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	Andrew Thornton	
Organisation (where relevant)	Environment Agency	
Job Title (where relevant)	Planning Advisor	
Address, including Post Code	Environment Agency (Iceni House), Cobham Rd, Ipswich IP3 9JD	
Telephone	[redacted]	
Email address	Andrew.thornton@environment-agency.gov.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	Comments on the Greater Cambridge Integrated Water Management Study – Detailed Water Cycle Study (WCS) Wastewater Addendum (2026)
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	yes

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.

Since our representation on the Regulation 18 stage of the Plan, we have engaged with yourselves and your consultants on the WCS evidence base. We previously, recommended that more detailed assessment be included in an updated detailed WCS. We note section 2.3 of the WCS Wastewater Addendum (2026), in which Stantec have summarised our Position. We would generally agree with this summary, however, we wish to clarify some key points, as follows.

Whilst there was concern about the potential for duplication of the work set to be undertaken by AWS as part of the DWMP process, we would still consider LPAs have the capability to commission their own studies to ensure their own evidence base underpinning the Plan and Policy wording is robust. In this instance, having engaged with GCSP on a Statement of Common Ground, we acknowledged that the complexities and time available to the LPA and their consultants as engagement progressed presented limitations, therefore we took a balanced viewpoint and recommended capturing the outstanding gaps in more detail within the WCS Addendum.

We acknowledge that section 2.4 clarifies the challenges at some Waste Water Treatment Works (WWTW), particularly around phosphorous limits, due to: growth and/or climate change effects, and the limitations of the WCS (2025).

Some of the proposed strategic sites fall within some of these WWTW catchment areas.

The addendum generally appears to demonstrate a heavy reliance on AWS' DWMP to provide solutions to accommodate growth in the more challenging locations.

As set out in paragraphs 2.4.6 and 2.4.7, whilst the WCS does not conclude that the pattern of growth is unsustainable in these locations, it does indicate that that "…only on completion of detailed plans can unqualified assurance of feasibility be provided. This is a consequence, in part, of relatively large growth across a natural water catchment with modest river flows."

We are uncertain as to what is meant by 'detailed plans'. If this is meant to refer to the DWMP, then we suggest that DWMPs are not currently 'proven' and solutions may not be practical or forthcoming at the desired time (e.g. technical reasons or funding not aligning as desired). It will remain important for yourselves to continue to work closely with AWS over the Plan period to ensure the DWMP can be updated where required, and any potential issues can be identified early on; as annual reviews of a DWMP by the relevant water company are now a statutory requirement.

We would conclude that, whilst the presentation of additional assessment and information within the Addendum does not go as far as we would normally recommend at this stage, we are satisfied that the WCS can be kept up to date as more information becomes available.

We are satisfied to be able to recommend that the WCS evidence base, as it pertains to wastewater, can be considered sound on the basis that there are strong Policy and future infrastructure planning measures in place to manage potential risks, but we wish to set out the following caveat advice around environmental risk.

Should any growth come forward for delivery in the interim, ahead of the updated DWMP, or development phasing trajectories are unable to be aligned with WWTW investment upgrade plans thereafter, then there remains some degree of uncertainty regarding any potential risk of harm to water bodies from growth within the associated to the WWTW catchments facing capacity challenges, in the absence of more detailed strategic assessment at this stage. Therefore, we would refer to the positive wording of Policy CC/IW and the Water Quality section, which requires the capacity for waste water treatment to be demonstrated prior to occupation of development and ahead of any respective phases if applicable. In such circumstances, it may be pertinent for further assessment at the site-specific stage of planning to be undertaken to manage risk to the water environment and inform decision making, as well as potentially justify phasing condition approaches.

To assist with understanding the individual circumstances associated with specific WWTW catchments, we have currently developed environmental position statements for two of the key WWTWs within the GCSP Local Plan area; Cambridge and Uttons Drove. The latest versions of these documents can be found attached to our representation. The Cambridge WWTW position statement (version 6) has been updated since our previous Reg 18 engagement, and the Uttons Drove WWTW statement (version 2) is newly developed. We will continue to review and update these statements regularly, as well as consider the need for position statements in other WWTW catchments, as our understanding of available information and evidence evolves.

Please provide a 100 word summary of your representation.

We have engaged with yourselves and your consultants on the WCS evidence base. We previously, recommended that more detailed assessment be included in an updated detailed WCS. We will continue to review and update these statements regularly, as well as consider the need for position statements in other WWTW catchments, as our understanding of available information and evidence evolves.

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.

GREATER CAMBRIDGE LOCAL PLAN FOR CONSULTATION

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	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