Representation on the Proposed Submission Greater Cambridge Local Plan (Regulation 19)

Respondent: Horningsea Parish Council

Submitted by: William Neale, Chair

Date: 22 August 2026

Consultation closes: 5pm, Friday 25 September 2026

Authorisation: These representations are made on behalf of Horningsea Parish Council and were authorised by resolution of the Council.

Schedule of representations

This response comprises eleven separate representations, each directed at an identified policy of the Proposed Submission Plan. They are set out in full below and may be entered individually on the online representation form. Representations 3 to 7 and 9 are made in common with Save Honey Hill and, where indicated, with Fen Ditton Parish Council.

Rep	Policy	Position	Principal ground
1	Whole Plan / S/DS	Object	Not consistent with national policy — Plan overtaken by the August 2026 NPPF
2	S/JH, S/AMC/NEC, CC/IW	Object	Not effective — trajectory relies on undeliverable North East Cambridge capacity; wastewater capacity not addressed
3	S/GB	Support, subject to modification	Honey Hill to be confirmed as Green Belt strongly contributing to Green Belt purposes and outside the grey belt
4	S/GB (para 2.137)	Object	Not justified — the 2026 Green Belt Assessment Review assessed purpose (d) alone and has not identified grey belt
5	J/AL	Support	Protection of best and most versatile agricultural land at Honey Hill
6	BG/RC	Object	Not effective — "along river corridors" is ambiguous and under-protects land visible from the corridor
7	BG/GI and S/CE	Support, subject to modification	Green infrastructure connection to the Cam Valley Trail at Baits Bite Lock via Honey Hill
8	GP/LC	Support, subject to modification	Important Countryside Frontages to be identified at Horningsea on the policies map
9	WS/HS	Object	Not effective — does not control internal light spill affecting dark Green Belt land
10	I/ST, S/WNT, S/AMC/NEC	Object	Not effective — no assessment of cumulative traffic on rural through routes including the B1047
11	S/SH and S/DE	Support, subject to modification	Defined development extent to be identified for Horningsea

Summary of position

Horningsea Parish Council supports a plan-led approach to growth in Greater Cambridge and does not object to the Plan in principle. We support a number of its policies, in particular Policy S/GB, Policy J/AL and Policy GP/LC, and our representations on those policies are made in support.

We consider, however, that the Plan as published is unsound in six respects: it is not consistent with national policy following publication of the new National Planning Policy Framework on 17 August 2026; it is not effective, because its housing trajectory relies on development that cannot presently be delivered in a catchment where the sewerage undertaker is objecting to new connections; it is not justified in its treatment of the Green Belt north-east of Cambridge, where the Councils' own evidence supports a firmer policy position than the Plan takes; it is not justified in its description of the 2026 Green Belt Assessment Review, which assessed a single Green Belt purpose and has not identified grey belt at all; it is not effective in its drafting of Policy BG/RC or Policy WS/HS; and it does not adequately address the cumulative transport consequences of station-led growth on the rural lanes serving Horningsea.

We also seek the positive application of the Plan's own Important Countryside Frontage designation, and of a defined development extent, to Horningsea. Those are not objections to the policies concerned, which we support, but requests that they be applied on the policies map where the evidence supports it.

We set out below the modifications we consider necessary to make the Plan sound.

Representation 1 — Consistency with national policy: the Plan has been overtaken by the new NPPF

Local Plan policy: Whole Plan; Policy S/DS (Development strategy)

Position: Object

Soundness / legal test engaged: Not consistent with national policy

The Government published a wholly rewritten National Planning Policy Framework on 17 August 2026, two weeks after this consultation opened. The national decision-making policies took effect immediately. The Plan was prepared against the December 2024 Framework.

This is not a technical point. The new Framework separates plan-making policies from national decision-making policies, and policy PM6(1)(c) provides that plans should not include policies which duplicate, substantively restate or are inconsistent with national decision-making policies. Policy PM15(1)(d) makes that a test of soundness in its own terms. A material number of the Plan's development management policies appear, on a first reading, to restate national policy and would therefore be liable to deletion at examination.

We recognise that the Plan may fall to be examined against the December 2024 Framework under the transitional provisions at Annex A. That does not dispose of the problem: applications in our parish are being determined under the 2026 national decision-making policies from today, whatever Framework governs the examination. If the Plan is adopted containing policies that carry limited weight against the new national policies, communities such as ours are left with a development plan that does not do the work it appears to do.

The corollary is that the Plan's genuinely local designations — those which identify particular land, in a particular village, by reference to locally assessed evidence — become the most valuable part of it. They

cannot be characterised as duplicating national policy, and they will survive the exercise described above. That is the basis of our representations 8 and 11.

Modification sought

1. That the Councils publish, before submission, a position statement confirming which version of the Framework they consider applies to the examination of this Plan under Annex A, and their reasoning.
2. That the Councils undertake and publish a policy-by-policy assessment of the Plan against the national decision-making policies in the August 2026 Framework, identifying policies at risk under PM6(1)(c).
3. That any consequential changes be consulted upon by way of a focused further Regulation 19 consultation, so that communities are not deprived of the opportunity to comment on the Plan as it will actually be examined.

Summary for the online form (under 100 words)

> *The Plan was prepared against the December 2024 Framework but a wholly rewritten NPPF took effect on 17 August 2026, two weeks into this consultation. Policy PM6(1)(c) provides that plans should not duplicate or restate national decision-making policies, and PM15(1)(d) makes that a soundness test. A material number of the Plan's development management policies appear to do so. The Councils should publish their position on which Framework applies, a policy-by-policy assessment against the August 2026 Framework, and consult on any consequential changes.*

Representation 2 — Effectiveness: the housing trajectory relies on North East Cambridge, which cannot currently be delivered

Local Plan policy: Policy S/JH (New jobs and homes); Policy S/AMC/NEC (North East Cambridge Area of Major Change); Policy CC/IW (Integrated water management, sustainable drainage and water quality)

Position: Object

Soundness / legal test engaged: Not effective; not justified

The Plan retains the allocation at North East Cambridge while acknowledging that Government will not fund the relocation of the Cambridge Waste Water Treatment Plant. Those two positions cannot comfortably sit together.

The facts are not in dispute:

- The Development Consent Order for relocation to Honey Hill was granted on 8 April 2025, against the Examining Authority's recommendation that consent be withheld.
- In August 2025 the Ministry of Housing, Communities and Local Government confirmed that Housing Infrastructure Fund money would not be made available, costs having risen from around £277m to in excess of £400m. Approximately £80m had by then been spent.
- Cambridge City Council has confirmed that, as a result, the proposed Hartree development at the heart of North East Cambridge cannot be delivered.
- North East Cambridge is nonetheless now coming forward for mixed housing and commercial development with the existing treatment plant in situ, which removes the original rationale for relocation.

- Anglian Water has stated that the existing Cambridge Water Recycling Centre lacks capacity for additional growth, and has been issuing holding objections to applications proposing connection within that catchment pending a feasibility review.

Policy W1 of the new Framework requires the development plan to be informed by early engagement with utility providers so that there is a clear understanding of drainage and wastewater capacity, and to use that understanding to address constraints on development. A trajectory that counts homes dependent on infrastructure that is consented but unfunded, in a catchment where the undertaker is objecting to new connections, does not meet that requirement.

The consequence for parishes such as ours is direct and serious. Under policy S5(1)(j) of the new Framework, development outside settlements which addresses an evidenced unmet need should be approved where the authority cannot demonstrate a five-year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test. If the Plan's supply is overstated because it counts undeliverable North East Cambridge homes, that overstatement will be exposed at appeal, and the pressure will fall on the countryside and Green Belt villages around Cambridge — including Horningsea.

Modification sought

1. That the residential component of Hartree and any other North East Cambridge capacity contingent on relocation of the treatment plant be removed from the five-year supply calculation and from the housing trajectory for the plan period, unless the Councils can identify a funded delivery route, the funding partners, and a realistic timescale.
2. That the Plan set out, transparently, the quantum of housing dependent on relocation and how the shortfall would be made up if relocation does not proceed.
3. That the Plan include a clear policy position on wastewater capacity as a constraint on the phasing of growth in the Cambridge catchment, in accordance with policy W1 of the Framework and Policy CC/IW of the Plan.

Summary for the online form (under 100 words)

> *The Plan retains North East Cambridge capacity while acknowledging that Government will not fund relocation of the waste water treatment plant. Costs rose from c.£277m to over £400m, Housing Infrastructure Fund money was withdrawn in August 2025, and the City Council confirms Hartree cannot be delivered. Anglian Water says the existing catchment has no capacity and is issuing holding objections. A trajectory counting those homes is not effective, and any overstatement of supply will expose Green Belt villages such as Horningsea to speculative development at appeal.*

Representation 3 — Honey Hill must be confirmed and protected as Green Belt

Local Plan policy: Policy S/GB (The Cambridge Green Belt)

Position: Support, subject to modification

Soundness / legal test engaged: Sound in principle; modification sought to secure effectiveness

Horningsea Parish Council supports Policy S/GB. The fundamental aim of national Green Belt policy is to prevent urban sprawl by keeping land permanently open. As pressure for development in Greater Cambridge increases, this policy needs to be robustly applied, and that applies with particular force to Green Belt land on the edge of Cambridge which is now the only thing preventing outward expansion.

Honey Hill is open agricultural land in the Cambridge Green Belt, north of the A14 between Horningsea, Fen Ditton and Stow cum Quy. It lies close to Quy Fen, a Site of Special Scientific Interest, within half a kilometre of three Conservation Areas including Horningsea, and in the setting of Biggin Abbey. It carries a well-used circular walking and cycling route giving Cambridge residents ready access to open countryside.

The Councils' own evidence is clear. Table 4.1 of the Greater Cambridge Green Belt Assessment (July 2026) identifies Parcel OA2, which includes Honey Hill, as carrying a harm rating for release from the Green Belt of "Very High", both in the original assessment and in the 2026 Review. The parcel is assessed as strongly contributing to Green Belt purpose (d), the preservation of the setting and special character of the historic city. Land which strongly contributes to a Green Belt purpose falls outside the definition of grey belt. The Plan should say so.

We object at representation 4 below to the methodology of the 2026 Review, which assessed a single Green Belt purpose. That objection does not undermine our reliance on the finding above, and the two positions are consistent. The defect we identify causes land to be labelled grey belt without being tested against purposes (a) and (b); it cannot cause land to be wrongly found to contribute strongly. A finding of strong contribution is therefore conservative and may safely be relied upon, whereas a finding of provisional grey belt may not.

We are concerned about the interaction between this land and the widened grey belt provisions in the new Framework. The definition has been simplified and the assessment criteria promoted from guidance into the Framework itself. Land in the Green Belt which is not affirmatively assessed as strongly contributing to Green Belt purposes is now materially more exposed than it was. Here, the affirmative assessment exists — but it sits in the evidence base rather than in the Plan, where a promoter can attempt to reopen it site by site.

Honey Hill does strongly contribute. It preserves the setting and special character of the historic city — one of the specific purposes for which the Cambridge Green Belt was established — and it maintains the physical and visual separation of Horningsea, Fen Ditton and Stow cum Quy from Cambridge and from each other.

The Development Consent Order does not alter that. The Order would permit a permanent land take of some 34 hectares for the operational facility, within a total of approximately 94 hectares of Green Belt land directly affected within the Order limits. The Examining Authority recommended that consent be withheld. The Secretary of State's decision letter confirms that the project constitutes inappropriate development causing harm to Green Belt openness, permitted only on the basis of very special circumstances. Those circumstances have since fallen away: the scheme is unfunded and therefore unviable, and its rationale is superseded now that North East Cambridge is being brought forward with the existing plant in situ. The Order runs to 2030 and the land remains undeveloped. The Plan should resolve that position rather than leave it open.

Modification sought

1. That the Plan, or the supporting text to Policy S/GB, expressly confirms that Honey Hill and the surrounding land north of the A14 within Parcel OA2 remain within the Cambridge Green Belt, strongly contribute to Green Belt purposes, and are accordingly not grey belt.
2. That the "Very High" harm rating for Parcel OA2 in the Greater Cambridge Green Belt Assessment (July 2026) be carried expressly into the Plan's supporting text, so that it is a matter of record on the face of the Plan and not a question left to be argued site by site.

3. That the Greater Cambridge Green Belt Assessment be confirmed as having been reviewed against Annex E of the August 2026 Framework, and the parcel assessments republished if the Annex E criteria require any change of approach.
4. That no part of this land is allocated, safeguarded or identified as a broad location for development of any kind, and that the Plan contains no policy provision predicated on relocation of the waste water treatment plant to this location.

Summary for the online form (under 100 words)

> *We support Policy S/GB. Table 4.1 of the Greater Cambridge Green Belt Assessment (July 2026) rates release of Parcel OA2, including Honey Hill, as "Very High" harm, strongly contributing to Green Belt purpose (d) and therefore outside the grey belt definition. The Development Consent Order permits inappropriate development harming openness, is unfunded and unviable, and its rationale is superseded by North East Cambridge coming forward with the existing plant in situ. The Plan should record the Very High rating expressly and confirm that no part of this land is allocated or safeguarded.*

Representation 4 — The 2026 Green Belt Assessment Review has not identified grey belt

Local Plan policy: Policy S/GB (The Cambridge Green Belt), supporting text at paragraph 2.137

Position: Object

Soundness / legal test engaged: Not sound — neither justified nor consistent with national policy

1. Horningsea Parish Council supports Policy S/GB in principle, as set out at representation 3 above. This representation concerns paragraph 2.137 of the supporting text, which states that the Cambridge Green Belt Assessment (2021) and the Cambridge Green Belt Assessment Review following changes to National Policy and Guidance (2026) "assess the contribution of different parcels of land to these purposes and identify grey belt land to inform plan making".
2. The 2026 Review does not identify grey belt land. It identifies land which does not contribute strongly to one Green Belt purpose. The Plan should not describe it as doing more than it does.
3. The definition of grey belt requires that the land does not contribute strongly to any of purposes (a), (b) or (d). Each purpose must therefore be assessed individually. Land which contributes strongly to only one of the three is not grey belt, whatever its performance against the other two. An assessment which examines one purpose cannot identify grey belt; it can only rule land out.
4. The 2026 Review examined purpose (d) alone, and this is apparent on the face of the document. The grey belt assessment findings record, for every parcel, a single substantive column headed "Purpose D Contribution", followed by a column headed "Provisional Grey Belt?". The key to every map in Appendix B carries only three substantive categories: "Provisional grey belt – Weak contribution to purpose D"; "Provisional grey belt – Moderate contribution to purpose D"; and "Not grey belt – Strong contribution to purpose D". Purposes (a) and (b) appear nowhere in the classification.
5. The consequence is that a parcel recorded as "Provisional Grey Belt? Yes" has been so recorded solely because it does not contribute strongly to purpose (d). Whether it contributes strongly to purpose (a) or to purpose (b) has not been asked, and cannot be answered from this evidence base.
6. In this parish, four parcels are recorded as provisional grey belt: HO4 (1.72 ha, Low harm, Weak contribution to purpose (d)); HO5 (1.13 ha, Moderate, Moderate); HO8 (1.5 ha, Moderate, Moderate);

and HO10 (1.18 ha, Low, Weak). The remaining parcels — HO1, HO2, HO3, HO6, HO7 and HO9 — are recorded as contributing strongly to purpose (d) and are not grey belt. The four provisional parcels are shown at Figure B.35, Horningsea grey belt map.

7. Not one of those four parcels has been assessed against purpose (b), the prevention of neighbouring towns merging into one another. That is the purpose this land most obviously serves. Horningsea is separated from Fen Ditton to the south, from Stow cum Quy to the east and from Waterbeach to the north by precisely the open land at the edge of the village. Nor has any of the four been assessed against purpose (a), the checking of unrestricted sprawl. All four lie on the village edge, between the built frontage and the open countryside or the river corridor, which is where both purposes bite hardest.
8. The error is not academic. HO4 carries the weakest recorded rating of the four and adjoins the High Street frontage. It is already the subject of a site submission promoted to the Councils — site 59410, The Boundary, High Street, Horningsea — which the Development Strategy Topic Paper Appendix 4 records as "Wholly Grey Belt. Overlaps with the following grey belt parcel(s) identified by the Greater Cambridge Green Belt Assessment Review: HO4." A provisional label in the evidence base will be deployed as a settled classification by a promoter at application and appeal stage, and the Plan as drafted invites that.
9. The Councils' own supporting documents are more careful than paragraph 2.137. The Development Strategy Topic Paper Appendix 4 describes an assessment "to identify land that could provisionally be considered grey belt", and every map in Appendix B is captioned "Provisional grey belt". Paragraph 2.137 omits the qualification. That omission is material, because it is paragraph 2.137 that will be cited.
10. Horningsea Parish Council adopts and supports the representation made on this issue by Fen Ditton Parish Council in respect of parcels FD3 and FD7, and makes the same objection in respect of the Horningsea parcels.

Modification sought

1. That a further grey belt assessment be carried out which assesses each parcel individually against Green Belt purposes (a), (b) and (d), so that the definition of grey belt is actually applied; or, failing that, the modifications at 2 to 4 below.
2. That paragraph 2.137 be reworded to state that the 2026 Review provisionally identifies land which does not contribute strongly to purpose (d), and that it does not identify grey belt.
3. That paragraph 2.137 state expressly that the 2026 Review is to carry little weight in any future determination of whether particular land is grey belt, and that the identification of HO4, HO5, HO8 and HO10 at Horningsea, and of FD3 and FD7 at Fen Ditton, as provisional grey belt carries correspondingly little weight.
4. That the word "provisionally" be included in paragraph 2.137 wherever the identification of grey belt is referred to.

Summary for the online form (under 100 words)

> *Paragraph 2.137 states that the 2026 Green Belt Assessment Review identifies grey belt. It does not. Grey belt requires that land contributes strongly to none of purposes (a), (b) and (d), so each must be assessed individually. The Review assessed purpose (d) alone: its findings table and every Appendix B map key record contribution to purpose D and nothing else. Four Horningsea parcels — HO4, HO5, HO8 and HO10 — are labelled provisional grey belt without ever being tested against purposes (a) or (b), which is what village-edge land principally serves.*

Representation 5 — Protection of the best and most versatile agricultural land at Honey Hill

Local Plan policy: Policy J/AL (Protecting the best agricultural land)

Position: Support

Soundness / legal test engaged: Sound — effective, justified and consistent with national policy

Horningsea Parish Council supports Policy J/AL. The land at Honey Hill affected by the Development Consent Order — approximately 94 hectares — is best and most versatile agricultural land, and is subject only to an unfunded Order for relocation of the treatment plant.

As development pressure in Greater Cambridge increases, and as risks to food security increase, this policy needs to be robustly applied. That applies with particular force to land on the edge of Cambridge which is of especial value as Green Belt, where the loss would be both of the agricultural resource and of the openness the Green Belt exists to protect. The two protections are cumulative and should be applied as such.

Modification sought

1. None. The policy is supported as drafted. We ask only that the supporting text make clear that where best and most versatile agricultural land also performs a Green Belt function, the two considerations are cumulative and neither is subsumed in the other.

Summary for the online form (under 100 words)

> *We support Policy J/AL. The approximately 94 hectares at Honey Hill within the Development Consent Order limits is best and most versatile agricultural land, subject only to an unfunded Order. As development pressure and food security risks increase, this policy needs to be robustly applied, particularly to land on the edge of Cambridge which is also of especial value as Green Belt. The supporting text should confirm that agricultural land value and Green Belt function are cumulative considerations.*

Representation 6 — River corridors: the River Cam through Horningsea, Laney Meadow and Rivermeadow

Local Plan policy: Policy BG/RC (River corridors)

Position: Object

Soundness / legal test engaged: Not effective (the policy is justified and consistent with national policy, but is internally uncertain)

The riverside meadows between Horningsea village and the River Cam — including Laney Meadow and Rivermeadow — form part of a continuous green corridor running from the city out towards Waterbeach and the Fens. They perform several functions at once: they hold the setting of the Horningsea Conservation Area, they maintain the separation of the village from Fen Ditton to the south and Waterbeach to the north, they carry the riverside path and the Baits Bite Lock approach, and they are of real and improvable ecological value. The Parish Council is actively pursuing arrangements to secure the long-term ecological management of this land.

There is an internal uncertainty in the policy which should be resolved. BG/RC(1) sets out requirements for development "along river corridors". The detail in the following subsections — protection and enhancement of the existing landscape of river corridors, views to and from the river, and enhanced access to, from and along river corridors for walking and cycling, at BG/RC(1)(c), (d) and (e) — plainly applies to a wider area than land immediately along the river. As drafted, a promoter can argue that a site set back from the bank is not "along" the corridor and so escapes the policy, while still causing exactly the harm the policy exists to prevent. At Horningsea the land between the village street and the river is precisely the land in question. The word "along" needs to be clarified.

For the reasons given at representation 3 above, we also consider that the widened grey belt provisions place river corridor land of this kind at greater risk than the Plan's evidence base presently recognises. Open meadow adjoining a village is exactly the land that a promoter will now seek to characterise as not strongly contributing.

Modification sought

1. That Policy BG/RC be clarified so that it applies to development which, while not immediately along a river corridor, is visible from it or affects views to and from it. To avoid uncertainty the policy should say so expressly.
2. That the Plan and its supporting Green Belt evidence expressly recognise the River Cam corridor through the parish, including the meadows between the village and the river, as land which strongly contributes to Green Belt purposes and which is not grey belt.
3. That the Plan recognise the role of parish-level and community stewardship of riverside land in delivering biodiversity and access objectives.

We ask, in addition, that the open frontages through which this land is seen from the village street be identified as Important Countryside Frontages. That request is set out at representation 8 below.

Summary for the online form (under 100 words)

> *BG/RC(1) applies to development "along river corridors", but subsections (1)(c), (d) and (e) — landscape, views to and from the river, and access — plainly reach wider than land immediately on the bank. As drafted a promoter can argue that a set-back site escapes the policy while causing the harm it exists to prevent. "Along" should be clarified to include development visible from the corridor. The Plan should also recognise the River Cam corridor through Horningsea, including Laney Meadow and Rivermeadow, as strongly contributing to Green Belt purposes and not grey belt.*

Representation 7 — Green infrastructure: connecting the Wicken Fen Vision to the Cam Valley Trail

Local Plan policy: Policy BG/GI (Green infrastructure); Policy S/CE (Cambridge East), at S/CE 15(d), 16(c) and 17(a)(iii)

Position: Support, subject to modification

Soundness / legal test engaged: Sound — effective, justified and consistent with national policy, subject to the modification sought

Development of Cambridge East will bring some 8,000 new homes, with requirements to provide access to open green space and to connect to strategic green infrastructure beyond Cambridge East, to contribute to

strategic-scale green infrastructure associated with the Wicken Fen Vision, and to provide walking and wheeled connections linking to wider routes. Policy S/CE 16(c) requires sensitive connection to the Wicken Fen Vision. We support those requirements.

We consider that they should be delivered through the route which already exists on the ground. The newly built footpath and cycleway exiting Marleigh on to High Ditch Road connects to a route used by walkers, cyclists and horse riders leading to the Wicken Fen Vision gateway on the east side of Honey Hill. Continuing from Honey Hill along Low Fen Drove Way and the Harcamlow Way to the River Cam corridor connects that gateway to the proposed Cam Valley Trail at Baits Bite Lock, and onward to North East Cambridge and Waterbeach New Town. Routing recreational demand this way relieves pressure on Quy Fen SSSI, which is a fragile receptor and is not capable of absorbing the recreational load of 8,000 new homes.

This is consistent with Policy BG/GI(4), which identifies green infrastructure initiatives including the River Cam corridor, and with Policy BG/RC(1), which supports delivery of a continuous Cam Valley Trail for the River Cam and the enhancement of connections between the rivers and other green spaces.

Horningsea Parish Council supports this in principle and would wish to be involved in its detailed design. Our one qualification is that the Cam Valley Trail at and north of Baits Bite Lock runs through this parish on a towpath of limited width, and the approach to it from the village is by way of the B1047 and narrow lanes with no continuous footway. Increased recreational use is welcome, but it must be planned with the parish and supported by appropriate provision for arrival, parking management and path capacity, rather than displaced on to a lane network that cannot take it.

Modification sought

1. That Policies S/CE 15(d), 16(c) and 17(a)(iii) and Policy BG/GI expressly identify the Marleigh – High Ditch Road – Honey Hill – Low Fen Drove Way – Harcamlow Way – Baits Bite Lock route as the strategic green infrastructure connection between Cambridge East, the Wicken Fen Vision gateway and the Cam Valley Trail.
2. That the supporting text records that this routing is intended in part to avoid further recreational pressure on Quy Fen SSSI.
3. That delivery of the Cam Valley Trail through Horningsea parish be accompanied by an assessment of path capacity, arrival and parking management, and safe non-vehicular access from the village, prepared in consultation with the Parish Council and secured through planning obligations.

Summary for the online form (under 100 words)

> *Cambridge East must connect to strategic green infrastructure and sensitively to the Wicken Fen Vision. That should be delivered via the existing route from Marleigh and High Ditch Road to the Wicken Fen Vision gateway at Honey Hill, continuing along Low Fen Drove Way and the Harcamlow Way to the Cam Valley Trail at Baits Bite Lock, connecting onward to North East Cambridge and Waterbeach while avoiding further pressure on Quy Fen SSSI. Delivery through Horningsea parish should be planned with the Parish Council, addressing path capacity, arrival and parking.*

Representation 8 — Important Countryside Frontages at Horningsea

Local Plan policy: Policy GP/LC (Protection, conservation and enhancement of landscape character)

Position: Support, subject to modification

Soundness / legal test engaged: Sound in principle; modification sought to the policies map and supporting text

The Parish Council supports the retention of Important Countryside Frontages in the Plan. Policy GP/LC carries forward the designation previously found at Policy NH/13 of the South Cambridgeshire Local Plan 2018. Part 2 of the policy defines Important Countryside Frontages as areas where land with a rural character either extends into or borders a built-up area — land of strong countryside character which penetrates or sweeps into the built-up area, providing a significant connection between the built environment and the surrounding rural area, or which provides an important rural break between two nearby but detached parts of a defined development extent. Part 3 provides that permission will be refused where development would compromise those purposes.

We consider this designation to be of greater practical value under the new national policy landscape than it has been at any point since it was introduced, for three reasons.

1. It is locally specific and therefore durable. An Important Countryside Frontage identifies particular land, in a named village, by reference to locally assessed evidence about the character of that village. It does not duplicate, substantively restate or conflict with any national decision-making policy, and it is therefore not exposed to the difficulty we describe at representation 1 above. It is squarely the kind of locally specific provision the plan-making policies contemplate, and it will still be doing work after any policy-by-policy review against the August 2026 Framework.
2. It operates independently of Green Belt status. If the widened grey belt provisions are deployed against land in and around the village, as we anticipate at representations 3, 4 and 6 above, an Important Countryside Frontage designation continues to apply on its own terms. A finding that land is grey belt does not switch off the Plan's landscape and village character policies. For a village in the position of Horningsea, that second, independent layer of protection is significant.
3. It protects precisely what is at risk here. Horningsea is a linear village strung along a single street. The relationship between the built frontage and the open land behind and between it is the defining characteristic of the Conservation Area, and the gaps through which the countryside and the river meadows are read from the High Street are not incidental to the village's character — they are its character. The land addressed at representation 6 above performs exactly the function that Policy GP/LC describes.

The point is no longer general. Parcel HO4, which adjoins the High Street frontage, has been recorded in the 2026 Green Belt Assessment Review as provisional grey belt on the basis of a weak contribution to purpose (d) alone, and is the subject of a current site submission to the Councils (site 59410, The Boundary, High Street, Horningsea). Parcels HO5, HO8 and HO10 carry the same provisional label. These are exactly the frontages and gaps through which the countryside is read from the village street. An Important Countryside Frontage designation over them would apply on its own terms whatever view is ultimately taken of their Green Belt or grey belt status, and is the most direct way for the Plan to secure what is at risk.

Modification sought

1. That Important Countryside Frontages be identified at Horningsea on the policies map under Policy GP/LC, including the frontages and gaps through which the open land between the village and the River Cam — including Laney Meadow and Rivermeadow — is seen from the High Street.
2. That any Important Countryside Frontage already identified at Horningsea on the adopted South Cambridgeshire Policies Map be carried forward to the Greater Cambridge Policies Map without reduction in extent.

3. That the supporting text to Policy GP/LC state expressly that the designation applies irrespective of whether the land in question is assessed as grey belt, so that the two questions are not conflated at application stage.
4. That the evidence underlying the identification of Important Countryside Frontages be published alongside the Plan, so that parish councils can see how boundaries have been drawn and, where appropriate, supply further evidence.

The Parish Council would be glad to work with officers on boundaries, and can supply photographic and other supporting evidence for the frontages it considers should be designated.

Summary for the online form (under 100 words)

> *We support Policy GP/LC. The designation is locally specific and so not exposed to deletion under PM6(1)(c); it operates independently of Green Belt and grey belt status; and it protects exactly what is at risk at Horningsea, a linear village whose character is defined by the gaps through which the countryside and river meadows are seen from the High Street. Important Countryside Frontages should be identified at Horningsea on the policies map, including the frontages over Laney Meadow and Rivermeadow, and existing designations carried forward without reduction.*

Representation 9 — Light pollution and dark skies over the Green Belt

Local Plan policy: Policy WS/HS (Pollution, health and safety), supporting information at paragraph 6.83

Position: Object

Soundness / legal test engaged: Not effective

Section 2 of the policy does not prevent the unnecessary light pollution now being caused by internal lighting left running in newly constructed commercial premises at North East Cambridge adjoining the River Cam corridor. That light spills into Green Belt land which at night should be dark, including Honey Hill and the river corridor through Horningsea parish.

Horningsea is an unlit village on the edge of the Cambridge Green Belt. Dark skies are part of the character of the parish and of the openness the Green Belt is intended to protect, and they matter for nocturnal wildlife along the river corridor. External lighting controls alone do not address the problem, because the light in question is internal light escaping through unscreened glazing outside working hours.

Modification sought

1. That the policy be amended to provide that internal lighting in commercial buildings should operate after dusk only where activated by movement sensors, or be otherwise screened or controlled so as to prevent light spill beyond the site.
2. That the supporting text identify the Green Belt and the River Cam corridor as areas where intrinsic darkness is to be protected.

Summary for the online form (under 100 words)

> *Policy WS/HS does not prevent unnecessary light pollution from internal lighting left running in new commercial premises at North East Cambridge adjoining the River Cam corridor, which spills into Green Belt land that should be dark at night, including Honey Hill and the corridor through Horningsea. External lighting controls do not address internal light escaping through unscreened glazing. The policy should require internal*

> *lighting in commercial buildings after dusk to be movement-sensor activated or otherwise controlled to prevent spill, and identify the Green Belt and river corridor as areas of protected darkness.*

Representation 10 — Cumulative transport impact of station-led growth on Horningsea

Local Plan policy: Policy I/ST (Sustainable transport and connectivity); Policy S/WNT (Waterbeach New Town); Policy S/AMC/NEC (North East Cambridge Area of Major Change)

Position: Object

Soundness / legal test engaged: Not effective; not justified

The new Framework introduces a default "yes" for residential and mixed-use development within reasonable walking distance of well-connected stations, extended in the final version to the top 80 Travel to Work Areas by Gross Value Added. Cambridge falls comfortably within that. The policy applies to Green Belt land.

Horningsea itself is roughly three kilometres from both Cambridge North and Waterbeach and is not within any plausible walking catchment. We do not object to the principle of station-led densification and we accept that it is a more sustainable pattern of growth than dispersal.

Our concern is the consequence. Horningsea is served by a single through route, the B1047 High Street, which is narrow, fronted by historic buildings, carries no continuous footway along parts of its length and already experiences speeds and volumes that the Parish Council has been working to address. Growth at Waterbeach, Milton and North East Cambridge, together with any A14 incident diverting traffic, loads that route. The Plan assesses transport impact at the level of the strategic network. It does not assess what station-led intensification does to rural lanes used as through routes between growth areas.

Modification sought

1. That the Plan require development proposals coming forward under station-proximity provisions, and at the strategic allocations at Waterbeach and North East Cambridge, to assess cumulative impact on the rural road network between and around those allocations, including the B1047 through Horningsea.
2. That the Plan identify mitigation of severance, speed and safety on rural through routes as an infrastructure requirement capable of being secured through planning obligations.
3. That the Infrastructure Delivery Plan reflect this.

Summary for the online form (under 100 words)

> *The new Framework's default "yes" for development near well-connected stations applies across Cambridge, including Green Belt land. Horningsea is outside any walking catchment but sits on the B1047, a narrow historic through route with no continuous footway, loaded by growth at Waterbeach, Milton and North East Cambridge. The Plan assesses transport impact only on the strategic network. It should require assessment of cumulative impact on rural through routes including the B1047, and identify mitigation of severance, speed and safety as an infrastructure requirement securable by obligation.*

Representation 11 — Horningsea's status in the settlement hierarchy and its defined development extent

Local Plan policy: Policy S/SH (Settlement hierarchy); Policy S/DE (Defined development extents)

Position: Support, subject to modification

Soundness / legal test engaged: Sound in principle; modification sought to the policies map

Horningsea is a small village of approximately 150 dwellings, washed over by the Green Belt, designated an Infill Village in the adopted South Cambridgeshire Local Plan, with a Conservation Area, no shop, no school and a bus service of two services to Cambridge on weekday mornings only. Its capacity to absorb growth without harm to its character or reliance on private car travel is genuinely limited.

We support its continued treatment as an infill village under Policy S/SH. We note, however, that under the new Framework the extent of a village and what constitutes limited infilling within it are matters of planning judgement on a case-by-case basis, and that a boundary shown on a policies map informs but does not determine that judgement. Given the more permissive national position, the absence of a clearly evidenced defined development extent on the policies map would leave the position materially less certain than it needs to be.

A defined development extent and an Important Countryside Frontage designation are complementary, not alternatives. The first defines where limited infilling may be acceptable in principle; the second identifies the open frontages within and adjoining the village which should remain undeveloped whatever the boundary shows. Taken together they give a clear, evidenced and locally specific picture of where development can and cannot go in this parish. This is a locally specific matter properly addressed in the Plan under policy PM2(1)(d) of the August 2026 Framework and does not duplicate national decision-making policy.

Modification sought

1. That the policies map identify a defined development extent for Horningsea under Policy S/DE, supported by proportionate evidence of how it has been drawn.
2. That the supporting text confirm that the defined development extent and any Important Countryside Frontage at Horningsea operate cumulatively and independently of one another.

Summary for the online form (under 100 words)

> *Horningsea is a village of about 150 dwellings, washed over by the Green Belt, with a Conservation Area, no shop, no school and two weekday morning buses. We support its treatment as an infill village. Under the new Framework the extent of a village and what counts as limited infilling are matters of case-by-case judgement, so the absence of a clearly evidenced defined development extent leaves the position materially uncertain. The policies map should identify a defined development extent for Horningsea under Policy S/DE, supported by proportionate evidence.*

Appearance at examination

Horningsea Parish Council wishes to participate at the relevant hearing sessions of the examination, in respect of the matters raised at representations 2, 3, 5, 7, 9 and 10 above.

The Parish Council can be contacted through Will Neale, Chair, at [insert contact details].