# 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 | Tim Deacon | Matt Clarke |
| Organisation (where relevant) | Waterbeach Development Company | Boyer |
| Job Title (where relevant) | | Director, Head of Boyer East |
| Address, including Post Code | c/o Agent | 15 De Grey Square<br>De Grey Road<br>Colchester<br>Essex<br>CO4 5YQ |
| Telephone | | 01206 584750 |
| Email address | | mattclarke@boyerplanning.co.uk |

* 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 | S/WNT 12 and SFD (Figure 71) |
| 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.

**Spatial Framework Diagram**

It is noted above that reference was previously made, specifically at S/WNT 8 of the Regulation 18 Draft Local Plan, to the Spatial Framework Diagram (SFD) presenting a layout which accorded with the Waterbeach New Town SPD and reflected the parameter plans approved under the respective outline planning permissions. As noted in the introduction to these representations, those references appear to have been removed from the Regulation 19 Draft. Notwithstanding the previous assertions, there were a number of deviations which WDC highlighted within its previous representations (some of which have been positive addressed) although it is considered that a number of conflicts still remain in this regard which would have implications for the soundness of Policy S/WNT.

S/WNT 12 states that built form of the new town is to be in accordance with the "indicative" Spatial Framework Diagram, with para 3.3.81 using the same terminology. It is considered that this presents a confusing approach with regard to the status of the SFD in terms of whether it is simply an indication of a potential approach (as the word "indicative" would imply) or is to be accorded with as the policy suggests.

Para. 3.3.81 also clarifies that the Waterbeach new town SPD will continue to be a material planning consideration in the determination of future planning applications. Yet there are a number of discrepancies between the SFD, the SPD and the Parameters defined within the respective Outline planning permissions for Waterbeach new town west and east, which arguably render the SFD unsound, on the basis of not being effective, or at the very least may give rise to confusion as to how this is to be applied or achieved in practical terms.

Notable deviations, which it is considered should be corrected to accord with the parameters plans that now form the principal framework against which future reserved matters applications are to be assessed and determined, are as follows:

- The local centres shown on the SFD and referenced in Policy S/WNT do not appear to tally with one another. The SFD shows five local centres, including the Station District Centre (plus the Town Centre), whilst S/WNT 8 c references the Town Cente, Station District Centre and two other local centres (in fact it says "at two other key areas of activity" which is assumed to be an error;
- The location of the southernmost of the Local Centres within WNTW appears to have been moved further east than shown on the approved U&C Parameters Plan;
- There is even greater discrepancy with regard to the broad siting of the required education provision. Only three school locations have been shown for WNTW whereas the approved parameters plan and details of the outline permission indicate five facilities, across three primary schools, one secondary school and a SEND school. Of these only the north-western primary school and secondary school locations appear to

correspond with those shown on the parameters plan. Those for WNTE are broadly correct in number and location, except for the northernmost school shown school location, which albeit indicative, has been moved some distance to the north-west in comparison with that approved on the parameter plans.

It is considered that these aspects should be corrected as currently these would not be deliverable in view of the identified variance from the approved parameters plans for WNTW and WNTE respectively.

Furthermore, whilst it is welcomed that key elements of the movement network have been added to the SFD, and that this illustrates the cross-boundary connections that are to be made, it is unclear why this network has not been continued within the WNTE site. An important aspect of the movement strategy is to ensure connectivity from all parts of the newt town to the relocated railway station and therefore this should be clearly portrayed within the SFD.

As mentioned above, it is welcomed that some positive revisions have been applied to the SFD, most notably inclusion of the area of proposed wetland creation to the north-east of the northern development boundary, which WDC's previous representations had highlighted as missing from the SFD.

It is noted that this has been included within the proposed Strategic Enhancement Area (SEA) for Waterbeach new town. The approach to the SEAs appears to have been amended from the Regulation 18 plan in recognition that differing aspirations would apply to the SEAs for each strategic allocation site that they have been identified for. It is considered to represent a positive step that, rather than defining an overarching policy basis for SEAs akin to that of a Green Belt function each area has been considered separately.

In this instance it is agreed that the primary role of the SEA for Waterbeach will be to safeguard the setting of Denny Abbey, whilst recognising the multifunctional functions that areas of this designation may also play in parallel.
This area has been appropriately addressed in the respective new town permissions with regard to respecting the setting of Denny Abbey. The additional area incorporated to the north-east will provide recreational open space and habitat creation, as referenced at S/WNT 6, but will also fulfil a drainage function which could also helpfully be referred to in this context.

**Please provide a 100 word summary of your representation.**

**WDC objects to elements of the SFD for Waterbeach New Town, including discrepancies between the location and quantum of certain land uses and facilities and those indicated in the SPD and/or on the parameters plans for WNTE and WNTW.**

**The status of the SFD should also be clarified with regard to whether this is indicative or needs to be accorded with.**

**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.**

**Please see accompanying statement**

**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.

Remove uncertainty over the status of the SFD by removing inconsistencies within policy wording. It is suggested that this should be indicative and therefore the policy cannot require elements to be in accordance with this, particularly in view of the primacy of the existing parent outline planning permissions with associated approved parameter plans.

The SFD should be amended to accord with the respective outline permissions and to illustrate key points such as the importance of ensuring suitable access to the relocated railway station.

**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.**

| |
|---|
| So that the matters raised within these submissions can be developed through direct discussion in order to assist the Inspector's assessment more efficiently than relying solely on these written representations. |

**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 |