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		James Waterhouse
Organisation (where relevant)	AMLC	Iceni Projects
Job Title (where relevant)		Director
Address, including Post Code		Da Vinci House 44 Saffron Hill London EC1N 8FH
Telephone		
Email address		[redacted]

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

Part B: Your Representation

Please fill in a separate sheet for each representation.

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

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	X
Proposed Submission Policies Map	X
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 Need for NPPF Conformity

Whilst it is acknowledged that the Plan's soundness will be tested against the previous National Planning Policy Framework published in 2024 (herein referred to as NPPF 2024), a newly published and significantly evolved version of the NPPF (herein referred to as NPPF 2026) was recently published in August 2026.

Annex A of NPPF 2026 is explicit that from the date of publication of NPPF 2026, any local plan policies that are *"materially inconsistent with national decision-making policies in this Framework should be given very limited weight. The only exception is where they have been examined and adopted or made against this Framework*".

In the interests of sound plan making and having an enduring Greater Cambridge Local Plan that maintains primacy from the point of adoption, the AMLC consider that minor modifications are required to the Plan. These will ensure that the Plan is consistent with national planning policy - particularly in respect of key draft Plan policies where conflict with NPPF 2026 currently exists and where the new policies risk being afforded only very limited weight upon adoption.

Soundness Concern with Strategic Policy S/DE (Defined Development Extents)

NPPF 2026 contains a new signature policy to drive housing growth around railway stations. The policy serves to enable housing and mixed-use development to be channelled to suitable qualifying railway station locations either as an essential component of a Development Plan's spatial strategy, or effectively as a form of housing "windfall" additionality, over and above what might be delivered through Local Plans. This policy is relevant to Greater Cambridge, as there are a number of qualifying railway stations within the plan-making area that have the potential to deliver significant levels of growth over and above the levels positively identified in the draft Greater Cambridge Local Plan, both during and beyond the plan period.

The Greater Cambridge Local Plan is silent on this key Government change of policy and its implications for Greater Cambridge. Furthermore, the failure to recognise the policy creates a clearpolicy conflict between the key strategic policy S/DE (defined development extents) and NPPF 2026 Policy S5 (and GB7). If this conflict is left unresolved, it would render railway station growth schemes that are brought forward in conformity with the NPPF 2026 with an immediate in-principle Development Plan conflict. This would result in S/DE being afforded very limited weight upon adoption. Clearly, plan makers should be seeking to resolve this conflict.

Reflecting Railway Station Growth Locations on the Plan Proposals Map

The Government's signature new railway station policy is outlined in Policy S5 of NPPF 2026 for railway station related land that lies outside of a settlement (and beyond the Green Belt). The policy amounts to a clear and deliberate approach to enable and secure housing and mixed-use development in locations that, if not already identified for growth in the Development Plan for the area, amount to windfall additionality over and above planned levels of growth.

The policy channels growth to locations where prized infrastructure is already in existence and where the requisite connectivity to economic centres is in place. In this way, the policy enables homes and mixed-use development to be delivered in locations that will support the continued economic growth of successful centres in a highly sustainable way.

Policy S/JH establishes that the housing requirement for the Greater Cambridge area is in accordance with the Standard Method requirements for Cambridge City and South Cambridgeshire District. Whilst the Plan approach is supported, national policy is clear that meeting an area's objectively assessed needs should only be a minimum and that Plans should be prepared positively. The housing additionality that can be achieved through the Government's railway station policy should be considered through the Plan strategy and the infrastructure implications associated with unlocking this growth should be factored in and reflected, if possible.

In order for the Plan to be positively prepared, it is requested that the Plan Proposals Map be updated to identify and notate those locations where railway station related windfall growth might be delivered through NPPF 2026 Policy S51h (and its Green Belt counterpart GB7).

Please provide a 100 word summary of your representation.

The AMLC supports the Plan strategy, but considers the Plan requires amendment to be consistent with both NPPF 2024 (upon which the Plan's soundness is tested) and NPPF 2026 (to ensure primacy of the Plan and avoid key policies being afforded very limited weight upon adoption in 2027).

Key strategic policy S/DE (defined development extents) conflicts with NPPF 2026 in its current form and should be modified through the remaining plan process to enable NPPF promoted railway station growth to be brought forward without Plan conflict.

The Plan should further consider the potential additionality of housing delivery through NPPF 2026 policies and the certain forms of development that can be unlocked through the application of decision-making policies. An additional appropriate change would be to notate railway station related windfall growth locations on the Proposals Map.

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.

N/A

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.

AMLC considers the Plan's national policy conflict can be resolved through the insertion of additional text (proposed in bold below) to Policy S/DE, so that it reads as follows:

> *1. Development and redevelopment of unallocated land and buildings within defined development extents (as shown on the Policies Map) will be permitted provided that:*
> *a. Development is of a scale, density and character appropriate to the location, and is consistent with other policies in the Local Plan;*
> *b. Retention of the site in its present state does not form an essential part of the local character, and development would protect and enhance local features of green space, landscape, ecological or historic importance; and*
> *c. There is the necessary infrastructure capacity to support the development.*
>
> *2. Outside defined development extents, development will not be permitted except for:*
> *a. Allocations within Made Neighbourhood Plans;*
> *b. Rural Exception sites meeting local need for affordable housing;*
> *c. Development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside;*
> ~~***or***~~ *d. Where development is supported by other policies in this plan; or*
> ***e. Where development is brought forward in conformity with provisions outlined in NPPF policy, including railway station related growth***

The AMLC would be supportive of alternative additional wording to Policy S/DE from that proposed above, subject to the wording clearly reconciling the existing conflict between the NPPF 2026 and the Greater Cambridge Local Plan on this key point.

In order for the Plan to be positively prepared, it is requested that the Plan Proposals Map be updated to identify and notate those locations where railway station related windfall growth might be delivered through NPPF 2026 Policy S51h (and its Green Belt counterpart GB7). These include the land around Ashwell & Morden Railway Station, which should be notated on the Proposals Map.

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.

A key point of soundness has been raised regarding the Plan's compliance with the 2026 NPPF and the likelihood of the Plan's key policy on development extents being afforded very limited weight upon adoption without modifications of the type requested.

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