



The countryside charity
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To: Greater Cambridge Planning Policy Consultation Team

Email: consultation@greatercambridgeplanning.org

22nd September 2026

Dear Planning Policy Team,

Subject: Regulation 19 representation - Proposed Submission Greater Cambridge Local Plan 2024-2045. Consultation period: 3 August 2026 to 25 September 2026 (5.00pm)

CPRE Cambridgeshire and Peterborough welcomes the opportunity to make this Regulation 19 representation on the Proposed Submission Greater Cambridge Local Plan 2024-2045. Our response is made in the interests of protecting the countryside, agricultural land, Green Belt, biodiversity, water resources, landscape and the character and resilience of rural communities, while acknowledging that sustainable and properly planned growth is necessary.

1. Overall position

We are concerned that the scale and spatial distribution of proposed growth is being advanced at a level which is heavily dependent upon infrastructure and environmental capacity that is not yet fully secured, funded or deliverable. Our concern is therefore not simply the quantity of development, but whether the Plan is sufficiently justified, effective and deliverable as proposed.

The July 2026 Infrastructure Delivery Plan (IDP) itself states that delivering growth at this scale is heavily contingent upon the timely delivery of supporting infrastructure. It also records that some costs remain to be confirmed, that funding information continues to develop, and that future iterations are expected to clarify funding gaps. We consider this material to the soundness of the Plan.

2. Water supply and environmental capacity

Water availability is a fundamental constraint. Cambridge Water relies substantially on groundwater from chalk aquifers, while chalk streams in the area already face ecological pressures. The IDP identifies significant challenges before 2032 and again beyond 2040 as environmental abstraction reductions, climate change, drought and growth interact.

The Plan's strategic allocations themselves recognise this constraint. Cambridge East and Grange Farm are subject to necessary water infrastructure, and Grange Farm includes provision for conditions limiting first occupation until the Grafham Water Transfer is operational or alternative headroom is secured.

The IDP identifies the Grafham Water Transfer as critical, with full capacity anticipated in 2032, while the Fens Reservoir is a much larger future project whose delivery and funding remain subject to regulatory and business-plan processes. Further solutions are identified for 2040 and beyond, but these should not be treated as guaranteed infrastructure.

We therefore consider that the Plan should not rely upon forecast infrastructure delivery as though it was equivalent to secured capacity. Development should be phased against demonstrable water availability and environmental headroom.

3. Wastewater and sewage capacity

The IDP identifies wastewater treatment works where Dry Weather Flow conditions are already exceeded and notes concerns regarding effluent quality. Strategic growth also depends upon major future upgrades, including Cambridge, Uttons Drove and Sawston wastewater treatment works. For Grange Farm, the Sawston upgrade is identified as critical, but its cost is currently recorded as to be confirmed.

The Plan should demonstrate that wastewater capacity, treatment standards and environmental receiving-water capacity will be available when development is occupied, rather than relying upon later investment decisions.

4. Agricultural land, food security and countryside

The Sustainability Appraisal acknowledges that the strategy is likely to result in substantial loss of greenfield land and some Best and Most Versatile agricultural land. The wider plan area contains substantial Grade 2 agricultural land, with higher-value soils also identified in parts of the area.

Agricultural land is not simply an undeveloped surface awaiting construction. It contributes to food production, landscape character, biodiversity, water management and the resilience of rural communities. We therefore ask that the Plan demonstrate that previously developed land and other reasonable alternatives have been properly exhausted before further high-value greenfield land is released.

5. Green Belt and landscape

The Plan proposes Green Belt releases, including land associated with the Cambridge Biomedical Campus and Babraham Research Campus. We recognise that the authorities have identified exceptional circumstances for these proposals, but the exceptional circumstances test should be applied rigorously and cumulatively, taking account of the permanent loss of Green Belt and the effects on the wider countryside and settlement pattern.

The Plan should also demonstrate that the claimed strategic benefits cannot reasonably be achieved through less harmful alternatives.

6. Infrastructure, communities and deliverability

The IDP identifies a substantial programme of schools, healthcare, community facilities, emergency services, transport, energy, water, wastewater and green infrastructure. However, a significant proportion of the infrastructure schedule is described as unfunded, partly funded, subject to future regulatory or business-plan decisions, or with costs still to be confirmed.

Examples include new primary and secondary schools, SEND provision, healthcare facilities, community and library provision, emergency-service infrastructure and numerous transport schemes. Electricity reinforcement for later phases of some strategic allocations is also subject to ongoing optioneering and future network business plans.

This creates a material question of sequencing. Existing communities should not be expected to absorb the consequences of growth while essential infrastructure catches up afterwards.

7. Climate change, flooding and sustainable transport

The Plan should demonstrate that development will remain resilient to climate change over its full lifetime, including increased drought, intense rainfall, flood risk and pressure on water resources. Sustainable drainage and green infrastructure should be integral to development rather than retrospective mitigation.

Similarly, transport infrastructure must be delivered early enough to shape travel behaviour. A strategy which assumes that bus, cycling and walking infrastructure will follow development risks embedding car dependency and placing additional pressure on already constrained roads and junctions.

8. Soundness and legal compliance

In our view, the matters above engage directly with the Regulation 19 requirements for legal compliance and soundness, including whether the Plan is positively prepared, justified, effective and consistent with national policy. In particular, the evidence should demonstrate that the proposed strategy is deliverable, that infrastructure requirements can be met in the necessary timescales, and that significant environmental impacts have been properly avoided, mitigated or justified.

We also expect the authorities to have properly discharged their duties in relation to sustainability appraisal, habitats and environmental protection, equality, and the protection of relevant human rights. We do not suggest that any one of these considerations automatically prevents development; rather, they must be properly balanced and evidenced in the formulation of the Plan.

9. Requested modification

CPRE Cambridgeshire and Peterborough respectfully asks that the Plan be modified so that no strategic development is permitted to proceed to occupation beyond the capacity of essential infrastructure and environmental services. For each major allocation, the Plan should identify, as appropriate:

- the infrastructure required before occupation and at each subsequent phase;
- the delivery body responsible;
- the estimated cost and current funding status;
- the land, consent and procurement position;
- the anticipated delivery date;
- the development trigger linked to that infrastructure;
- the evidence demonstrating actual capacity rather than reliance solely on forecast provision; and
- a credible contingency where the identified infrastructure is delayed, unavailable or materially more expensive than anticipated.

Our central principle is straightforward: growth should follow capacity, not create a demand for capacity which the authorities hope will subsequently be provided.

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10. Conclusion

CPRE Cambridgeshire and Peterborough supports sustainable development which is properly planned and capable of being supported by the infrastructure and environmental resources on which communities depend. We cannot, however, support a strategy where substantial elements of essential infrastructure remain unfunded, uncertain, dependent on future regulatory decisions or subject to costs and delivery arrangements that have not yet been established.

We therefore ask the Council to address these matters before submission of the Plan and, where necessary, to make the modifications required to ensure that the Plan is robust, deliverable, environmentally responsible and sound.

The accompanying Appendix A, Infrastructure and Deliverability Audit, provides further detail and identifies the principal infrastructure dependencies evidenced in the July 2026 IDP.

Yours faithfully,

JaneMWilliams

On behalf of the Cambridgeshire and Peterborough Branch

Principal evidence relied upon

- Greater Cambridge Proposed Submission Local Plan 2024–2045, Regulation 19 version, August 2026.
- Greater Cambridge Infrastructure Delivery Plan, July 2026, Proposed Submission Regulation 19 interim final draft.
- Greater Cambridge Sustainability Appraisal, 2026.
- Greater Cambridge Water Supply Evidence / Water Cycle evidence and associated 2026 evidence updates.
- National Planning Policy Framework and Planning Practice Guidance current at the time of submission.