site investigation and remediation of contaminated land, particularly where development could affect groundwater or surface water bodies.

This is essential to comply with:

- the **Environmental Protection Act 1990**,
- the **Environmental Permitting (England and Wales) Regulations 2016**, and
- **NPPF paragraph 174**, which requires planning decisions to prevent new and existing development from contributing to pollution.

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### **Protection of Private Water Supplies and Boreholes**

The Plan should explicitly recognise and protect **private water supplies**, including boreholes used by rural homes, farms, and businesses.

Development proposals should be required to demonstrate that:

- groundwater quality and quantity will not be compromised
- abstraction will not adversely affect existing boreholes; and
- mitigation measures are secured where risks are identified.

This aligns with **Policies CC/4 (Water Efficiency) and CC/5**, the **Water Resources Act 1991**, and the **NPPF requirement to safeguard water resources**.

### **5. People, Communities, Equality and Housing**

Policy **SC/1 (Health and Wellbeing)** must ensure compliance with the **Equality Act 2010**, the **UN Convention on the Rights of Persons with Disabilities**, and **NPPF paragraph 8**.

Policies **H/1 (Housing Mix)** and **D/1 (Design and Layout)** should require accessible and adaptable housing standards (including **M4(2)** and **M4(3)**), inclusive street design, and step-free access to public spaces.

### **6. Infrastructure, Transport and Digital Connectivity Transport and Inclusive Access**

Policies **TI/2 (Transport Infrastructure)** and **TI/3 (Infrastructure Delivery)** must ensure that walking, wheeling, and public transport routes are safe, step-free, and accessible from the outset.

The Plan should acknowledge that **much growth is proposed in areas where existing pavements are not accessible** and require developers to address these deficiencies as part of development proposals.

#### **Broadband and Digital Infrastructure**

Digital connectivity is essential infrastructure. Policy **TI/3** should explicitly require **high-quality broadband provision**, including fibre or equivalent, in all new developments.

Particular attention must be given to **rural areas**, where poor connectivity risks deepening inequality and undermining economic viability, remote working, education, and access to healthcare.

This approach aligns with:

- **NPPF paragraph 114**, which supports advanced, high-quality communications infrastructure; and
- the **Town and Country Planning Act 1990**, which requires planning to support the social and economic wellbeing of communities.

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### **7. Rural Economy and Farming**

Policy E/1 (**Rural Economy**) should protect agricultural land, rural businesses, and water-dependent enterprises. Development should not undermine food production, water availability, or land management.

### **8. Conclusions**

CPRE Cambridgeshire and Peterborough supports the ambition of the Greater Cambridge Local Plan to deliver sustainable growth. However, sustainability must include **environmental protection, inclusive access, resilient infrastructure, digital connectivity, and safeguarding of water resources**.

As currently drafted, the Plan does not sufficiently protect chalk streams, private water supplies, or rural broadband provision, nor does it adequately address contamination risks or inclusive access deficiencies. These shortcomings, particularly when combined with the proposed development at Grange Farm, render the Plan unsound under Regulation 19.

We urge the Greater Cambridge authorities to strengthen the Plan in line with national policy, environmental law, and equality duties to ensure development benefits all communities while protecting the natural environment.

Yours faithfully,



Jane Williams

On behalf of CPRE Cambridgeshire and Peterborough Branch