Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Roderick L Bristow LL.B	
Organisation (where relevant)		
Job Title (where relevant)		
Address, including Post Code	[redacted]	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policies H/GT and S/AMC/GT
Proposed Submission Policies Map	Policy S/AMC/GT Map 104
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	Yes / No
Legally compliant	Actions taken preclude a firm 'yes'
Sound	Re the two policies: NO

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

My conclusions are based on the following observations and facts.

To be 'sound' the local planning authority (LPA) says:
"This means the Plan must be: justified; effective; positively prepared and consistent with national policy". In looking at these conditions for 'soundness' I believe the following to be the case. Regarding Policy S/AMC/GT.
"Justified?" The objectives of both policies are laudable, so naturally justified both morally and by National Guidance, but actions already taken (shown below) are unjustifiable, indeed unlawful, so the policy S/AMC/GT must be unsound if such is the only way to deliver it.
"Consistent with National Policy?". National policy requires that housing sites for Gypsies & Travellers et al (G&T's) be consistent with locations for any housing developments, within, or close to, the limits of the Local Development Framework (LDF). The Smithy Fen sites are 1.5 miles from the junior school and circa 0.5 miles from the edge of the LDF. Whereas the existing sites cannot, should not, be tampered with, any suggestion of land expansion of those sites (and especially on land covered by injunction) is clearly inconsistent with National Policy. Thus, the policy S/AMC/GT is rendered unsound, but not because of the objective to: 'maximise the use of authorised pitches', but because action already taken has been to utilise land covered by court injunctions.
"Positively Prepared?" An assumption, I believe, has to be made here that to be 'positively prepared' means the preparation must be made with clarity of mind - meaning with integrity and impartiality. S/AMC/GT refers to only two locations: Smithy Fen (SF) and Chesterton Fen (CF). It acknowledges sites of over half a hectare as suitable, but specifically only mentions the two sites above, and not by way of example by saying: "such as SF and CF', but by specific reference – no reference to Moor Drove and the hectarage there, no mention of the new housing developments at such as Northstowe, Waterbeach, Bourn, Cambridge North where tens of thousands of new homes are to be built – no, just the two locations, which suggests that the level of open minded research spent identifying potential locations for new G&T sites was woefully lacking or, indeed, non-existent. Furthermore S/AMC/GT refers to an optimum of 12 pitches per hectare (per 2.47 acres) – the 'authorised' land at Smithy Fen is circa 10 acres (10% either way so let's say 11.5), room for 48 -56 pitches, and there are already in excess of 50 on the authorised lands no little room for "intensification". The policy has not been 'positively prepared' in my estimation, I believe the objectives were written to a predetermined plan, a belief I consider supported by the LP's statement that when looking for land none was offered… true perhaps of settled community landowners, but the residents of Moor Drove have been seeking permission to expand and doubtless other existing sites will be looking to accommodate the extended families, but there is no record of such sites being approached. As an aside the Select Committee report of 2003 (reported 2004) recommended new sites be no larger than 18 pitches (1.5 hectares) not half an acre and above. Being as (has there?) there has been nothing from Govt since that date to over-ride that recommendation, then, arguably, policy S/AMC/GT is again out of step with national policy and unsound.

Finally: "is the plan thus the policy, effective?". To be effective has to mean: 'can it be delivered?'. The simple, emphatic, answer to this is: "No, it cannot!"
S/AMC/GT 1. Says: 'Development …..as shown in the policies map will be supported where:
'1.1 intensification, expansion, reconfiguration creates a positive, balanced attractive environment with a material improvement in health, safety, living conditions and amenities for the existing residents and neighbouring occupiers (presumably settled community neighbours)'. These requirements cannot be met. By its own admission at a meeting 20th February 2026, the LPA acknowledged (and it has aerial photos that support this) that a great many of the authorised pitches on the two SF sites are occupied by non-nomadic persons renting from the pitch G&T owners; that pitch densities exceed the conditions of the planning permissions; that pitch boundaries are now such that they cannot be accurately tied to the planning permissions granted and thus licenses cannot be issued; that it (the LPA) cannot simply evict these non-travellers, cannot insist that the accommodation and amenities provided are up-graded, and, in effect, had at that time no way of delivering this 1.1 nor, 1.3 (re design), 1.4 (re land scape), 1.7 (re ecological enhancement) or 1.8 (policy H/GT).
'1.2 is the density requirement of 12 to the hectare unless robustly justifiable in exceptional circumstances'. SF sites (see above) are already at or close to maximum density, so to identify those as 'expansion sites' (there are no exceptional circumstances mentioned anywhere) is contrary to the expectations of the policy relative to 'new need provision', and to the Local Plan per se in its need to show growth in housing capacities.
'1.3 refers to design, vehicle access'. The design issue is beyond the LPA's remit, without somehow withdrawing existing permissions, temporarily relocating both sites' occupants in order to effect 'pitch rebuilds', thus this policy part is totally undeliverable. As to vehicle access: current densities already make it difficult for such as refuse removal trucks to turn without using land under injunction and quite often such vehicles are seen reversing into certain areas. The Fen itself is served by a single lane drove over a small bridge, and in 2004 – again without published withdrawal – the advice of Akins, a highways specialist to County Council, and at its request, was that no expansion of the Smithy Fen sites should be supported because the drove was unsuitable, the road surface such that without massive expenditure it would give rise to great repairs expenses from any major increases in traffic movements. Again, the policy is undermined by the reality of SF being unsuitable for further expansion.
'1.4 refers to landscaping, layout, and minimising visual and other adverse impacts on neighbouring uses (thereby users). Landscaping and layout is, broadly, addressed above and cannot be delivered, and at no stage has the LPA considered the impact of sites enlargement on other Smithy Fen residents – no consideration of the impact from increased traffic and people movement, no thought for the fact that every vehicle, every foot fall, will be seen or heard in 5 of the just 18 properties currently on Smithy Fen's Droves, where three are good mile from the Fen entrance. This policy is unsound because, in fact, none of 1.'s sub sections have been considered whilst the expansions mooted in the policy have already been implemented and unlawfully as explained in the following submissions.

Policy H/GT.
Unlike policy S/AMC/GT this policy, as written and presented, is undeniably justified, capable of being delivered thus effective, seeming positively prepared, and overtly consistent with national policy, and thus it meets the requirements of soundness and legality in its "presented, written, form" BUT the reality is that with regard to the two Smithy Fen sites it has already been totally ignored and filed 'top-shelf in the archives'. To explain:

In planning terms the land "authorised for G&T pitches" on Smithy Fen constitutes, over the two sites, circa 50% of an area of approx 20 acres (8 ha). The other 50% is largely covered by injunctions issued 22/09/04, 6/04/06 and 17/06/06 (two other small areas within that 50% are covered by extant enforcement notices and by a 2005 appeal dismissal).

There are two sites because from 2004 through 2025 and a successive number of appeals and dismissals - together with any planning refusals not appealed - showed the Inspectorate fully supporting, and endorsing, the findings of Inspector Baldock (as ratified by the First Secretary of State, John Prescott Deputy PM) in the appeal APP/W0530 determined 10/10/2005. W0530 dismissed the appeals on planning guidelines: the then policy HG/23 was probably less demanding than the current H/GT, but nevertheless it showed the same guidance over, such as, 'demonstrable need', 'local amenities', 'access to services', and 'scale relative to the local community'.

Recent LPA actions, attitudes, interpretations have resulted in the condoning of breaches of injunction and their ignoring historic planning decisions, thereby breaking the law on the one hand and rendering S/AMC/GT unsound and H/GT insignificant and irrelevant.
Past South Cambs DC site maps show the boundaries of the authorised lands on Smithy Fen, and, too, by which injunctions other parts are governed.
In November 2025 I advised the Parish Council (PC) and the local District Cllr (DC) that development was taking place on land we refer to as Pine View, in breach of the 17/06/06 injunction. The LPA took action in December by which time the land had been flattened, cleared and, as it turned out in January 2026, readied to receive a hard core base.
In December 25 the PC and DC were advised of an increasing number of chalet arrivals, and in January 2026 they, and by way of a complaint (still unanswered), the LPA that a great number of hard core carrying lorries, diggers and chalets were being despatched to the (per S/AMC/GT map 104) southern of the two sites and to the lands covered by injunction thereby committing further breaches of injunction.

No action was taken, no response from the LPA received.
On 20th February a meeting of concerned residents, the PC and the DC was held with the LPA representative and it was acknowledged by the LPA that:

breaches of injunction had occurred; the lands covered by injunction had been developed and housed many chalets; the LPA was aware that many pitches were now rented out to non-travellers and that those pitches were showing multiple occupancy.

Legal advice had been sought regarding both issues and the advice received suggested that removing the non-travellers without providing alternative accommodation was not an option; that the injunctions were old and as the history of the sites had no relevance were unlikely to be upheld and that the inspectorate would find for the appellants should the LPA seek to reinstate developed injunctive land to its pre-developed state.

In response to an e-mail 13th July the LPA, responding 20th, broadly reaffirmed the legal advice it had received, and, in response to the questions regarding a planning permission granted to a pitch, on land covered by the 6/04/2006 injunction, incorrectly (by its own location map) numbered 10 Orchard Drive it then said that:
10 was one of two which the officers felt were genuine requests and that in the case of 10 occupancy was restricted to a named family with explicit caravan numbers etc. This statement is almost puerile in that the LPA has aerial photos showing that pitches 10 and 11 (or 10a and 10) already had multiple occupancy at the end of February whereas permission for 11 (10) was granted May/June.
(Other comments were made to which I will refer as the occasion arises)

There are two things wrong, at least, with this response.
On the one hand the legal advice has either been misinterpreted or it was bad advice, because injunctions do not expire or outlive their usefulness, by law a discharge has to be sought to explain the reason for the requested discharge, and given that the Fen circumstances in planning terms have not changed one bit in 20 years, that would be difficult to explain. Likewise planning history is not irrelevant (says the Law Society) and especially not where examples exist of repeated planning requests and failures at appeal; furthermore, planning is comparable to the legal system, the higher the court the greater weight of precedent and at this time W0530 still carries the weight not having been over-ridden by either law or a case of same circumstances otherwise determined and approved by a First Secretary
On the other hand: the case officer has recommended approval of a pitch (and implicit is the approval of the other) unlawfully developed on land covered by injunction. Both pitches are on such land but the explanation of the LPA includes: "a large part of Orchard Drive has been developed unlawfully, these two pitches are in the heart (of the whole 20 acres) of Smithy Fen, over the last decade the impact on the open countryside has become less of a consideration, in view of the potential numbers of appeals we have to consider each application carefully (a view specifically denounced as flawed in W0530 where it is stated that when viewing the impact of one pitch the whole potential for the area in question should be taken into consideration) "

In the light of history, the law and its own H/GT this utter nonsense.
To dispel part of the myth: any unlawful development outside of pitches 11 and 10 Orchard Drive have only occurred under this LPA's watch and since January 2026 (I know the site, I last visited

late summer 2025 and those two and 15 Water Lane were the only three unlawful pitches, each with a known history).
Less consideration for the open countryside for the last 10 years, it has not been an issue on Smithy Fen for more than 8 months so what is the relevance of that statement and 'how', anyway can that possibly be in compliance with National No Planning in the Open Countryside general policy?
Legally how can you grant approval on land covered by injunction without being in contempt of court?

The granting of the one planning application for pitch 10 which was actually pitch 11, and the probable approval of 10a which is actually pitch 10, together with only consulting over those applications with neighbours on adjacent pitches, some dozen of which are also on land covered by injunctions, demonstrates that the LPA seems, unquestionably, to have abandoned policy S/AMC/GT – map 104 is already meaningless because the 'gap' between the north and south sites is part occupied and, from the nature of the numbering in the consultations for 10a, the whole of Orchard Drive and Water Lane is occupied by at least 12 unlawful, injunction breaking pitches. The one G&T 'control' policy has been unceremoniously dumped and the other, H/GT, rendered totally meaningless as nothing in that policy can now be adopted, enforced, consulted on or even considered ….all pretence of due process has been abandoned.

There are two appendices herewith; the one SCDC's own depiction of the Smithy Fen sites circa 2006/07 the other an aerial view in March of this year. The two should be placed alongside each other, the differences on the southern site (per S/AMC/GT map 104) have all occurred this year, and the added density to the northern have occurred since 2016.

No matter how one assesses the situation the fact is that the the G&T policies in the Local Plan cannot be applied to Smithy Fen, they are therefore unsound. Unsound by virtue of predetermination of the Local plan pertaining to Smithy Fen (surely unlawful) or by a combination of inaction leading to unlawful action.

To be clear: no criticism is levelled here at those who have occupied the land, it was apparent back in January that the LPA had no intention of taking action against the unlawful developments, and more it is unlikely that the need for official G&T pitches will now be met at the SF locations because amongst the new residents are a good many non-travelling renters and no visible steps have been taken to stop this either. In addition to being (seemingly being) in contempt of court, it rather looks as though the Local Plan consultation was a ruse, the policies for G&T's were never intended to apply to Smithy Fen. The LPA had a predetermined course to follow and an unimportant, small community, in a remote area, outside of a village of little significance as it's to be downgraded to a minor rural community, could not be an obstacle. Cynical? Indeed, but it seems rational to draw such conclusion, and likewise to speculate on the motives as being:

To reduce the necessity for imposing new sites any where near major strategic developments.
To avoid disruption to political or socially, influential areas.

A popular decision probably without doubt, but a decision that should be treated with contempt and met with the full force of law, a decision that should be over-turned and have individuals, perhaps too the corporation, held to account.

Government and its Inspector will decide.

R L Bristow – Turks Head Farm, Smithy Fen

Please provide a 100 word summary of your representation.

Question:

“Does the Local Plan comply with the law and is it sound?”

Being as the Local Plan is just that, a plan, the objectives cannot be considered ‘illegal’ unless they propose actions that are.

My response to this LP concerns Smithy Fen and policies H/GT and S/AMC/GT.

I conclude that the objectives of these policies are not illegal, but that actions already taken in respect of those objectives most certainly are.

I further conclude that these actions, together with the inability to deliver in accordance with H/GT, render these Local Plan policies (H/GT and S/AMC/GT) ‘unsound’.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

SCDC's Map of Smithy Fen circa 2006/2007

Aerial View March 2026

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	NO

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes