Response to S/CBN: Cambourne North September 2026

Reference Document:
https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan/site-allocations/new-settlements/policy-scbn
[Accessed September 2026]

Summary

PEPC does not consider the S/CBN to be “sound” as it fails all four tests of soundness under the NPPF.

The document is less “plan” and more a vague framework describing a range of possible future development aspirations, 80% of the deliverables to be implemented post 2045, beyond the time horizon of the “plan”.

It lacks specificity, appears to deliberately employ constructive ambiguity and is insufficiently detailed about how and when the infrastructure and construction will be phased.

Specifically PEPC wishes to raise 8 concerns:

1. The Plan is not “Sound” under the NPPF
2. Drafting Ambiguity
3. Modelling Uncertainty
4. Erosion of Settlement Identity
5. Traffic and Transport Uncertainty
6. Public Services Vulnerabilities
7. Utilities Uncertainty
8. Other Matters

PEPC makes a number of recommendations to improve the plan as well as a number of requests.

1. Soundness

Under the National Planning Policy Framework (NPPF) there are four tests of “soundness”.
These ask whether the plan is:

1. Positively Prepared
2. Justified
3. Effective
4. Consistent with National Policy

A failure to meet any one or more of these four criteria means the plan is not sound and so cannot be legally adopted.

PEPC feels that North Cambourne suffers from the same problems as the North Essex Garden Communities project (NEGC) which was rejected as unsound in 2020. Like NEGC, North Cambourne is a mega-allocation reliant on multi-decade transport infrastructure (in the case of North Cambourne also multi-decade water and grid infrastructure) with unviable lead times pushing the bulk of the housing delivery beyond the end of the plan period and having negligible impact on short-medium term housing needs.

There are also parallels with the Uttlesford Local Plan which was also found to be unsound as it placed over reliance on a single large site with long lead times at the expense of delivering more achievable smaller projects in shorter timescales.

Test 1: Positively Prepared

Does the plan meet objectively assessed development needs?

PEPC believes that policy S/CBN fails the 'Positively Prepared' test under NPPF paragraph 35(a) which requires plans to be “positively prepared”

> *providing a strategy which, as a minimum, seeks to meet the area’s **objectively assessed** needs; and is informed by agreements with other authorities, so that **unmet need** from neighbouring areas **is accommodated** where it is practical to do so and is consistent with achieving sustainable development.*

While the policy proposes a headline figure of ~13,000 homes, only ~2,550 homes are anticipated to be delivered within the plan period (to 2045) due to severe infrastructure and water constraints.

Allocating a site where over 80% of the housing capacity falls outside the plan period fails to meet the area’s objectively assessed housing needs in a timely or realistic manner. To be "positively prepared," a plan must allocate land that actually delivers housing to meet the community’s identified needs *within the plan period* (i.e. before 2045).

Moreover, S/CBN will effectively block other smaller developments which would have otherwise been brought forward to provide housing in the short-medium term. Consequently the plan will act as a drag on the short term growth and economic dynamism of local settlements including Papworth Everard.

Consequently, PEPC believes the plan fails to provide a positively prepared strategy for meeting short-to-medium-term housing demand.

80% of the housing provision falls beyond a reasonable time horizon. It is not plausible to accurately predict housing needs 20 to 40 years into the future, there is simply too much uncertainty around demographic

trends. There are countless examples of demographic shifts due to changes in fertility rates or local economic conditions.

For example:

- The UK Total Fertility Rate (TFR) has fallen from 1.91 in 2012 to ~1.4 by 2024. This is a very steep decline in just 12 years.
- UK “ghost towers” (Nine Elms, St George Wharf, Centre Point Residences and build-to-rent accommodation in Manchester, Liverpool or Salford that were built far faster than the local market could absorb the capacity.
- The town of Ciudad Valdeluz in Spain was constructed in the early 2000s to house 30k Madrid commuters. The town was largely abandoned after the 2008 financial crisis leaving thousands of apartment blocks and retail spaces never occupied.

Furthermore, placing such heavy reliance on a single site - almost entirely dependent on external, multi-decade water supply projects (GUCT / Grafham Transfer / Fens Reservoir) *and* external, multi-decade transport projects “Cambourne To Cambridge” (CtoC) / “East West Rail” (EWR) the plan risks creating a “paper allocation” with a very low probability of actual delivery.

Test 2 Justified

Under NPPF paragraph 35(b), a plan is “Justified” if it is:

> *"an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence.*

While there is scant consideration of alternatives the key justification for the site selection seems to be primarily the colocation with EWR and CtoC, both of which are likely to suffer the multi-year delays and budget overruns common across UK infrastructure projects. This will mean either the houses are built before the new transport infrastructure - increasing load on the already overloaded A1198, A428 and surrounding road networks - or that the houses are significantly delayed.

S/CBN acknowledges that the area is already under severe water stress with groundwater abstraction threatening local chalk streams and rivers. This fact is significantly underplayed by the plan as it assumes that interim solutions (Grafam Transfer) will be deliverable on time without simply shifting environmental concerns to another area. There is no compelling evidence that the Grafam Transfer initiative is feasible, deliverable in the correct timescale, certainly not enough evidence to be considered “proportionate” to a 13,000 home mega-site. Grafam Transfer itself is dependent on the highly uncertain GUCT. (see also 7. Utilities Uncertainty)

There are also other areas where reasonable alternatives do not appear to have been explored in appropriate depth. For example, the refusal to release small-scale non-sensitive sites on the edge of the Cambridge urban area does not seem to be based on proportionate evidence. Building closer to job hubs and existing public / active transport networks would reduce car dependency more effectively than building on similar green field sites, with similar loss of rural landscape and environmental impact that are also dependent on completely new - and highly uncertain - public transport infrastructure.

Cambridge North has been selected over other freestanding new settlements in areas away from sensitive chalk streams despite effectively requiring the same new water and transport infrastructure as a freestanding new settlement.

Test 3 Effective

Under NPPF paragraph 35(c), a plan is **Effective** if it is:

> *"**deliverable over its period,** and based on effective joint working on cross-boundary strategic priorities that have been agreed through joint strategic matters, as evidenced by the statement of common ground*."

Fundamentally the plan Period runs until 2045. This is at the very upper end of a typical local plan time horizon of 15-20 years. Despite this, only 2550 homes are expected to be built in that period. The remaining 10,450 (>80%) fall entirely outside the scope and timescale of the plan and are not even proposed to be delivered until the 20-30 years after 2045. Therefore the plan as proposed is obviously NOT “effective” as >80% of the homes proposed will not be delivered over its period.

Even if NPPF somehow entertained the 40-50 year time horizon proposed by S/CBN, delivering such a complex infrastructure project, riddled with water / transport infrastructure codependencies is highly uncertain. The extension of the Northern Line to Battersea Powerstation, regeneration of York Railway Station, dualling the A66 and Crossrail all took ~40 years or more. The third runway at LHR and the Stonehenge tunnel are perpetual talking points devoid of any real action.

The Havant Thicket reservoir costs have more than doubled and despite securing planning approval in 2021 is not expected to be completed before 2034.

Delivering S/CBN by the mid 2070s may be possible. However, it is by no means guaranteed and indeed seems unlikely given its extensive dependency chain. The plan is extremely fragile and will not be deliverable if one or more the following major infrastructure projects are not delivered on schedule:

- EWR extension via Cambourne to Cambridge
- CtoC Busway
- Grafham Transfer (in turn dependent on the Grand Union Canal Scheme)
- Fens Reservoir
- Sustained housing market demand in West Cambridgeshire.

The plan does not even discuss the required electricity grid connection. This is likely to be approaching 200MVA for the full 13k homes (or ~60MVA for the 2550 within the plan period). This could take a similar period of elapsed time as arranging sufficient water provision if it requires upstream Transmission Grid upgrades.

Test 4: Consistent with National Policy

Under NPPF paragraph 35(d), a plan is consistent with National Policy if it is:

> *"enabling the delivery of **sustainable development** in accordance with the policies in this Framework."*

Severe Water Stress
The EA has designated the area covered by S/CBN as under "severe water stress". The initial development of 2550 homes to be before 2045 (the only ones that fit within the plan timeline) will significantly add to water stress and so **directly contradict national policy on environmental protection.**

Baseline groundwater abstraction is already causing serious ecological damage to local chalk streams. Proceeding with the 2550 homes to be built before 2045 on the assumption that high risk unbuilt interim pipeline transfers (Grafham Transfer and the Grand Union Canal Scheme) proceed appears to violate national rules requiring plans to secure a safe sustainable water supply prior to allocating growth.
(See also the section on Utilities Uncertainty

Loss of BMV Agricultural Land
The Framework explicitly mandates that planning policies must "*recognise the economic and other benefits of the best and most versatile [BMV] agricultural land*" (Grades 1, 2, and 3a) and protect soils as a natural resource essential for food production and national food security. NPPF Footnote 62 adds that where significant development of agricultural land is demonstrated to be necessary, authorities must prefer areas of poorer quality land over higher quality land. However, the "Strategic Enhancement Area" (SEA) and the area within the "Site Allocation" in combination result in the permanent loss of 100s of hectares of high-grade arable farmland that is indisputably "BMV".

This seems to be in direct conflict with the NPPF chapters on food security, soil conservation and proportionate land allocation. Removing active, high-yield food-producing soils from agricultural production to serve as an oversized landscape buffer contradicts the Framework's explicit mandate to protect soil as a vital natural and economic resource.

Economic Sustainability of the SEA
The SEA is very large and will incur significant ongoing maintenance costs. There is no indication of the funding mechanism or statutory body responsible for multi-decade management, security and maintenance.

2. Excessive Ambiguity

Local plans and their associated decision making processes are required to comply with the Nolan Principles, including Openness, Objectivity, and Transparency. However, S/CBN is full of ambiguity and may not meet the required threshold to be considered either Open or Transparent.

NPPF Paragraph 16d requires that plans are:

> ***"clearly written and unambiguous**, so it is evident how a decision maker should react to a development proposal*

S/CBN does not seem to be compliant with NPPF 16d. The document seems to have been written by planners for other planners, replete with industry jargon and language loaded with insider meaning or language that has been carefully selected to be ambiguous. The drafting effectively prevents local residents (and Parish Councils) from being able to respond to the document in appropriate depth.

For example:

- "*A major strategic expansion of ~13,000 homes at Cambourne North*".
  This phrase implies the plan will deliver 13k homes and be an 'expansion' as if 'Cambourne North' already existed. In fact it will deliver only 2550 homes within the plan period and is closer to an entirely new settlement than an expansion. Indeed S/CBN is filed under "new settlements" on the GCSP portal, it is not an expansion.

- *"Growth will be aligned with the delivery of sustainable water infrastructure"*
  The true meaning of this phrase is that this is >80% a 'paper allocation' that will not deliver growth. Currently the water infrastructure is unsustainable and delivery of the various complex projects required to provide sustainable water (and probably grid) infrastructure are outside of GCSPs control.

- *"A well-connected, sustainable development served by East West Rail and the C2C Busway"*
  In reality the settlement will be connected by the overloaded A1198 and the A428. EWR and C2C are high risk, remain a decade or more from operation and sit entirely outside of GCSPs control. The development will not be "well connected" or "sustainable" until the very end of the 2024-2045 planning period.

- *"Development will respect and enhance the setting of surrounding rural villages"*
  This language seems to be deliberately misleading around the (eventual) scale of a 13k settlement which could cause physical / visual settlement coalescence, entirely destroying the character of nearby villages like Papworth Everard, Knapwell and Elsworth.

- *The Local Plan sets out a clear, deliverable strategy for sustainable growth.*
  This statement is an oxymoron. A strategy and a plan are different things. The document may well set out an aspirational strategy but it demonstrably not a sound "Plan" under the tests established by the NPPF.

- "*maintains a soft, green landscape to enhance the wider rural setting"*
  This phrasing claims to "enhance" the rural setting when in fact 13k homes inevitably mean the permanent and irrevocable loss of countryside and a high probability of settlement coalescence.

- *"a mosaic of landscape typologies".* This seems to be code for - Trust us, we'll figure out what goes here later.

The ambiguity extends to the maps and mapkeys provided. For example the poor resolution Fig66 employs a palette of confusingly similar greens and yellows and has no scale. Neither would be acceptable in a GCSE Geography response, let alone in a plan of this scale.

Fig 66 also:

- Does not show the full extent and context of the surrounding villages

- Shows a "*Strategic Enhancement Area"* which the S/CBN purports will provide physical and visual separation between the villages. This phrasing has little meaning in plain english and has not been in any way reassuring to local villagers who generally believe it will eventually be covered in buildings. Moreover, as >80% of the proposed Cambourne North falls outside of the plan period the actual layout, governance and long-term management of the Strategic Enhancement area is uncommitted and so provides no material protection whatsoever.

- Shows two "*Main Vehicle Access*" routes, one of the A1198 and a second one from the A428. The A1198 is already an extremely difficult to navigate route in peak periods and adding a further roundabout

- Shows a "*mobility hub*" on the southern outskirts of Papworth Everard.
  This is entirely undefined. Verbally GCSP have suggested that this could be anything from a park and ride scheme to a bike rack. Its purpose seems to be to enable a computer model to show sufficient reduction in car usage to fit within an arbitrary "*trip budget*" rather than serving any identified community need.
  The mobility hub introduces ambiguity about
    - Target users and use cases
    - Transport modalities
    - Physical footprint, spatial boundary, land requirement
    - Ownership, and operating responsibility

- Shows undefined "*Traffic Management*" on roads to/from Elsworth and Knapwell. Verbally these have been indicated to be "modality filters" - again a computer modelling artefact that seems to have a tenuous link to real-world need.

The document is rife with industry jargon. For example:

- "Infrastructure Gating"
- "Phased Infrastructure Triggers"
- "Post-Plan Period Delivery"
- "Transport-Oriented Development"
- "Active Travel Hierarchy"
- "Settlement Hierarchy"
- "Off-site Mitigation"
- "Windfall Allowance"
- "Settlement Coalescence"
- *"*Landscape typologies*"*

This reinforces the impression that the document has (inappropriately) been written by planners for planners and not the required audience of local stakeholders.

3. Modelling Uncertainty

Local plans typically have lifetimes of 15-20 years.

S/CBN covers the period 2024-2045 and seeks to deliver 2,550 homes by 2045 with a further 10,450 in the subsequent 20-30 years completing after 2070.

It is risible to expect modelling assumptions made in the mid 2020s to hold true until the mid 2040s, let alone the mid 2070s. Modelling assumptions on birth rates, demographic trends, economic growth, transport preferences, working patterns, climate and rainfall, vehicle emissions and globalisation have all changed dramatically in the past decade.

The changes between now and 2045 are almost certain to render whatever modelling has been done to support the plan hopelessly inaccurate.

For example:

- The plan assumes that Cambridge's phenomenal economic growth and success will continue at historically high 2010-2020 growth rates led by young professional families.
  In reality, there has been a marked drop in fertility rates post 2020 and newly built primary schools are already expecting to be undercapacity and facing closure. There are also reductions in international migration and an ageing demographic since 2020 that may not have been captured by the modelling.

- The population growth rate is linked to an assumption that the local economy, driven by the technology and research sector will grow indefinitely at 2% per annum.
  Research and Technology is global with highly mobile, well capitalised businesses able to relocate rapidly to take advantage of changes in tax incentives, venture capital funding or economic shocks.

- The plan assumes >60% active or public transport usage and a permanent reduction in car ownership. This assumption may be appropriate for Cambridge city or cycling-distance villages like Girton or Eddington. However, Cambourne North is too distant for most commuters to consider cycling. Rural Cambridgeshire villages do not achieve more than 30-45% active / public transport.
  In reality hybrid workers still need to own (and park!) a car for myriad purposes besides commuting. Furthermore the shift to EVs dramatically reduces the marginal cost of driving to perhaps <10p / mile so no public transport solution can possibly compete economically with the marginal cost of driving.

- The plan assumes average household water consumption can be reduced to 85-110 L/p/day vs the UK average of 140L/p/day. This requires unproven behavioural shifts and technical solutions that are not yet mandated by national building regulations (and are likely to be removed by home owners during routine maintenance).

- The plan (when modelling CO, NOx and unburnt HC emissions) assumes a near complete transition to EVs by 2035, eliminating tail pipe emissions along the A428. Passenger EV adoption rates are high and high EV penetration seems likely by 2035. However, complete electrification of transport is estimated to require 100 -125TWhr/yr of electricity. The entire UK electrical output in 2025 was 322 TWhrs so complete electrification would require ~33% increase in electricity generation, transmission and distribution even without demand increases from space heating, industrial electrification and data centres. That kind of increase is simply not possible in <10 years.
  National Grid's Future Energy Scenarios forecasts EVs will make up 50-65% of vehicles on UK

roads by 2035 so CO, NOx and unburnt HCs emissions may halve, but they will not be negligible.

- The plan makes no comments on electrical grid capacity which is typically a bigger challenge than water capacity across most of the UK. If there is insufficient headroom the distribution network and the project

Aside from the number of homes, there is absolutely no clarity about which other features are expected to be part of the plan delivered pre 2045 and which features are in the post plan aspirational period that runs to the 20270s. Examples of features with no specific timelines include:

- The SEA
- The “Mobility Hub”
- The A1198 “Main Vehicle Access”
- Public Service provision
- Employment space provision
- The green corridors
- The public square
- Faith spaces
- Food stores
- Cafes
- Public houses.

It is perfectly possible to interpret S/CBN as intending to build 2550 homes within the plan period and nothing else until post2045.

4. Erosion of Settlement Identity

S/CBN shows that the “new settlement” of Camborne North will at best come very close to eroding the visual, psychological and social boundaries between a number of established settlements including Cambourne, Papworth Everard, Elsworth, Knapwell and Childerly. Settlement “Coalescence” is obviously unacceptable, even to the authors of the S/CBN documentation and they seek to reassure stakeholders that this will be effectively prevented by the *Strategic Enhancement Area* (SEA)

Strategic Enhancement Area
The primary mechanism employed by S/CBN to prevent settlement coalescence is an ill-defined “Strategic Enhancement Area” (“SEA”).

This is described as a “*soft, green landscape*” but S/CBN also notes that “*the SEA could also deliver other appropriate associated uses…*” and be *“as part of a mosaic of landscape typologies and uses*”. This is typical of the drafting style employed by S/CBN which seems to deliberately use the maximum number of words to convey the minimum possible meaning.

Presumably the document intends to convey the impression that the SEA will work as an ersatz “greenbelt” and reassure local stakeholders that it will prevent coalescence. However, the SEA suffers from the same constructive ambiguity found throughout the document.

It is not clear who will own the land designated as SEA during development of North Cambourne, how/when it will be procured or who will decide if a use of that space is “appropriate” and on what criteria. There is discussion of “community-led stewardship” and an implication that this would be a decision for “*Cambourne's distinctive community spirit and collaborative culture*”. However, some areas of the SEA are several km from the existing centre of Cambourne but directly abut the surrounding villages of Papworth

Everard, Elsworth, Knapwell and Childerley. Furthermore Cambourne Town Council reportedly has a recent history of misuse of developer funding (https://www.bbc.com/news/articles/cx291v3lj0eo) suggesting that multi-council collaboration may be preferable to any single council managing the SEA.

The SEA seems to come as close as possible to surrounding villages rather than being a defined distance from the “Site Allocation” boundary of North Cambourne. There is no reasonable rationale given for the extent of the SEA, particularly its very close approach to the surrounding villages. This raises a number of concerns including:

- The possibility of “land banking” for future development post 2045, enabling future local plans to permit significant housing expansion.
- Significant loss of high grade agricultural land under the banner of “enhancement”.
- The SEA is very large and will incur significant ongoing maintenance costs. There is no indication of the funding mechanism or statutory body responsible for multi-decade management, security and maintenance.

1198 Green Corridor
Currently there is a largely contiguous green corridor to the East of the A1198 running North between the A1198/A428 roundabout and Papworth Everard. This green corridor should be retained as far as reasonably practicable to preserve the current visual amenity and sense of separation from Cambourne North.

5. Traffic and Transport Uncertainty

Construction Disruption
Traffic heading south from Papworth Everard has been chronically and severely impacted by the long term A428 roadworks, making the village a virtual prison for several hours in the early morning and late afternoon with every additional roundabout adding significant traffic friction, boosting emissions and reducing safety. S/CBN seems to expect ongoing traffic disruption and construction traffic until well into the 2070s, in addition to the general increase in traffic that will stem from the additional 2550 homes that might possibly be built within the plan period, should sufficient water materialise before 2045.

“Mobility Hub”
Inclusion of an undefined “Mobility Hub” on the southern extremity of Papworth Everard is only explicable as an artefact of computer modelling tendentiously set up to illustrate an improbable scenario in which the proposed development will fit within an arbitrary “trip budget”.

Nobody at any of the consultation events could be specific about what the "Mobility Hub” would be. The best hypothesis seemed to be that it might be a bus stop linking Papworth Everard to the EWR station in Cambourne. If the "Mobility Hub” is to be a bus stop it's obviously not in an appropriate location. Active Travel England suggests that bus stops should be within 400m of people's homes, less if the population includes mobility impaired individuals, elderly residents or young families. The UK Department for Transport's *Inclusive Mobility* guidance recommends keeping distances as short as possible, ideally under 200m for accessible design.

Papworth Everard is >1500 dwellings. Perhaps 30 are within 400m of the proposed location (<2%).
The proposed Mobility Hub is 1300m from the centre of the village and many residents would need to walk ~2km to reach it. The probability that sufficient people use this bus service for it to be economically sustainable is approximately 0. To be useful, a bus service would need to depart from the centre of the village - indeed they are likely to need several stops along Ermine St.

The idea that people will cycle to a “Mobility Hub” on the outskirts of Papworth, then get a bus to Cambourne, then get on the CtoC / EWR network rather than just driving to their end destination is for the birds. That kind of transport mishmash will be slower, most costly and deeply inconvenient.

Cambourne Station Parking
The proposed “landmark railway station” in North Cambourne is being designed to be a “multi modal transport interchange”.

However, the plan seems to be unreasonably hostile to vehicular access ensuring it;s “*highly accessible and permeable by non-private modes and acts as the interchange for walking, cycling, rail and bus, and other forms of Mass Rapid Transit”.* This seems to be planner-speak for “somewhere you can’t drive to”.

Furthermore, car parking at the station seems to be being intentionally undersized: *“parking provision at the new station, with minimised provision across the wider Station Quarter”.*
Huntingdon railway station (the main NS railway station) now has parking provision for >1000 vehicles having been expanded in recent years because car parking capacity came to restrict the growth of rail travel. This is despite the fact that maybe 5-7000 people live within a 10 minute walk of Huntingdon Railway Station - a similar situation to Cambourne North.

It seems extremely anti-growth to limit the passenger carrying capacity of the £7B EWR project by providing inadequate capacity in a ~£20M Cambourne North multi-storey car park which would be revenue generating and economically self-sustaining.

Delivering EWR and CtoC will not substantially alleviate EW traffic on the A428 if people cannot drive to one end of those transport links. Currently 20-30k people per day drive to Cambridge along the A428 from Caxton Gibbet. For EWR / CtoC to materially reduce EW traffic people need to be able to park walking distance from a station.

Miscalculated EV Impacts
Fundamentally, the hostility to private vehicles is fighting last decade’s war. Irrespective of mass transit and commuting options, car ownership will remain high: people will still regularly need a vehicle for trips further afield, carrying children / elderly relatives / mobility impaired family members or carrying large / heavy loads. When comparing transport options, rational individuals will compare the marginal cost of the journey - the full fare of public transport against the marginal cost of driving - dominated by fuel cost - as depreciation / finance / service costs are largely fixed.

EV penetration will be very high by the mid 2030s when construction of Cambourne North may start, especially in West Cambridgeshire where a high proportion of homes offer charge point suitable driveways. The marginal cost of driving an EV charged overnight is ~3p/mile (possibly +3p/mile e-VED). To travel the 4 miles from Papworth to Cambourne that is perhaps 24p.

Public transport solutions simply cannot compete economically while maintaining a reasonable quality of service. Cambridgeshire’s adoption of the £2 bus fare caps chimed with an almost immediate and severe degradation in service reliability to/from Cambridge. Under the £1 fare cap regime, buses were effectively unusable.

Public transport offerings will only compete effectively against ultra-low cost marginal cost EV usage if they are materially easier, faster and more convenient to use. That means building “multi-modal transport interchanges” that are actively designed to *accommodate*, not prevent, private vehicles interchanging with other modalities. People will either drive to their end-destination or drive to a public transport interchange, whichever they perceive to be faster and easier for them.

“Main Vehicle Access”
Cambourne North is shown on Fig 66 as having two “Main Vehicle Access” routes, one from the A428 and one from the A1198. S/CBN discusses “Vehicular access into the site via at least the A1198”. This has two issues, the capacity of the A1198 and the location of that junction. There is no discernable timeline associated with the link to the A1198.

The A1198 has been shown (AECOM / Atkins 2025 using the Cambridge Sub-regional model) to already have a volume to capacity ratio of 85-90% - the threshold where severe queueing and traffic breakdown begin. Indeed, long queues are the daily norm in early mornings and late afternoons.

National Highways modelling explicitly showed (in the DCO for the Black Cat to Caxton Gibbet scheme) that the A428 upgrade is predicted to create a significant increase in daily traffic along the A1198 as it allows much higher volumes of traffic to use the A1198 to link the A428 and the A14. This is expected to overwhelm the single-carriageway sections of the A1198. CPCA has shown that HGVs represent a disproportionately high percentage of traffic flow suppressing average speeds well below design expectations.

Consequently, adding a significant road junction between Cambourne North and A1198 raises a number of concerns about impact on capacity, traffic flow, road safety and journey times south from Papworth Everard. Indeed the plan acknowledges that *“Additional strategic highways mitigation measures… may be required beyond the Plan period“.*

It seems an extraordinary dereliction of duty to embark on a development of the scale of S/CBN when the A1198 is already expected to be “overwhelmed” by the existing A428 upgrades without significant modelling of the impact on the surrounding road network and planning appropriate mitigations for NS travel.

Furthermore that stretch of the A1198 undulates. The location of the junction is not accurately shown but there is a risk of limited visibility leading to an extremely hazardous junction.

6. Public Services Vulnerability

S/CBN seems to contain a number of vulnerabilities around provision of public services which could be regarded to impact NPPF “soundness”.

These vulnerabilities include:

- Heavy reliance on "population triggers" to deliver schools and GP surgeries. However, because only ~2,550 homes are planned by 2045, early residents risk living in a Northstowe-esque "services desert" for decades, placing immediate collateral pressure on existing GP practices and schools in nearby villages including Papworth Everard.
  Already a significant number of Cambourne residents travel to Papworth to use the GP surgery increasing competition for GP appointments and intensifying the misery of the 8am appointment scramble.

- Community facilities are assumed to be secured primarily via Section 106 / CIL agreements. However, developers could submit viability assessments later, citing high infrastructure costs (for example due to water pipelines or transport links) putting downward pressure on budgets for community facilities.

- Papworth Everard has recent experience of developers dragging their feet on community facilities. Significant action had to be taken to ensure developers followed through on legal commitments to

develop and open the Printworks after many years of delay. The developer initially sought to leave the Printworks to the end of their development and had to be forced to implement it on schedule through restrictions on sales of completed properties.

- The policy requires land reservation for healthcare, but local planning authorities cannot compel the NHS/ICB (Integrated Care Board) to fund or staff GP practices. Reserving land without guaranteed operational funding leaves service delivery unverified.

7. Utilities Uncertainty

S/CBN is dependent on a number of improbable assumptions becoming true within the plan timelines to build even the 2550 homes within the planning period.

1. **Grand Union Canal Transfer (GUCT)** must become fully operational**.** This will transfer water from near Birmingham to has not yet submitted a DCO application and is not expected to start construction before 2029. The best case target commercial operations date is 2033.
   The scheme is extremely ambitious and complex involving Affinity Water, Severn Trent Water and the Canals and Rivers Trust in an unprecedented combination of 18th century canal infrastructure with new build underground water mains over 100 miles across several county boundaries.

   It has recently been reported (FT 23rd Sept) that the projected cost of the Havant Thicket reservoir has risen to >£1B (initially £339M) and despite securing planning approval in 2021 is not expected to be completed before 2034, extending the timeline from 8 years to 13. Indeed, no significant water infrastructure projects have been completed in the UK in the past two decades that have achieved operational status in <8 years from the current status of pre-application consultation.
   It seems vanishingly improbable that the first project to achieve completion in <8 years will be a project with the level of technical, economic, planning and consenting risk as GUCT.

2. The **Grafam Transfer Pipeline**
   This 28km interconnector is intended to bring 26ML/day from Grafam water (managed by Anglian Water) to Cambridge Water. The project is yet to submit a formal planning application but crosses two different planning jurisdictions (each requiring its own planning applications) and more than a dozen Parish boundaries all of whom may be alarmed by construction disruption. Technically it requires directional drilling under railway lines, the strategic road network, major utility lines and river flood planes. Currently completion is not expected until 2032 but given the complexity of the project and potential for delay this also seems optimistic.

   Even if the Grafam Transfer Pipeline is completed in time for the initial build of 2550 homes by 2034, it cannot be used without successful completion of GUCT to provide sufficient headroom in the demand on the Grafam reservoir.

   Furthermore, the Grafam Transfer Pipelinen is only available as an interim solution as by 2040, Anglian Water believes it will need that capacity to be returned for its own network.

3. **Fens Reservoir**
   This £2bn megaproject is in pre-application phase and will require a DCO, which they hope will be submitted by 2028 with construction optimistically completing in the mid 2030s.

   However, the scale and complexity of the Fens Reservoir project means that there are significant schedule risks linked to planning and consenting, compensation and easement negotiations,

climate instability, civil engineering complexity, loss of agricultural land and the complexity of treating Fenland river water.

4. **Implausible reduction in household water consumption**
   The modelling seems to assume consumption will reduce to 80 to 110 liters per person per day (L/p/d), well below the UK national building regulation baseline of 125 L/p/d or typical UK household usage of 140L/p/d).

   There are no real-world examples in the UK (or globally) of whole communities reducing water consumption this dramatically. UK Building Regulations - even for water stressed areas - require 110l/p/d for indoor use.

   Post Occupancy Evaluation studies consistently show that real-world consumption from homes approved and built under Building Regulations Part G Water Calculator methodology tend back to ~100l/p/d as residents retrofit conventional fittings to compensate for poor water pressure.

   GCSP's assertion that 80l/p/d is achievable is tendentious and unrealistic across a settlement of this size.

5. **Cambridge Water Performance**
   Regulatory performance reviews published by Ofwat and the EA highlight that Cambridge Water is currently running behind its target Water Resources Management Plan (WRMP24) trajectory due to delays in delivering minor supply options and persistent leakage issues.

   If Cambridge Water is struggling to deliver minor projects and fix persistent leaks, the probability that they can manage the high risk megaprojects to the tight schedules required by S/CBN seems very low.

6. **Grid Capacity**
   S/CBN does not discuss grid capacity. Under the NPPF local planning authorities are required to consider whether the site can obtain a timely or affordable grid connection. It is well known that in the UK grid connections are very frequently the dominant bottleneck for any major project and it's remarkable that S/CBN is silent on this topic.

   The current UK standard assumption for peak demand from a Net Zero Home is 23kW - rising to 41.5kW for large detached homes.

   Assuming 2550 homes at an average of 23kW the site will need a grid connection of ~60MVA - more for the employment spaces, station, services etc. No doubt the developer may argue to apply "After Diversity Maximum Demand" analysis. However, even this would be ~12.8MVA per home or perhaps ~40MVA including an allowance for employment, services etc.

   A connection of this size will require a direct connection to the UKPN 132kV network or higher.

   If UKPN happens to have headroom (which is unlikely) a grid connection of this scale could be delivered in as little as 7 years. (Inclusion of solar PV etc will have little impact on this as the peak load is for heat pumps and EV charging after midnight in winter).

   Should the full development happen, by the 2070s the site will need grid allocation of >170MVA - perhaps 200MVA to allow for employment spaces etc. This is a very significant connection that is likely to be dependent on National Grid's own transmission grid reinforcement, especially if North Cambourne coincides with significant data centre or logistics hub (i.e. eHGV charging) build outs. If

upstream transmission upgrades are required this could take the timeline well beyond the mid 2030s optimistically envisaged for water availability.

7. Other Matters

S/CBN contains an allocation for 24 permanent "*Gypsy and Traveller pitches*", "*on the edge of the development*". Furthermore it suggests they could be "*outside* [of] *but in close proximity to the site".*

This raises a number of concerns for Papworth Everard.

1. If the Gypsy or Traveller pitches could be "*outside* [of] *but in close proximity to the site"* that seems to bring the entire concept of the red line boundary into question. If the developers can move these pitches to just "outside" the site boundary what else can they move across the boundary?

   Suggesting that the S/CBN is able to develop anything "outside" the boundary seems to render the entirety of S/CBN unsound under the NPPF.

2. Approximately one third of the northern boundary of North Cambourne abuts Papworth Everard, suggesting there is a high probability these pitches may encroach on the character and amenity and quality of life enjoyed by residents of Papworth Everard.

3. Papworth has a long history of friction with some elements of the traveller community who have previously camped around the village when visiting relatives in the Hospital causing significant damage and disruption, spikes in local crime rates and intimidation of residents. The loss of Papworth Hospital to Addenbrookes has reduced traveller related incidents in recent years. However, adding permanent pitches at the edge of the village seems to risk a reignition of old tensions.

4. PEPC seeks reassurance that all lessons learned from the Chesterton Fen Road site will be reviewed and implemented before any pitches are formally allocated. Fen Road has grown (in some cases illegally over green belt land) to >150 pitches creating social segregation, protracted legal appeals and multiple retrospective enforcement notices. The SEA will not be effective if it becomes routinely used for illegal traveller / Gypsy pitches so cannot be regarded as an effective mitigation without concrete reassurance on how / where these Gypsy pitches will be arranged, who will police their boundaries and the measures that will be taken to prevent illegal growth of the site.

8. PEPC Requested to the Plan Amendments

Unless it is withdrawn, the plan must:

- Not convolve intended actions within the planning period (to 2045) with vaguer aspirations for the many decades thereafter (2045-2070+)

- Focus on scope for which there is a high confidence of delivering by 2045 after adjusting for realistic risk-based estimates of the completion schedules of the many infrastructure projects Cambourne North is dependent on including CtoC, EWR, Grafam Transfer and GUCT.

- Consider electricity grid capacity provision (and other electrical grid demands) as an infrastructure prerequisite similar to provision of transport and water suitable for modern heat pump and EV charger equipped homes on winter evenings.

- Avoid the permanent and irrevocable loss of so much BMV land by focussing on what is deliverable by 2045

- Avoid apparently intentional ambiguity and use of jargon to obfuscate intent to ensure the plan is accessible to all stakeholders.

- Provide clear, high resolution maps that show the full context of the surrounding villages, include a scale and avoid using confusing colour palettes.

- Provide abundant, easily accessible parking at the stations for EWR and CtoC to avoid over reliance on economically unsustainable short bus routes and maximise taxpayer return on investment for these schemes.

- Be significantly more specific, open and transparent about:

    - modelling assumptions - including transport and utility provision modelling - so that stakeholders can ensure that impossible assumptions (100% EV by the mid 2030s is impossible) or the temptation to extrapolate models so far into the future that they have no value (modelling post 2045)

    - the timelines and requirements for building public services and community facilities.

    - the timelines and location of the Gypsy / Traveller pitches, how these will be contained and who will prevent them from spreading across the SEA.

    - Definitions of key plan features including:
        - The timeline, nature, purpose, governance and funding for the “Strategic Enhancement Area”
        - The timeline, nature, target user group and intended use case of the “Mobility Hub” which if it is intended to be a bus stop for residents of Papworth Everard should be in the centre of Papworth Everard.
        - The timeline nature and intent of the “Traffic Management”
        - The timeline, precise location and anticipated traffic flows at the “main site access” from the A1198

9. PEPC requests to GCSP

PEPC would like to make several requests of GCSP with regard to S/CBN:

1. To be reassured that:
    a. GCSP will continue to consult with PEPC on all aspects of the plan as it evolves, especially any matters that abut or cross the Papworth Everard Parish boundary.
    b. The green areas established on the previous much more detailed local plan will be preserved
    c. The protections around various parts of Papworth Everard established by prior agreements will not be expunged by the new plan.
    d. Any development abutting Papworth Everard will be compliant with the Papworth Design Guide

2. Where there is likely to be an impact on the residents of Papworth Everard - for example increased traffic, construction disruption, increased pressure on local services (including healthcare and education provision), reduced water pressure or reduced visual amenity the developers must provide appropriate compensation to Papworth Everard residents through either s106 or a Community Infrastructure Levy.

3. Consider the long term funding for the SEA and ensure governance responsibility is shared with all the communities living around it.

4. GSCP is asked to consider PEPCs previous consultation response (submitted in February 2026 by a different PEPC administration). See Appendix A.