Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

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

Data Protection and Freedom of Information

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

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

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

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

About this Response Form

This response form has two parts:

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

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

Your completed response form should be:

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

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

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Wendy Blythe	
Organisation (where relevant)	FeCRA	
Job Title (where relevant)	Chair	
Address, including Post Code	[redacted]	
Telephone		
Email address	[redacted]	

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

Part B: Your Representation

Please fill in a separate sheet for each representation.

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

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

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

Test	**Yes / No**
Legally compliant	Yes

Sound	No

Section 3: Your representation

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

First I want to put it on record that at a recent packed meeting of 81 concerned and actively engaged local residents no one, including the speaker, who used to work with local authorities and strategic partnerships, had any idea at all precisely how to input into this Regulation 19 consultation.
Attendees at the meeting shared their experiences of how extremely complicated and unwieldy this process is for providing representations, their concerns about the democratic deficit of this and the immense difficulty of even tracking down the response forms. Therefore this consultation process is deeply flawed – it will not ensure sustainable good growth or address the widespread concern felt over the UK but especially in Cambridge the UK's most water short city about the vital issues of water management, sustainable drainage and water quality.
Greater Cambridge is an area of severe, acute water stress. The Cam chalk streams are known to be in dire straits. The plan predicates the delivery of over 50,000 new homes based on highly speculative, unconfirmed, or delayed long-term water infrastructure schemes. In 2023 the Director of the Greater Cambridge Planning Service referring to Michael Gove's plans for Cambridge to be the model for turbo-charging UK growth said: "Our water scarcity issue makes it slightly indulgent to try and meet the country's housing need in a place that doesn't have enough water."
https://www.bdonline.co.uk/briefing/plans-for-150000-homes-but-no-water-to-supply-them-does-goves-vision-for-cambridge-stand-a-chance/5128538.article

What has changed about since 2023? There is still no clarity about how Cambridge's water scarcity will be addressed. River groups and the Cambridge and South Cambridgeshire Green Party have called for urgent transparency from the Water Scarcity Group (WSG) amid growing concern that residents, councillors and local authorities are still being kept in the dark about progress on securing sustainable water supplies for Greater Cambridge. The WSG was established in March 2024 to address water scarcity one of the biggest constraints on growth facing Cambridge highlighted by Stephen Kelly in 2023. How to provide water for existing communities, thousands of proposed new homes and major commercial developments which may also include water hungry data centres. Yet, three years after the WSG was set up there remains little public information about what the group has actually achieved. This summer's drought which experts say is likely to continue well into next year makes it clear that we need urgent action on water scarcity. The risks we face are huge. The Gulf Stream has declined in strength by 15%. Severe climate dislocation that could affect rainfall patterns and water supply must be taken into account in forming Policy S/DS. Policy S/DS is a development strategy, that deals with clean-water supply and wastewater by making growth conditional on infrastructure being 'available' and by 'phasing' major new development to align with it.

Many residents, civic amenity, environmental and river groups are concerned that the evidence base for water supply for the growth planned for this area lacks certainty. They point out that there is no conditionality between housing and commercial growth as set out in the Local Plan and the successful implementation on time of major infrastructure remedies.
With respect to Clean water, Policy S/DS indicates that first homes at the new strategic sites are not expected until 2032, when the Grafham Water pipeline is expected to be functioning. The Grafham Water pipeline connection to Madingley is projected to be on line from 2032. But how definite is that? The Grafham Water supply depends on Affinity Water getting a replacement supply of treated effluent from a sewage works in Birmingham down the Grand Union Canal. The Grafham Scheme is a complicated, tightly timed multi-company chain. Cambridge's 26 Ml/d share becomes available only if upstream replacement infrastructure frees it at Grafham, while the pipeline and its connections are built, consented, commissioned and enabled to operate by the same point. The 2032 operation date is vulnerable to delays at planning, environmental assessment, land access and construction of the Grafham–Cambridge pipeline. The 26 Ml/d allocation depends on Anglian Water's Grafham–Rede strategic main and on Affinity Water's Grand Union Canal and Minworth schemes freeing water currently taken from Grafham. Delays, changed designs, funding or regulatory decisions in any linked scheme could prevent this. Delivery must also coincide with Cambridge Water's connections and network works. Environmental constraints, stakeholder objections, inflation, contractor capacity and unforeseen ground conditions add risk. The plans for the new Fens Reservoir are currently 'stalled.' Where is the water coming from to fill the new Reservoir? It is not clear. For homes scheduled from 2032, there is inadequate programme contingency, so Policy S/DS is not sound.

The Cambridge region has a constrained groundwater system, growing demand and climate exposure. Cambridge Water's 2025/26 review records a very dry 2025, the hottest summer then on record (although 2026 has been even hotter), peak daily demand of 109.9 Ml/d and activation of its drought plan.

The point of new strategic supplies is partly to enable reductions in pressure on the chalk aquifer and chalk streams. Existing sources already face water-quality and outage issues, while required environmental abstraction reductions are due around 2030.
The wider plan relies on leakage reduction, smart/universal metering, water efficiency,and potentially reuse and water-credit mechanisms. However the privatised water companies have failed in invest in vital infrastructure while continuing to pay out eye-watering dividends. For example: the £4.6bn group-level dividend payment by Anglian Water during 2012–2022 was the highest in England (https://www.eadt.co.uk/news/23337381.anglian-waters-4-6bn-dividend- highest-england/). Anglian Water paid another £88.6 million in the year to 31 March 2025 despite having been rated 'red' for total sewage pollution incidents in 2024 for the 2nd consecutive and being noted by the Environment Agency in 2024 as "requiring improvement" – for the 4th year running.

As for the reliance on potential re-use and water-credit mechanisms to address water scarcity and the assumption that it will be possible to oblige major new developments to 'design in and build in' 90 litres per person son per day vs the national standard of 110 1/pppd vs about 135 l/pppd presently, Eddington has never been 'switched on' to achieve a similar figure or lower, because legislation and regulation does not permit it (Drinking Inspectorate, mainly see link below.

https://www.newcivilengineer.com/latest/cambridge-water-reuse-scheme-not-operational-five-years-after-installation-21-08-2026/
The Cambridge Water Credits scheme is no longer being actively progressed instead the focus has shifted to major infrastructure projects such as the Grafham pipeline transfer and the Fens Reservoir
It is also likely that from 2040 Anglian Water will want the Cambridge Water Company's Grafham supply to cover growth in demand in their own area. If so, we will then be heading back to square one in 2040, well within the Plan's time horizon, with a return to over-abstraction from the chalk. Yet the Environment Agency has consistently warned that the chalk aquifer is over-abstracted, causing severe degradation to the local Cam chalk streams.

A "turbo-charged" front-loaded development strategy before there is any certainty and firm evidence about additional water supply and wastewater treatment and sewage investment, creates an unacceptable risk to both environmental sustainability and delivery certainty. And, in relation to the proposed 90 l/pppd, requires plumbing arrangements not feasible or legal under current legislation and regulations. This is all highly questionable and very complacent.

While the recent initiatives for agriculture ponds to save water are welcome, rainwater is needed for agriculture and food security and for restoring groundwater levels. This is necessary for the chalk streams and nature of this area to recover from the water crisis. And, as we saw this summer, there is no certainty about enough rainfall filling the ponds. The new £3million Elveden Estate Reservoir in Suffolk was almost completely dry by late July and August 2026, less than a year after its completion.
River and nature rights need to be embedded in Policy S/DS – not just green washed as "given a voice". For sustainable water management this needs to be clear before the draft Policy can be judged to be sound.
For all these reasons we regard Policy S/DS to be unsound.

Please provide a 100 word summary of your representation.

Cambridge remains in severe water stress. Policy S/DS makes development conditional on adequate water and wastewater infrastructure, with growth phased to match delivery. But there is insufficient certainty planned infrastructure—including the Grafham pipeline and Fens Reservoir—will deliver the water needed for new homes and commercial growth. The Water Scarcity Group has provided little evidence of progress.
Drought, climate change, environmental abstraction and infrastructure dependencies increase delivery risks. Demand-management measures cannot substitute for secure supply, while proposed mechanisms remain uncertain. Development should be conditional on demonstrably secured water infrastructure, with stronger protection for rivers. Therefore Policy S/DS is unsound.

Section 4: Supporting Documents

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

Section 5: Proposed Modifications

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

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

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

Section 6: Participation at the Examination

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

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

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

As the chair of The Federation of Cambridge Residents Associations and a member of the Friends of the Cam steering group, we believe this is important for Cambridge residents

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

Section 7: Being Kept Informed

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

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