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Greater Cambridge Shared Planning Service
South Cambridgeshire Hall
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Cambridge
CB23 6EA

Sent via email to [REDACTED]

30 January 2026

[REDACTED]

Submission of evidence to inform Greater Cambridge Local Plan Grange Farm

I write on behalf of our client, the Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust (hereafter referred to as "PE"), to submit our representations in respect of the proposed allocation of land at Grange Farm and Ley Rectory Farm for a new settlement of approximately 6,000 new homes, and all other supporting uses and infrastructure.

- Please see Appendix A for a tabulated set of representations relating to **Policy S/GF**.

We very much welcome the positive joint working to date with the Greater Cambridge Shared Planning Service, and now with a wider group of statutory consultees and key stakeholders to progress this opportunity.

In our submission of July 2025, we included in the report authored by RedFern and No. 6 Developments, an overview of our client's ambition and vision for the project, which officers are well aware of and so I don't repeat in these representations.

I can also confirm that we are working constructively with the adjoining landowner at Ley Rectory Farm, Mr Stephen Franklin. I understand that Mr Franklin will be writing to you directly to confirm his willingness to bring forward some of the farm for development, whilst being clear that as a family farm, they are very focussed on ensuring the residual farm remains viable for the long term. This is particularly important when considering the definition of the site boundaries, the approach to edge treatments and consideration of the role and purpose of the proposed Strategic Enhancement Area.

The general thrust of these representations is that we are very supportive of the principle of the allocation, the broad scale and location of the development and mix of uses proposed. We have highlighted a number of areas where we feel that more work is necessary to achieve the level of precision required for the allocation at Regulation 19 stage, and as you aware we have appointed a multi disciplinary team covering all of the priority areas (masterplanning, landscape, ecology, heritage, all engineering disciplines, project financial model/delivery strategy advice and transport). We are working to prepare a robust masterplan framework and a range of supporting evidence to refine the proposed allocation wording, and to ensure that the project is demonstrably deliverable in all respects.

We anticipate that once we have reached common ground on the appropriate approach to development of the site, as signposted in these representations, that the Council's Draft Policy and wider evidence base will need to be refreshed. We have therefore not provided a detailed critique of that evidence at this stage.

If you have any questions about the content of these representations, then please do not hesitate to contact either myself or Mr Frederick Killander.

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For and on behalf of No. 6 Developments

Appendix A – Representations relating to Policy S/GF

Please note below that the first column is the relevant paragraph of policy limb.

The second column is the current local plan text. We have not proposed any amendments to that text in column 2, and our full comments are within Column 4.

The third column sets out our support / comment / objection to that aspect of the policy.

The 4th column summarises our comments.

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
Paragraph 3.3.58	This policy provides a consistent planning framework for managing new applications for development of this new town in the context of a new strategic allocation for site. The policy will ensure that new development is well integrated, whilst maintaining a separation from other nearby settlements, serves the needs of existing and future communities and mitigates the impact of development where required. Grange Farm will be developed during the period of the Local Plan and beyond.	Support	<p>PE welcome the suggestion that delivery will be within the Local Plan period and beyond.</p> <p>PE note that the Council's updated Greater Cambridge Housing Delivery Study Addendum assumes delivery of 2,550 new homes in the plan period to 2045. This is lower than the position as we set out within our initial Delivery Strategy and we remain committed to this objective (c. 4,750 dwellings).</p> <p>PE do however agree it is important not to limit the potential of the project to what can be delivered in this Local Plan period, and welcome the ambition to plan for a coherent, well planned new town, with a scale and mix of uses to promote self containment, with the range of uses and amenities provided on site to support the needs of all residents.</p> <p>As landowner, PE look forward to working constructively with GCSP and wider stakeholders to determine the most appropriate form of development for the site.</p>
Policy S/GF – 1	Grange Farm will be a thriving and sustainable new town, providing a distinctive mixed-use development shaped by a comprehensive and innovative approach to delivering resilient placemaking. It will be delivered through a design-led approach with placemaking and nature at the heart of development.	Comment	PE suggest that careful consideration is given to the term "new town". The terminology is important and new towns might create an association in people's minds with some of the larger London overspill towns such as Milton Keynes or Stevenage, which are very much different to our ambition for this proposal.

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			<p>The ambition of PE (as set out in our previously submitted delivery report) for the project is more akin to the Garden Village movement, and therefore we would suggest consideration is given to alternative naming convention moving forward. We are open to a discussion about this as part of further advancing the evidence base for the project.</p>
Policy S/GF – 2	<p>Located at the heart of the Rural Southern Cluster, a globally important cluster of science innovation, Grange Farm will play a vital role in locating high quality new homes close to existing employment areas, connected through a holistic active travel and public transport network. At its heart, it will be a vibrant place that provides for the day-to-day health, wellbeing and quality of life needs of new residents, workers, surrounding communities and visitors, by positioning new local centres, schools, community uses, and other local services and amenities close to homes.</p>	Support	<p>PE welcome the intentions as described by the policy, and look forward to working with all parties to bring this to reality.</p>
Policy S/GF – 3	<p>The new town will play a critical role in extending the Cambridge South East Transport scheme, with a new segregated connection proposed which would also enable potential future extension of the proposed scheme to settlements further afield.</p>	Comment	<p>As landowner, PE are very supportive of the ambitions of the CSET project, which would bring improved public transport connections very close to the Grange Farm site, with the Travel Hub (CSET terminus) to be located south west of the Fourwentways roundabout.</p> <p>Full integration with CSET is supported, and will provide frequent, high quality connections to / from the Cambridge Biomedical Campus and the city.</p> <p>However, the policy as drafted serves to require a “segregated connection” and is supported by a preliminary study by Mott MacDonald as part of the Council’s evidence base.</p> <p>As landowner, PE feel that insufficient work undertaken to date to be certain over deliverability (technical, funding/viability, land ownership, consenting) and until such time as work has been undertaken, we think it is premature to conclude that a segregated connection (i.e. bridge link) is the right solution taking account of deliverability and viability.</p>

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			<p>PE have commissioned KMC Transport Planning to prepare a transport strategy for the project, and a key focus will be on the options for achieving integration with CSET. We will submit our evidence on this point in due course.</p>
Policy S/GF - 4	<p>Development will need to respond to the surrounding character and context whilst maintaining a distinction with other surrounding settlements, in part through the preservation of the existing distinctive built and natural environment.</p>	Support	<p>As landowner, PE have been the stewards of the farm for generations. We are committed to ensuring that the scheme is sensitive to the character and context, and is distinctive and separate from the surrounding settlements.</p> <p>PE look forward to working with GCSP to develop masterplan principles which will achieve this shared objective.</p>
Policy S/GF – 5	<p>The proposed Grange Farm site sits alongside the S/SEA/GF non-development areas adjacent to Grange Farm Strategic Enhancement Area. The Strategic Enhancement Area aims to ensure sufficient separation from neighbouring settlements and maintain a soft, green landscape to protect the development's rural setting. These areas may also be used to deliver other associated uses, including drainage, habitat compensation and informal open space.</p>	Object	<p>PE are concerned about the lack of clarity about the purpose, appropriate land uses, location, definition/purpose and spatial extent of the proposed Strategic Enhancement Areas.</p> <p>The term Strategic Enhancement Area is potentially misleading given the wide-ranging nature of the policy intention and its generalised use across different contexts and boundary interfaces. The components all need to be achieved but different aspects of the site will deliver different function – these will generally include, but won't be limited to landscape character, heritage and/or visual mitigation, ecological enhancement, SuDS, delivery of public open space, formal sports provision and retention of agricultural land, which may or may not be considered "enhancements" depending on context. One or multiple of these functions may contribute to areas creating "separation from neighbouring settlements", which feels like a separate policy point which could be addressed more symbolically on the policy plan (if at all) to retain flexibility for testing appropriate masterplan solution and landscape strategy.</p>

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			<p>PE are fully supportive of a landscape led design, of meeting objectives around accessible green space, promoting biodiversity, and sensitive integration of the scheme into the landscape. However, we feel that further work is required to define the role and purpose of the SEA, and to consider how the edges of the site are designed to ensure a range of objectives can be appropriately met.</p> <p>We consider that further work is required to establish the size and nature of the proposed Strategic Enhancement Area, the purposes and land uses for this area. There may be merit in a less prescriptive SEA, but that the intentions of delivering appropriate edge treatments, landscape and ecological buffers, and habitat improvements can be achieved in a different way. This should be masterplan led. We recognise and support the desire to take an appropriate and proportionate approach to the setting of the Roman Road to the north, given its important heritage status.</p> <p>As long term landowners, both PE and Mr Franklin intend to continue to farm their residual land holdings, and therefore definition over the proposed SEA and consideration of impacts on the residual farm will be important considerations for both landowners.</p> <p>As landowner, PE look forward to working constructively with GCSP and wider stakeholders to determine the most appropriate approach to the Strategic Enhancement Area.</p>
Policy S/GF – 6	Grange Farm contains and is close to a number of nationally significant ecological and historic assets, including the Worsted Street Roman Road Scheduled Ancient Monument and SSSI to the north, County Wildlife Sites, an extensive network of archaeological remains and features, various listed and non-designated heritage assets as well as the Abington Conservation Area to the south. The future layout of the new town will consider these assets, identifying and	Object	<p>PE support the principles of this policy, and the desire to respect and sensitively integrate all of the important heritage, ecological and landscape features into the masterplan for the scheme.</p> <p>However, read in conjunction with the draft Spatial Framework (figure 82) it could be interpreted that the Council</p>

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	<p>implementing measures that mitigate any impacts but also deliver enhancement wherever possible, including creating an extensive network of ecological corridors</p>		<p>has already determine the most appropriate design solutions and mitigation.</p> <p>PE have commissioned a full multi disciplinary team to explore these issues in detail, and to develop a robust masterplan framework for the site, which identifies and respects the site’s ecological and heritage constraints/opportunities</p> <p>Further work is required to understand these constraints, the development proposals and appropriate mitigation through set back, design/landscaping or management.</p> <p>Dialogue is also underway with Historic England and a geophysical survey has been commissioned in areas close to the non-designated barrows, and to the north of the proposed allocation, in order to develop a deeper understanding of the site’s history, and any constraints associated with this.</p>
Policy S/GF – 7	<p>Development proposals must make a positive and meaningful contribution to the creation of a fully functional, self-contained new town. To achieve this, the site is allocated for mixed use development comprising:</p>	Comment	<p>Minor point. PE query numbering of subsequent bullet points in the policy – should start with a).</p>
Policy S/GF – 7 (f) (i and ii)	<p>f. Approximately 6,000 homes, including:</p> <p>i. affordable housing, self and custom build homes and key worker housing to support surrounding employment sites;</p> <p>ii. 10% of the approximately 6,000 dwellings as specialist accommodation (within Classes C2 and C3), particularly for older people or those with disabilities.</p>	Object	<p>PE very much support the principle of a new settlement but housing numbers and the mix of housing typologies and tenure needs to be developed based on further work on character, acceptable building heights, and housing needs (by typology and tenure).</p> <p>The policy will set the framework for a 20 year development programme – and therefore will inevitably need to flex over time.</p> <p>We are supportive of the ambition for a scale of development which can be self contained and sustainable, providing direct access to a range of employment opportunities by public transport and active travel.</p>

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			<p>However, further work is required to confirm that the “approximately 6,000 homes” is the appropriate quantum of housing.</p> <p>We are concerned with the suggestion that 10% of the dwellings should be specialist accommodation. For a scheme of this scale this will generate a very significant number of these homes, and this should be a product of up to date assessments of need (over time), rather than a blanket policy requirement.</p>
Policy S/GF – 7 (g)	g. A total of 12 Gypsy and Traveller pitches (within a site of approximately 1 hectare);	Object	<p>PE do not feel that the Council has prepared a robust justification for requiring the provision of Gypsy and traveller pitches on the site. This is a point that we wish to explore further with GCSP.</p> <p>Our reading of the Council’s own evidence is that it signposts a number of other solutions as being sequentially preferred, with allocations on new development as a last resort. The case for an allocation at Grange Farm does not appear compelling and on that basis PE object.</p> <p>No clear basis for requiring a G&T allocation here and we are concerned that this will have a detrimental impact on site capacity both with the loss of housing capacity (or capacity for other uses from the scheme), and also consequential impacts on the capacity of adjoining land.</p> <p>The approach to siting of any G&T site would require great care to ensure effective integration with the wider community.</p>
Policy S/GF – 7 (h)	h. Class B2 (General Industrial) floorspace and Class B8 (Storage or Distribution) through provision of a local last-mile logistics hub/warehousing of approximately 20,000 square metres (GIA);	Object	PE wish to promote the notion that a range of employment uses will be needed on site to create a mixed and balanced new community, that is both self contained and thus creates sustainable travel patterns and good quality of life for

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			<p>residents, but also recognising the relationship of the site to nearby science parks in the southern cluster. We feel that the site is well placed to accommodate complementary uses, and welcome the reference to B2 and B8 employment uses.</p> <p>However, we do not feel that the policy at this stage should be overly prescriptive, pending further work on the appropriate scale and mix of employment uses that will best create a mixed and balanced community.</p> <p>Whilst we are supportive of the desire to promote local last-mile logistics hub / warehousing, the wording infers that this is the only purpose of any employment, which could serve to restrict the market (and prevent delivery). The use class definition should be suitably broad to allow other uses (e.g. advanced manufacturing) or other uses that we cannot reasonably foresee (but which may be wholly appropriate) over the likely build out period for this development.</p> <p>The precise nature and quantum of employment and its role serving the site, and the wider ecosystem, requires further assessment and flexible approach. We feel that any limits of floorspace should be set very carefully and believe that a case may be made to increase the amount of employment floor area to create a more self contained community.</p>
Policy S/GF – 7 (i)	i. Approximately 15,000 square metres (GIA) office (E(g)(i) floorspace to meet local needs generated by the new town;	Object	<p>PE support E(g)(i) office uses appropriate for the site. However we question the need to be so specific about the Use Classes Order. What is the intention here?</p> <p>Consideration should be given to increasing the amount of floor space to create a sustainable community – further evidence / justification required to determine appropriate scale/ mix.</p>

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			<p>The use class definition should be suitably broad to allow other uses (e.g. advanced manufacturing) or other uses that we cannot reasonably foresee (but which may be wholly appropriate) over the likely build out period for this development.</p>
Policy S/GF – 7 (j)	j. A mix of retail, commercial and community facilities including indoor and outdoor leisure provision, provided at a new town centre;	Support	<p>PE very much support the ambition for a mixed use town centre, and early delivery of amenities to support community integration from the earliest stages of development.</p>
Policy S/GF – 7 (k)	k. Provision of educational facilities including primary and secondary schools that are operational from the early phases of development;	Comment	<p>PE support the desire to include primary and secondary education. This should be extended to include early years provision.</p> <p>We note in particular the comment that these should be delivered “from the early phases” of development. We support the sentiment, but are aware that there is considerable experience in the Greater Cambridge area of careful management of the timing of opening new schools (both primary and secondary), with implications for other nearby schools.</p> <p>We are committed to working with GCSP and the County Council (as education authority) to determine the most appropriate approach, taking account of capacity in nearby schools, likely development phasing and housing typologies (to determine expected child yield) and trigger points for delivery (which we would expect to be determined at planning application stage).</p> <p>We note that the Council’s Draft Infrastructure Delivery Plan identifies approximate costings for new schools, and we look forward to working with all parties to consider carefully the education needs for the development.</p>
Policy S/GF – 7 (l)	l. Healthcare facilities to meet the needs of the development; and	Support	<p>PE support in principle the desire to see provision of a new healthcare facility on the development.</p>

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			We wish to encourage early dialogue with the Integrated Care Board to understand the likely requirements and land take.
Policy S/GF – 7 (m)	m. High quality open space and recreation provision, including parks, community gardens and food-growing spaces.	Support	PE support the intentions of the policy, noting further work is required to establish the scale of each element of open space, sports provision and to work through how best to integrate into a landscape led masterplan.
Context	The development of Land Adjacent to A11 and A1307 at Grange Farm must do the following:	Comment	There seems to be an error with the paragraph numbering which reverts to 2. We have adopted this numbering for clarity, noting it will need to change.
2	Embed exemplar principles of landscape, townscape, heritage protection and enhancement into all phases of masterplanning and design by:	Comment	<p>PE support the desire for high quality design, and whilst we share the ambition for an exemplar approach, greater clarity is required on interpretation of what this means.</p> <p>We very much welcome the opportunity to develop a robust masterplan framework and to test the approach to a range of matters to reach common ground with GCSP on these points.</p>
2(a)	a. Ensuring the development respects, protects and enhances the landscape within its rural setting, including surrounding chalk hills and woodlands;	Comment	PE very much support the ambition of this aspect of policy. We support in principle but request clarity on what is referred to by “the landscape within its rural setting”. This may be interpreted in different ways and therefore we would welcome a discussion about what is intended here.
2(b) (i) through to (v)	<p>b. Responding sensitively to the local townscape and heritage, incorporating appropriate buffers where appropriate and necessary, including:</p> <ul style="list-style-type: none"> i. the Worsteds Street Roman Road Scheduled Ancient Monument to the north; ii. the Grade II listed Worsteds Lodge Farmhouse immediately to the north-west, iii. onsite burrows; iv. non-designated heritage assets at Grange Farm; and v. known and unknown archaeological assets. 	Support	<p>We support, in principle, the protection of the Ancient Monument (Roman Road) and Grade II Listed Building (Farmhouse), and are working through a process of better understanding the important features of the site, in order to consider an appropriate design response. This includes commencing a geophysical survey of parts of the site, as a first step towards a phased assessment of the site’s archaeological potential.</p> <p>We agree that key heritage assets need to be treated sensitively – and would seek to develop some broad principles in agreement with GCSP and all key stakeholders</p>

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			<p>(including Historic England and Cambridgeshire County Council Historic Environment Team).</p> <p>We also support the need to carefully consider local townscape including local Conservation Areas.</p> <p>Minor amendments:</p> <ul style="list-style-type: none"> • Typo “burrows” should be “barrows” • Typo “Far” should be “Farm”
2(c)	c. Establishing a robust landscape framework that integrates the development with the Strategic Enhancement Area (S/SEA/GF) and the wider landscape context, informed through preparation of a Landscape Visual Impact assessment;	Object	<p>PEsupport in principle the need for a robust landscape framework. We have commissioned expert consultants on landscape, ecology and heritage to explore these issues further.</p> <p>We remain concerned about the current definition of the Strategic Enhancement Area (S/SEA/GF) and agree that this should be devised based on a more detailed evidence driven understanding of the site constraints and opportunities, and a landscape led masterplan proposal.</p> <p>We have provided comments on Policy S/GF 5 and look forward to working through these matters with GCSP.</p>
2(d)	d. Undertaking Heritage Impact and Historic Landscape Character Assessments to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation measures and informing the appropriate siting and design of buildings; and	Support	<p>PE support Heritage Impact and Historic Landscape Character Assessments</p> <p>We support in principle the need for a robust landscape and masterplanning framework. We have commissioned expert consultants on landscape, ecology and heritage to explore these issues further, to ensure that we can respond to these key issues.</p>
2(e)	e. Maintaining separation between Grange Farm and surrounding existing settlements, including Little Abington and Babraham.	Support	PE strongly support the objective to avoid convergence of settlements and note that this has been a particularly strong

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			<p>point raised through initial community responses on the project.</p> <p>We would suggest that the policy wording could be sufficient to ensure settlements do not coalesce, without prejudging the appropriate way of achieving this.</p> <p>We are committed to working with GCSP to devise appropriate design solutions to ensure that Little Abington and Great Abington (in particular) retain their own distinct identity. We anticipate this will require a review of the most appropriate scheme boundaries, and landscape strategy/ mitigation and use of planted buffers to integrate the development into the local area, and retain separation of existing communities.</p> <p>It is important however that this separation is balanced with the need for community integration. We will wish to encourage future residents at Grange Farm to support local services and amenities in the existing communities, whilst bringing the necessary provision on site, for the benefit of local residents. Active travel connections will be important to ensure sustainable movement within the local area.</p>
Built Form 3	3. Ensure the built area of the settlement is contained within the Site Allocation boundary identified on the policies map and as shown on the Spatial Framework diagram.	Object	<p>PE have commissioned a full multi disciplinary team to explore the site constraints and opportunities in detail, to consider character and context and to develop a robust masterplan framework for the site, which identifies and respects the site's landscape, ecological and heritage constraints/opportunities.</p> <p>Further work is required to understand these constraints, the development proposals and appropriate mitigation through set back, design/landscaping or management.</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
			We consider this is likely to require a review of the proposed boundaries of the Spatial Framework diagram both in respect of the development area, and the Strategic Enhancement Area, ahead of the Regulation 19 consultation.
Built Form 4	4. Take a design-led approach to development through the preparation of a comprehensive Masterplan for the site and subsequent design codes for each phase of development, in accordance with the Spatial Framework, that demonstrate how the design will:	Support	As noted elsewhere in our response, PE are fully supportive of a design led approach, and to the development of a comprehensive site masterplan, and (later in the process) design codes, to ensure each development phase comes forward in accordance with the overall masterplan vision.
Built Form 4(a)	a. contribute to creating a thriving place, with access to key services and facilities that will support the community and surrounding villages from the outset;	Object	<p>PE support the objective of delivering a thriving place, and the need for a mix of services and facilities.</p> <p>We are however concerned that the policy does not pre-judge the appropriate uses, or timing, which will be negotiated carefully at application stage.</p> <p>We are committed to ensuring early provision of community facilities to encourage and foster a strong sense of community, potentially through some meanwhile uses.</p> <p>However, taken literally the desire to see this in place “from the outset” could infer this is required before any occupiers and demand. It will always be the case that some critical mass is required to support even the most basic facilities.</p> <p>We are keen to learn from best practice in other successful new communities, in places such as Welbourne, Nansledan and Poundbury, for inspiration.</p>
Built Form 4(b)	b. respond positively to key landscape, heritage, townscape and ecological features (identified elsewhere in this policy), and how these will be afforded appropriate protection and enhancement;	Support	As above, PE support the objective here, but we are keen to work with GCSP and other key stakeholders to ensure an appropriate and proportionate response, in order to deliver on the range of sometimes competing priorities for the development.

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			<p>We have commissioned a full multi-disciplinary team to explore the site constraints and opportunities in detail, to consider character and context and to develop a robust masterplan framework for the site, which identifies and respects the site's landscape, ecological and heritage constraints/opportunities.</p> <p>Further work is required to understand these constraints, the development proposals and appropriate mitigation through set back, design/landscaping or management, in consultation with the relevant consultees.</p> <p>We consider this is likely to require a review of the proposed boundaries of both the development area, and the Strategic Enhancement Area, ahead of the Regulation 19 consultation.</p>
Built Form 4(c)	c. deliver buildings that respond to the surrounding context and ensure heights of taller buildings do not adversely impact sensitive views, heritage assets and the setting or character of surrounding communities, particularly considering scale, density, massing and form at:	Support	PE support the desire to develop high quality buildings that respond to the surrounding context with appropriate massing, building heights and densities, as well as building form. We are very much committed to design quality as set out in our vision for the project in our previous Local Plan submission.
Built Form 4(c) (i)	i. the northern area of the site, where densities should be limited to reduce impacts on the Worsted Road Roman Road;	Object	<p>PE object to this policy as further work is required to understand the heritage importance of the Roman Road, and the area south of the Roman Road and its interface with the development. As landowner, geophysical survey work has been commissioned to aid our understanding of the site's heritage significance.</p> <p>Whilst it is recognised that there will be a need to provide some buffer to sensitive heritage and landscape features, there is further work required to determine the most appropriate way to achieve this. Reducing densities may be one element of this, but this should be revisited ahead of Regulation 19 Consultation. Design approaches, such as</p>

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			framing buried remains of interest to give them a visual setting, thereby enhancing their significance, may also be appropriate.
Built Form 4(c) (ii)	ii. the new local centre towards the centre of the site (as shown on the Spatial Framework diagram), where taller buildings may be appropriate.	Object	<p>PE support the need for an appropriately located “centre” to the scheme, but further work is required to determine the most appropriate location for this accounting for a range of factors. Site topography and building heights will be important considerations, but there will be wider considerations including (and not limited to) proximity and access to nearby communities, the mix of uses proposed, the phasing of development (noting the desire to see early community provision) and related to this the infrastructure required to support the delivery of such facilities.</p> <p>The policy should therefore be amended to support the identification of a site for a new local centre, but leave flexibility in the policy to find the appropriate design led response.</p>
Built Form 4(d)	d. provide for an appropriate variety of typologies, scales, massing and densities across the site	Support	<p>PE support variety of built form as set out in the draft policy.</p> <p>This policy limb conflicts with 7 A) which promotes an average density target of 50 – 55 dwellings per hectare. See comments on that element of the policy.</p>
Built Form 4(e)	e. identify landmark features and buildings that aid legibility and create identity within the new development	Support	PE support landmark features and buildings in appropriate locations, taking account of landscape and other technical work which will provide guidance on appropriate locations for taller buildings.
Built Form 4(f)	f. maintain the distinction between Grange Farm and neighbouring villages, in terms of character and physical separation	Comment	<p>PE suggest this policy limb is reworded to read “maintain the distinction between the Grange Farm development and neighbouring villages, in terms of character and physical separation.”</p> <p>Note also there are inconsistencies here with the land being referred to as “Grange Farm” rather than “Land adjacent to A11/A1307”. There should be a consistent naming convention adopted for clarity.</p>

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Built Form 4(g)	g. deliver exemplar design quality, reflecting the site's prominent location and close association with nearby innovative employment centres.	Support	<p>PE support exemplar design quality. Further discussions are likely to be required about what is meant in this regard, but in principle GCSP's ambition for the site is aligned with our own.</p> <p>It may be that this policy limb needs to be refined in due course to reflect this.</p>
Built Form 5	5. Deliver a network of new centres for the town, specifically:	Support	<p>PE support principle of town and neighbourhood centres; however, further work is required to establish how many centres and what facilities can be supported by the proposed 6,000 homes.</p> <p>Great care will be required to consider the appropriate number of centres, their make up, scale and mix of uses, to ensure the objective of a vibrant, walkable new community is achieved. This may require decisions which weigh up the merits of fewer, larger "centres" vs a dispersed approach to amenity provision.</p> <p>This should be design led and not pre-judged by the policy.</p>
Built Form 5(a)	a. A vibrant Town Centre, approximately in the centre of the site (as shown on the Spatial Framework diagram), which will act as a landmark for community and civic facilities and amenities and be the main focus for commercial and retail uses;	Object	<p>PE support the need for an appropriately located "centre" to the scheme, but further work is required to determine the most appropriate location for this accounting for a range of factors. Site topography and building heights will be important considerations, but there will be wider considerations including (and not limited to) proximity and access to nearby communities, the mix of uses proposed, the phasing of development (noting the desire to see early community provision) and related to this the infrastructure required to support the delivery of such facilities.</p> <p>The policy should therefore be amended to support the identification of a site for a new local / town centre, but leave flexibility in the policy to find the appropriate design led response.</p>

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			We comment elsewhere on the use of the word “town”.
Built Form 5(b)	b. Neighbourhood centres, serving day-to-day need for key services, education and community facilities in close proximity to homes.	Support	<p>As per our comments on other limbs of Policy S/GF5, whilst PE support the desire to promote community integration through appropriately sized and located neighbourhood centres – further work is required on the number required, and relationship to wider development to maximise opportunities for effective integration with the scheme (and commercial viability).</p> <p>We are very much willing to explore higher densities in the vicinity of the Town or Neighbourhood Centres.</p>
Built Form 6	6. At these centres, buildings and main entrances provide an active frontage to the public realm and make a positive contribution to the street scene and wider placemaking objectives.	Support	PEsupport the objective to achieve active frontages in the “centres”.
Built Form 7	7. Deliver an appropriate mix of well-designed, high-quality residential neighbourhoods to meet a range of needs, incorporating:	Support	PEsupport this policy objective, and look forward to developing this into a clear project vision and concept masterplan.
Built Form 7(a)	a. a range of typologies, including terraced houses, semi-detached and mews housing, built at an average density of 50-55 dwellings per hectare (net);	Object	<p>Both landowners are supportive of the broad ambition for the new town and the broad support scale of the development.</p> <p>However, following engagement with our masterplan lead, we consider that an average density of 50-55 dwellings per hectare is likely to be too dense in this location.</p> <p>We propose to test a number of scenarios as we begin to set a masterplan framework for the project, and propose to test a range of densities in order to explore matters raised in the policy (sensitive heritage assets, landscape capacity, views, self containment, separation) and believe at this point a slightly lower density is likely to prove more appropriate to the rural landscape setting.</p> <p>We acknowledge that there will be pockets of higher density, but do not feel that these densities will be achievable on this site (as a whole), nor something that the market will support.</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
			<p>This will obviously have a bearing on the overall site capacity, unless any reductions in density can be compensated for by an increase in site area elsewhere (for example to the north).</p> <p>At this stage the policy should not need to define a target density until further work has been undertaken.</p>
Built Form 7(b)	b. homes that are adaptable to support the needs of future generations; and	Support	PE support the policy expectation of homes that are adaptable
Built Form 7(c)	c. a range of other uses at neighbourhood centres, embedded within neighbourhoods, providing key facilities, services and flexible community amenity uses, (for example a community centre that provides social benefit including sport and recreation), within a short walking or wheeling distance of homes.	Support	PE support the ambition for the uses within neighbourhoods.
Public Space 8	8. Establish a high-quality public realm that encourages healthy lifestyles, physical activity and positively contributes to wellbeing, including through legible and well-lit routes that enable safe walking and wheeling throughout the day and night.	Support	PE support, and are passionate, about the need for high quality public realm. Our client's vision is that this development is different and something the community is proud to call home. The layout and quality of the public realm will be critical to realising this ambition.
Public Space 9	9. Provide open space comprising formal children's play space, informal children's play space, informal open space, allotments and community orchards.	Support	PE support provision of open space – more work needed to establish the scale of the provision as part of overall land use budget. This is being tested through our masterplan framework.
Public Space 10	10. Integrate green and blue infrastructure into the design of the public realm including by providing places for people to interact, play and rest in nature.	Support	PE support the effective integration of green and blue infrastructure.
Nature 11	11. Preserve and enhance significant ecological heritage and the natural environment across the allocation, Strategic Enhancement Area (S/SEA/GF), and its surrounding context, by:	Support	<p>PE support the preservation and enhancement of significant ecological heritage and the natural environment – suggest the requirements will inform both the extent of the built development and the scale, location and approach to delivering the Strategic Enhancement Area.</p> <p>We have separately set out our views on the SEA under Policy S/GF – 5.</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
Nature 11(a)	a. Adopting a landscape-led design that supports the diverse ecological character and preserves the chalk hills and woodlands that are home to a species rich ecology;	Support plus further work	PE strongly support the need for landscape-led design and suggest that further work is required to establish the most appropriate approach to integrating the scheme into the landscape and ecological character of the area.
Nature 11(b)	b. Maximising opportunities for ecological enhancement, such as through restoration of degraded habitats and reinforcements of ecological habitats and networks, including commuting, foraging and sheltering of species such as badgers, bats, hedgehogs and other mammals, birds, amphibians and invertebrates;	Support	PE support the principle of maximising opportunities for ecological enhancement and building on the special qualities of the site.
Nature 11(c)	c. Appropriately responding to the designated Roman Road Site of Special Scientific Interest (SSSI) and remnant lowland calcareous grassland of high floristic diversity to the northern boundary of the development, and non-statutory designations such as local wildlife sites within 2km distance of the development;	Support	PE support the need to respond to the designated historic and ecological sites – but note that further work is required to establish the most appropriate design led approach to accommodating and respecting these important features as part of the comprehensive approach to masterplanning.
Nature 11(d)	d. Ensuring that appropriate measures are implemented to minimise recreational disturbance and pressures on ecology at the SSSI;	Support	PE support minimising recreational disturbance on ecology at the SSSI, but this needs to be looked at in a holistic way, as it may be that additional habitat of equivalent or better quality may be created as part of the scheme.
Nature 11(e)	e. Creating dark corridors to ensure nocturnal and crepuscular species are not disturbed, by providing minimal lighting near to the buffer of the development, and directional and movement sensitive lighting where appropriate;	Support	PE support creating dark ecological corridors
Nature 11(f)	f. Preserving the existing range of watercourses and waterbodies of ecological significance and aquatic ecosystems, including the River Granta, a chalk stream that flows through Little and Great Abington;	Support	PE support the preservation of the existing range of watercourses off-site and intend to develop a landscape led masterplan, with integrated green and blue infrastructure, SUDs and with careful consideration of all aspects of the water cycle to ensure the scheme sensitively integrates into the area.

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
Nature 11(g)	g. Creating a clearly defined green buffer between the neighbouring settlements which:	Support	<p>PE support the creation of a clearly defined green buffers between the development and established settlements. As per our comments elsewhere on the policy, the role, purpose, extent and definition of the SEA is an important consideration here.</p> <p>We welcome discussions with GCSP, and in due course with the community, about how we best achieve this objective.</p>
Nature 11(g) (i)	i. preserves viewpoints from the northern and eastern boundary of the site	Object	<p>PE feel that this limb needs greater clarity. It is not the viewpoints that are to be preserved, rather it is important to understand what it is about key views that is important.</p> <p>With a development of this scale, key views and character will change, so it is important to identify and understand what i important to consider and what it is we are trying to “preserve”.</p> <p>We would very much welcome a discussion with landscape officers about the key views that we should be giving particular attention.</p>
Nature 11(g) (ii)	ii. protects existing landscape features; and	Support	<p>PE support protection of existing landscape features, wherever possible and allowing for the most appropriate scheme as a whole. It should be noted that there may be elements of existing landscape features which do need to be removed (e.g. hedgerows) to accommodate site infrastructure or development, where justified.</p>
Nature 11(g) (iii)	iii. extend and strengthens the existing treeline along the edge of the site.	Support	<p>As long term, locally resident landowners for generations, PE have been instrumental in establishing the strong planted treeline buffers around the site. Dendrology is a particular passion of the family.</p> <p>We support the desire to strengthen planting and enhancement of the site boundary but suggest that further</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
			<p>work is required to establish the appropriate location for such boundary planting</p> <p>We believe that there is a case for further screening to ensure visual containment and separation from adjoining communities.</p>
Nature 12(a)	<p>12.To inform the design at all phases of development, the applicant must:</p> <p>a. carry out a full programme of ecological survey and monitoring, to guide a Biodiversity Implementation and Management Plan, providing appropriate mitigation and enhancement. This must include preparing site-specific ecological surveys to inform all phases of development, including strategic masterplanning, development of design detail (including dark corridors) and, where unavoidable impacts occur, appropriate mitigation;</p>	Support	<p>PE support the need for full ecology survey and biodiversity implementation and management plans throughout the development of the scheme.</p> <p>Early input from specialist ecologists is being sought to ensure biodiversity is a priority in the development of the masterplan.</p>
Nature 12(b)	<p>b. propose measures that will support the appropriate positive management of any ecological buffers, to maintain biodiversity value.</p>	Support	<p>PE support the need for positive management of the ecological buffers, and are committed to a strong stewardship model to ensure the proactive management and maintenance of all aspects of the scheme.</p>
Movement 13	<p>13.Deliver a comprehensive movement and connectively network across the whole town that actively encourages and prioritises active and sustainable modes of travel, and provides connections across the site and to surrounding villages and employment sites. This must:</p>	Support	<p>PE are strongly supportive of the broad ambitions for a strong connectivity and movement network across the site and beyond, for all modes of travel.</p>
Movement 13(a)	<p>a. Deliver a well-connected network that prioritises walking, wheeling, cycling and public transport movements and provides a legible high quality street network in accordance with Healthy Streets guidance and National Design Guidance;</p>	Support	<p>PE strongly support the need for walking, wheeling, cycling and public transport movements. Streets must be well designed and accord with best practice and guidance.</p>
Movement 13(b)	<p>b. Improve walking and cycling infrastructure to Babraham, Babraham Research Campus, the Wellcome Genome Campus, Granta Park, Little and Great Abington, Linton, and Whittlesford Station, including addressing local severance from the A1307 and A11;</p>	Support plus further work	<p>PE agree we should prioritise exploration of opportunities to enhance walking and cycling connectivity to key local employment destinations and public transport hubs. Further work will be required to establish how best to overcome local severance from the A1307 and A11. PE is committed to working with local authority partners to achieve ambitions in the area to ensure deliverable solutions..</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
Movement 13(c)	c. Ensure there is no direct access from the new town to the Worsted Road Roman Road, given archaeological, heritage and ecological sensitivities;	Object	<p>PE feel that further work is required to understand the distinctive and important features of the Roman Road, and to determine the most appropriate design response.</p> <p>The Roman Road is already a byway and is well used for recreational walking, dog walking and cycling. Current uses have not degraded or harmed the archaeological significance of the road.</p> <p>The policy should not seek to pre-judge the approach to the Roman Road until a more detailed heritage assessment and design led approach to sensitively integrated the development into the local area.</p> <p>We agree that the development should create an appropriate network of accessible green space and movement networks (cycle routes/walking routes) to reduce pressure in this area.</p>
Movement 13(d)	d. Provide a segregated link for the proposed Cambridge South East Transport Scheme to enable the project to serve the development without being impacted by local congestion; and	Comment	<p>Building on our comments relating to Policy S/GF – 3, PE support the principle of effective integration of the new community with the proposed Cambridge South East Transport busway.</p> <p>integration with CSET is supported, having the potential to provide frequent, high quality connections into the Cambridge Biomedical Campus and the city.</p> <p>However, the policy as drafted serves to require a “segregated connection” and is supported by a preliminary study by Mott MacDonald as part of the Council’s evidence base.</p> <p>As landowner, we feel that insufficient work undertaken to date to be certain over deliverability (technical, funding/viability, land ownership, consenting) and until such</p>

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			<p>time as work has been undertaken, we think it is premature to conclude that only a segregated connection (i.e. bridge link) is the right solution taking account of deliverability and viability. Alternative systems and integrations may provide the same benefits and these should also be explored.</p> <p>We have commissioned KMC Transport Planning to prepare a transport strategy for the project, and a key focus will be on the options for achieving integration with CSET. We will submit our evidence on this point in due course.</p>
Movement 13(e)	e. Explore opportunities for an active travel connection parallel to the segregated link to connect the new town with central Cambridge, Babraham, the Cambridge Biomedical Campus and Granta Park.	Support	PE support the principle of promoting active travel connections. For the reasons given in our comments on policy limb 13 (d), the appropriate design solution should be derived from more detailed assessment and engagement with Cambridgeshire County Council as highway authority.
Movement 14	14. Integrate a last mile logistics hub within development to enable delivery of goods from the distribution centre and supports the trip budget in reducing the number of trips through the development.	Object	<p>Whilst we support the potential role that the site can provide in terms of employment within last mile logistics (either within the new settlement, or serving nearby employment hubs) we wish to encourage GCSP to encourage a wider definition of the employment offer until such time as further work has been undertaken on the appropriate mix and quantum of employment to support the new community. We also support the inclusion of a community concierge (or similar) as part of community provision in the area but wish to ensure the ambition for a last mile movement hub does not seek to limit the types of employment that the development may accommodate more broadly.</p> <p>We do agree with the objective of minimising trips to / from and within the development, but feel recognition is required of the role that the site can play in supporting the Southern Employment cluster.</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
Movement 15	15.Ensure transport and junction modelling is be undertaken to confirm points of vehicular access into the site and the necessary road and junction enhancements required to satisfy the Highways Authority and National Highways	Change	<p>PE wish to suggest reword as follows: “Ensure transport and junction modelling is be undertaken to assess and confirm all possible points of vehicular access into the site and the necessary road and junction enhancements required to satisfy the Highways Authority and National Highways.”</p> <p>We have commissioned work to explore the potential for a direct access/egress from the A11 in the north west corner of the site, utilising the existing slip road serving the Total Energies filling station and the materials recycling facility (operated by Dockerill).</p> <p>We feel that this has a potentially important role to play, and KMC Transport Planning are assessing the potential options to provide additional access / egress to the A11. There would be a number of potential benefits if this can be achieved, including separate access/egress for construction traffic, and potential separation of heavy traffic from other road users. We accept that these arrangements would need to be agreed with National Highways as highway authority for the SRN.</p>
Movement 16	16.A trip budget based on detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.	Support	<p>PE support the principle of a trip budget and welcome the opportunity to negotiate this with the local planning authority.</p> <p>We feel strongly that it would be premature for the policy to seek to fix the trip budget, which should be the product of detailed assessment of appropriate development mix and transport strategy, taking account of local highway capacity constraints and the wider strategy to deliver public transport and active travel connections.</p>
Movement 17	17.To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer in	Support	In line with the development of a masterplan, PEsupport the development of a strategic and local transport mitigation plan,

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
	<p>consultation with the Local Highways Authority and Local Planning Authority. This must include:</p> <p>a. providing appropriate access to and from the site to avoid congestion on the A1307 during peak travel hours, with appropriate mitigation methods to the transport network; and</p> <p>b. Potential delivery of mitigations and other supporting transport schemes through Section 106 contributions.</p>		<p>which would form the basis of a Transport Assessment in due course.</p>
Movement 18	<p>18.To reduce private vehicle usage from the outset of the development and improve placemaking, prioritise incorporating rural car barns into the design at the edge of parcels or plots to enable remote parking solutions.</p>	Object	<p>PE are concerned that the policy as drafted pre-determines the most appropriate design solution for this project. We therefore suggest the below alternative wording:</p> <p>“To reduce private vehicle usage from the outset of the development and to improve placemaking, alternative car parking and storage options should be explored at the edge of parcels or plots as part of a strategy of more remote parking solutions.”</p> <p>This does not set this as an absolute requirement, but requires this to be considered in the round as part of a robust transport strategy (necessarily with careful controls on car parking).</p>
Resources 19	<p>19.As part of the design, consider innovative approaches to incorporating low-carbon energy infrastructure, circular economy principles, and sustainable water management, including greywater recycling, rainwater harvesting, and sustainable drainage systems (SuDS), informed by preparation of an Integrated Water Management plan and Water Cycle Strategy.</p>	Support	<p>PE support the Council's objective to consider low-carbon energy infrastructure, circular economy principles, and sustainable water management. Including an Integrated Water Management plan and Water Cycle Strategy. We have already commissioned work in these areas from a suitably qualified expert.</p>
Resources 20	<p>20.Demonstrate that development can provide or contribute to suitable wastewater treatment plant on-site, or at a suitable nearby location with sufficient capacity to support development.</p>	Support	<p>PE note the requirement to ensure that foul water can be appropriately managed, as part of the overall water cycle. We have commissioned work in this area from a suitably qualified expert, and we expect that this will help shape an</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
			<p>appropriate policy for the site, based on what is practical and deliverable.</p> <p>We are clear that ultimately the Water companies have a statutory duty to provide for waste water collection and recycling, but we are aware of the constraints locally and environmental pressures, and are committed to exploring what we can do to ensure integration into the wider network.</p>
Lifespan 21	21.The delivery of Grange Farm, including any individual phases, must be in accordance with an approved phasing plan that must be submitted alongside the first planning application for the site, to ensure the expansion supports the creation of a fully functioning and successful town	Support	PE support the need for any development to need to come forward in accordance with an agreed phasing plan. We would expect this to be submitted indicatively as part of any outline application, with updates provided in support of each Reserved Matters application. This can be conditioned appropriately.
Lifespan 22	22.Planning for essential services, facilities and infrastructure must be undertaken in a comprehensive manner at the outset, identifying and anticipating future needs and establishing suitable mechanisms to deliver the infrastructure in a timely and efficient way to achieve the successful delivery of the new town.	Support	<p>PE support planning for essential services, facilities and infrastructure and we are committed to working with all statutory undertakers, GCSP and other interested parties to ensure timely delivery of infrastructure.</p> <p>Viability will be an important consideration.</p>
Lifespan 23	23.The approach to the long-term management, maintenance and stewardship of the new town, including its infrastructure, services, facilities and built and natural environment, must be identified at the outset through a Management and Maintenance Plan that sets out a comprehensive approach to the long-term management of the site as it evolves.	Support	PE agree this is a critical ingredient for success and that a clear stewardship strategy is required to demonstrate how the ambitions for the project can be realised.
Lifespan 24 to 29	<p>24.In addition to those required in other areas of this policy, the applicant must prepare a range of supporting studies, and submit these for approval by the Local Planning Authority as part of an outline planning application, including:</p> <p>25.Phasing and delivery plan, including indicative costings and potential delivery through Section 106 agreements or CIL;</p>	Comment	PE support the indicative list of documents to accompany any outline planning permission. We are not sure these are worthy of listing separately in each strategic allocation, as they would be expected of all major projects and could be covered elsewhere in the Local Plan for succinctness.

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
	<p>26. a. A Parking strategy; b. A Meanwhile use strategy; c. An Integrated water management plan; d. A Waste management plan;</p> <p>27. A cohesive stewardship strategy through early-phase community engagement including through conservation groups to deliver community-based enhancement stewardship as endorsed by Natural England;</p> <p>28. A strategic and local transport mitigation plan (in consultation with the Local Highways Authority and Local Planning Authority); and</p> <p>29. A Sustainability Statement.</p>		
Figure 82	Concept Spatial Framework Diagram	Object	<p>Whilst we support the principle of development, PE wish to object to the Spatial Framework diagram as drawn.</p> <p>Further work is required to consider a range of characteristics of the development, which we anticipate will give rise to changes.</p> <p>These may include such matters as:</p> <ul style="list-style-type: none"> • The scale, location and extent of the development boundary • The scale, location, purpose/definition and extent of the Strategic Enhancement area • The site access points • The location of any on site Waste Water Recycling Centre • The approach to integration with CSET • The location of the “centre” or “centres”

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
			<ul style="list-style-type: none"> • The set of distances and proposed design mitigation for any sensitive receptors (e.g. Roman Road SAM and SSSI) • Edge treatments to secure separation from the Abingtons • The integration of farming activities on residual land holdings. <p>All of the above may give rise to refinements to the diagram as shown.</p> <p>A comprehensive evidence base has been commissioned and will be submitted to GCSP in due course. We anticipate making suggested amendments to the Spatial Framework diagram to align with more detailed technical evidence and design led consideration of key issues.</p>
Supporting information 3.3.59	3.3.59 The location of Grange Farm provides an opportunity to create a high quality and sustainable town that is residential-led but provides access to nearby employment centres such as Babraham Research Campus (S/BRC) to the north west, Granta Park to the south, and the Wellcome Genome Campus and Chesterford Research Park to the south west. Development will support these existing employment sites through provision of key worker housing, services and amenity provision and access to high quality green open spaces.	Support	PE support this broad objective, subject to refinement of the proposals as set out elsewhere in our representations.
Supporting information 3.3.60	3.3.60 This policy is required to enable development of the site as a comprehensive new town, and provide a framework for consideration of future planning applications. The policy sets out clear expectations for placemaking and the elements needed to achieve this to a high standard whilst responding to significant historic landscape and heritage assets including the chalk hills and woodlands that are home to a species rich ecology.	Support	PE support the inclusion of the policy (as a principle) to provide a framework for consideration of future planning applications. As set out in our representations, the policy itself, the accompanying evidence base and resulting Spatial Framework will require some further refinement.
Supporting information 3.3.61	3.3.61 Housing should be of high quality design and be located nearby to centres to enable access to amenities to support the day to day need of residents and visitors. Homes should provide a range of	Support	PE support this objective.

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
	types and tenures and should include delivery of affordable housing, build to rent, and key worker housing.		
Supporting information 3.3.62	3.3.62 The Spatial Framework for Grange Farm sets out an indicative high level illustration of the policy requirements that are location-specific within the site.	Object	PEe support the principle of a Spatial Framework for Grange Farm (Figure 81) but stress that it needs further work to test that it reflects the optimal / evidenced approach to the allocation.
Supporting information 3.3.63	3.3.63 Currently, the site is bounded by the A11 to the west and the A1307 Cambridge Road to the south, which provides the existing access to the site, with a Roman Road (public right of way) to the northern boundary. To the west is access to the A1307, one of the main routes into the city of Cambridge, and the A11.	Support	PE support the description of the site.
Supporting information 3.3.64	3.3.64 Walking, cycling, and public transport will be the primary modes of access, supported by a coherent and legible network of routes within the site. Development should enhance connectivity and integrate proposed the CSET scheme to reduce car dependency.	Object	<p>PE support the aspiration that walking, cycling, and public transport will be the primary modes – however, greater recognition required to confirm that cars will continue to play a significant role.</p> <p>We would like to see amendments to the policy (taken as a whole) support integration with CSET without specifying how this is achieved until further work has been completed.</p>
Supporting information 3.3.65	3.3.65 Implementation of an effective site-wide Travel Plan against the trip budget, that include measures such as site-wide micromobility, car-sharing, electric car clubs, and incentives to encourage travel by active and sustainable modes.	Support	PEsupport the broad ambitions for a Travel Plan.
Supporting information 3.3.66	3.3.66 For Grange Farm to be successful in the long term, management and maintenance of infrastructure, services and facilities must be provided and should be agreed with the Local Planning Authority.	Support	PE support the need for long term, management and maintenance of the development and are committed to developing a leading stewardship model with direct landowner involvement.
Proposals Map (Figure 83)	Proposals Map	Object	<p>Whilst PE support the principle of development, we wish to object to the Spatial Framework diagram as drawn and therefore also to the Proposals Map (as drawn).</p> <p>Further work is required to consider a range of characteristics of the development, which we anticipate will give rise to changes.</p>

Policy / Paragraph (Policy S/GF)	Current text	Object / Change / Support	Summary of Key Points / Rationale
			<p>These may include such matters as:</p> <ul style="list-style-type: none"> • The scale, location and extent of the development boundary • The scale, location, purpose/definition and extent of the Strategic Enhancement area • The site access points • The location of any on site Waste Water Recycling Centre • The approach to integration with CSET • The location of the “centre” or “centres” • The set of distances and proposed design mitigation for any sensitive receptors (e.g. Roman Road SAM and SSSI) • Edge treatments to secure separation from the Abingtons • The integration of farming activities on residual land holdings. <p>All of the above may give rise to refinements to the Spatial Framework and Proposals Map.</p> <p>A comprehensive evidence base has been commissioned and will be submitted to GCSP in due course. We anticipate making suggested amendments to the Spatial Framework diagram and Proposals Map to align with more detailed technical evidence and design led consideration of key issues.</p>