25th September 2026

Save Abington Village Environment

OVERARCHING REPRESENTATION ON LEGAL COMPLIANCE, PROCEDURE AND SOUNDNESS

1. INTRODUCTION AND OVERARCHING OBJECTION

1.1 SAVE objects to the proposed allocation of Land at Grange Farm under Policy S/GF and seeks the deletion of the allocation from the submitted Greater Cambridge Local Plan.

1.2 This representation should be read together with the accompanying planning, transport, landscape, heritage and water evidence submitted on behalf of Abington Parish Council and/or SAVE. Those specialist reports identify a series of significant constraints and unresolved matters affecting Grange Farm.

1.3 SAVE's concern is not simply that individual technical objections arise in relation to the site. Taken together, the evidence raises more fundamental questions concerning:

(a) the adequacy of the process by which Grange Farm emerged as a preferred strategic allocation;

(b) the adequacy and consistency of the Sustainability Appraisal and assessment of reasonable alternatives;

(c) whether strategic and cross-boundary matters have been adequately addressed;

(d) whether Policy S/GF satisfies the tests of soundness, particularly whether it is justified and effective; and

(e) whether matters fundamental to the suitability, capacity and deliverability of the allocation have been deferred to subsequent masterplanning, planning applications and infrastructure processes when they should properly have informed the strategic decision whether to allocate Grange Farm at all.

1.4 SAVE recognises that a Local Plan is not required to resolve every matter of detailed design before allocating a strategic site. There is, however, an important distinction between details which can properly be determined subsequently and matters which go to the fundamental suitability and deliverability of the allocation itself.

1.5 The Planning Inspectorate's Procedure Guide for Local Plan Examinations states that a Regulation 19 plan should have been rigorously assessed before publication, should identify the matters which need to be planned for and should address them with careful attention to deliverability and viability. It cautions against deferring necessary matters or relying upon the examination process to rectify a deficient plan.

1.6 SAVE respectfully submits that this distinction lies at the heart of the Grange Farm objection.

2. LATE EMERGENCE OF A STRATEGIC NEW SETTLEMENT

2.1 Grange Farm is not a conventional housing allocation. At approximately 4,500 dwellings, together with substantial employment provision, schools, community facilities and major new transport and utility infrastructure, it is in substance a proposal for a new settlement.

2.2 Its procedural history is therefore important.

2.3 Preparation of the Greater Cambridge Local Plan has extended over a number of years and has involved successive stages of evidence gathering and public consultation. However, the present Grange Farm new-settlement proposal emerged only at a late stage in that process.

2.4 Representations made on behalf of the promoter acknowledged that "Grange Farm was not on the agenda when the Regulation 18 plan was prepared". The promoter nevertheless sought the inclusion of a new settlement in the subsequent Plan. This confirms that Grange Farm was not a strategic allocation around which the earlier Regulation 18 process had been structured.

2.5 The procedural history of Grange Farm is particularly material. In representations submitted in December 2021, the Grange Farm Partnership promoted a new settlement of approximately 4,000–5,000 dwellings on land identified as HELAA site 59401. The promoter expressly acknowledged that **"Grange Farm was not on the agenda when the Regulation 18 plan was prepared"** but requested that the proposal subsequently be incorporated into the Regulation 19 Local Plan.

2.6 The Councils subsequently considered HELAA site 59401 but did **not** prefer it for allocation. Significantly, the reasons recorded for that conclusion were not principally concerned with its accessibility or relationship with employment. The Councils acknowledged its proximity to Granta Park and Babraham Research Campus, its prospective relationship with CSET and its potential to provide a range of services and facilities. Nevertheless, they concluded that large-scale development at Grange Farm would likely cause adverse effects upon designated environmental and heritage assets and, critically, that **"This site boundary is not considered large enough to provide opportunity to mitigate these impacts through careful masterplanning of the site."**

2.7 The subsequent assessment underlying the preferred allocation adopts substantially the same positive reasoning concerning employment accessibility, CSET and provision of services, and continues to acknowledge likely adverse effects upon environmental and heritage assets. However, the conclusion is reversed. The later assessment identifies a site **larger than HELAA site 59401** and concludes instead that **"The scale of the site provides opportunity to mitigate these impacts through careful masterplanning of the site."**

2.8 SAVE considers that this change is important to the examination of the site-selection process. The earlier assessment did not reject Grange Farm because its strategic advantages were then unknown: those advantages were expressly recognised. The identified impediment was the inability of the then site to accommodate the mitigation required for acknowledged environmental and heritage effects. The later preferred approach appears to address that difficulty principally by enlarging the site and concluding that its increased scale provides sufficient opportunity for mitigation.

2.9 The relevant question is therefore not simply why Grange Farm was reconsidered, but **what proportionate evidence demonstrates that enlargement of the site satisfactorily overcame the environmental and heritage reasons for which the earlier proposal was not preferred**. This is particularly material given that subsequent evidence continues to identify significant landscape and heritage constraints, including the Scheduled Barrow Cemetery and the proposed settlement has itself subsequently reduced in capacity from approximately 6,000 to 4,500 dwellings.

2.10 SAVE respectfully asks the Inspector to examine the evidential chain between those two assessments: what materially changed; what additional environmental, heritage, landscape and infrastructure assessment was undertaken; how the enlarged boundary was determined; whether the increased land area was demonstrated to provide the mitigation assumed; and how that reconsideration was reflected in the Sustainability Appraisal and comparison with reasonable alternatives.

2.11 SAVE has been unable to identify within the submitted evidence base any clear explanation, supported by proportionate evidence, of why the Councils reversed their earlier conclusion that Grange Farm should not be preferred, or how enlargement of the site overcame the environmental and heritage constraints which had led to that conclusion.

2.12 If such evidence exists, it should have formed an identifiable part of the plan-making and consultation process so that the affected community and other interested parties had a meaningful opportunity to scrutinise and respond to the basis upon which a previously non-preferred strategic site became a preferred allocation. If it does not exist, the evidential basis for that reversal is itself unclear. SAVE therefore asks the Inspector to determine expressly:

(i) **what evidence caused the Councils to reverse their earlier conclusion;**

(ii) **when that evidence was produced and subjected to public consultation and Sustainability Appraisal;**

(iii) **whether the community was afforded a meaningful opportunity to respond to it while the strategic choice remained genuinely open; and**

(iv) **whether, in those circumstances, the selection of S/GF complies with the applicable plan-making requirements and the Councils' Statement of Community Involvement and is justified on proportionate evidence.**

2.13 SAVE submits that this issue requires a reasoned answer at examination and cannot adequately be addressed merely by observing that Grange Farm was subsequently consulted upon as a proposed allocation.

2.14 SAVE has identified a further matter which materially reinforces the need for the evidential audit trail referred to above. There appears to have been a significant evolution in the geographical extent and identity of the site between its original promotion through the Call for Sites process and its subsequent emergence as the preferred strategic allocation. That evolution is not readily apparent from the description of the allocation simply as "Grange Farm".

2.15 The Councils' published Call for Sites record identifies HELAA Site 59401, "Land adjacent to A11 and A1307 at Grange Farm", as comprising 184.77 hectares, promoted for 4,000–5,000 residential units together with employment development. The Call for Sites form required the submitted red-line plan to show the site boundary and all land necessary for the proposed development. Accordingly, the 184.77 hectare figure appears to represent the land originally put forward for assessment as Site 59401.

2.16 There is further apparent uncertainty within the Councils' own evidence as to the extent of the land which was actually being assessed. The October 2025 Grange Farm Heritage Impact Assessment identifies the proposal as "JDI: 59401" but records a site size of 378 hectares and states that the site was then being tested through the Local Plan process as an option for a settlement of approximately 4,000–6,000 homes. That figure is more than twice the 184.77 hectares recorded for the original Site 59401. SAVE does not seek to infer from the 378 hectare figure precisely what land was intended to be included without clarification from the Councils; the point is that the published evidence does not presently provide an obvious or consistent account of the geographical unit being assessed.

2.17 The promoter's own September 2025 heritage evidence provides a further material part of that chronology. It refers expressly to a "proposed eastern extension" and an "eastern expansion area", and identifies Ley Rectory Farm immediately to the south of that expansion area. It therefore appears that, by September 2025 at the latest, the proposal under consideration extended eastwards beyond the land comprised within the original Grange Farm proposal and involved additional land associated geographically with the neighbouring Ley Rectory Farm area.

2.18 SAVE accordingly asks the Inspector to establish from the Councils' evidence:

(i) the precise geographical extent of HELAA Site 59401 when it was originally assessed and found not to be preferred;

(ii) the identity and extent of the additional land subsequently incorporated into the proposal described as "TBC larger than 59401";

(iii) the relationship between the original 184.77 hectare Site 59401, the 378 hectare site identified in the October 2025 Heritage Impact Assessment, the "eastern extension" identified in the promoter's September 2025 evidence, and the boundary ultimately proposed for allocation under Policy S/GF;

(iv) when and by what process the additional land was introduced into the strategic site-selection process, and whether its availability was demonstrated;

(v) whether the enlarged/combined site was itself subjected to proportionate HELAA, Sustainability Appraisal and reasonable-alternatives assessment before its selection as a preferred allocation;

(vi) what evidence demonstrated that enlargement of the site overcame the environmental and heritage constraints which had contributed to Site 59401 not previously being preferred; and

(vii) when the public was first given a meaningful opportunity to understand and comment upon the enlarged/combined site as the strategic development option which the Councils were considering.

2.19 SAVE does not contend that every alteration to the boundary of a potential allocation necessarily requires the plan-making process to begin again. The concern here is narrower and more fundamental. Where enlargement of the site appears potentially to have been material to reversing the Councils' previous assessment of the site's suitability, there should be a transparent evidential and consultation trail demonstrating how that enlarged site was selected, assessed and consulted upon. Without that trail it is difficult to establish whether the allocation now before the examination is the same reasonable alternative that was previously assessed, a modified version of it, or in substance a materially different strategic site.

2.20 This also bears upon the effectiveness of the environmental evidence supporting Policy S/GF. If different evidence-base documents have assessed materially different geographical areas, it is necessary to establish that the landscape, heritage, transport, water, hydrogeological and other evidence relied upon to support the submitted allocation relates to the land actually proposed for development, and that conclusions drawn from assessment of one site boundary have not simply been carried forward to another.

2.21 SAVE therefore respectfully submits that the Councils should be required to provide at examination a clear site-boundary and assessment chronology, preferably illustrated by comparative plans, identifying the original Site 59401, each material subsequent enlargement or alteration, the date and source of that alteration, the relevant assessment undertaken and the consultation stage at which that particular geographical proposal was exposed to public scrutiny.

2.22 Of particular significance is the fact that the subsequent HELAA assessed Grange Farm as “unsuitable” overall, including a Red assessment for landscape. The HELAA methodology does not make such an assessment an absolute prohibition upon subsequent allocation. It does, however, require the reasons for nevertheless progressing an unsuitable site, and the mitigation of the identified impacts, to be properly explained.

2.23 Against that background, affected communities had no obvious reason during earlier stages of Local Plan preparation to anticipate that Grange Farm would subsequently emerge as one of the Plan's principal strategic development locations.

2.24 Grange Farm subsequently appeared in the Draft Local Plan published in December 2025 as a proposed new settlement of approximately 6,000 dwellings. Following further investigation, significant constraints were identified and the proposed capacity was materially reduced, ultimately to approximately 4,500 dwellings, with substantially more detailed policy requirements.

2.25 The extent of that change is itself material. It demonstrates that important questions concerning the environmental capacity, infrastructure requirements and deliverability of Grange Farm were still being investigated at a very late stage in preparation of the Plan. SAVE does not contend merely from the length or timing of the formal consultation periods that the statutory consultation requirements were necessarily breached. The concern is more substantive.

2.26 The question SAVE asks the Inspector to consider is:

Has a strategic new settlement introduced at a late stage in the Local Plan process received sufficient investigation, iterative appraisal, consideration of reasonable alternatives and effective public and stakeholder scrutiny before the strategic decision to allocate it has been made?

2.27 Experience elsewhere demonstrates the lengthy and iterative process normally associated with strategic new settlements. Within the Cambridge area itself, developments including Waterbeach and Bourn Airfield have evolved through successive stages of strategic assessment, consultation, examination, infrastructure planning and masterplanning over periods measured in years. Gilston provides another example of the extensive strategic planning and masterplanning ordinarily associated with development of this scale.

2.28 SAVE does not rely upon those examples as establishing any prescribed minimum gestation period for a new settlement. They demonstrate instead the inherent complexity of establishing the environmental capacity, infrastructure requirements, transport strategy, viability, phasing and deliverability of development on this scale. The Inspector is therefore respectfully invited to examine when Grange Farm first became an active candidate for allocation as a strategic new settlement; what assessment had been undertaken by that stage; what opportunity existed for effective participation while the strategic principle remained genuinely under consideration; and whether the late evolution of the proposal has resulted in matters which should have informed site selection instead being deferred until after allocation.

3. SUSTAINABILITY APPRAISAL AND REASONABLE ALTERNATIVES

3.1 SAVE considers that the Sustainability Appraisal and reasonable-alternatives exercise require particularly careful examination.

3.2 Sustainability Appraisal is intended to be an iterative process undertaken during preparation of a Local Plan, including assessment of the emerging strategy against reasonable alternatives and consideration of their likely significant effects.

3.3 The issue at Grange Farm is therefore not merely whether a Sustainability Appraisal exists. The relevant question is whether the appraisal process adequately and consistently assessed the proposal which has actually emerged and provided a proper basis for comparison with reasonable alternatives.

3.4 There are grounds for concern.

3.5 The HELAA assesses Grange Farm as unsuitable overall and records a Red landscape assessment. The Sustainability Appraisal, however, describes the HELAA landscape assessment as Amber.

3.6 Different evidence documents also refer to differing site areas and iterations of the development proposition. The development quantum has meanwhile altered materially from approximately 6,000 homes to approximately 4,500 homes as environmental and other constraints have been investigated.

3.7 SAVE's accompanying specialist evidence identifies further matters relevant to the strategic assessment of the site and its alternatives, including landscape capacity, heritage constraints, water and hydrogeological risks and dependence upon major transport infrastructure.

3.8 SAVE therefore asks:

Was Grange Farm, in the form and at the scale now proposed, assessed against reasonable alternatives through a sufficiently consistent and iterative SA/SEA process using an adequate understanding of its environmental effects, infrastructure dependencies and realistic development capacity?

3.9 SAVE reserves its position as to whether the deficiencies identified amount to legal non-compliance with the applicable SA/SEA requirements. At minimum, those matters bear directly upon whether the selection of Grange Farm is justified for the purposes of the NPPF soundness test.

4. CROSS-BOUNDARY STRATEGIC MATTERS

4.1 Grange Farm also raises strategic issues extending beyond Greater Cambridge, particularly in relation to CSET and the wider Cambridge–Haverhill public transport corridor.

4.2 Policy S/GF states that the new settlement would play a critical role in extending CSET and that the proposed segregated connection would enable potential future extension of the scheme to settlements further afield.

4.3 The Local Plan transport evidence goes further. In modelling Grange Farm, it assumes CSET continuing from the A11 Travel Hub, across the A11 and through Grange Farm before continuing along the A1307 towards Haverhill.

4.4 The strategic transport proposition relied upon when assessing Grange Farm therefore has implications extending into Suffolk and involving public authorities and infrastructure bodies beyond the two plan-making authorities.

4.5 SAVE considers that the examination should establish:

(a) what effective strategic engagement has taken place with Suffolk County Council, West Suffolk Council, the Cambridgeshire and Peterborough Combined Authority and other relevant transport and highway bodies;

(b) what matters concerning the Haverhill–Cambridge corridor and Grange Farm were considered;

(c) what conclusions were reached; and

(d) how those conclusions influenced the selection of Grange Farm and the design, safeguarding and deliverability of the strategic transport infrastructure upon which it depends.

4.6 SAVE does not presently assert breach of a particular statutory cooperation requirement. The applicable legislative and transitional provisions require separate consideration. However, effective cross-boundary joint working is relevant to the effectiveness of the Plan and the Inspector should be satisfied that strategic matters have been addressed rather than deferred.

5. SOUNDNESS OF POLICY S/GF

5.1 The Plan must satisfy the applicable tests of soundness: it must be positively prepared, justified, effective and consistent with national policy.

5.2 SAVE's principal concerns in relation to Grange Farm concern whether the allocation is justified and effective, together with consequential questions of consistency with national policy.

Justified

5.3 The question is whether Grange Farm represents an appropriate strategy, taking reasonable alternatives into account and based upon proportionate evidence.

5.4 SAVE considers that significant doubt arises from the cumulative effect of:

(a) the late emergence of Grange Farm as a strategic new settlement;

(b) the HELAA assessment of the site as unsuitable overall;

(c) inconsistencies between the HELAA and Sustainability Appraisal;

(d) significant landscape and heritage constraints;

(e) unresolved water, wastewater and hydrogeological matters;

(f) dependence upon CSET and a further, separate CSET extension;

(g) uncertainty concerning the environmental mitigation required and its consequences for developable capacity;

(h) unresolved infrastructure costs, funding, phasing and delivery; and

(i) the adequacy with which reasonable alternatives have been compared with the proposal now before the Inspector.

Effective and deliverable

5.5 The question is whether the allocation has a reasonable prospect of being delivered over the Plan period at the scale and rate upon which the Plan relies.

5.6 That question cannot properly be answered merely by demonstrating that individual components of the development may be technically feasible.

5.7 The Councils' own evidence expressly states: "Successful delivery of Grange Farm would be reliant on full delivery of CSET plus a direct connection from CSET to the site."

5.8 CSET Phase 2 itself remains subject to its statutory process. The separate Grange Farm extension is materially less advanced and raises unresolved questions concerning alignment, engineering design, land requirements, statutory authorisation, detailed cost, funding and programme.

5.9 Policy S/GF additionally permits an interim public transport solution without presently establishing the number of dwellings that such a solution could sustainably support, its duration and funding, or the objective development threshold at which the permanent connection must become operational.

5.10 Similar uncertainty arises elsewhere. Further work remains necessary concerning wastewater disposal and hydrogeological effects. Landscape and heritage mitigation may materially affect developable capacity. Changes to capacity may in turn affect viability and the ability of the settlement to support the infrastructure and services upon which its claimed sustainability depends.

5.11 These uncertainties are therefore interdependent rather than discrete.

6. FEASIBILITY IS NOT DELIVERABILITY

6.1 SAVE considers this distinction fundamental.

6.2 The fact that an engineering, environmental or infrastructure problem might ultimately prove capable of solution does not demonstrate that the necessary solution has a reasonable prospect of being secured and delivered within the timescale and financial assumptions upon which the Local Plan relies.

6.3 Grange Farm presently depends upon a sequence of propositions:

- CSET Phase 2 must obtain the necessary authorisation and proceed;
- the separate Grange Farm CSET connection must then be designed, funded, authorised and constructed;
- the necessary land, highway interfaces and access arrangements must be resolved;
- an appropriate interim transport solution must operate in the meantime if development precedes the permanent connection;
- sustainable water-supply and wastewater solutions must be available;
- hydrogeological and other environmental constraints must prove capable of satisfactory mitigation;
- that mitigation must remain compatible with the assumed development capacity; and
- sufficient housing must then be constructed to achieve the 2,550 completions attributed to Grange Farm by 2045.

6.4 No single one of those propositions necessarily demonstrates that development is impossible.

6.5 The concern is their cumulative and sequential nature.

6.6 The planning judgment underlying Policy S/GF assumes that these uncertainties can ultimately be resolved and that the resulting solutions will collectively remain compatible with the development quantum, infrastructure requirements, viability and housing trajectory.

6.7 SAVE considers that there are reasonable grounds for concluding that this planning judgment has been reached before sufficient proportionate evidence exists to demonstrate it.

6.8 Put shortly:

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. MATTERS GOING TO THE HEART OF THE ALLOCATION

7.1 The distinction between subsequent detail and matters fundamental to a strategic allocation has arisen in other Local Plan examinations.

7.2 In considering the proposed new settlement at Tudeley Village, the Inspector observed:

"It is clearly not necessary to have all the details of a site allocation agreed and resolved at the local plan stage."

7.3 The Inspector nevertheless concluded that the unresolved strategic matters before him:

"go to the heart of whether the site and strategy for Tudeley Village is justified and effective."

7.4 Similar concerns arose in the examination of the North Essex Garden Communities, including transport infrastructure delivery, timing, cost and funding, housing delivery assumptions, employment, viability, delivery mechanisms and the assessment of reasonable alternatives.

7.5 SAVE does not rely upon those examinations as legal precedents determining the outcome at Grange Farm. They illustrate an important matter of examination judgment: there comes a point at which unresolved matters cease to constitute future detail and instead concern whether the strategic allocation itself has been adequately demonstrated.

7.6 SAVE considers that Grange Farm has crossed that threshold.

7.7 The unresolved issues concern the fundamental transport strategy, environmental capacity, infrastructure provision, development capacity, phasing, funding and housing trajectory of the proposed settlement.

7.8 They therefore go to the heart of whether Policy S/GF is justified and effective.

8. DEFERRAL TO SUBSEQUENT PLANNING STAGES

8.1 The Councils may contend that outstanding matters can appropriately be addressed through a future masterplan, Transport Strategy, phasing plan, planning applications and associated technical assessments.

8.2 SAVE does not consider that answer sufficient.

8.3 The Planning Inspectorate Procedure Guide emphasises that necessary matters should be addressed through plan preparation rather than deferred, with particular attention paid to deliverability and viability. It also warns against assuming that significant deficiencies requiring substantial further evidence can simply be rectified during examination.

8.4 That guidance is particularly relevant to Grange Farm.

8.5 If establishing the soundness of the allocation requires substantial additional transport modelling; selection and design of strategic transport infrastructure; materially revised infrastructure costing; hydrogeological modelling and risk assessment; reassessment of developable capacity following landscape and heritage mitigation; or reconsideration of reasonable alternatives and the Sustainability Appraisal, these are not merely matters of subsequent development management.

8.6 They are matters capable of determining whether and at what scale Grange Farm should be allocated at all.

9. CUMULATIVE ASSESSMENT

9.1 SAVE considers it particularly important that these matters are not examined in isolation.

9.2 An assessment that each individual issue might ultimately be capable of resolution does not answer the central soundness question.

9.3 Landscape and heritage mitigation may reduce developable area. Reduced capacity may affect infrastructure viability. Transport delay may affect the housing trajectory. Alternative interim transport may affect sustainable mode share and the number of dwellings capable of occupation. Revised infrastructure requirements may affect cost and viability. Hydrogeological assessment may constrain wastewater or drainage solutions.

9.4 The allocation therefore depends upon a number of interacting assumptions.

9.5 The relevant examination question is consequently not:

"Could each outstanding problem conceivably be solved?"

9.6 but:

"Does the evidence available at submission stage demonstrate a reasonable prospect that these matters can be resolved collectively, consistently and in sufficient time to deliver the development quantum and housing trajectory upon which the Plan relies?"

9.7 SAVE submits that this has not presently been demonstrated.

10. MAIN MODIFICATIONS AND REMEDY

10.1 SAVE asks the Inspector to consider not only whether Policy S/GF is sound as submitted but whether the deficiencies identified are realistically capable of being remedied through Main Modifications.

10.2 Main Modifications should not become a substitute for substantial plan preparation, strategic investigation and evidence gathering which ought properly to have informed the decision whether to allocate the site.

10.3 If demonstrating the soundness of Grange Farm requires substantial new technical work and reconsideration of the planning judgment which led to its selection, SAVE submits that the appropriate remedy is deletion of Policy S/GF, rather than reconstruction of the evidential basis for the allocation during examination.

11. MATTERS WHICH SAVE ASKS THE INSPECTOR TO EXAMINE

11.1 SAVE respectfully asks the Inspector to consider including within the examination's Matters, Issues and Questions:

(a) whether Grange Farm emerged sufficiently early in the plan-making process to permit adequate investigation, iterative Sustainability Appraisal, assessment of reasonable alternatives and effective public participation before its selection as a strategic allocation;

(b) whether the Sustainability Appraisal and site-selection evidence provide a consistent and legally adequate assessment of Grange Farm and its reasonable alternatives, having regard particularly to the HELAA findings, changing scale and boundaries of the proposal and subsequently identified environmental constraints;

(c) whether relevant strategic cross-boundary matters, including the relationship between Grange Farm, CSET and the Haverhill–Cambridge corridor, have been effectively addressed through joint working with relevant authorities and infrastructure bodies;

(d) whether there is a reasonable prospect that CSET Phase 2 and the separate Grange Farm CSET connection can be authorised, funded and delivered sufficiently early to support the housing trajectory attributed to Grange Farm;

(e) what level of development, if any, could sustainably be occupied before the permanent CSET connection becomes operational and upon what evidence that conclusion is based;

(f) whether environmental mitigation required in respect of landscape, heritage, water and hydrogeology is compatible with the development capacity upon which the allocation and its infrastructure assumptions depend;

(g) whether the cumulative effect of unresolved infrastructure, environmental, funding and phasing matters has been adequately considered rather than each uncertainty being treated separately on the assumption that it will subsequently be resolved;

(h) whether 2,550 dwellings have a reasonable prospect of completion at Grange Farm by 2045;

(i) whether matters fundamental to the justification and effectiveness of the allocation have been deferred to subsequent masterplanning, planning applications or infrastructure processes when they should properly have been established at plan-making stage; and

(j) whether any deficiencies identified are capable of remedy through Main Modifications without substantial new evidence and reconsideration of the strategic basis upon which Grange Farm was selected.

12. REQUESTED CHANGE

12.1 For the reasons above, and for the reasons contained within the specialist representations which follow, SAVE considers that Policy S/GF has not been demonstrated to be justified and effective and therefore has not been demonstrated to be sound.

12.2 SAVE accordingly requests the deletion of Policy S/GF from the submitted Local Plan.

12.3 In the alternative, if the Inspector is not satisfied at the outset that deletion is required, SAVE asks that the matters identified above be expressly examined and that the Councils be required to demonstrate through proportionate evidence that Grange Farm is justified, effective and deliverable before the allocation can be found sound.

12.4 SAVE reserves its position concerning legal compliance, including the Sustainability Appraisal/SEA process and the other procedural matters identified above, pending examination of the Councils' evidence concerning the preparation, appraisal and selection of the allocation.

12.5 SAVE requests participation in the relevant examination hearing sessions. Given the breadth and interaction of the matters raised, SAVE considers that oral participation would assist the Inspector in examining the soundness and legal compliance of Policy S/GF.

12.6 SAVE respectfully asks the Inspector to consider the evidence submitted as a whole. Our objection is not founded upon the proposition that every detail of a new settlement must be known at Local Plan stage, nor that any single outstanding constraint necessarily prevents development. It is that, at Grange Farm, too many matters fundamental to the principle, scale, timing and deliverability of the allocation remain unresolved and interdependent. The Plan presently assumes successful outcomes to questions concerning transport, infrastructure, environmental capacity, mitigation, funding and phasing which the evidence has not yet answered. In those circumstances SAVE considers that allocating Grange Farm now, with those matters left principally to subsequent processes, would reverse the proper sequence of plan-making. The evidence necessary to demonstrate that a strategic new settlement is justified and effective should inform the decision to allocate it, rather than be produced afterwards in an attempt to make the allocation work. SAVE therefore respectfully requests deletion of Policy S/GF and asks to participate in the relevant hearing sessions at Examination.

Key documents referred to

1. National Planning Policy Framework (December 2024), paragraph 36 – tests of soundness.
2. Planning Inspectorate, Procedure Guide for Local Plan Examinations (legacy system), current edition.
3. Planning Practice Guidance, Strategic environmental assessment and sustainability appraisal.
4. Greater Cambridge Local Plan: Policy S/GF – Land adjacent to A11 and A1307 at Grange Farm.
5. Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) 2026 – Grange Farm / OS280.
6. Greater Cambridge Sustainability Appraisal 2026 – assessment of Grange Farm / OS280.
7. Greater Cambridge Development Strategy Topic Paper 2026, Appendix 6 – Review of 'new' new settlement opportunities.
8. Greater Cambridge Local Plan Transport Evidence Report – Grange Farm modelling and CSET/Haverhill assumptions.
9. Greater Cambridge Local Plan Infrastructure Delivery Plan (July 2026).
10. Tunbridge Wells Borough Local Plan Examination, ID-012 Inspector's Initial Findings (Matthew Birkinshaw, November 2022), especially paragraphs 25–37 and 95–98.
11. Accompanying specialist evidence: Planning representation (James Bailey Planning Ltd); Transport Appraisal (John Russell Transport Planning); Heritage Report (Asset Heritage Consulting); Landscape Report (Robert Davies John West); Water Risks Report (GWP Consulting).
12. Greater Cambridge Shared Planning, assessment of HELAA Site 59401, *Land at Grange Farm, east of A11 & north of A1307*, recording the site as **"not preferred"** and concluding that the site boundary was not considered large enough to provide opportunity to mitigate the identified environmental and heritage impacts through careful masterplanning; compared with the subsequent assessment of the enlarged Grange Farm site (Policy S/GF), recording **"Reasons for inclusion in preferred approach"** and concluding that **"The scale of the site provides opportunity to mitigate these impacts through careful masterplanning of the site."** See also Grange Farm Partnership representations, December 2021, acknowledging that **"Grange Farm was not on the agenda when the Regulation 18 plan was prepared."**
13. Greater Cambridge Shared Planning, Call for Sites record for Site 59401, "Land adjacent to A11 and A1307 at Grange Farm", recording a site area of 184.77 hectares and proposed development of 4,000–5,000 dwellings together with employment development.
14. Grange Farm Heritage evidence (September/October 2025), including the promoter's reference to the "proposed eastern extension" / "eastern expansion area" in the vicinity of Ley Rectory Farm, and the Greater Cambridge Grange Farm Heritage Impact Assessment identifying "JDI: 59401" and recording a site size of 378 hectares.
15. Heritage evidence submitted on behalf of the Grange Farm promoter, September 2025, referring to the "proposed eastern extension" and "eastern expansion area" in the vicinity of Ley Rectory Farm.
16. Greater Cambridge Shared Planning, Grange Farm Heritage Impact Assessment, October 2025, identifying "JDI: 59401" and recording a site size of 378 hectares.