Oakington and Westwick Parish Council

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Greater Cambridge Local Plan: Proposed Submission (Regulation 19)

Formal Representation on Soundness and Legal Compliance

Representor	Oakington and Westwick Parish Council
Plan	Proposed Submission Greater Cambridge Local Plan (consultation 3 August – 25 September 2026)
Policies / allocations addressed	Section 1: Policy S/RRA/SHF – Land north of A1307, Bar Hill (Slate Hall Farm) Section 2: Policy S/NS – Northstowe; and Policies S/DS (Development strategy) and S/RRA (Site allocations in the rest of the rural area) in respect of the Green Belt release at Station Road, Oakington
Related representations	Parish Council response to the Regulation 18 consultation (January 2026); Parish Council objection to outline application 26/02534/OUT, Land east of Junction 25 of the A14 ("Cambridge 25"), August 2026
Hearing sessions	The Parish Council wishes to participate (see Part D)
Date	25 September 2026

Introduction

Oakington and Westwick Parish Council ("the Parish Council") submits this formal representation on the Proposed Submission Greater Cambridge Local Plan. It builds on the Parish Council's response to the Regulation 18 consultation in January 2026 and on its objection to outline planning application 26/02534/OUT, which seeks permission for the development proposed under Policy S/RRA/SHF.

The Parish Council notes that several of the matters it raised in January 2026 have not been taken into the Proposed Submission Plan. It therefore restates them here, framed against the tests of soundness, together with the specific modifications it considers necessary to make the Plan sound.

Section 1: Policy S/RRA/SHF – Land north of A1307, Bar Hill (Slate Hall Farm)

Part A: Legal compliance and tests of soundness

In accordance with Section 20(5)(a) and (b) of the Planning and Compulsory Purchase Act 2004 and paragraph 35 of the National Planning Policy Framework (NPPF), the Parish Council submits that Policy S/RRA/SHF is UNSOUND on the following grounds:

- **Positively prepared:** No. The allocation fails to integrate with essential infrastructure (foul drainage, multi-modal freight connectivity, sustainable travel) and ignores acute cross-boundary cumulative network impacts.
- **Justified:** No. The strategy is not an appropriate strategy when considered against reasonable rail-connected alternatives. The supporting transport and drainage evidence base is internally inconsistent, unreliable, and fails to justify the site selection.
- **Effective:** No. Key mitigation measures are undeliverable, uncosted or unenforceable; critical highway junctions are forecast to exceed capacity with Northstowe growth alone, rendering highway mitigation ineffective.

- **Consistent with national policy:** No. The policy conflicts with national decarbonisation targets, national freight modal-shift policies, and NPPF sustainable transport and environmental policies.

Part B: Detailed grounds of unsoundness

The Parish Council recognises that the success of the Cambridge economy creates demand for additional logistics and business space. Its objection is specific: the chosen location is fundamentally unsuitable.

1. Unjustified strategy and ineffective traffic mitigation: no protection for Oakington from HGV and light freight traffic

- **Relevant test:** Justified and effective (NPPF paras 108–114).
- **Critique:** The promoter's transport modelling shows 11% of vehicular trips distributed via Oakington Road West and separately tests the A1307/Oakington Road roundabout, confirming that development traffic will use this route. Despite this, freight management measures (signage, access restrictions, ANPR monitoring, width/weight limits) are proposed only for Dry Drayton, with no equivalent safeguard for Oakington. This asymmetry is unjustified.
- **Impact:** Dry Drayton Road between the A1307 and Oakington crossroads is an unclassified road that already suffers from overuse by vehicles cutting through to the A14 and Northstowe from central Cambridge, and it is due to become an access road to Northstowe Phase 3A. It cannot sustain HGV traffic or the large increase in delivery vans that would use the village as a short cut into North and East Cambridge. The allocation does not demonstrate that an effective, deliverable routing and enforcement framework can be secured.

2. Ineffective delivery of sustainable transport and pedestrian/cycle connectivity

- **Relevant test:** Positively prepared, justified and effective (NPPF paras 104, 110).
- **Critique:** The policy presumes substantial mode shift without securing the infrastructure needed. Public transport relies on non-binding commitments to seek commercial operators "depending upon demand"; no buses currently serve the site. Active travel assessments use unrealistic cycling times to Cambridge and inaccurate walking times to shops in Bar Hill. The policy's reference to a "Mobility Hub" is undefined, with no detail on its design, location or transport links — a point the Parish Council raised in January 2026 which remains unaddressed. The Parish Council's January 2026 response also noted that the movement policy statements are aspirational rather than specific and compulsory.
- **Impact:** Despite the significant increase in motor traffic the allocation would generate, the Plan provides no dedicated, segregated active travel route along Dry Drayton Road between Oakington and the A1307, a road which in its current state is unsuitable for cycling and could not support a regular bus service. As drafted, the policy locks in car and van dependency, contrary to the Plan's own decarbonisation objectives.

3. Unsound environmental evidence and infrastructure: foul water discharge and flood risk to Oakington Brook

- **Relevant test:** Justified and effective (NPPF paras 20, 174, 185).
- **Critique:** The proposal relies on private package treatment plants discharging treated effluent directly into Oakington Brook rather than requiring connection to the public foul sewer network. No evidence is provided on plant capacity, treatment standards, storm redundancy or long-term management responsibility for a site that could serve thousands of workers. The Parish Council's January 2026 response asked for a much stronger commitment than "opportunities for betterment" of water management for Oakington Brook; this has not been provided.
- **Impact:** Oakington Brook already presents fluvial and surface-water flood risk downstream within the parish, including to properties historically at risk of flooding. Discharging at this scale without statutory water-company adoption creates unacceptable ecological, flood-risk and water-quality risks.

4. Flawed and unreliable evidence base: collision and trip generation data

- **Relevant test:** Justified (Planning Practice Guidance on plan-making).
- **Critique:** An allocation must rest on a proportionate, robust and credible evidence base. The transport evidence underpinning this allocation contains internal discrepancies in its collision data (67 vs 64 recorded collisions; 4 vs 3 fatalities within the study area).
- **Impact:** Trip and HGV generation rates rely on generic national averages rather than any confirmed occupier or sector-specific logistics operation. With the safety and traffic-volume baseline compromised, the conclusion of “no significant road safety issues” cannot be relied upon.

5. Premature displacement of adopted development plan policies

- **Relevant test:** Consistent with national policy (NPPF paras 11, 47, 48).
- **Critique:** The case for the allocation depends on treating adopted South Cambridgeshire Local Plan Policies S/6, S/7 and E/11 — the latter specifically restricting large-scale warehousing and distribution — as “out of date”.
- **Impact:** The Plan elevates this logistics hub over established countryside protection policies without demonstrating why the locational needs of B8 distribution cannot be met in sustainable urban extensions or designated growth corridors.

6. Landscape, building height and public amenity harm, including the Bridleway (Oakington & Westwick)

- **Relevant test:** Effective and consistent with national policy (NPPF paras 100, 174).
- **Critique:** The applicant’s Environmental Statement (reported at Planning Statement para 5.28) confirms that users of the Bridleway (Oakington & Westwick) will experience close-range views of the development and that residual visual effects remain significant even after mitigation. The site is flat and B8 storage buildings can exceed 15 metres in height, yet the Plan gives no clear maximum building heights — a point raised by the Parish Council in January 2026.
- **Impact:** The policy provides no mechanism to protect the open rural setting of this historic route bearing the parish’s name, or to ensure the development is not visible from Oakington. Unmitigated harm to a bat commuting corridor is also unresolved.

7. Unsound strategic highway strategy: Girton Interchange and A428/A14 capacity

- **Relevant test:** Positively prepared and effective (NPPF paras 110, 111).
- **Critique:** The site does not have direct access to the A14. It connects via two signal-controlled junctions on the A1307 local service road, designed for local passenger traffic rather than sustained, high-frequency HGV flows. The junctions relied upon for a “nil detriment” conclusion are already forecast to be over capacity from cumulative (largely Northstowe-driven) growth before this development’s traffic is added.
- **Impact:** There is no HGV route from the site to the A428 westbound and the Oxford–Cambridge Growth Corridor, and no known plans to redesign the A14 Girton Interchange to allow these movements. HGVs will therefore divert through rural routes, including Dry Drayton, Madingley and Oakington, none of which is suitable for sustained freight traffic.

8. Inconsistency with national decarbonisation and rail freight policy

- **Relevant test:** Consistent with national policy (Climate Change Act 2008; NPPF paras 152–154; national rail freight growth target).
- **Critique:** A stand-alone, road-only strategic distribution centre undermines the UK’s statutory commitments to a 68% reduction in greenhouse gas emissions by 2030 (against 1990 levels) and net zero by 2050, and runs counter to the national target to grow rail freight by at least 75% by 2050.
- **Impact:** The Plan has not tested reasonable rail-connected alternatives, such as the Ely–Soham freight corridor, Cambourne/Bourn Airfield (A428/East West Rail) or the Waterbeach/Cambridge

North corridor. Locating a major distribution hub that depends entirely on road freight is a fundamental flaw in the spatial strategy.

Part C: Modifications necessary to make the Plan sound

1. **Delete Policy S/RRA/SHF.** Remove the allocation of Land north of A1307, Bar Hill (Slate Hall Farm) for strategic B2/B8 industrial, logistics and warehousing uses from the Plan.
2. **Reassess the spatial freight strategy.** Commission a multi-modal freight study to direct strategic logistics needs to rail-served corridors, brownfield regeneration sites, or locations with direct, unconstrained access to the strategic road network that avoid local roads and villages.
3. **If retained (without prejudice):** If the Inspector is minded to retain an allocation on this site, Policy S/RRA/SHF must be modified to include mandatory, pre-commencement requirements for:
   - a legally binding, enforceable HGV and light goods vehicle routing management plan, backed by ANPR enforcement, preventing development traffic from passing through Oakington and Westwick;
   - direct connection to the public foul sewer network, prohibiting unadopted package treatment plants discharging into Oakington Brook;
   - site water management that demonstrably and significantly reduces flood risk in Oakington and Westwick, not merely “opportunities for betterment”;
   - developer funding for the upgrading of Dry Drayton Road between the A1307 and Oakington, including a fully segregated cycle and pedestrian path and speed reduction measures;
   - a defined, deliverable public transport service and a Mobility Hub with specified design, location and connections;
   - clear maximum building heights, so that the development is not visible from Oakington, and protection of the setting of the Bridleway (Oakington & Westwick);
   - junction capacity improvements on the A1307 to resolve existing and cumulative Northstowe traffic deficits before occupation.

Section 2: Policy S/NS – Northstowe

The Parish Council has compared its January 2026 response with the Proposed Submission Plan. Its comments have not been fully incorporated, and it considers Policy S/NS unsound in the following respects (not justified or effective, and inconsistent with national policy on the Green Belt and flood risk).

1. Gypsy and Traveller pitch allocations (Policy S/NS, paragraph 7(a)(iii))

The policy allocates 24 permanent Gypsy and Traveller pitches across two sites of approximately 1 hectare each, but still does not specify where these sites will be located. To prevent outward creep into the surrounding countryside or strategic buffer land, the policy must make clear that these pitches will be provided strictly within the Northstowe urban footprint, and not on land acquired outside these boundaries.

Requested modification:

Amend Policy S/NS 7(a)(iii) to read: *“iii. 24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches, each on approximately 1 hectare of land), to be located strictly within the Northstowe Defined Development Extent as identified on the Policies Map, and not on external land or countryside parcels outside these boundaries.”*

2. Objection to removal of Green Belt at Station Road, Oakington (Policies S/DS and S/RRA, and the Policies Map)

The Parish Council objects to the removal of Green Belt status from the land at Station Road to release it for development. This is a further encroachment of the Green Belt from the Northstowe development and erodes the green separation that protects Oakington’s separate identity. Removing the Green Belt status to enable this development would leave Oakington with no buffer at all;

development along Station Road would in effect become “Northstowe East”. The Plan is also unclear on whether development along Longstanton Road, Church View and Station Road is to be treated as part of Northstowe.

- The land is functionally a flood plain, holding overspill from Oakington (Beck) Brook during heavy rainfall. It is imperative that it is retained to relieve pressure on the adjacent cottages in Westwick Terrace, which are historically at risk of flooding.
- The additional load on Oakington Brook from the proposed Cambridge 25 (Slate Hall Farm) development remains unresolved (see Section 1, ground 3). The cumulative flood risk has not been assessed.
- Proper consideration must be given to the Iron Age barrow opposite the Mill Road junction.

No exceptional circumstances have been demonstrated to justify this release (NPPF Green Belt policy), and it would place development in an area of flood risk, contrary to the sequential approach.

Requested modification:

Delete the proposed Green Belt release at Station Road, Oakington, and retain the land in the Green Belt as part of the green separation between Northstowe and Oakington and Westwick.

3. Green separation between Northstowe and Oakington and Westwick

The Parish Council supports the policies to maintain a green separation between Northstowe and Oakington and Westwick, the commitment to additional tree planting, and its character as “pastoral parkland”. However, it strongly objects to any development in the green separation, or to its use for playing fields, allotments, a cemetery or any other planned use that would stop it functioning as a wildlife corridor. There must be no development from the Oakington and Westwick boundaries and no further expansion of Northstowe towards the village.

The inset map published in January 2026 was contradictory: it showed the area as green separation while also indicating that certain forms of development might be permitted within it. The permission granted on appeal for eight houses on the field between Manor Farm Close and the Northstowe boundary shows how weakly this separation is currently protected.

Requested modification:

Redraw the Policies Map so it is clear that no development will be allowed between Northstowe and Oakington and Westwick, and add a policy statement to S/NS to that effect, excluding formal recreation and other planned uses from the green separation.

4. Flood mitigation

The Parish Council welcomes the policy’s reference to flood mitigation, but the Plan still gives no detail on the location or form of that mitigation. Given the flood risk along Oakington Brook and at Westwick Terrace, and the cumulative effect of Northstowe and Slate Hall Farm, this is not effective.

Requested modification:

Add specific requirements to Policy S/NS setting out the location, form and timing of flood mitigation measures, and requiring that they demonstrably reduce flood risk in Oakington and Westwick.

Part D: Participation in examination hearing sessions

Oakington and Westwick Parish Council requests to appear and be heard at the examination hearing sessions before the appointed Planning Inspector. It wishes to speak on transport modelling, highway capacity, environmental and flood risk, strategic site selection for Policy S/RRA/SHF, the green separation and Gypsy and Traveller site matters under Policy S/NS, and the Green Belt release at

Station Road under Policies S/DS and S/RRA. As the parish directly affected by both allocations, the Parish Council can provide local evidence the Inspector will not otherwise hear.

Submitted on behalf of Oakington and Westwick Parish Council

Cllr Tom Westcott, Chair of Oakington and Westwick Parish Council

25 September 2026