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	David Plank	
Organisation (where relevant)	Trumpington Residents' Association FORM TWO of four	
Job Title (where relevant)	Member of Management Committee	
Address, including Post Code	[redacted]	
Telephone		
Email address	[redacted]	

* 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	Chapter 10, Infrastructure – including "Our strategic priority" Policy I/ID: Infrastructure and delivery Policy I/ST Sustainable transport and connectivity Infrastructure Topic Paper Infrastructure Delivery Plan
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	As far as we know
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.

NOTE: Text shown in bold italics is a conclusion, proposal or recommendation

Is the Local Plan Proposed in the Submission Viable?

NO IT IS NOT

Without a significant and sustained real terms increase in investment in essential infrastructure, we believe that the Plan will either fail to deliver the very high level of housing and jobs growth it envisages, or, perhaps more likely, our quality of life will continue to deteriorate. By investment we mean not only financial investment but also collective political will and effective community development. As it stands, the Plan is particularly deficient in respect of transport and hospital investment which are addressed below together with the critical issue of water supply in our deeply water stressed area.

TRANSPORT INFRASTRUCTURE

Transport investment is lagging far behind the high rate of population growth Greater Cambridge has experienced over the last twenty or so years. The City Deal / Greater Cambridge Partnership transport schemes have been frustratingly slow to get off the ground, none of the major schemes having been delivered as yet. We refer in particular to Cambridge South East Transport, the Cambridge South West Travel Hub, and the City Access Project.

The last of these, which was central to the whole City Deal programme, is dead in the water for now due to a collective lack of political determination to see it through in amended or altered form following years of public consultation. ***Without it, even if other planned projects are eventually delivered, we as citizens will not benefit from the major reduction in the ever rising tide of traffic congestion we experience day in day out to the detriment of our quality of life that only the City Access Project was***

/ is capable of delivering. Without it, due to the major disincentives of unreliability and delay, the bus service will never become the effective rival to / replacement for the private car that it and other forms of public transport must become if we are to be rescued from the damage which excessive reliance on the private car, including the growing number of harmful SUVs[1], inflicts upon our quality of life. ***Despite this, our local politicians have collectively walked away from the fundamental transport change that is so essential to the healthy future of Greater Cambridge. This must change: otherwise, the proposed Local Plan will not succeed.***

The Citizens' Assembly's imperative for the City Access Project "be brave be bold and take action", while remaining more than current, now has a plaintive ring. [Greater Cambridge Citizens' Assembly on Congestion, Air Quality and Public Transport, November 2019] As we said in the 2022 crucial public consultation when echoing the Assembly's exhortation, "The time for action is now". *It still is.* The then urgent need to reduce "traffic congestion by one quarter on current levels", is even greater now. [Making Connections 2022, Response of the Trumpington Residents' Association, 10 December 2022, pages 1 & 2] A crucial part of the infrastructure necessary for our Local Plan to be viable, is the collective political will to deliver the aims of the City Access Project. Unfortunately, it went walkabout and has not yet returned – *it is about time that it did*.

The County Council's October 2025 "Transport Evidence" on which the proposed Local Plan Submission relies, concludes *unrealistically* that –

> "The Emerging Preferred Development Strategy for (the) Draft Plan is capable of being accommodated in the local transport network in Greater Cambridge with appropriate mitigation." [Paragraph 20.1.2]

And there's the rub – "with appropriate mitigation". Principal among "The mitigation assessed as necessary" in the Evidence is "City Access Proxy", i.e., a substitute for the failed City Access Project. *But there isn't one!* Nor at present does it appear that there will be one in the foreseeable future. As a direct result, the "200,000+ vehicles crossing the outer boundary of Cambridge between 7am and 7pm each day" is likely to increase not decrease as it urgently needs to, *and the "20% reduction in car traffic planned by the Greater Cambridge Partnership" looks increasingly like a pipe dream.* [10. Infrastructure, Contents, page 660] [It was 25%, not 20% as the Draft Local Plan states, but what is 5% among friends when we are so far away from the traffic reduction that is essential to a decent quality of life?]

In Trumpington our experience is of increasing not decreasing traffic levels with the adverse impacts on our quality of life this entails. And we do not see with any confidence a prospect of this changing for the better any time soon. Indeed, with the yet higher rate of growth now envisaged in the proposed Local Plan Submission on top of the already high rate associated in our area with the Cambridge Biomedical Campus in particular, we fear it will get worse.

This is fundamental in Trumpington and Cambridge more widely. Cambridge is swamped by its excessive reliance on the private car as a main mode of travel. This is readily observable day in and day out on our roads. It harms our quality of life where we live and in our ability to travel reasonably by public transport which is persistently delayed so that it is not in the least unusual to take well over an hour to

[1] https://en.wikipedia.org/wiki/Criticism_of_SUVs

travel across Cambridge. With yet more growth planned, this will only get worse. *Unless this is solved, any claim to sustainable transport and effective connectivity has no substance. Yet there is not active addressing or debate of this – just silence.* ***This is an Achilles Heel in the proposed Local Plan. It needs to be sorted out by clear collective thinking and planning – SOON.***

This is one major reason why we conclude that the Proposed Local Plan as it stands is not viable – is not capable of delivering the Great Places, Biodiversity and Green Spaces, and our essential contribution to the reversal of climate change that the Proposed Local Plan aims for at the same time as delivering the very high number of new homes and jobs that are planned. Let alone deliver the even greater number of homes and jobs which the government seeks to impose upon us through an unelected Greater Cambridge Development Corporation.

The mitigation measures in addition to the "City Access Proxy" deemed to be "necessary" for the planned rate of growth to be "capable of being accommodated in the local transport network in Cambridge" include "Cambridge Eastern Access Phase B", "Cambourne to Cambridge extended throughout the site and on to Papworth Everard", and "Extension of CSETS via a grade separated crossing of the A11 into Grange Farm to facilitate access to the site". *None of these seem likely to be in place within a reasonable period of time. And implementation of the much needed Bus Strategy is not even mentioned in the necessary mitigation measures.* Perhaps because its feasibility depends fundamentally on a substitute for the City Access scheme which is effective in reducing the now chronic traffic congestion that undermines the service reliability without which the bus service will continue to decline.

The Mayor's recent announcements on bus franchising do not increase confidence that franchising will become the powerful tool it needs to be to underpin and bolster confidence in the Combined Authority's willingness / ability to drive forward a truly effective bus strategy that reverses the demoralizing decline in the service throughout Cambridgeshire and Peterborough. Indeed, necessary confidence and determination seem to have been overcome by diffidence and caution which does not augur well for the least well off who are more reliant on buses than other citizens. ["Bus Franchising is not a silver bullet, warns mayor". Cambridge Independent, 22-28.7.2026.]

We ask that as a strict condition of the proposed Local Plan with its planned level of accelerated jobs and housing growth proceeding to full approval, there is a firm guarantee of the transport wherewithal being in place in good time to ensure that the planned 20 per cent reduction in traffic on our road network is achieved well in advance of 2045 and maintained thereafter.

HOSPITAL INFRASTRUCTURE

It is remarkable that the "Infrastructure Delivery Plan" meant to underpin the Local Plan Submission *is silent on essential hospital investment*. We refer to the large sums needed to renew/ replace the ageing, physically restricted Addenbrooke's Hospital within the overall emerging Acute Healthcare Strategy envisaged by the Cambridge University Hospitals (CUH) NHS Trust.

In stark contrast with the £2.3 billion estimated as necessary to renew Addenbrooke's alone [BBC Local News Cambridgeshire, 5.12.2025], *the Infrastructure Delivery Plan includes only £51.5 million for "healthcare" - exclusively for primary care health facilities.*

[Infrastructure Delivery Plan: Delivery Schedule, Table 18-2, Cost Summary, page 163; and Summary of primary healthcare projects, Table 12-1, page 111] It is of course good that the Plan includes this important primary healthcare investment. Yet we know and have known for some long time that our hospitals have not received the investment that is essential to cope with our rapidly growing population *at the same time* as changing the model of acute health care towards one featuring new "neighbourhood health centres". In a report published recently, the CUH NHS Foundation Trust makes the following statement:

> "Due to its accelerated population growth, Cambridgeshire is ahead of the National trend in facing increased demand. Census data shows that over the past decade Cambridge's population has grown by c.18% (against a c.6% national average) and its local population is set to grow by in excess of 60% by 2040 to meet the Government's ambition for economic growth in this region. *By contrast, hospital facilities have not kept pace with rising demand.* CUH's emergency department (ED) was built for a quarter of the patients it now services, and over 70% of CUH's acute estate is classified as being in poor or bad condition. We currently have an acute bed deficit of c.162 beds. This gives us an added impetus for change." [Report to Scrutiny and Overview Committee, South Cambridgeshire District Council, 8.12.2025] [Our emphasis]

Due to the age of the Trust's building stock, its maintenance backlog increased again in 2024/25 to a total of *£238 million*, Including *High and Significant Risk* maintenance of £29 million and £105 million respectively. In answer to our question, the Trust has confirmed that only a proportion of this is in practice funded, and that is funded from the Trust's hard pressed capital allocation with a high opportunity cost rather than the annual revenue budget which cannot accommodate it. [CBC Ltd Open Forum meeting, 15 December 2025] The maintenance backlog is increasing year on year, having grown from £98 million in 2020/21 including high and significant risk maintenance of £26.5 and £33.6 million respectively. [Cambridge University Hospitals NHS Foundation Trust, Maintenance Backlog Five Year History]

Yet ***no account is taken of this*** *in the proposed Local Plan Submission's Infrastructure Delivery Plan!* ***This is not acceptable. Without adequate investment in hospital as well as primary healthcare, the proposed Local Plan Submission's ambitions for jobs and housing growth are unsustainable given the risks to the local population that are being / will be incurred.***

As the Infrastructure Delivery Plan notes somewhat ruefully –
"The strategy demonstrates that, with full implementation of this model, future acute healthcare needs generated by Greater Cambridge growth can be met more efficiently, *but only if strategic infrastructure investment is brought forward in parallel with development*."(Our emphasis) [Page 105]

We ask that as a condition of the growth planned in the Local Plan 2025-45, this major deficiency in hospital infrastructure is satisfactorily remedied before yet more jobs and housing growth are allowed. This should be funded either by those who gain from development or by the Government – or both.

We also ask that before it is finalized the Infrastructure Delivery Plan includes appropriate provision for other missing forms of essential infrastructure particularly "Children and Adult Care Social Services" which were dismissed with faint mention in the Draft Local Plan - and appear to have been removed altogether

from the Proposed Submission. Please refer to paragraph 11.2 of the Draft Local Plan which says, "There *may* also be a need to consider the implications of Children and Adult Social Services for healthcare and community provision" – "may also be a need to consider" should become "does consider". The *£11 billion of cuts in Rate Support Grant to local authorities in England since 2010* (at 2011 prices), have resulted in, amongst other things, the decimation of the Youth Service and associated youth centres, the total demise of the Sure Start service, and more and more stringent criteria for eligibility to receive adult care services. *These services are ESSENTIAL to the "Wellbeing and social inclusion" aspirations of the Draft Local Plan. As is* true social housing at truly affordable rents which does not drive out of Cambridge the very people upon whom we rely for our basic services – as the Covid pandemic vividly demonstrated. [See the "Well-being and Social Inclusion: New Homes" section of this response on pages 23-24]

If the CBC's Landowners wish to obtain the benefits of further CBC growth, they must be prepared to contribute to the real cost of that growth and not to assume that cash strapped public bodies will come up with the goods. Further expansion must only be allowed if as a condition in the Local Plan the CBC's Landowners publicly commit themselves to making this contribution. Otherwise, the proposed expansion should not be allowed.

WATER SUPPLY

We have read carefully the water supply section of the Infrastructure Delivery Plan. It seems reassuring. However, while estimated costs are given for key "critical" projects, *there is not an explicit plan for their funding* which there must be, particularly for the Fens Reservoir at £1,965 million, and the Water recycling centre effluent re-use scheme at £400 million (not total cost, just funding from the Cambridge Water Company). At a smaller level, there must also be some scepticism about the River Cam abstraction project creating "opportunities for a new surface abstraction from the River Cam". Like many others in Greater Cambridge, *we will need a lot of persuasion that the depleted River Cam can or should provide such "opportunities"*.

We ask that an explicit funding plan for "critical" water supply projects is adopted and made public to provide necessary reassurance and accountability. Without it, the level of growth in jobs and housing proposed in the Local Plan Submission should be reduced.

We will also take a lot of persuading that the assumptions underpinning the "Supply-Demand Balance" projections are sound. [Infrastructure Delivery Plan, Figure 7-1, page 73] *In this regard* ***it is notable that the water supply section of the Infrastructure Delivery Plan does not take explicit account of climate change and the climate emergency*** *we are experiencing. Surely, this is a significant risk factor in assessing future water supply* – a factor of which account seems not to have been taken in the water supply – demand balance assumption being relied upon in the Infrastructure Delivery Plan. ***We ask that the water supply – demand balance in the Local Plan is revised to take full account of climate change, and recalculated accordingly.***

Alongside this is an apparent assumption in the Infrastructure Delivery Plan that if the major infrastructure projects and in particular the Fens Reservoir successfully meet their "gated process" targets, they will then be fully funded by government. ***This bold***

assumption warrants more rigorous testing before reliance is placed upon it in the proposed Local Plan[7.3, Priority Projects, page 74, final paragraph]

We ask that both of these risk factors are tested rigorously before it is concluded that future water supply is sufficient to meet the water demands of the growth projected in and underpinning the Local Plan Submission. As of now, such a conclusion would be premature and unsafe.

PLEASE also refer to the three other forms we are submitting which cover other aspects of our representations relating to the proposed Local Plan's provisions concerning the Cambridge Biomedical Campus, and Wellbeing and Social Inclusion; and also cover the Contents of and Introduction to our representation which will help you assimilate it and understand the holistic view we wish to convey.

Please provide a 100 word summary of your representation.

We believe - for good reason as set out - that the proposed Greater Cambridge Local Plan is NOT VIABLE. Without major additional investment in essential transport, hospitals and water supply infrastructure, the large number of additional jobs and homes proposed for 2025 to 2045 will either not be delivered or, more likely, will be delivered at the cost of yet further unacceptable deterioration in the quality of our daily lives.

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.

None

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 refer to our representation in section 3 above which clearly sets out and highlights in ***bold italics*** the modifications to the proposed Local Plan we believe to be essential, and why they are needed.

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 – not unless the Inspector wishes to question us – in which case we will willingly attend.

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