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Sent via email to
[redacted]

25 September 2026

Dear Lizzie,

Proposed Submission Greater Cambridge Local Plan Consultation 2026

This representation to the Proposed Submission Greater Cambridge Local Plan 2026 Consultation has been made on behalf of our client, the Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust (hereafter referred to as "PE").

The representation principally relates to their land interest, allocated site S/GF: Land adjacent to A11 and A1307 at Grange Farm.

Context

The site has been promoted to date through the course of the earlier stages of Local Plan preparation, and this letter provides further support for the inclusion of the site as an allocation within the Local Plan.

The inclusion of the site will both strengthen the supply of housing and bring forward new employment opportunities as well as providing additional investment in transport and community infrastructure. We believe that the site is fundamentally in the right place to provide complementary housing, as part of a vibrant mixed use new community, in close proximity to the Southern Cluster, thus creating the maximum opportunity for people to travel to work by modes other than by car. With planned delivery of CSET, the site will be very well placed to provide high quality public transport and active travel links into Cambridge, including direct links to the Cambridge Biomedical Campus.

As landowner, PE is committed to delivering a scheme of the highest possible quality and intend to take a long term role in the design, delivery and stewardship of the development.

We have set out in full the case for Grange Farm in our submitted evidence base (dated June 2026) and therefore we do not repeat it here.

A suite of documents were submitted by PE to GCSP in June 2026, having been developed collaboratively with GCSP officers and other stakeholders since January 2026.

- Place Vision and Concept Proposals (Stir Architects)
- Historic Environment Baseline Report (Landgage Heritage) and associated Geophysical Survey
- Transport Topic Papers (KMC Transport Planning)
- Preliminary Ecological Appraisal (BSG Ecology)
- Landscape Strategy (Fabrik)
- Managing Water and Finite Resources (i.e. Utilities) (Hilson Moran).

The basis for our response

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which required that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared;

b) Justified;

c) Effective; and

d) Consistent with national policy.

These representations therefore relate to these tests.

Our position

PE are **very supportive of the principle of the allocation the broad scale and location of the development and mix of uses proposed**.

However, PE wish to propose a series of further modifications to the allocation in order to optimise the development of the site, and to ensure it delivers the most appropriate form and quality of development, whilst respecting neighbouring communities, as well as important environmental and other technical constraints affecting the site.

In order to make these points, these are presented as objections to elements of the policy. We are aware of the broad nature of concerns as expressed by local communities and other interested parties, and believe that the modifications proposed will go some way to alleviating concerns expressed.

We note that there are a number of drafting errors and inconsistencies when comparing the policy in the Reg 19 Local Plan, and the supporting evidence. We suggest that such inconsistencies should be addressed prior to submission of the plan for Examination.

Overview of proposed modifications to Policy SG/F and figure 68 (indicative spatial framework)

The primary changes, and our rationale for these changes is summarised below, with more detailed objections then provided in respect of the specific limbs of Policy S/GF.

Our requested modifications can be summarised as follows:

- **Moving the northern boundary of development further north** – there is a lack of justification or evidence for such a substantial setback from the Roman Road. We strongly advocate the need to move the allocation boundary further north, whilst ensuring an appropriate and acceptable relationship to the Roman Road Scheduled Monument and SSSI. The case for this is set out in PE's submitted evidence dated June 2026, including the Masterplan Vision and Place Principles, Historic Environment Baseline Report, and Landscape Strategy. We are committed to working with GCSP, Historic England, Cambridgeshire County Council Historic Environment Team and other interested parties to ensure an appropriate design response. As it stands, the prescription in the policy is not justified, and is to the detriment of the scheme. Revisions to the policy and to Figure 68 are requested

- **Moving the eastern boundary of development further west –** PE's submitted evidence, including landscape strategy, makes clear the importance of keeping development west of the eastern ridge, to prevent views of development in long views from the east. As proposed, the allocation boundary extends beyond the ridge, a consequence of the substantial setback of the northern boundary, and is not supported. As it stands, the prescription in the policy is not justified, and revisions to the policy and to Figure 68 are proposed.

- **New northern vehicular access on / off the A11** – the transport evidence submitted in June 2026 proposed an additional site access in the north west corner of the site, which we consider to be important to delivery of the movement strategy (and which necessitates infrastructure within the SEA north of the current proposed

development boundary) and will materially improve the scheme. From a delivery perspective, this provides an opportunity to segregate construction traffic (primarily arriving and leaving via the A11) and also allow delivery of infrastructure and development from both ends of the site, accelerating delivery. Whilst shown as an "option for site access" on Figure 68, the associated notation is unclear and potentially misleading. Therefore, a greater commitment to policy support for this access is required. PE wish to work with Cambridgeshire County Council and National Highways to further explore the parameters for an acceptable design.

- **CSET Extension into Grange Farm** – whilst supportive in principle of CSET, and an extension of CSET to serve Grange Farm, we are concerned that the service level defined for any interim solutions (ahead of CSET connections into the site) are unrealistic and unnecessary in order to encourage sustainable development. We suggest that the policy framework is simplified to enable a negotiation on acceptable interim provision to support early phase(s) of development.
- **Water Supply** – we support the ambition to make Grange Farm as sustainable as possible in all respects, including in terms of the approach to surface water, flood risk, potable water supply and foul water treatment and disposal. We do however object to the explicit link to the Grafham Water Connection, as there may be alternative and satisfactory ways of providing potable water supply for early phases of development.

These principal points are set out in more detail below, and recorded as objections to Policy S/GF.

The objections set out in this letter have also been formally submitted via GCSP's consultation portal.

Our objections to specific elements of Policy S/GF

The principal changes we wish to promote to Policy S/GF are set out in the table below.

Paragraph / reference	Policy wording	Support/ Object	Suggested response to Consultation
1.	A new settlement of approximately 4,500 homes delivered from 2034, subject to the necessary water infrastructure being available, approximately 35,000 square metres gross internal area (GIA) of employment floorspace, with a range of supporting services and facilities including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the site allocation boundary identified on the Policies Map.	Object	Paragraph 1 requires that "The built area of the expansion will be contained within the site allocation boundary identified on the Policies Map." As set out in our response, we believe that the allocation boundary is not yet resolved as further evidence is required in key areas to reach a definitive position on the boundary. For instance, at paragraph 12 b. proposals are "to respond sensitively to local townscape and heritage, incorporating appropriate buffers…." As we contend elsewhere in this objection, PE consider that further work is required to establish the scale, location and design of such buffers, and therefore greater flexibility is required in the policy and associated maps/diagrams.
2.	A site wide masterplan will be prepared by the landowners and/or promoters in conjunction with the Council and in consultation with the local community and other	Object	PE agree with the principle of a site wide masterplan, appreciating the need to secure comprehensive, high quality development. However, PE object to the requirement for the masterplan to be 'broadly aligned' with the

Paragraph / reference	Policy wording	Support/ Object	Suggested response to Consultation
	stakeholders. The masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 68 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The masterplan should be agreed by the Local Planning Authorities prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the LPAs).		indicative Spatial Framework at Figure 68 given the need for significant modifications to the allocation boundary and spatial framework diagram. The case for the changes is set out in our responses to various limbs of Policy S/GF as set out below. Further, the policy in its current wording requires the masterplan to be approved "in advance of any planning applications". PE suggest that either the policy needs to set out the mechanisms by which the masterplan would be approved ahead of an application, or otherwise or it needs to make reference to submission and approval as part of approval of the first planning permission.
6.	The new settlement will play a critical role in extending the Cambridge South East Transport (CSET) scheme, with a new segregated connection proposed which would also enable potential future extension of the proposed scheme to settlements further afield.	Object	Whilst PE support the principle of the CSET extension into the scheme, further work is required in partnership with public sector. We understand some feasibility work is underway which is welcomed to ensure the plan is positively prepared, and in particular focussing on the connection into the Travel Hub (over the A11). We anticipate a case can be made for early phases of development ahead of any CSET connection to the site, to avoid delays in scheme delivery. This should not be precluded. See in particular our comments on policy paragraph 23 c iv.
8.	The proposed Grange Farm site sits alongside the S/SEA/GF non-development areas adjacent to Grange Farm referred to as the Strategic Enhancement Area. The Strategic Enhancement Area sets out to ensure sufficient separation from neighbouring settlements and maintain a soft, green landscape to protect the development's rural setting. These areas will also be used to deliver other associated uses, including new habitats, biodiversity and informal open space.	Object	While accepting the need for a SEA and its objectives, PE object to the location of the northern boundary of development as shown on figure 68 (which also defines the southern edge of the SEA). There appears to be very little justification for this location within the Council's evidence base and therefore the level of prescription should be revisited. The buffer of several hundred metres to the Roman Road is not supported by evidence, which serves to reduce the development potential of the site. Revisions are also necessary to the eastern boundary of the development (and therefore the SEA) to move the development edge further west, consistent with the landscape evidence submitted by PE. Our principal concern is to ensure development does not encroach beyond the ridge, to ensure the development can assimilate into the landscape appropriately when viewed from the east.

Paragraph / reference	Policy wording	Support/ Object	Suggested response to Consultation
			The approach to the development of the site should take all issues in the round, including critical mass to support secondary education / vibrant mixed uses, and the overall viability of the project. The two inter-related issues above of landscape and heritage to determine an appropriate design response need to be explored in the round.
10.	Land adjacent to A11 and A1307 at Grange Farm is allocated for mixed use development within the developable area of 198.2 hectares.	Object	PE objects to the level of prescription in the policy, which seeks to fix the development boundaries without the full evidence base to support this. In particular on the northern and eastern edges (see our comments on figure 68). PE remain concerned that the reference to the site area of 198.2 hectares fixes the development extent prematurely.
11.a.ii.	10% of the total homes as specialist accommodation (within Classes C2 and C3), particularly for older people or those with disabilities.	Object	PE remain concerned that 10% of the dwellings are proposed as specialist accommodation. Whilst supporting the need to meet a range of housing needs, this should be established through an up to date assessment of need at the time of a planning application, recognising delivery is anticipated over c. 20 years.
11.b.	A total of 12 Gypsy and Traveller pitches (within a site of approximately 1 hectare) provided on site or be located off site in compliance with Policy H/GT;	Object	PE are concerned that the provision of G&T pitches during the Local Plan period will be alongside the delivery of only 2,550 homes and only in phase 1 of the wider masterplan. At this stage, the site may not be developed enough to bring these pitches forward given that over half of the wider site remains to be developed out. The Development Strategy Topic Paper – Appendix 11: 'Meeting the accommodation needs of travellers' is only a needs assessment and not a site selection assessment. Further, the restrictions currently on the site as a result of the S/SEA/GF designation would make it difficult to deliver the pitches whilst meeting the other land use requirements set out in the policy,
11.c.	Approximately 20,000 square metres (GIA) Class B2 (General Industrial) floorspace and Class B8 (Storage or Distribution) through provision of a local last-mile logistics hub/warehousing;	Object	PE are in agreement with the provision of employment uses as part of a mixed use settlement. However, the quantum of employment and the arbitrary figure of 20,000sqm predetermines the outcome of an objective assessment of need alongside development of the masterplan which will need to take into account how the mix of uses can be successfully incorporated whilst addressing the wider constraints of the site such as the SEA.
11.d.	Approximately 15,000 square metres (GIA) office (E(g)(i)	Object	PE are in agreement with the provision of employment (office) uses as part of a mixed use

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	floorspace to meet local needs generated by the new settlement;		settlement. However, the quantum of employment and the arbitrary figure of 20,000sqm predetermines the outcome of an objective assessment of need alongside development of the masterplan which will need to take into account how the mix of uses can be successfully incorporated whilst addressing the wider constraints of the site such as the SEA.
11.f.	Education facilities to meet the needs of the development including early years, primary and secondary schools, and for special educational needs, including three primary schools and a secondary school that are operational from the early phases of development;	Object	PE remain supportive of the provision of education facilities and welcome the inclusion of 'early years'. However, there is a continued concern that delivery should be carefully managed and that the ambiguity attached to 'early phases of development' may not be appropriate without the benefit of up to date assessments of need and local capacity at the time of delivery.
11.j.	Delivery of uses in the Strategic Enhancement Area, including: 11.j.i. Agricultural uses through sustainable management practices that provide for Biodiversity Net Gain, protect priority habitats and species, prevent erosion of the land and its quality, and provide other long term environmental benefits; 11.j.ii. Sustainable drainage systems (SuDS) such as swales, wetlands and reed beds; 11.j.iii. New habitats for wildlife and habitat compensation through the provision of same or better quality habitat conditions including grasslands, chalklands, and meadows; 11.j.iv. Informal open green space that provides recreational function and opportunity to access nature, biodiversity and foraging; and 11.j.v. Introduction of dark corridors where necessary to mitigate impacts on protected species.	Object	PE object to this policy as drafted. The northern area of the SEA should be capable of accommodating a northern access / egress from the A11, within the SEA. As drafted, this may not be compatible with the SEA definition in this limb of the policy. Furthermore, the policy should make appropriate provision for active travel movement networks (e.g. walking / cycle routes) through the SEA. We have also commented more broadly on the spatial definition of the SEA under other objections to Policy S/GF.

Paragraph / reference	Policy wording	Support/ Object	Suggested response to Consultation
12.b.	Respond sensitively to the local townscape and heritage, incorporating appropriate buffers where appropriate and necessary, including the: 12.b.i. Worstead Street Roman Road Scheduled Monument to the north; 12.b.ii. Bronze Age Barrow Cemetery Scheduled Monument to the west, and north west of Grange Farm Cottage; 12.b.iii. Grade II listed Worsted Lodge Farmhouse immediately to the north-west and Grade II Listed 8 Cambridge Road immediately to the South; 12.b.iv. Non-designated heritage assets of Grange Farm; 12.b.v. Nearby Great and Little Abington Conservation Areas and associated Listed Buildings; and 12.b.vi. Known and unknown archaeological assets.	Object	PE are supportive of the principles of sensitively responding to heritage and townscape constraints, and taken in isolation has no concern with Policy 12. B). However, when read in conjunction with the illustrative spatial framework (figure 68) , the response to these constraints has been determined prematurely, and without justification. We have made a case in our response to S/GF para 8 that the location of the northern boundary of development as shown on figure 68 (which also defines the southern edge of the SEA) has been set with very little justification for this location within the Council's evidence base and therefore the level of prescription should be revisited. The buffer of several hundred metres to the Roman Road is not supported by evidence, and serves to reduce the development potential of the site. PE considers that the appropriate policy response is not to pre-determine a conservative buffer, but instead to identify an extended redline for the allocation, within which the indicative Spatial Framework (figure 68) could identify a zone of heritage sensitivity within which development is supported, subject to express design criteria addressing the setting of the scheduled monument, with the precise edge treatment resolved at application stage. Revisions are also necessary to the eastern boundary of the development (and therefore the SEA) to move the development edge further west, consistent with the landscape evidence submitted by PE. Our principal concern is to ensure development does not encroach beyond the ridge, to ensure the development can assimilate into the landscape appropriately when viewed from the east. The approach to the development of the site should take all issues in the round, including critical mass to support secondary education / vibrant mixed uses, and the overall viability of the project. The two inter-related issues above of landscape and heritage to determine an appropriate design response need to be explored in the round. Further engagement with Historic England is proposed with a view to developing a clear evidence base and rationale for this important part of the site, which we consider to have been prematurely sterilised from development without justification.

Paragraph / reference	Policy wording	Support/ Object	Suggested response to Consultation
12.c.	Establish a robust landscape framework that integrates the development with the Strategic Enhancement Area (S/SEA/GF) and the wider landscape context, informed through preparation of a Landscape Visual Impact assessment. This should include the enhancement and extension of the existing tree line along the southern edge of the landscape buffer to provide screening from the development area;	Object	PE support the principle of a masterplan which is landscape focused. However, there remains concern that the policy is somewhat ambiguous and there are objections to the scale of the area identified as development (eastern boundary) and the SEA, which does not align with the evidence PE have commissioned.
12.e.	Undertake a Historic Landscape Characterisation and Landscape Character Assessment, and a more detailed Heritage Impact Assessment, to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation and enhancement measures. The Council's HIA and the results of these further assessments must inform the masterplanning for the site;	Object	PE support in principle the need for a robust landscape and masterplanning framework but have concerns about the lack of evidence which underpins decisions on the site boundary as highlighted throughout our representations.
12.g.	Respond appropriately to the indicative edge boundary treatment to the north of the site as set out in the indicative Spatial Framework through a comprehensive evidence base demonstrating how any access infrastructure or development near to the northern edge towards the Roman Road, or SSSI will mitigate the impacts on the setting and significance of the heritage asset of the Roman Road, landscape and ecology.	Object	PE object to this policy on the basis that there is insufficient evidence to set the boundary of development in the location shown on the Proposals Map and Indicative Spatial Framework (figure 68). Further evidence is required to test the extent of development and the associated SEA, acceptable relationships to heritage, ecological and other constraints, and potential mitigation through design and management. This should also consider the potential for a northern access to the A11.
13.i.	Protect the character of the Eastern boundary including retaining agricultural uses in this area;	Object	PE object to the proposed setting of the eastern boundary of development. Significant work was undertaken as part of our submitted evidence on all topics, particularly landscape, to ensure a sensitive and appropriate eastern edge which does not extend beyond the ridge in order to protect the long views from the east.

Paragraph / reference	Policy wording	Support/ Object	Suggested response to Consultation
			The allocation boundary proposes development further east of the line set by our submitted proposals which is not supported.
13.j.	Not build on or around the Listed Barrows to protect the barrows and their setting.	Object	PE acknowledge the importance of the Listed Barrows, but the wording is ambiguous. Through engagement with Historic England, dialogue is sought to agree the parameters for development in the area of / around the barrows. .
21.a.	Manage recreational pressure on areas of sensitive ecology and habitat including the impacts on the SSSI. This includes a buffer of chalk grassland for habitat creation. The design of the development should: 21.a.i. Prevent direct access onto the SSSI, including direct connections between the SSSI and the Roman Road PRoW. A strip of grassland should be used to create a buffer for the SSSI; 21.a.ii. Adopt a landscape-led design that supports the diverse ecological character and preserves the chalk hills and woodlands that are home to a species rich ecology; 21.a.iii. Maximise opportunities for ecological enhancement, such as through restoration of degraded habitats and reinforcements of ecological habitats and networks, including commuting, foraging and sheltering of species such as badgers, bats, hedgehogs and other mammals, birds, amphibians and invertebrates; 21.a.iv. Appropriately respond to the designated Scheduled Monument Roman Road and Alder Carr Site of Special Scientific Interest (SSSI) and its setting, River Granta and remnant lowland calcareous	Object	Specifically to limb 21.a. i. PE have engaged with Natural England through the pre-application Discretionary Advisory Service. NE's letter dated 09 June 2026 does not indicate that access should be prevented to the SSSI, rather it makes clear that impacts on the SSSI should be carefully managed through design of the development, specifically the northern edge, that appropriate high quality accessible greenspace is provided as part of a network of green infrastructure, and through careful management. It is not as prescriptive so as to "prevent direct access onto the SSSI". The wording of this policy should be amended in line with this advice.

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	grassland of high floristic diversity to the northern boundary of the development, and non-statutory designations such as local wildlife sites within 2km distance of the development; 21.a.v. Ensure that appropriate measures are implemented to minimise recreational disturbance and pressures on ecology at the SSSI along the Worstead Roman Road which is a Public Right of Way and a European Long Distance Route; 21.a.vi. Support the long-term management and enhancement of the SSSI, including measures to support the restoration of the SSSI. This should include the long-term management of any new chalk grassland habitat; 21.a.vii. Create dark corridors (including along the SSSIs) to ensure nocturnal and crepuscular species are not disturbed, by providing minimal lighting near to the buffer of the development, and directional and movement sensitive lighting where appropriate; 21.a.viii. Preserve the existing range of watercourses and waterbodies of ecological significance and aquatic ecosystems, including the River Granta, a chalk stream that flows through Little and Great Abington;		
21.b.	Create a clearly defined green buffer between the neighbouring settlements which: 21.b.i. Preserves viewpoints from the northern, southern and eastern boundary of the site; 21.b.ii. Protects existing landscape features; and	Object	PE continue to support the creation of a clearly defined green buffer between the development and established settlements and protect/enhance landscape features. As per our previous comments, the role, purpose, extent and definition of the SEA is an important consideration here as well as greater clarity in relation to 'preserving viewpoints', many of which will change.

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	21.b.iii. Extends and strengthens the existing treeline along the edge of the site; and the open character of the landscape buffer should be maintained.		
23.c.	23.c.iv. Extension of the CSET Phase 2 public transport corridor and services directly into the site via a segregated link from the proposed Travel Hub across the A11 into the site, to support the early phases of development. This must be in place to support first occupation of the site, unless it can be demonstrated by the applicant through a detailed Transport Strategy and phasing plan (as agreed with the Local Planning Authority and, Local Highways that, to support first occupation, there is an alternative, temporary means of securing a frequent, reliable, prioritised public transport service providing fast, direct connections between the site and Cambridge Biomedical Campus, key nearby mobility hubs, and other key destinations in and around Cambridge. If a temporary approach is agreed, the agreed phasing plan must demonstrate an appropriate trigger for completion of the segregated link based on the development capacity supported by that temporary approach;	Object	PE is supportive of the principle of extending CSET into the Grange Farm site. We were concerned that at Regulation 18 stage, the requirement was for the CSET connection to be provided prior to first occupations. We welcome the recognition in the updated text that there may be alternative solutions to enable early phases of development. We note the requirement that: *"This must be in place to support first occupation of the site, unless it can be demonstrated by the applicant through a detailed Transport Strategy and phasing plan (as agreed with the Local Planning Authority and, Local Highways that, to support first occupation, there is an alternative, temporary means of securing a frequent, reliable, prioritised public transport service providing fast, direct connections between the site and Cambridge Biomedical Campus, key nearby mobility hubs, and other key destinations in and around Cambridge."* This is an exhaustive list, and we would suggest that the level of prescription on the service level required is reduced, such that the parties may agree an acceptable level of service provision to support an early phase or phases, recognising and supporting the desire to embed sustainable travel habits from early phases of development. It is not necessary to pre-determine this. PE wish to continue a dialogue with Cambridgeshire County Council and other public sector partners to explore a package of transport measures to enable timely delivery of early phases, whilst also working in collaboration with all parties to support extension of CSET into the site.
24.b.	The quantum and mix of development can be delivered within the agreed trip budget. The Trip Budget will be refined as the site goes through the planning process and the final definitive trip	Object	Whilst PE Is supportive of the concept of a Trip Budget, to embed sustainable travel habits in the development, and to limit traffic impacts on the highway network, PE are concerned that the supporting text at para 3.3.64 defines an initial Trip Budget of 1,114 trips.

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	budget must, based on detailed evidence, be agreed with the Local Highways Authority prior to submission of the outline application. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.		The wording of the policy is helpful, as it establishes that a full Transport Assessment, supported by all appropriate evidence, will be the right and proper stage to establish and agree the Trip Budget. The evidence to reach an agreed figure will require significant further evidence and PE wish to work with all parties to agree, at an application stage, an appropriate Trip Budget for Grange Farm, both at completion of development, and in support of earlier phases of development. Therefore our concern relates to the weight that any parties may give to a figure which is at best a ranging shot, rather than reliable, at this stage.
28.	A Site Specific Flood Risk Assessment is required to support the planning application and this must include modelling of Oakington Brook. No development should be located within 8 metres of Oakington Brook apart from permitted access.	Object	Note – the reference to 'Oakington Brook' appears to be a typographical error and requires reconsideration. .
30.	Conditions are likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the LPA is satisfied that there is scope for earlier development.	Object	PE object to the suggestion of an explicit link between the Grafham transfer and delivery of development at Grange Farm. Whilst PE supports all initiatives to boost potable water supply to the region, there may be other interim solutions, and therefore any such limitation on development should be outcome driven (i.e. subject to evidence of satisfactory water supply) rather than pre-judging what that technical solution may be. One example of such an opportunity is the potential to curtail an existing groundwater abstraction borehole local to Grange Farm and divert this supply towards early phases of the development. The intent of the policy is not in dispute, rather the level of prescription implied.

We are committed to working with all parties to explore further modifications to the allocation, and suggest that through Statements of Common Ground further modifications are put forward ahead of the Examination Hearings to ensure Grange Farm is deliverable.

PE reserve the right to articulate objections further, supported by more detailed evidence, at the relevant matter hearings once the Examination in Public has commenced. **We would like to put on record our request to participate in any Examination Hearings relating to Policy S/GF.**

If you have any questions about the content of these representations, then please do not hesitate to contact either myself or Mr Frederick Killander.

Yours sincerely



Richard Oakley

Director

For and on behalf of No. 6 Developments