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Our ref: ABI1/1 (LPF)
Your ref: Greater Cambridge Local Plan

25 September 2026

Greater Cambridge Shared Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne, Cambridge
CB23 6EA

SUBMITTED VIA EMAIL USING CONSULTATION FORM

OBJECTION TO PLAN AND POLICIES S/GF and S/DS

Dear Sirs

RE: Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm Greater Cambridge Local Plan: Proposed Submission and Policy S/DS Development Strategy
Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Introduction

1. We are instructed by Abington Parish Council and lodge our client's formal objection to the Regulation 19 Consultation to the proposed Plan and Policies S/GF: Land adjacent to A11 and A1307 at Grange Farm in the Greater Cambridge Local Plan, and Policy S/DS Development Strategy. The Parish Council comprises of councillors elected to represent the approximately 1,500 residents of Great Abington and Little Abington and improve their quality of life.

2. The Parish Council has been supported by Save Abington Village Environment (SAVE)[1] through financial contributions for the legal team and the five technical experts whose reports support these objections. SAVE is submitting their own objection in support of the Parish Council's objection.

[1] *SAVE is a community-led group, committed to protecting the character, environment, and long-term wellbeing of Abington and its surrounding villages.*

3. The Parish Council's independent expert reports address the following matters and are referenced as indicated:

    a. Planning Matters and Evidence Basis – Steven Stroud MRPTI, James Bailey Planning [JB]
    b. Landscape – Pete Leaver CMLI, Robert Davies John West Ltd [PL]
    c. Transport - John Russell, CMILT, MCIHT, JR Transport Planning [JR]
    d. Flood Risk and Hydrology – John Sutton BSc, MSc, GWP Hydrogeological Consultants [GWP]
    e. Heritage – Dr Nicholas Doggett, FSA, MICfA, IHBC, Asset Heritage Consulting Ltd. [ND]

4. The expert reports are submitted as a bundle to accompany this letter; we would respectfully ask that they are read in full.

5. The Parish Council requests to participate in the examination hearings to ensure local residents voices are represented at the EiP and subject to funding will instruct counsel and their experts to attend to assist the Inspectors at the EiP.

Objection to proposed Policy S/GF

6. The Parish Council objects to proposed Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm on the basis the Plan has not been prepared in accordance with legal and procedural requirements and fails the legal requirement for soundness as set out in the 2024 National Planning Policy Framework (NPPF 2024). In summary the Plan is unsound because:

    (1) The Plan is not justified in relation to high landscape harm incapable of mitigation:

    (i) key evidence contains material inconsistencies and inaccuracies, including the Housing and Economic Land Availability Assessment ('HELAA' 2026), the Sustainability Appraisal ('SA' 2026), the Development Strategy Topic Papers (2026), and the Site Allocations Topic Paper (2026) [JB/2/2.1-2.10]. These inconsistencies and omissions undermine the reliability of the assessment of scale

of adverse impacts on this sensitive and vulnerable Cambridgeshire Chalk Hills Landscape comprising Grange Farm and include: -

a. The fact that the site was taken forward despite its 'red' HELAA score requires appropriate mitigation to be addressed in the *Development Strategy and Sites Topic Papers*; however those papers do not adequately explain how the identified significant adverse impacts on the Chalk Hills Landscape could be mitigated [JB/2.3];

b. The 2026 Sustainability Appraisal (SA) fails to record the overall 'red' and significant negative impact rating for Landscape as set out in the HELAA. Instead, the SA records the site as rating 'amber'. As a consequence, the SA process is unreliable and inevitably has led to a downplay in respect of landscape impacts [JB/2.4-2.7];

c. The SA is inconsistent when defining the proposed area being assessed with a variation of 26.98 ha [JB/2.8] which impacts inter alia on site area for infrastructure, landscape and heritage mitigation measures;

d. The failure to justify selection of Grange Farm, a sensitive Chalk Hills Landscape against other less sensitive sites. The Council's own evidence is that the Chalk Hills Landscape is a sensitive landscape typology more vulnerable to change and so the high adverse harm expected from this allocation potentially cannot be mitigated [JB/2.9-2.15;];

e. Significant adverse effects on the landscape will remain with the consequence that the strategic allocation cannot be delivered in accordance with the policy requirement within S/GF (paragraph 12) which requires all phases of masterplanning and design to: *"Ensure the development respects, protects and enhances the landscape within its rural setting, including surrounding chalk hills and woodlands"* [JB/2.16]. As the Landscape expert Pete Leaver records:

   There is no evidence that during the decision making process, regard was given to the landscape and visual sensitivities of the site within its landscape and

visual context. As a result, the allocation is inconsistent with other local plan policies and with the National Planning Policy Framework. [PL/1.1.11]

The harm goes to the heart of the established settlement pattern of Cambridge: -

> *The landscape south and east of Cambridge is characterised by a pattern of development in valley bottoms and lower valley slopes, with chalk uplands left clear of development. The development parcel of the allocation strays well into these unsettled Chalk Hills. It represents an unprecedented and major departure from the existing landscape pattern of Greater Cambridge and from the plan area's settlement pattern* [PL/1.1.4].
>
> *The proposed allocation would cause adverse effects to key landscape characteristics and landscape sensitivities, particularly of the Chalk Hills landscape, as described in the Landscape Character Assessment. Development would not contribute to landscape management guidance for the area. Major adverse effects could not be mitigated by masterplanning, site layout or design* [PL/1.1.7].

The consequence is that the sensitive Chalk Hills Landscape Character cannot be conserved, protected or enhanced as required by policy GP/LC [JB/3.2-3.7; PL/1.1.4].

(2) Critical transport Infrastructure delivery is uncertain/ may be undeliverable

(i) There are fundamental funding and delivery risks for <u>critical transport infrastructure</u> including (i) the making of the Transport and Works Act Order for the Cambridge South East Transport (CSET) and funding gaps [JR/3.40-3.43] and (ii) the delivery of *inter alia* a new bridge over the A11 from the CSET travel hub into the site necessary to demonstrate a sustainable and deliverable transport strategy to support the allocation [JB/2.27; JR/3.44]. This matters because there are presently significant constraints on walking and cycling from the site to employment facilities and services [JR/3.7-3.20; 3.46] and limited public (bus) transport [JR/3.21-3.23' 3.47] and existing road network constraints [JR/3.24-3.20; 3.49] and road safety considerations [JR/3.31-3.37]. As the transport expert John Russell records, the uncertainty over delivery of CSET and the

extension are such that without this essential infrastructure the traffic impacts would mean the allocation is unsustainable [JR/3.52]: -

> *Given the scale of the Site and the existing limitations of the transport network, any significant delay to, or failure to deliver CSET would fundamentally undermine the transport sustainability of Grange Farm*.

(ii) The developer-led CSET extension into the Grange Farm site is critical to delivery of a sustainable transport strategy [JR/3.52] but relies on uncertain developer funding where site constraints may reduce capacity and so must be tested against viability and therefore deliverability of the extension is unconfirmed [JB/2.28-2.31; 3.19-3.21; 4.7-4.13]. The CSET and CSET extension uncertainties present a substantial risk to delivery of the site as James Bailey records [JB/4.13].

> *If either scheme is substantially delayed or does not proceed, the basis for allocating Grange Farm as a sustainable new settlement would be fundamentally undermined. Any smaller scheme would require a fresh assessment of its transport impacts, infrastructure requirements, viability and ability to deliver the Plan's strategic objectives. On the evidence presently available, the necessary delivery case has not been demonstrated and the allocation should be deleted.*

(3) Heritage harm

(i) The amber HELAA rating for Designated Heritage Assets comprising *inter alia* Worsted Street, a Scheduled Ancient Monument Roman road and a Bronze age Barrow Cemetery SAM [ND/1.2][2] has not been fully considered [JB/2.17-2.19] in circumstances where Councils' recent HIA 2026 identifies the risk of significant residual heritage harm as high and undermines the amber rating of risks as capable of mitigation [JB/2.21-2.24]. The heritage expert Dr Doggett concurs with the HIA on high residual risks to the Worsted Street principally because suggested 'buffer' to open land to the south is insufficient to preserve the significance of the setting of the Roman Road as a SAM [JB/3.8-3.9. ND/3.10-3.11].

[2] Dr Doggett considers all the designated heritage assets in his report at 2.1-2.27.

(4) Loss of BMV farm land

(i) When tested against the 2024 NPPF and the new Defra maps which indicate that almost all of the farm land is BMV land (Grade 2 or Grade 3a) the site selection is not justified in national planning policy terms [JB/3.12-3.18].

(5) Risk to Water resources

(i) Finally the high-risk ground water environment (a chalk aquifer and chalk stream) at Grange Farm gives rise to significant uncertainties for water resource safety, uncertainties over costs for waste treatment and surface water discharge measures which have not been adequately explored in accordance with EA guidance and puts the groundwater environment at significant risk and uncertainty [JB/3.23-3.26; GWP, pgs 1-3]. At an absolute minimum stringent water safety conditions need to be incorporated into the policy if it proceeds in the submission draft plan as explained by GWP.

Objection to proposed Policy S/DS

7. The Plan is unsound because of the over reliance on new settlements, including Grange Farm, for delivery of the Councils' Development Strategy (Policy S/DS) where a significant proportion of the housing is likely to come forward after the plan period and therefore poses a significant risk to the Councils' development strategy [JB/2.32]. Specifically, the Grange Farm trajectory is 2,550 by 2045 but this is uncertain given the critical infrastructure relied upon to deliver such housing including CSET and the CSET extension [JB/2.33-2.34].

8. This uncertainty undermines the strategy where other allocations including Cambourne North which will benefit from the recent TWAO for C-to-C busway warrant reconsideration [JB/2.35-2.38] along with reconsideration of smaller sites and increased densities at existing allocations [JB/2.39-2.43].

Conclusion

9. As Steven Stroud explains, the evidence identifies fundamental weaknesses in the justification for allocating Grange Farm and in the assumptions supporting its capacity and

delivery. The Councils have not demonstrated that the proposed settlement can accommodate the necessary environmental safeguards while providing the homes, infrastructure and services upon which its sustainability depends.

10. The consequence is that Policy S/GF has significant delivery risks that undermine the overall housing delivery strategy in circumstances where alternatives have not been fully explored.

11. For these reasons, the Parish Council respectfully requests deletion of Policy S/GF and the associated allocation from the Policies Map. The Councils are urged to reassess the housing supply position, including the remaining headroom, and test whether any additional provision which is needed to maintain a sound and sufficiently flexible strategy can be secured through the reasonable alternatives identified in the James Bailey representations.

Yours faithfully

RICHARD BUXTON SOLICITORS