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	Colum Fitzsimons	
Organisation (where relevant)	Cambridgeshire County Council (Lead Local Flood Authority)	
Job Title (where relevant)	Development and Policy Manager	
Address, including Post Code	New Shire Hall Emery Crescent Alconbury Weald Huntingdon PE28 4YE	
Telephone	[redacted]	
Email address	[redacted]	

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

Part B: Your Representation

Please fill in a separate sheet for each representation.

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

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	CC/FM Managing flood risk
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.

The LLFA has reviewed the Local Plan submitted for review under Regulation 19 of the Town and Country Planning (Local Planning) 2012 and have the following comments to ensure that the Plan is consistent with national policy:

- Officers recommend a review of the latest National Planning Policy Framework (NPPF) changes in 2026 and how this can be applied to the Local Plan. The August 2026 NPPF replaces the December 2024 Framework in full. The main flood risk changes are:
    - A dedicated flood risk chapter (F1-F9), which consolidates national flood risk policy into a dedicated section. **Alignment with these policies will help ensure the Local Plan remains consistent with the current NPPF.**
    - Flood Zones, vulnerability classifications and compatibility tables are now in the NPPF itself.
    - SuDS must now be designed **in accordance with the 2025 National Standards for SuDS.**
    - **National validation requirements introduced**, including site-specific Flood Risk Areas (FRAs) and SuDS statements as part of the information expected for relevant applications.
- Please note, on page 135 of the Proposed Submission, there is a reference to 'safe access and egress route'; however, this should be revised to read as 'safe access and escape route' in line with Planning Policy Guidance (PPG).

Officers would encourage specific promotion of **above-ground open SuDS such as wetlands, attenuation basins, ponds and swales** as they provide water quantity, water quality, amenity and biodiversity benefits. PPG Paragraph 55 details the importance of SuDS which includes reducing the need for carbon-intensive construction and pumped systems, replenishing groundwater resources and capturing and re-using rainwater. There should be reference made to the SuDS Management train. The management train is a sequence of drainage features that collect, convey, store and manage quality of surface water runoff as it drains through the development. Source control, in the management train, should prioritised. They assist in mimicking the natural runoff from the site and provides the first stage of the SuDS Management Train, intercepting surface water at a localised level. As source control can be in the form of bioretention, rain gardens, over paved areas (permeable paving) and on roofs (green roofs) it is possible to fit this in every development around the hard landscaping without taking up much space.

Please provide a 100 word summary of your representation.

The LLFA recommends updating the Plan to reflect the August 2026 NPPF, including the new flood risk chapter, incorporation of flood zone and vulnerability guidance, compliance with the 2025 SuDS Standards, and new validation requirements for FRAs and SuDS statements.

A drafting amendment is also required to replace “safe access and egress route” with “safe access and escape route” in line with PPG.

The LLFA further encourages stronger support for above-ground, open SuDS and the SuDS management train approach, prioritising source control measures to deliver flood risk, water quality, biodiversity, amenity and groundwater benefits.

Section 4: Supporting Documents

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

Section 5: Proposed Modifications

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

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

The LLFA recommends updating the Plan to reflect the August 2026 NPPF, including the new flood risk chapter, incorporation of flood zone and vulnerability guidance, compliance with the 2025 SuDS Standards, and new validation requirements for FRAs and SuDS statements.

A drafting amendment is also required to replace “safe access and egress route” with “safe access and escape route” in line with PPG.

The LLFA further encourages stronger support for above-ground, open SuDS and the SuDS management train approach, prioritising source control measures to deliver flood risk, water quality, biodiversity, amenity and groundwater benefits.

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	No

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

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