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	Sue Wells	
Organisation (where relevant)	Cam Valley Forum	
Job Title (where relevant)		
Address, including Post Code		
Telephone		
Email address		

* 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	
Proposed Submission Policies Map	
Sustainability Appraisal	Sustainability Appraisal Objective 10
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.

We consider that SA objective 10: Water "*To achieve sustainable water resource management and enhance the quality of Greater Cambridge's waters*" is not a sound objective, given the lack of evidence confirming that adequate water supplies can be found to "*to serve new growth for the lifetime of the development in a changing climate without negatively impacting on the environment*".

In relation to the vital need to ensure a sustainable water supply for both the residents of Greater Cambridge and the nature, environment and agriculture that supports them, we consider that the Plan cannot be considered Sound, since SA Objective 10 in relation to the development proposed in the Plan, is neither

- Effective (i.e. **deliverable over the plan period**) nor
- Justified (i.e. an **appropriate** strategy, taking into account the reasonable alternatives, and **based on proportionate evidence**).

The Sustainability Assessment (SA), the Statement of Common Ground, the Plan itself, and the supporting evidence relating to water (the 2025 evidence report and the 2026 Addendum) provide numerous examples of the fact that, as the SA itself words it (Para 2.48) *"... there are known challenges with water supply in terms of sustainable abstraction and also with water recycling capacity*". Throughout these documents there are continual references to the uncertainty of whether water supplies can be found to meet the proposed level of growth. Policy 28 of the Plan requires all new development to meet the minimum standards of water efficiency to address the severe water stress within the area and has set a target for water consumption of 110 litres per person per day, but there is no evidence to suggest that this will be feasible. The Plan may provide "the potential" to secure long term sustainable development but this will require that "*all new development implement water efficiency standards, and that the phasing of new development is in line with any implementation timescales for any new strategic schemes that water companies might require*". Recent history suggests that such requirements are very difficult to meet, and no new evidence is provided that this will be possible.

Paragraph 4.93 states that solutions are being developed to enable developments to proceed *if appropriately phased in line with the new water supply options,* but it is unclear how this would be implemented, given the very slow progress being made to identify water supply options. Paragraph 4.95 similarly raised in its statement *"If waste water treatment and water recycling infrastructure is not expanded or enhanced to deal with the increase in wastewater, there is the potential for significant effects in relation to water quality within waterbodies in Greater Cambridge, and in particular those designated as SACs, SPAs and Ramsar sites, as highlighted by the HRA Report for the GCLP (2026).*" The lack of clarity about the future of wastewater treatment raises a huge question mark over this section of the SA.

Paragraphs 5.34 and 5.46 further emphasise and explain why '*Significant negative uncertain effects*' are expected for SA objective 10: Water, and we fully agree with this explanation which is based on good independent research. However, beyond reference to new water supply options being developed, there is nothing to suggest that there is clear road map for mitigating these '*significant negative uncertain effects*'. We could provide many other examples of where the documentation supporting the draft Local Plan, rather than providing good evidence, actually emphasises uncertainty.

Particular concern arises from the failure of the Water Scarcity Group to produce any reports or information on the research that they were charged to undertake to identify future solutions.

These include mechanisms such as water efficiency appliances in buildings, agricultural reservoirs, water credits, and others. Without reports from the WSG, which was mandated explicitly with identifying solutions that could reduce the uncertainty, we can only conclude that this is indeed an intractable problem. Many of general policies on the environment and climate change are a major improvement on the previous Local Plan. However, the uncertainty about future water supplies means that the implementation process needs reviewing, given the proposed intensity of development in this water-starved area. Full transparency and independent review of the research undertaken to find solutions for water solutions is urgently needed.

Please provide a 100 word summary of your representation.

The draft Local Plan is unsound (neither justified nor effective). Concerning SA objective 10 (*achieve sustainable water resource management and enhance the quality of Greater Cambridge's waters*), Paragraph 5.34 states that "*Significant negative uncertain effects are expecte*d". This demonstrates major doubt about the achievability of this objective. Evidence shows that water supply is **dependent** on numerous actions, needed within an unrealistic time scale, and still unfunded. Without an early understanding of sustainable water supply options, the appropriate phasing of development (para 4.93) will be impossible. The failure of the Water Scarcity Group to report on their work reinforces this.

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.

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	Choose the answer that suits you!
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Choose the answer that suits you!
Informed of adoption of the Local Plan	Choose the answer that suits you!