SAVE Regulation 19 Representation

Greater Cambridge Local Plan Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

Nature of representation: **OBJECTION**

SAVE objects to Policy S/GF and requests the deletion of the Grange Farm allocation from the Greater Cambridge Local Plan.

SAVE considers that Policy S/GF has not been demonstrated to be sound. In particular, the allocation has not been demonstrated to be:

- justified;
- effective; or
- consistent with national policy.

SAVE also raises important questions concerning legal compliance, procedure, Sustainability Appraisal, consideration of reasonable alternatives and the opportunity for effective public participation. These matters are addressed more fully in SAVE's separately submitted SAVE_Grange_Farm_Legal_Procedure_Soundness_Final, which should be read together with this representation. [7]

SAVE requests the opportunity to participate in the relevant examination hearings.

1 SAVE 4
2 Relationship with the Abington Parish Council representation 5
3 The Regulation 19 question 5
4 The central objection 6
5 Grange Farm's late emergence 7
6 Sustainability Appraisal, HELAA and reasonable alternatives 8
7 Landscape 9
8 Settlement pattern 10
9 Heritage reinforces the strategic location objection 10
10 Landscape mitigation creates a capacity problem 11
11 Transport 12
12 CSET and the separate Grange Farm connection 12
13 Interim public transport is not an answer unless it is demonstrated 13
14 The Trip Budget 13
15 Highway access and resilience 14
16 Water and hydrology: the expert evidence 15
17 The site lies over a Principal Chalk Aquifer 15
18 Surface-water infiltration and pollution prevention 16
19 Foul water presents a further dependency 16
20 Water supply is itself a development dependency 17
21 An apparent drafting error in Policy S/GF 17
22 The correct significance of the hydrology evidence 18
23 The cumulative case 19
24 Matters are being deferred which go to the principle of allocation 19
25 Effective community participation 20
26 Cross-boundary strategic planning 21
27 Why Policy S/GF is not justified 21
28 Why Policy S/GF is not effective 22
29 Consistency with national policy 22
30 Why further masterplanning is not an adequate answer 23
31 Remedy 23
32 If deletion is not accepted 24
33 Participation at examination 25
34 Conclusion 25
Appendix A Documents relied upon and incorporated by reference 27

1 SAVE

1.1 SAVE, Save Abington Village Environment, is a community-led organisation established in response to the proposed Grange Farm [Policy S/GF]new settlement and its potential consequences for The Abingtons and surrounding area.

1.2 SAVE describes itself publicly as a community-led campaign to protect The Abingtons' landscape, heritage, chalk streams, farmland and village identity "through evidence, not alarm". Its stated position is that it supports sustainable, proportionate development but considers the Grange Farm proposal to be "the wrong scale, in the wrong place". [s-a-v-e.co.uk]

1.3 That distinction is important.

1.4 SAVE has also played an active role in informing and engaging the local community about the proposed Grange Farm allocation. Through public meetings, community communications, research and engagement with residents and other local stakeholders, SAVE has helped bring together local knowledge and concerns and, importantly, has sought to test those concerns through independent professional evidence. SAVE has also been instrumental in raising the funds required to commission specialist advice through Abington Parish Council. This representation therefore reflects not simply opposition to development, but sustained community engagement supported by independently commissioned evidence across the principal issues affecting the proposed allocation.

1.5 The SAVE operations have involved considerable engagements with Parish Councils in the wider area. This includes 6 direct face to face at their PC meetings; 5 presentation extended presentations to local village residents and ongoing contact with 19 PC village Parish Councils in the vicinity of Abington. We have conducted a survey of the Abington residents that showed that 94% of those surveyed AGAINST the Grange Farm proposal. We have sent out 4 newsletters to every house in the Abingtons keeping them informed and seeking their comment.

1.6 Within the SAVE membership there are lots of relevant expertise including: property developers, architects, chartered surveyor and engineers. SAVE's representations should therefore be understood as the product of sustained community participation combined with a deliberate evidence-led approach to the proposed allocation.

1.7 SAVE does not object to the principle that Greater Cambridge must plan positively for development, including the provision of new homes and employment.

1.8 Our objection is to the proposition that Grange Farm has been demonstrated, through the evidence available at Regulation 19, to be an appropriate and deliverable location for a new settlement of approximately 4,500 homes.

1.9 Policy S/GF provides for approximately 4,500 homes, of which 2,550 are expected to be delivered within the Plan period, together with approximately 35,000 sq m of employment floorspace and substantial supporting services, facilities, education, sports and open space. [consultati...anning.org]

1.10 This is therefore a strategic decision of considerable and permanent consequence.

1.11 SAVE considers that the evidence required to demonstrate the soundness of that decision should exist before the allocation is made, rather than being produced subsequently in an attempt to make the allocation work.

2 Relationship with the Abington Parish Council representation

2.1 SAVE's representation should be read alongside the Regulation 19 objection to Plan and Policies S/GF and S/DS submitted by Abington Parish Council [1] Via their solicitors (Richard Buxton Solicitors).

2.2 SAVE has worked closely with the Parish Council in developing the evidence relating to Grange Farm and has made material financial contributions to fund Abington Parish Council's legal team (Richard Buxton Solicitors) and the five technical experts who whose reports support the Parish Council's objection.

2.3 The reports from the five technical experts constitute independent professional evidence, to which SAVE has had full access. SAVE therefore adopts and relies upon the relevant findings of the specialist evidence accompanying the Parish Council representation, including:

- the planning representation;
- the Transport Appraisal prepared by John Russell Transport Planning;
- the Landscape Assessment prepared by Robert Davies John West;
- the Heritage Report prepared by Asset Heritage Consulting; prepared by GWP Consultants. [6]

2.4 In providing a separate objection to that made by Abington Parish Council, SAVE's purpose is firstly, to fully endorse that evidence, and secondly, to supplement it with substantive points arising from SAVE's community role and its participation in the Local Plan consultation process.

3 The Regulation 19 question

3.1 Regulation 19 is not simply an opportunity to express whether members of the public like or dislike a proposed allocation.

3.2 At this stage the relevant question is whether the Plan is legally compliant and sound.

3.3 The December 2024 NPPF defines a 'sound plan' as one which is:

- Positively prepared;
- Justified, meaning an appropriate strategy, taking into account reasonable alternatives and based upon proportionate evidence;
- Effective, meaning deliverable over the plan period and based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy, enabling the delivery of sustainable development in accordance with the Framework. [democracy....ove.gov.uk], [houghtonon...-pc.gov.uk]

3.4 SAVE has assessed the submitted Plan against the applicable tests of soundness, inc. whether it's justified, effective and consistent with national policy.

3.5 The Councils themselves explain that Regulation 19 representations should focus upon legal compliance and whether the Plan is justified, effective, positively prepared and consistent with national planning policy. [greatercam...anning.org]

3.6 SAVE has framed this representation accordingly.

4 The central objection

4.1 The central problem with S/GF is not that there is one technical constraint which makes development demonstrably impossible.

4.2 The problem is that too many matters fundamental to the suitability, scale, sustainability and deliverability of the new settlement remain unresolved, and those matters interact with one another.

4.3 The evidence identifies significant questions concerning:

- landscape capacity;
- fundamental change to the existing settlement pattern;
- heritage;
- developable area;
- transport accessibility;
- the Trip Budget;
- dependency upon CSET;
- dependency upon a further separate CSET connection;
- highway capacity and mitigation;
- infrastructure funding and timing;
- agricultural land;
- water supply;
- foul drainage;
- the underlying Principal Chalk Aquifer;
- Source Protection Zones;
- surface-water infiltration;
- groundwater pollution risk;
- housing delivery;
- reasonable alternatives; and
- the adequacy of the process through which Grange Farm emerged and was assessed as a strategic new settlement.

4.4 Some individual questions may ultimately prove capable of solution.

4.5 That does not answer the soundness issue.

4.6 The relevant question is whether there is sufficient evidence now to demonstrate a reasonable prospect that all the necessary solutions can be secured collectively, consistently and in sufficient time to deliver the scale and trajectory upon which the Plan relies.

4.7 SAVE considers that there is not.

5 Grange Farm's late emergence

5.1 This matter is addressed comprehensively in SAVE's separate representation on legal compliance, procedure and soundness and is summarised here rather than repeated.

5.2 Grange Farm was not a strategic allocation around which the earlier stages of preparation of the Local Plan had been structured. The separate representation records promoter representations acknowledging that "Grange Farm was not on the agenda when the Regulation 18 plan was prepared". [7]

5.3 Grange Farm subsequently appeared in the December 2025 Draft Local Plan as a proposed settlement of approximately 6,000 homes. Following further investigation of the constraints, proposed capacity was reduced materially to approximately 4,500 homes. [7]

5.4 There is a further important aspect to the evolution of S/GF. The allocation now described as “Grange Farm” is not simply the original Grange Farm landholding. The promoter's July 2025 delivery evidence described Grange Farm as a 195-hectare holding of The Pampisford Estate, while separately considering expansion land. Subsequent promoter evidence assesses a substantially larger area, with the June 2026 Landscape Strategy identifying a 382-hectare study area and a proposed allocation red line of approximately 274 hectares. That report expressly acknowledges that earlier landscape work did not relate to the full extent of land subsequently included within the draft allocation. [oc2.greate...anning.org], [consultati...anning.org]

5.5 The importance of the additional land was also apparent locally. Minutes of the January 2026 public meeting record that a member of the Grange Farm tenant farming family described Grange Farm as comprising approximately half the land within the scheme, with the other half belonging to the owners of Ley Rectory Farm. SAVE therefore considers that the examination should scrutinise the extent to which the allocation and its assumed 4,500-home capacity depend upon land beyond the original Grange Farm holding, and whether that enlarged land assembly was subject to the same iterative assessment, consultation and comparison with reasonable alternatives as the original proposition. [abington-pc.gov.uk]

5.6 SAVE considers the extent and timing of that change significant.

5.7 It indicates that major questions concerning environmental capacity, infrastructure and deliverability continued to be investigated very late in the plan-making process.

5.8 SAVE's separate procedural representation therefore asks whether a strategic new settlement introduced at such a late stage received sufficient:

- investigation;
- iterative assessment;
- Sustainability Appraisal;
- consideration against reasonable alternatives; and
- effective community and stakeholder scrutiny

before the strategic decision was made to allocate it. [7]

5.9 This is not simply a complaint that local people wanted a longer consultation. It is a question about the quality and sequence of plan-making.

6 Sustainability Appraisal, HELAA and reasonable alternatives

6.1 This is potentially one of the most important aspects of SAVE's case.

6.2 The HELAA (performed in December 2025) reportedly assesses Grange Farm as unsuitable overall and records a Red assessment for landscape. The evidence considered by SAVE further identifies an apparent inconsistency because the Sustainability Appraisal describes the HELAA landscape assessment as Amber. [7]

6.3 SAVE recognises that a Red assessment does not automatically prohibit allocation.

6.4 The question is what happens next.

6.5 If the Councils choose to allocate an otherwise unsuitable site, their evidence needs convincingly to explain:

1. why the site nevertheless represents an appropriate strategy;
2. how the identified impacts are to be addressed;
3. how that conclusion compares with reasonable alternatives; and
4. whether the final version of the proposed settlement has been assessed on a consistent evidential basis.

6.6 The reduction from approximately 6,000 to 4,500 homes makes this particularly significant.

6.7 It demonstrates that the constraints materially affected the development proposition.

6.8 SAVE asks whether the 4,500-home development now proposed has itself passed through a sufficiently rigorous and iterative comparison against reasonable alternatives using the full information now available.

6.9 This question goes directly to whether S/GF is justified.

7 Landscape

7.1 SAVE adopts the conclusions of the independent landscape evidence submitted with the Abington Parish Council representation.

7.2 The majority of the proposed developable site lies within the Cambridge Chalk Hills landscape.

7.3 The professional evidence identifies important characteristics including:

- elevated and locally prominent chalk hills;
- a predominantly arable landscape;
- sparse settlement;
- an absence of settlement across important areas of the upland;
- long-distance views;
- tranquillity;
- historic routes and earthworks; and
- undeveloped ridgelines.

7.4 The critical distinction in the landscape evidence is between effects which may be reduced through layout and those which arise from the principle of imposing a substantial settlement upon the landscape itself.

7.5 A masterplan can retain individual trees.

7.6 It can create landscape buffers.

7.7 It can alter building heights.

7.8 It can move development away from sensitive boundaries.

7.9 But masterplanning cannot simultaneously deliver a new town of 4,500 homes on presently unsettled Chalk Hills and preserve the characteristic absence of settlement from that landscape.

7.10 The heritage evidence reinforces the landscape evidence because several affected heritage assets derive part of their significance from the same rural landscape which S/GF would transform. The Heritage Statement identifies the rural surroundings of Worsted Street, Worsted Lodge Farmhouse, 8 Cambridge Road and the Great and Little Abington Conservation Area as contributing, to differing degrees, to their significance or the ability to appreciate that significance. The heritage and landscape effects are therefore not separate impacts capable of being considered in isolation: both arise materially from replacing the existing rural landscape with a substantial new settlement.

7.11 A further example of the interrelationship between these constraints concerns the Scheduled Bronze Age Barrow Cemetery. The transport feasibility evidence identifies the cemetery immediately to the north of the prospective CSET extension route between Newmarket Road and the A1307, while the heritage evidence confirms that the cemetery is a Scheduled Monument of national significance. SAVE has not identified evidence demonstrating that a technically deliverable alignment for the CSET connection upon which Grange Farm depends has been established which is also compatible with protection of the Scheduled Monument and its setting. This is not simply a matter of detailed route design: it illustrates the need to consider heritage constraints and the deliverability of critical transport infrastructure together before relying upon that infrastructure to support the allocation.

7.12 That is an inherent effect rather than a detailed-design problem.

7.13 SAVE considers this of fundamental importance to soundness.

8 Settlement pattern

8.1 The landscape objection extends beyond visual impact.

8.2 The professional evidence identifies a longstanding relationship between settlement and topography in which existing settlements are principally associated with lower land and river valleys, while the elevated Chalk Hills remain comparatively sparsely settled.

8.3 S/GF would fundamentally alter that relationship.

8.4 It would introduce a substantial new settlement into the upland landscape itself.

8.5 SAVE therefore considers that the allocation represents a significant change not merely in individual views but in the settlement pattern and landscape character of this part of Greater Cambridge.

8.6 That is precisely the type of consequence which must be justified strategically through the Local Plan.

8.7 It cannot properly be answered by saying that a future masterplan will make the development attractive.

9 Heritage reinforces the strategic location objection

9.1 SAVE adopts the independent Heritage Statement prepared by Asset Heritage Consulting for Abington Parish Council. The assessment identifies harm to the significance of a range of designated and non-designated heritage assets, including the Scheduled Roman road at Worsted Street, the recently Scheduled Bronze Age Barrow Cemetery, Worsted Lodge Farmhouse, 8 Cambridge Road, the Great and Little Abington Conservation Area and Grange Farmhouse. [Heritage Expert Report]

9.2 Of particular significance to the allocation decision is the expert's conclusion that the proposed mitigation is insufficient to avoid or minimise the identified heritage harm. In relation to Worsted Street, the Heritage Statement considers that the buffer would need to be considerably more extensive than presently proposed. For 8 Cambridge Road it similarly concludes that a substantial open buffer would be required if any semblance of its existing rural setting is to be preserved. [Heritage Expert Report]

9.3 The expert's overall professional conclusion is unusually strong: the scale and proximity of the allocation would adversely affect the way in which the significance of the affected heritage assets is experienced, and the report concludes that the proposal would cause significant and irrevocable harm which cannot be rectified by adjustment to the present allocation. [Heritage Expert Report]

9.4 SAVE considers that conclusion relevant not simply to the detailed design of a future scheme but to the strategic selection of Grange Farm itself. If protecting heritage significance requires materially greater separation from important assets and retention of their rural settings, those requirements must be incorporated into the assessment of developable capacity before the allocation is relied upon for 4,500 homes.

10 Landscape mitigation creates a capacity problem

10.1 This leads to an important cumulative issue.

10.2 If landscape effects require substantial development setbacks, reduced development on prominent slopes or ridges, protection of long views and retention of sensitive areas as open land, the developable area is reduced.

10.3 Heritage protection creates further demands upon the available land. The independent heritage expert considers that a considerably more extensive buffer is required adjacent to Worsted Street and a substantial open buffer behind 8 Cambridge Road. The same assessment identifies the positive contribution which parts of the site make to the setting of the Great and Little Abington Conservation Area and other heritage assets. [Heritage Expert Report]bronze

10.4 These requirements cannot rationally be treated as cost-free mitigation. If land must remain substantially open to preserve heritage significance, that land is correspondingly unavailable, or materially constrained, for housing and associated development.

10.5 Green infrastructure requires land.

10.6 Drainage requires land.

10.7 Schools, employment, local centres and public services require land.

10.8 Transport infrastructure requires land.

10.9 Yet approximately 4,500 homes must still be accommodated if the settlement is to perform the strategic role contemplated by the Plan. [consultati...anning.org]

10.10 This question assumes particular importance because the 4,500-home allocation extends beyond the original Grange Farm holding. The evidence shows that the promoted and assessed site expanded materially during the plan-making process. The Councils should therefore demonstrate transparently how many of the 4,500 dwellings depend upon the additional land, including the Ley Rectory Farm land, and what capacity would remain if that land were unavailable or materially constrained by landscape, heritage or other requirements. [oc2.greate...anning.org], [consultati...anning.org], [abington-pc.gov.uk]

10.11 In other words: is Ley Rectory Farm merely additional land within the allocation, or is it land without which S/GF cannot achieve the development quantum necessary to function as the strategic new settlement which the Councils have selected? SAVE considers that this should be demonstrated by evidence rather than assumed.

10.12 The issue is therefore not whether each constraint can be illustrated separately on a plan.

10.13 It is - Where is the robust land-budget exercise demonstrating that all environmental mitigation, infrastructure, employment, services, open space and 4,500 homes can be accommodated simultaneously while producing the sustainable settlement upon which the Councils' justification depends?

10.14 SAVE considers that this has not been adequately demonstrated.

11 Transport

11.1 SAVE adopts the conclusions of the independent transport appraisal accompanying the Abington Parish Council submission, subject to its final form.

11.2 The fundamental transport issue is not simply that Grange Farm will generate traffic.

11.3 The more significant issue is that its claimed sustainability depends upon travel behaviour substantially different from existing car-dependent patterns and upon transport infrastructure which is not currently present.

11.4 This creates a dependency problem.

12CSET and the separate Grange Farm connection

12.1 CSET itself does not directly serve the proposed settlement.

12.2 The currently proposed CSET2 statutory scheme terminates at the A11 Travel Hub and does not itself extend into Grange Farm. Grange Farm therefore requires a separate further connection, including crossing the A11/A1307 corridor, to connect the settlement to CSET.

12.3 The separate SAVE procedural representation records the Councils' own evidence as stating:

12.4 "Successful delivery of Grange Farm would be reliant on full delivery of CSET plus a direct connection from CSET to the site." [7]

12.5 That is a highly significant statement.

12.6 S/GF's sustainability therefore contains a sequence of dependencies:

- ET2 authorised/funded/delivered → A11 Travel Hub operational → separate GF connection designed/authorised/funded/delivered → sustainable public transport outcome → housing delivery at the assumed scale and trajectory

SAVE does not contend that this proves CSET will not happen.

12.7 The concern is that feasibility is not the same as deliverability.

12.8 As SAVE's separate procedural representation explains, CSET Phase 2 remains subject to its statutory process, while the separate Grange Farm connection is materially less advanced and involves issues including alignment, engineering design, land, authorisation, cost, funding and programme. [7]

12.9 The Infrastructure Delivery Plan identifies an indicative cost of approximately £30 million for the Grange Farm CSET extension. SAVE has not identified the detailed evidential derivation of that figure. This is material because the September 2025 feasibility work states that no formal updated cost estimate had been undertaken and that the underlying estimates required updating/indexation.

12.10 The Plan nevertheless attributes substantial housing delivery to Grange Farm.

12.11 SAVE considers that the evidence should demonstrate that these timetables can credibly align, rather than assume that they will.

13 Interim public transport is not an answer unless it is demonstrated

13.1 Policy S/GF permits an interim public transport solution before the permanent connection is operational.

13.2 That policy flexibility does not establish deliverability.

13.3 The relevant questions remain:

- What is the interim solution?
- What capacity can it provide?
- What journey times and reliability can it achieve?
- How will public transport receive sufficient priority?
- How will it be funded?
- How many homes can it sustainably support?
- How long can it operate?
- What objective trigger requires the permanent connection to become operational?

13.4 SAVE's separate procedural paper identifies the absence of an established number of dwellings that an interim solution could sustainably support, together with questions concerning duration, funding and the objective development threshold at which the permanent connection becomes necessary. [7]

13.5 Those questions bear directly upon effectiveness.

14 The Trip Budget

14.1 The transport strategy also depends upon an ambitious external vehicle Trip Budget.

14.2 The independent transport evidence compares the required outcome with observed traffic behaviour at Cambourne.

14.3 SAVE does not assert that Cambourne predicts precisely what will occur at Grange Farm. That would be an inappropriate use of comparator evidence.

14.4 Its importance is that Cambourne provides an empirical indication of the scale of behavioural change which Grange Farm must achieve.

14.5 The Councils should therefore demonstrate why S/GF can achieve materially different external vehicle generation and identify the infrastructure and interventions which make that outcome credible.

14.6 There is then a further effectiveness question:

- What happens if the Trip Budget is approached materially earlier in the build-out than assumed?
- What remedial measures are triggered?
- What infrastructure is provided?
- Can further homes continue to be occupied?
- How does this affect the housing trajectory?

14.7 Unless those questions are answered, the Trip Budget is partly an aspiration rather than demonstrated evidence of deliverability.

15 Highway access and resilience

15.1 SAVE also considers that the examination should consider the resilience of the proposed highway-access strategy.

15.2 Policy S/GF would result in the new settlement being served through a deliberately constrained highway-access arrangement, while avoiding direct vehicular access onto sensitive surrounding rural routes.

15.3 Having a limited number of accesses is not inherently unacceptable.

15.4 The question is whether the number, location and capacity of the proposed accesses have been demonstrated to provide appropriate operation and resilience for a completed strategic settlement of this scale.

SAVE asks in particular:

- how development traffic is expected to distribute between the proposed accesses?
- what happens when one access is temporarily obstructed or unavailable?
- whether one access can safely accommodate abnormal demand?
- whether emergency resilience has been appropriately assessed?
- how resilience changes during different phases of the build-out? and
- how the access arrangements interact with Fourwentways, the A1307, A11 and CSET infrastructure?

15.5 These questions become particularly important where the wider rural network is deliberately not intended to function as an alternative route for development traffic.

16 Water and hydrology: the expert evidence

16.1 SAVE has the benefit of an independent specialist assessment from GWP Consultants dated 15 September 2026.

16.2 It is important to represent that evidence fairly.

16.3 GWP's overall conclusion is that it does not believe there is a strong basis for objection on water-related grounds at this stage. The report considers that the potential risks identified should be mitigated through development, planning and design processes, while noting that once the site reaches planning stage and further details become available there may be grounds for water-related objection. [6]

16.4 SAVE therefore does not contend that its hydrological evidence independently establishes that S/GF must be deleted.

16.5 However, the GWP report identifies a number of important facts and future requirements which become significant when considered cumulatively with the other uncertainties affecting the site.

17 The site lies over a Principal Chalk Aquifer

17.1 GWP confirms that the site is underlain by the New Pit Chalk Formation and Holywell Nodular Chalk Formation.

17.2 The majority of the site has no superficial deposits overlying the chalk bedrock.

17.3 The Chalk is designated as a Principal Aquifer by the Environment Agency.

17.4 GWP also identifies the site as lying within groundwater Source Protection Zones 2 and 3, with several SPZ1 areas in the surrounding area associated with public water supplies from the Chalk Aquifer. It consequently describes the wider aquifer as a sensitive receptor. [6]

17.5 These are important site-specific facts.

17.6 They mean that SAVE's groundwater concern is not based simply upon the general proposition that chalk exists somewhere beneath South Cambridgeshire.

17.7 The independent hydrologist confirms that:

- the development is over chalk;
- much of that chalk lacks superficial cover;
- it is a Principal Aquifer;
- the site lies within SPZ2 and SPZ3;
- nearby SPZ1s relate to public water supplies; and
- the Chalk groundwater system is hydrologically relevant to connected surface-water receptors including the River Granta. [6]

17.8 The objective must therefore be to avoid unacceptable groundwater contamination.

17.9 Environment Agency guidance separately states that pollutants discharged to ground which reach groundwater constitute a groundwater activity and explains that groundwater can provide base flow to rivers and support ecosystems. [gov.uk]

17.10 This reinforces the importance of appropriate groundwater protection.

18 Surface-water infiltration and pollution prevention

18.1 The hydrology report anticipates that surface-water drainage will probably rely substantially upon infiltration because of the chalk geology.

18.2 It explains that infiltration SuDS and soakaways must be designed to avoid discharging pollutants into the underlying Chalk Aquifer, which supplies public water and feeds the River Granta. [6]

18.3 This creates an important design requirement.

18.4 On the one hand, the drainage hierarchy may make infiltration the appropriate means of disposing of surface-water runoff.

18.5 On the other, water infiltrating into this sensitive receptor must be of appropriate quality.

18.6 GWP therefore says that the treatment capacity of SuDS will need to comply with the SuDS Manual and demonstrate that the design is capable of preventing discharge of polluted runoff. [6]

18.7 The Environment Agency's groundwater-protection guidance has prevention of groundwater pollution as its primary aim. [assets.pub...ice.gov.uk]

18.8 SAVE accepts GWP's view that detailed drainage design properly arises at planning stage.

18.9 The broader relevance to Regulation 19 is that yet another component of S/GF's sustainability depends upon a future technical solution which must work alongside the masterplan, landscape strategy, development capacity and other infrastructure.

19 Foul water presents a further dependency

19.1 GWP identifies potentially more substantial issues in relation to foul water.

19.2 GWP notes that the existing Linton treatment works is unlikely to have capacity for the additional loading. Other Local Plan evidence considers alternative wastewater solutions, including Sawston WRC. SAVE's point is that the ultimate foul-water solution for S/GF is therefore not presently settled.

19.3 GWP further says that the development would require collection and probably pumping of untreated sewage over a Principal Aquifer.

19.4 If a new treatment plant is required, it may discharge to ground. [6]

19.5 The hydrologist identifies the need at planning stage for a proportionate groundwater-pollution risk assessment addressing matters including:

- leakage;
- accidental releases;

- failure scenarios;
- groundwater vulnerability;
- groundwater depth;
- protective superficial deposits;
- the nature of the bedrock;
- proximity to abstractions and SPZs;
- likelihood of overflows; and
- engineering and operational controls. [6]

19.6 Again, GWP does not consider this presently to constitute an objection in itself. SAVE's point is narrower. Foul-water disposal is not presently an entirely resolved element of the development proposition.

19.7 Its eventual solution potentially involves engineering, permitting and groundwater-protection considerations that must be coordinated with the wider development.

19.8 The correct cumulative question is therefore whether all these future solutions are reasonably capable of being delivered together without undermining development capacity, cost, viability or timetable.

20 Water supply is itself a development dependency

20.1 GWP also identifies potential challenges with water supply.

20.2 The report notes that Policy S/GF addresses the need to limit first occupation or provide an additional temporary water supply until the Grafham to Cambridge Transfer becomes operational.

20.3 GWP states that this demonstrates a water-resource, water-security and water-supply issue within the existing supply zone. [6]

20.4 As recorded in the report dated 15 September 2026, the planning application for the transfer pipeline had yet to be submitted and full operation was scheduled for 2032. GWP notes that this precedes the projected first S/GF housing delivery in 2034 but identifies potential consequences should permission for the pipeline be delayed. [6]

20.5 GWP also notes the emerging requirement for residential development of 100 or more dwellings to achieve water usage of no more than 80 litres per person per day with water reuse or recycling, describing achievement of that requirement as challenging. [6]

20.6 This reinforces the wider dependency case.

20.7 S/GF's delivery assumes successful development not simply of housing but of the water infrastructure necessary to supply it.

21 An apparent drafting error in Policy S/GF

21.1 The hydrology expert identifies what appears to be a specific error in the proposed policy.

21.2 GWP says S/GF Policy 28 refers to modelling of Oakington Brook and requires no development within 8 metres of it.

21.3 GWP states that Oakington Brook lies approximately 17 km north-west of the site and considers that this reference is incorrect. If watercourse modelling were required, the report says the relevant reference would be the River Granta, which passes south of the site through Great Abington and Little Abington. [6]

21.4 This should be corrected.

21.5 SAVE recognises that this mistake alone would plainly not render the allocation unsound.

21.6 It is nevertheless a concrete drafting error in Policy S/GF identified by an independent specialist and should be rectified before adoption.

22 The correct significance of the hydrology evidence

22.1 SAVE has deliberately not overstated this evidence.

22.2 It would be inconsistent with GWP's professional conclusion for SAVE to claim that the hydrology report establishes that development over the aquifer is inherently unacceptable. It does not.

22.3 What it establishes is that:

1. the site overlies a sensitive Principal Chalk Aquifer; [6]
2. much of the site lacks superficial deposits over the Chalk; [6]
3. it lies within SPZ2 and SPZ3 and the surrounding aquifer supplies public water;
4. surface drainage is likely to involve infiltration and therefore requires appropriate treatment and groundwater protection; [6]
5. foul drainage may require a new treatment facility and the pumping of untreated sewage over the Principal Aquifer; [6]
6. further risk assessment would be required as details emerge; and [6]
7. water supply depends upon additional strategic infrastructure. [6]

22.4 Those matters do not establish an independent hydrological veto.

22.5 They do add to the number of important future conditions and dependencies upon which successful delivery of S/GF relies.

22.6 That is their proper relevance to this Regulation 19 representation.

23 The cumulative case

23.1 This is the issue SAVE particularly asks the Inspector not to lose sight of.

23.2 Each technical discipline can be considered separately and a conclusion reached that some future solution may exist.

23.3 But that is not the same as demonstrating a sound strategic allocation.

- Landscape mitigation may reduce developable land.
- Heritage mitigation may reduce developable land further.
- Green infrastructure, SuDS and drainage require land.
- Reduced capacity may affect the critical mass and viability of the settlement.
- Transport sustainability depends upon CSET.
- CSET access depends upon a separate connection.
- Interim transport arrangements may affect the number of homes capable of sustainable occupation before that connection exists.
- Highway mitigation has cost and land consequences.
- Water supply depends upon strategic water infrastructure.
- Foul-water treatment remains to be resolved and must protect the Principal Aquifer.
- Hydrological requirements must be coordinated with drainage, landscape and masterplanning.
- All those matters must then be reconciled with a housing trajectory expecting substantial delivery from Grange Farm.

23.4 This is precisely the point made in SAVE's separate legal and soundness representation:

23.5 Feasibility should not be treated as synonymous with deliverability, and a succession of unresolved assumptions should not collectively be treated as evidence of delivery. [7]

23.6 SAVE considers that proposition central to S/GF.

24 Matters are being deferred which go to the principle of allocation

24.1 SAVE accepts that Local Plans are not planning applications.

24.2 It would be unreasonable to expect every drainage pipe, road junction, dwelling layout or SuDS feature to be fully designed now. That is not SAVE's case.

24.3 The distinction is between questions of detail and questions which may determine:

- whether the site is appropriate at all;
- how much development it can accommodate;
- whether the development remains capable of supporting the infrastructure required to make it sustainable;
- what strategic infrastructure it depends upon;
- how much housing can credibly be delivered during the Plan period; and
- whether S/GF performs better than reasonable alternatives;
- whether the scale of development can retain the rural setting and separation which the independent heritage evidence considers necessary for affected designated heritage assets.

24.4 Those matters go to the principle of allocation.
The separate SAVE procedural representation gives the particularly apposite example of Tudeley Village, where the Inspector accepted that not every detail of a site allocation needs to be resolved at Local Plan stage but nevertheless concluded that unresolved strategic matters could "go to the heart of whether the site and strategy … is justified and effective". [7]

24.5 SAVE submits that this distinction applies here.

25 Effective community participation

25.1 SAVE also asks the Inspector to consider the process through which this new settlement emerged.

25.2 We recognise that the Councils have conducted formal consultation and do not assert simply from public dissatisfaction that the statutory requirements must therefore have been breached.

25.3 The concern is more fundamental.

25.4 The Plan-making process began well before S/GF emerged in its present strategic form. The Councils say that three consultations preceded Regulation 19 and that the latest Draft Local Plan consultation ran from 1 December 2025 to 30 January 2026. [greatercam…anning.org]

25.5 SAVE asks:

At what point did the affected community have a meaningful opportunity to influence whether this location should become a strategic new settlement while the answer remained genuinely open?

That is particularly important given:

- the late emergence of Grange Farm;
- its initial proposed scale of approximately 6,000 homes;
- its subsequent reduction to 4,500;
- the HELAA conclusion;
- the significant additional evidence generated at a late stage;
- the infrastructure dependencies subsequently identified; and
- the environmental constraints now established by specialist analysis. [7]

25.6 The issue is not whether consultation meetings occurred. Meaningful participation requires an opportunity to affect the strategic decision, not simply to comment upon how a decision already made might subsequently be mitigated. That distinction should be examined.

26 Cross-boundary strategic planning

26.1 SAVE's separate representation raises an additional issue concerning the relationship between Grange Farm, CSET and the wider Cambridge to Haverhill transport corridor.

26.2 The transport assumptions used in assessing Grange Farm extend conceptually beyond the site towards Haverhill, creating potential strategic implications extending beyond Greater Cambridge. [7]

26.3 SAVE does not presently assert breach of a particular statutory obligation.

26.4 It asks instead that the examination establish what substantive engagement has taken place with relevant bodies, what conclusions resulted, and how those conclusions influenced the selection and deliverability of Grange Farm.

26.5 This is directly relevant to the December 2024 NPPF test that an effective Plan should be based upon effective joint working on cross-boundary strategic matters which have been dealt with rather than deferred. [democracy....ove.gov.uk]

27 Why Policy S/GF is not justified

27.1 SAVE considers S/GF has not been demonstrated to be justified because the evidence does not yet establish that Grange Farm represents an appropriate strategy when reasonable alternatives are considered.

27.2 The reasons include cumulatively:

- its late emergence as a strategic new settlement;
- its assessment as unsuitable overall in the HELAA; [7]
- the apparent HELAA/SA landscape inconsistency; [7]
- fundamental landscape effects;
- significant heritage constraints;
- uncertainty over the development capacity that remains after appropriate mitigation;
- dependency upon CSET and its separate connection;
- demanding transport assumptions;
- unresolved infrastructure dependencies;
- groundwater and drainage requirements;
- unresolved foul-water arrangements;
- water-supply dependency; and
- questions over whether the final 4,500-home proposal has been assessed consistently against reasonable alternatives.

27.3 National policy does not require the Councils to choose a site without constraints.

27.4 It does require their chosen strategy to be appropriate, taking into account reasonable alternatives and based on proportionate evidence. [democracy....ove.gov.uk]

27.5 SAVE considers that threshold has not been shown to have been met.

28 Why Policy S/GF is not effective

28.1 The December 2024 soundness test requires an effective plan to be deliverable over the Plan period. [democracy....ove.gov.uk]

28.2 The Council's own evidence states that successful delivery of Grange Farm is reliant upon full delivery of CSET plus a direct connection to the site. [7]

28.3 Other identified dependencies include:

- strategic water infrastructure;
- transport mitigation;
- site access;
- an interim transport solution if necessary;
- foul-water disposal;
- environmental mitigation;
- landscape and heritage constraints;
- infrastructure funding; and
- a development capacity sufficient to maintain the sustainability and viability of the proposed settlement.

28.4 The question is whether there is a reasonable prospect that these requirements will be resolved collectively and in time to deliver the housing trajectory.

28.5 SAVE considers that this has not been sufficiently demonstrated.

29 Consistency with national policy

29.1 SAVE relies upon the individual professional representations regarding detailed national-policy conflicts.

29.2 At an overarching level, the allocation raises questions concerning:

- protection and enhancement of the natural environment and countryside;
- sustainable transport;
- sustainable patterns of development;
- protection of the historic environment;
- appropriate consideration of water resources and pollution;
- effective strategic planning; and
- proportionate evidence supporting site selection.

29.3 The December 2024 NPPF's concept of soundness is not satisfied merely because a policy states a desirable future outcome.

29.4 The strategy must itself be justified and deliverable. [democracy....ove.gov.uk]

29.5 SAVE considers that S/GF has not met that test.

30 Why further masterplanning is not an adequate answer

30.1 Policy S/GF places considerable weight on a future site-wide masterplan. [consultati...anning.org]

30.2 SAVE accepts the value and necessity of masterplanning if a strategic settlement proceeds.

30.3 But a masterplan cannot answer the prior question:

30.4 Should this particular land have been selected for a strategic new settlement in the first place?

30.5 Nor can future masterplanning itself:

- remove inherent landscape effects caused by introducing settlement onto the Chalk Hills;
- deliver CSET;
- guarantee the separate connection to CSET;
- establish that an interim transport strategy is adequate;
- change the physical properties of the Principal Aquifer;
- provide strategic water infrastructure;
- establish that all mitigation fits alongside 4,500 homes; or
- retrospectively demonstrate that S/GF was preferable to reasonable alternatives.

30.6 Those are strategic matters.

30.7 They belong in the evidence which justifies allocation.

31 Remedy

31.1 SAVE respectfully asks the Inspector to find that Policy S/GF has not been demonstrated to be sound.

31.2 SAVE's requested modification is:

31.3 Delete Policy S/GF and remove the Grange Farm allocation from the Greater Cambridge Local Plan.

31.4 This is the appropriate remedy because several of SAVE's objections concern the strategic location and scale of development, not drafting defects which could simply be cured by amending individual sentences within the policy.

31.5 In addition, SAVE's separate legal/procedural representation asks the Inspector to consider whether the deficiencies identified can realistically be remedied through Main Modifications without substantial further evidence and reconsideration of the strategic basis on which S/GF was selected. [7]

31.6 If demonstrating S/GF's soundness requires substantial new work on transport, infrastructure, environmental capacity, hydrology, development capacity, Sustainability Appraisal or reasonable alternatives, SAVE considers that reconstruction of the evidential basis for the allocation during examination would not be the appropriate course.

32 If deletion is not accepted

32.1 SAVE's primary case is deletion.

32.2 If the Inspector is not persuaded that deletion is required, SAVE asks that the Councils be required to demonstrate, through proportionate evidence, at least:

a) why Grange Farm represents an appropriate strategy when compared consistently with reasonable alternatives;
b) that the apparent inconsistency between the HELAA Red landscape assessment and the Sustainability Appraisal's description has not affected site selection;
c) the development capacity remaining after all necessary landscape, heritage, drainage, infrastructure and other mitigation has been allowed for;
d) a credible programme for delivery of CSET and the separate Grange Farm connection;
e) the sustainable development quantum capable of occupation under any interim public-transport solution;
f) appropriate Trip Budget monitoring, triggers and remedies;
g) an integrated assessment of site accesses, the A1307, A11, Fourwentways and surrounding network;
h) the funding and phasing of necessary transport and other infrastructure;
i) a satisfactory strategy for water supply corresponding with the development trajectory;
j) a credible foul-water strategy and protection of the Principal Chalk Aquifer;
k) appropriate treatment and groundwater protection associated with infiltration SuDS;
l) how environmental protection can be reconciled with development quantum and viability;
m) that the combination of these requirements remains capable of supporting 4,500 homes and the associated employment and services;
n) that the housing contribution attributed to S/GF has a reasonable prospect of delivery within the Plan period; and
o) that relevant cross-boundary strategic matters have been dealt with effectively rather than deferred;
p) the number of dwellings and supporting uses dependent upon land outside the original Grange Farm holding, including Ley Rectory Farm, and the effect upon capacity, infrastructure viability and deliverability if that additional land is unavailable or requires further constraint.

32.3 The erroneous Policy S/GF reference to Oakington Brook identified by GWP should also be corrected. [6]

33 Participation at examination

33.1 SAVE requests participation in the relevant examination hearing sessions.

33.2 SAVE particularly wishes to participate in matters concerned with:

- Policy S/GF;
- development strategy;
- site selection and reasonable alternatives;
- Sustainability Appraisal and legal compliance;
- housing trajectory and deliverability;
- transport;
- CSET;
- infrastructure;
- landscape;
- heritage;
- water resources and hydrology;
- the natural environment;
- cross-boundary strategic matters; and
- the plan-making and consultation process.

33.3 SAVE's participation would allow the Inspector to hear both the community perspective and the extensive body of independent professional evidence which SAVE and Abington Parish Council have helped bring together.

34 Conclusion

34.1 SAVE supports the preparation of a sound Local Plan for Greater Cambridge.

34.2 We recognise the compelling need for homes, employment and infrastructure.

34.3 Our position is not "no development".

34.4 It is the right development, of the right scale, in the right place, supported by evidence before irreversible strategic decisions are made.

34.5 Grange Farm has not yet satisfied that test.

34.6 The landscape evidence identifies effects inherent in introducing an extensive new settlement into the sensitive and substantially unsettled Chalk Hills.

34.7 The transport evidence identifies a development whose claimed sustainability depends upon substantial behavioural change and major strategic infrastructure, including CSET and a separate connection upon which successful delivery is acknowledged to depend.

34.8 The hydrology evidence should not be exaggerated. GWP does not presently identify water as a standalone reason to reject the allocation. But it confirms that the development lies over a sensitive Principal Chalk Aquifer, within Source Protection Zones 2 and 3; that much of the Chalk has no superficial cover; that infiltration drainage requires protection against pollutant entry; that the development may require its own sewage-treatment solution and probably pumping untreated sewage over the aquifer; and that first occupation is dependent upon strategic water-supply infrastructure. [6]

34.9 These matters exist alongside heritage, infrastructure, developable-capacity and other constraints.

34.10 The heritage evidence materially reinforces this cumulative case. It identifies harm affecting several designated assets whose significance is connected, in different ways, with the site's existing rural character and concludes that materially greater buffers or retained open land would be required in important locations. That creates the same fundamental difficulty identified by the landscape evidence: mitigation intended to protect the site's environmental and historic context potentially removes or constrains land upon which the assumed development capacity depends.

34.11 The procedural history creates a further concern. A strategic new settlement which was not part of the earlier Regulation 18 strategy emerged late, initially at approximately 6,000 homes and subsequently at approximately 4,500 as constraints were investigated. The HELAA assesses the site as unsuitable overall, while the evidence raises questions over the consistency of its treatment in the Sustainability Appraisal. [7]

34.12 The relevant question is not whether somebody might ultimately devise an engineering or planning solution to every individual problem.

34.13 It is:

34.14 Does the evidence available at submission stage demonstrate a reasonable prospect that all the matters fundamental to Grange Farm can be resolved collectively, consistently and in sufficient time to deliver the scale, sustainability and housing trajectory upon which the Local Plan relies?

34.15 SAVE's conclusion is that it does not.

34.16 The evidence base presently asks the Local Plan to assume successful future outcomes on transport, strategic infrastructure, development capacity, environmental mitigation, water, funding and phasing.

34.17 That reverses the proper sequence of plan-making.

34.18 The evidence demonstrating that a strategic new settlement is justified and effective should inform the decision to allocate it. The allocation should not come first, with the evidence necessary to make it work deferred until afterwards.

34.19 For these reasons, and the additional reasons contained in the Abington Parish Council representation and SAVE's separate representation concerning legal compliance, procedure and soundness, SAVE objects to Policy S/GF and respectfully requests that Grange Farm be removed from the Greater Cambridge Local Plan.

SAVE
Save Abington Village Environment
September 2026

Appendix A Documents relied upon and incorporated by reference

1. Abington Parish Council Regulation 19 representation on Policy S/GF. [Sent in by email by Richard Buxton Solicitors on 25th September 2026]
2. Planning representation prepared by James Bailey Planning Ltd.
3. Transport Appraisal prepared by John Russell Transport Planning.
4. Landscape Assessment prepared by Robert Davies John West.
5. Heritage Report prepared by Asset Heritage Consulting.
6. Hydrology - 260919.v01 RBGRANGE Policy S_GF_Land Adjacent to A11 and A1307 V2, GWP Consultants LLP, Report 260919, 15 September 2026. [Hydrology...d A1307 V2 | PDF]
7. SAVE_Grange_Farm_Legal_Procedure_Soundness_Final, submitted by SAVE via the opusConsult portal.
8. National Planning Policy Framework, December 2024.
9. Greater Cambridge Proposed Submission Local Plan, Policy S/GF.
10. Greater Cambridge HELAA 2026.
11. Greater Cambridge Sustainability Appraisal 2026.
12. Greater Cambridge Infrastructure Delivery Plan.
13. Greater Cambridge transport evidence relating to Grange Farm and CSET.