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	Mrs. J. Keeler	
Organisation (where relevant)	Sawston Parish Council	
Job Title (where relevant)	Parish Clerk	
Address, including Post Code	[redacted]	
Telephone	[redacted]	
Email address	clerk@sawstonparishcouncil.gov.uk	

* 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	Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm
Proposed Submission Policies Map	
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	Yes
Sound	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.

General Comments

- A development of this scale would, assuming that the Burnham administration proceeds with the proposed Planning Functions Transfer Order, be overseen by the Greater Cambridge Development Corporation. In that event, input of the local authority planning service will cease. This should be reflected, for clarity, in the wording of Policy S/GF.

- Whilst it is proposed that the new settlement will be self-sufficient, previous experience at Cambourne and Northstowe has shown that it is many years after the start of construction that this ideal is likely to be achieved (Platt, A., 2007, *Lessons from Cambourne*, Cambridge Architectural Research Ltd., *Northstowe: The broken-promise new town built 'with no heart',* BBC East, 2023 https://www.bbc.co.uk/news/uk-england-cambridgeshire-66156561). The social dislocation, mental health issues and anomie in the early stages of new town development have been well documented (Berkley, G.E., 1973, *Britain's new town Blues*. Nat Civic Rev, **62**: 479-485). This solution to meeting housing delivery targets should therefore only be contemplated as a last resort.

Water supply:

- Policy S/GF Paras.1 and 11a state that development would not start until 2034 and is contingent on "*the necessary water infrastructure being available".* Despite the reference in Para.30 of the policy to the Grafham Water transfer pipeline this scheme is only intended as a temporary mitigation to supply already planned development until 2036 (*Addressing water scarcity in Greater Cambridge: update on government measures - GOV.UK*, *06/03/2024, p.4*). The proposed 2034 start date of Grange Farm, implying first occupations in 2035-6, is therefore more likely to be a reference to the completion of the Fen Reservoir Project originally scheduled for completion in 2035 at the earliest (*Cambridge Water Water Resources Management Plan 2024, p.3*). There has already been significant slippage in the timing of this project. The submission of the Development Consent Order (DCO) originally scheduled for the first quarter of 2027 (*A proposed reservoir in the Fens, Phase three consultation – associated water infrastructure proposals*, *Oct. 2025*) has now been put back to late 2028 (*fensreservoir.co.uk, Project Update, June 2026*). Policy S/GF envisages a build out rate of 2,555 dwellings by 2045 i.e. about 255/p.a. Any delay in commencement will render the projected housing supply trajectory unachievable and that part of the Local Plan unsound.

Built Form:

- Para 5.196 of the Policy S/GF Sustainability Appraisal states that '*The development of the site is also required to ensure that distinction remains between the new settlement and nearby existing settlements including Little Abington and Babraham*.' Although the size of the proposed development has been reduced from 6,000 to 4,500 dwellings following the Reg.18 consultation and the proposed green separation between it and the A1307 was widened, the proximity of a settlement of 4,500 dwellings (projected population of around 11,400 (based on average SCDC occupancy levels) to Little and Greater Abington (combined population ~1,380) and Hildersham (Pop. ~210) would impact unacceptably on the smaller settlements by population pressure as much as visual intrusion.

- The proposed housing densities of 50-60 dph (Para.14b)are well above the 40dph hitherto considered appropriate for a new settlement (*SCDC Adopted Local Plan, 2018, Policy H8*) and suggest a cramped, urban, form of development. Experience at Trumpington Meadows and the other Cambridge Southern Fringe developments suggests that in order to achieve these densities, building heights of at least four storeys will be required over substantial parts of the site (eg.*Trumpington Meadows Design Code, 2010*). The site contours rise from about 30m to 70m towards the East, making development on this scale particularly prominent in this otherwise open rural landscape. Although Policy S/GF Para.13 seeks to protect the Bronze Age barrow complex (Grid Ref. TL 52536 50628), it is in conflict with Para. 14 which states that to preserve visual amenity, the highest densities of development and tallest buildings should be confined to the lowest area of the site, precisely where this protected feature lies.

Access and Transport:

- A monitoring point on the A1307 south of the junction with the A11, i.e. the section on which the access roads to the proposed development would be located, has been shown to have the heaviest traffic flow of 15 points between Haverhill and Cambridge (*A1307 Haverhill to Cambridge Monitoring Report, 2017 , Fig. 4.3, monitoring Point 11*) (A1307 Report) and the *A1307 Draft Concepts Report (2016)* prepared *inter alia* as justification for the Cambridge South East Transport (CSET) proposals noted that "*The corridor experiences congestion inbound to Cambridge during the AM peak and outbound in the PM peak with regular queueing and delay occurring through Linton and Little Abington/Great Abington*" (Para. 1.3.2). Traffic flows on this section are likely to be boosted by further development in Haverhill (*Adopted West Suffolk Local Plan, July, 2025, Policies, AP13, AP14, AP15; 3560 proposed dwellings*) and by the proposed construction of a travel hub in the NW arm of this junction as part of the CSET proposals.

- Whilst Para.6 of Policy S/GF refers to the provision of a "*a new segregated connection*" to the proposed guided busway, no detail is provided as to how this might be achieved other than the outline site map which appears to show a connection across the A1307. Assuming that this would be at grade and light controlled, as would be the two proposed access points to the settlement, three new junctions with the A1307 would be created within a distance of under 800m.

The proposed busway crossing appears to be less than 200m from the SW exit to the Fourwentways roundabout and indeed would need to be as its location is severely constrained by the availability of land to the South of the Fourwentways junction for the construction of the link. The way in which this part of the policy would interact with Policy S/RSC/CC (Comfort Café) and details of how such a segregated link might be constructed without compromising access to the Comfort Café, Fourwentways Travelodge and Shell service station from the A1307 requires clarification. The effect of these measures on traffic flows does not appear to have been modelled and the "*site access arrangements*" and "*mitigation*" referred to in Para. 25b shown to be achievable, rendering the policy unsound.

- It is assumed that the additional, non-active, transport needs generated by Grange Farm will be fully met by the CSET Phase 2 proposals. At the time of writing, the proposed public works order does not include the extension across the A11 on which Policy S/GF depends. Although funding for this project was previously approved by Central Government, this does not include the cost of the extension into the development and at the time of writing, the original package has yet to be confirmed by the Burnham administration. It would be important to include this extension in the approved CSET2 plan in order to avoid an expensive and disruptive re-build of the proposed Park and Ride site to accommodate the new access should Policy S/GF be implemented. The projected budget of the GCP has no funding attached to this project beyond the end of the 2026/27 financial year (*Minutes, GCP Executive meeting, 09/07/2026*). The soundness of Policy S/GF is therefore contingent on CSET Phase 2, including the proposed extension, gaining approval and full funding, taking into account inflation.

- The CSET Phase 2 business plan is based on meeting current and future transport needs based on existing and already planned settlement and employment patterns. Its ability to accommodate the extra demands generated by Policy S/GF whilst serving its original intended function appears to be unevidenced.

- The effect of traffic generation due to Policy S/GF on the wider road network including the A11, A505 and the A505/A1301 junction (MacDonalds Roundabout) does not appear to have been modelled.

Water and Drainage

- The site is located on the Holywell Nodular and New Pit Chalk formations; (*BGS, 1:50,000 Series, Sheet 205*) which places it over a major aquifer highly sensitive to contamination from pollutant runoff (*NRA Groundwater Vulnerability. 1:100,000 Map Series Sheet 32*). The extent to which this risk can be mitigated is unclear, but a major development in this location is clearly undesirable in this water-stressed region.

- A major new settlement at Grange Farm will inevitably increase urban runoff. The natural pattern of drainage of the site is towards the River Granta which flows through Great Abington. This river is vulnerable to flooding at its confluence with the Western tributary of the Cam at Stapleford and any increased flows in the system are likely to exacerbate this problem. Flood risk at this location is designated as 'High to Medium' (https://check-long-term-flood-risk.service.gov.uk/map) and has the capacity to flood the junction of London Road (A1301) and Bury Road effectively blocking the main route between Sawston and settlements to the North (eg. In October 2001). Stapleford and the Shelfords are within the catchment of Sawston Village College (SVC) and the cycleway to the West of the former railway bridge, which is well used by SVC students, floods regularly. The Cambridgeshire County Council Surface Water Management Plan (2014, *Para. 4.5.3, Table 4.22*) also identifies a potential flood risk to the main Cambridge/Liverpool Street railway line at this point.

- Whilst Para. 21a, viii aspires to "*Preserve the existing range of watercourses and waterbodies of ecological significance and aquatic ecosystems, including the River Granta*", it is difficult to understand how this might be achieved in practice. This watercourse is already recognised as being under stress and Abington has been selected as one of the monitoring points by the Greater Cambridge Chalk Streams Monitoring Project (https://www.cambridge.gov.uk/media/1safhplt/greater-cambridge-chalk-stream-project-report.pdf *April, 2025*). This report highlights the extreme vulnerability of these sensitive ecosystems to urban runoff and fluctuations in flow rate. Whilst recognising the aspiration of Policy S/GF to mitigate the worst effects of these, it is difficult to see how the impact of a major urban development cannot result in a significant degradation in the quality of this watercourse.

Wastewater Treatment

- The reference to an on-site waste water treatment plant in the Reg.18 consultation document (*What this policy does, Para.21*) has been omitted from the current document and it must therefore be assumed that this function will be performed by existing off-site plants. The two nearest are Sawston and Linton currently serving populations of approximately 10,850 and 6,800 respectively (https://utilityradar.com/wastewater/plant/wwtp/united-kingdom). Both discharge into the River Granta. Sawston recorded 72 spillages totalling 1,242h and Linton 42 spillages totalling 44.5h between 2021 and 2024. (www.floodmapper.co.uk/data-explorer/search-sewage-report). Whilst the Anglian Waste Water Treatment Plan (*2023, p.65*) does not propose expansion of the Sawston plant, accommodation of the proposed Grange Farm development would require an approximate doubling of capacity at Sawston or tripling at Linton. Whilst acknowledging the operator's aspiration to reduce spillages, it is almost certain that expansion on this scale would result a significant increase in sewage pollution into this ecologically fragile chalk stream.

Please provide a 100 word summary of your representation.

Objection due to:

- Uncertainty over current status of CSET and achievability of dedicated link into site.
- Failure to demonstrate that access arrangements would not cause unacceptable increase in congestion at the Fourwentways junction.
- Failure to assess traffic impact on wider road system especially A11 and A505.
- Deliverability dependent on uncertain off-site improvements in water supply.
- Potential damage to chalk aquifer.
- Lack of clarity over handling of waste water and urban runoff, posing a major risk of ecological damage to River Granta chalk stream and increase in downstream flooding risk.
- Conflict between proposed built form and archaeological constraints.

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.

Supporting documents referenced in text are available online. Full references are provided with links where appropriate.

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.

Omission of Policy S/GF as we do not think it is deliverable within the stated timetable, is inconsistent with environmental protection policies and is dependent on policies and funding outside the control of the present planning authority. Consideration should be given the addressing the resultant shortfall in housing delivery by increasing the build rate on other, existing, major sites (Greater Cambourne, Northstowe, Waterbeach). The comments on water supply apply to the overall Local Plan housing delivery targets and a higher level of certainty is needed to make the plan sound.

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