

Greater Cambridge Shared Planning (GCSP)

Draft Greater Cambridge Local Plan Consultation

Cambridge Approaches

Comments related to: **Infrastructure**

Summary

GCSP's Local Plan says its overarching objective is sustainable development, targeting to add 73,300 jobs and 48,195 homes by 2045 – equivalent to a second Cambridge City next to the existing one. GC is under serious water stress **now**, it is urgent to provide new water infrastructure (but none anticipated before 2032) **and** reduce current demand (how effective are proposed measures). With uncertainties, risks, lack of control over timing, costs and deliverables we believe the LP's water plan is not sustainable. We are similarly concerned on transport, wastewater, energy, healthcare, and on significant additional growth pressure from Government and CGC.

Sustainability and Key Numbers

1. In its Part 1 – Introduction and Summary of the Greater Cambridge Local Plan ¹, Greater Cambridge Shared Planning (GCSP) makes regular use of the word “sustainable”. We note the following highlights, including in relation to water:
 - “The UK Government has identified Greater Cambridge as a priority for sustainable economic growth”;
 - “The Local Plan’s overarching objective is to deliver sustainable development”;
 - “The relationship between homes, jobs, and sustainable transport opportunities has been a key influence on the development strategy”;
 - “One of the greatest challenges we have faced when preparing this Local Plan has been the availability of sustainable water supplies”.
2. Our observations here are all developed around the question of sustainability. Let’s look at the key numbers which underpin the direction of the Local Plan. We are using numbers again from GCSP’s Greater Cambridge Local Plan Part 1, and from a Government sponsored report by Oxford Economics of “Greater Cambridge Growth Scenarios” (November 2025) ²:
 - [GCSP Local Plan] “The economy has experienced high levels of growth, and this growth is anticipated to continue. We [GCSP] anticipate around **73,300**

¹ https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-01/Draft_Greater_Cambridge_Local_Plan_Dec_2025%20%281%29.pdf Greater Cambridge Local Plan Part 1 Introduction and Development Strategy

² <https://www.gov.uk/government/publications/greater-cambridge-growth-scenarios/greater-cambridge-growth-scenarios> Oxford Economics Greater Cambridge Growth Scenarios November 2025

additional jobs in between 2024 and 2045. Our plan responds to this by planning to deliver at least **48,195 additional homes** between 2024 and 2045”;

- In Table 4.1 of the “Greater Cambridge Growth Scenarios”, the baseline scenario numbers for job growth gives an increment of around 80,000 additional jobs between 2025 and 2050 (similar to the Local Plan, with an extra 5 years), and the average annual job growth rate over that future period would be 1.15%;
- In the last 10 years, the average annual job growth rate for all of the UK is estimated to be between 0.5% and 1% (see for example ³);
- The Local’s Plan target of around 50,000 additional homes by 2045 is comparable to the existing Cambridge City size (around 53,000 homes in 2021, see for example ⁴), in effect building a second Cambridge City in proximity to the existing Cambridge City (noting that the Local Plan targets 13,500 homes for Cambourne North, with the objective of Cambourne growing to become the largest centre outside Cambridge).

3. We consider now the infrastructure factors that raise concerns about the ability of the Local Plan to deliver its jobs and homes objectives sustainably. Overall, there needs to be more than just statements about sustainability. The requirement from Government is to have an up-to-date Local Plan by the end of 2026. We also believe that Government may be setting higher growth targets and adding these to the Local Plan through the Cambridge Development Company (see more on these concerns below). We believe that the Local Plan should proactively discuss the risks and visibly flag the barriers to development – and does not do so.

Water

4. In its Greater Cambridge Local Plan Part 1 GCSP identifies what it sees as the key elements of the water scarcity crisis and challenge facing Greater Cambridge:
- The “need to protect our precious chalk streams by reducing abstraction from the chalk aquifer which currently supplies most of our water”;
 - The plan to deliver new water delivery infrastructure: pipeline to Grafham Water, new Fens Reservoir;
 - The plan to implement measures to use water supplies more efficiently: roll out smart meters, retrofit existing properties, require buildings to be highly efficient in water use;
 - The formation of a Cambridge Water Scarcity Group bringing together all the key agencies to identify solutions;
 - GCSP concludes “there are now solutions available such that the development needs can be met by sustainable water supplies”.

³ <https://tradingeconomics.com/united-kingdom/employment-change> select 10Y view

⁴ <https://www.cambridge.gov.uk/media/um1hoasz/housing-key-facts-population-households-and-economy.pdf>
Cambridge City Council Housing Key Facts March 2025

5. Our interpretation and assessment of the water scarcity crisis is that:
- Greater Cambridge is under serious water stress **right now**;
 - For a sustainable future it is essential to **both** urgently provide new water infrastructure **and** reduce current demand for water resources;
 - See for example ⁵: “without urgent investment in water infrastructure and demand reductions, the East of England is expected to face a water deficit of around 600 million litres a day by 2050”;
 - The pipeline connection to Grafham Water only becomes available “from 2032”, and the “Fens Reservoir from the mid 2030s” ⁶;
 - If there is no new water infrastructure until 2032 (at the earliest), what happens to creating new jobs, building more houses, other infrastructure construction (notably EWR) between the crisis “right now” and 2032?
 - Is it credible that in that period the delicate balance is maintained sustainably only with measures to reduce water demand?
 - For demand reduction, we note that there has been a proactive study into the possibility of restricting residential water usage to e.g. 80 litres per person per day, which would require water reuse or recycling and dual pipe systems ⁷.
6. And then there are concerning delivery and implementation questions. What if there is a delay and/or cost overrun to the Grafham Water and Fens Reservoir projects? Is there a climate change risk to the viability of the Fens Reservoir project? How much will the smart meter and other demand reduction measures cost, and are the funds available to implement them? How effective will those measures be to actually reduce demand?
7. Overall we disagree with GCSP’s conclusion that “development needs can be met by sustainable water supplies”. With the uncertainties, risks, high level assumptions, lack of detail and confidence in dates and costs, lack of control over aspects of project implementation, we have serious concerns about sustainability and believe the water infrastructure plan is not currently effective or deliverable. At the very least GCSP has not demonstrated that the necessary water infrastructure will be in place to support this Local Plan.

Transport

8. As we have noted separately (refer to detailed submissions under “Cambourne S/CB” and “Cambourne North S/CBN”) we have serious concerns with the assumptions and methodology relating to rail mode share for EWR in Cambourne and Tempsford. We conclude that the likely outcome would be to substantially increase commuting by car to

⁵ <https://www.gov.uk/government/news/water-investment-to-unlock-growth-in-east-of-england> Water investment to unlock growth in East of England March 2025

⁶ Greater Cambridge Local Plan Part 1 §2.82

⁷ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-10/EBGCLPGCIWMSDWCSOct25.pdf> Greater Cambridge Integrated Water Management Study October 2025

Cambridge from Cambourne and Tempsford, endangering local road capacities. Far from helping with local transport challenges, EWR would likely worsen them.

9. If we consider the entrenched local transport challenges that are readily apparent in Cambridge City at the present time, and that the Local Plan aims to build by 2045 in effect a second Cambridge City in proximity to the existing Cambridge City, it is concerning that:
- The Infrastructure Delivery Plan (IDP) identifies that key projects such as "Public transport improvements for Cambridge" have costs listed as "TBC" ⁸;
 - The Greater Cambridge Transport Strategy will not even be completed until the end of 2026 ⁹;
 - The Local Plan itself says that transport remains a "substantive challenge that needs to be resolved" ¹⁰.
10. Overall we believe that the transport element of the Local Plan is unsound.

Waste Water

11. In its Greater Cambridge Local Plan Part 1 GCSP notes that in August 2025 "the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) [from North East Cambridge to Honey Hill] through its Housing Fund". Nevertheless GCSP is retaining its plans for North East Cambridge on the basis that "other funding may be found to enable the relocation of the CWWTP". It is concerning that:
- The Local Plan has no confirmed investment strategy to provide the funding;
 - Several Water Recycling Centres are already "exceeding the Dry Water Flow condition of their permit" ¹¹;
 - There are "bottlenecks" in waste transfer capacity ¹².
12. Overall we believe that the waste water element of the Local Plan is not credible.

Energy

13. In its Greater Cambridge Local Plan Part 1 GCSP notes that electricity demands in Greater Cambridge are "expected to triple". It is concerning that, at the same time, the Cambridgeshire Local Area Energy Plan, which is "required to ensure that the right energy infrastructure is in place to support growth and the transition to a low carbon

⁸ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-12/EBGCLPDGCLPIDPDec25.pdf>

Infrastructure Delivery Plan (IDP) December 2025 Table 5.1

⁹ Greater Cambridge Local Plan Part 1 §2.88

¹⁰ Greater Cambridge Local Plan Part 1 §2.92

¹¹ Infrastructure Delivery Plan (IDP) December 2025 §8.1

¹² Infrastructure Delivery Plan (IDP) December 2025 §9.2

future”, and which needs to allow for a factor of three increase in the resources that are in place today, is still only in preparation ¹³.

14. If it is not clear how the electricity would be created, then its cost would also not be clear. The cost of electricity in the UK is already a material barrier to growth in relation to other economically comparable countries – this is a serious unaddressed risk.

Healthcare

15. In its Greater Cambridge Local Plan Part 1 GCSP notes that “the Addenbrooke’s hospital building is aging”. The IDP notes that there is a lack of confirmed primary care space, with the NHS still undertaking initial exercises to estimate requirements ¹⁴.

16. It is concerning that detailed requirements are not readily visible in the Local Plan, but a recent BBC article on Addenbrooke’s provides a good perspective on key ingredients ¹⁵:

- Cambridge University Hospitals NHS Foundation Trust (CUH) is seeking funding “towards completing an outline business case for a £2.3bn new-build hospital”;
- more than 70% of its current estate is in “poor or bad condition” and it has an acute bed deficit of about 160;
- Cambridge City’s population is “set to grow by in excess of 60% by 2040 to meet the Government’s ambition for economic growth in the region”;
- by contrast, hospital facilities have not kept pace with rising demand, including an “emergency department built for a quarter of the patients it currently serves”;
- by 2040 the Trust would need “double the number of beds it currently has and an emergency department five or six times the current size”.

Growth Requirements From Outside the Local Plan

17. The Greater Cambridge Local Plan Part 1 includes a section entitled “Working with Government and the Cambridge Growth Company” ¹⁶. This arises out of the following Government publications, announcements and actions in previous years:

- “The Case for Cambridge”, in March 2024 ¹⁷; in Section 2, “The Case for Growth”, it states that “illustrative growth scenarios show that if 150,000 new homes are built by 2050 <...> there is potential to add £6.4 billion to the economy”;
- The Cambridge Growth Company (CGC) was incorporated in May 2024, to “address barriers to growth and help unlock Greater Cambridge’s full potential”;

¹³ Infrastructure Delivery Plan (IDP) December 2025 §6.2

¹⁴ Infrastructure Delivery Plan (IDP) December 2025 §12.2

¹⁵ <https://www.bbc.co.uk/news/articles/cze8l98jr70o> Radical plans for a new £2.3bn major hospital December 2025

¹⁶ Greater Cambridge Local Plan Part 1 §1.19 to §1.21

¹⁷ <https://www.gov.uk/government/publications/the-case-for-cambridge/the-case-for-cambridge> The Case for Cambridge March 2024

- “Jobs, homes and better transport links for the Oxford Cambridge Growth Corridor”¹⁸, in October 2025, which includes funding of £400 million to “kickstart development in Cambridge”.

18. In that section “Working with Government and the Cambridge Growth Company” GCSP makes clear that the Local Plan is “based only upon the Councils’ own evidence following a normal approach to local plan-making”, and that Government and the CGC will “support the development of the Local Plan” and “work with local partners to deliver high quality sustainable growth in Cambridge”.

19. From this it can be inferred that the Local Plan continues on its own timetable and evidence, and won’t be materially affected by any growth plans that Government or the CGC may produce subsequently.

20. In “The Case for Cambridge”, even if the figure of “150,000 new homes by 2050” is only illustrative of scale (and not an official target), it still indicates how Government is thinking, and the figure is clearly a factor of 3 higher than the “around 50,000 new homes by 2045” target in the Local Plan.

21. And to answer the question about what is Greater Cambridge’s “full potential” (for the CGC to help unlock), we return to the earlier reference to the November 2025 Oxford Economics “Greater Cambridge Growth Scenarios” (Section 4, Scenario Results):

- The report presents job growth scenarios up to 2050 with average annual growth rates between 1.8% (“low”) and 2.5% (“high”) – this should be compared with the baseline growth rate of 1.15% (see above, comparable with the Local Plan);
- Earlier in the report the “low” and “high” growth scenarios are associated with housing increments by 2050 of respectively 100,000 and 150,000 – again this should be compared with the Local Plan target of 50,000 by 2045.

22. While the Local Plan remains based only on the Councils’ own evidence and process, we believe it is very likely that the wider Government’s aspirations on national economic growth, and the substantial contribution that Greater Cambridge could make to this, could result in heavy pressure for the Local Plan to significantly increase its job growth and housing growth targets, by up to a factor of 2 (and realistically it could be more).

23. And given our serious concerns about the sustainability of notably the water infrastructure plan in the current Local Plan (see above), those concerns would be magnified by any significant increase in the growth targets. In particular, it is not clear where the money would come from to fund infrastructure proposed by the CGC, we are not aware of any allocation in the 2025 multi-year spending review.

¹⁸ <https://www.gov.uk/government/news/jobs-homes-and-better-transport-links-for-the-oxford-cambridge-growth-corridor> Jobs, homes and better transport links for the Oxford Cambridge Growth Corridor October 2025