Appendix A: PEPC Response to S/CBN

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Papworth Everard Parish Council – Objection to Policy S/CBN: Cambourne North

Papworth Everard Parish Council consider the consultation process and supporting information/evidence regarding Policy S/CBN (namely, the creation of a new centre for the town north of the A428 (referred to as 'Cambourne North')) to date to be materially deficient (and seriously so), to the extent that Policy S/CBN is not legally compliant, is not sound, and that GCP has not complied with its duty of co-operation (SCI).

There been NO ENGAGEMENT by GCP with Papworth Everard Parish Council despite Papworth Everard Parish Council being a statutory consultee for planning applications and an important stakeholder that is materially affected by what is proposed by GCP with Policy S/CBN. Importantly, this lack of engagement is in marked contrast to the approach taken by SCDC in previous Local Plans where there was pro-active engagement by the SCDC policy team led by Jonathon Dixon and Caroline Hunt of SCDC. The fact that Policy S/CBN is termed "North Cambourne" in "consultations" to date has been called out as misleading – even by SCDC's own Planning Committee member and District Councillor Peter Sandford. Cambourne lies entirely to the south of the A428. Parishioners have also commented on the very misleading notation used. "North Cambourne" would reasonably be expected by the public at large to refer to the north part of the existing town south of the A428. Indeed, SCDC have always referred to the potential use of the land north of the A428 as "Harbourne".

The two significant transport schemes that this development is predicated on, East West Rail (EWR) and Cambourne to Cambridge (C2C), have not been finalised. C2C has not had its public enquiry report, and the new changes to EWR "proposals" include a **hugely expensive 1.5km fully bored tunnel** that is now required for the much longer and more expensive northern EWR route to cross the A428 twice. Indeed, this is yet to go out for consultation. The development consent order process (DCO) is not expected to start until 2027. The significantly increased cost of the civil engineering required may cause a rethink by central Government, as proved to be the case with the northern leg of HS2. As a consequence, it is extremely concerning that GCP base its most significant site allocation of 13,000 houses for a settlement that it is rumoured could grow to 50,000 houses, becoming the third largest in Cambridgeshire, all based on two transport schemes that are not finalised. Consequently, Policy S/CBN is not legally compliant and not sound.

We believe that the consultation process has been materially flawed, the responses to requests for detail and assurances have been inadequate. The Parish Council stands ready to file for Judicial Review and has allocated funds for this.

In addition, the Parish Council are also deeply concerned about the implications of the current outline plan for the location of a station for Cambourne, the Cambourne North development, and its effects on the surrounding villages. The documentation provided to date by Cambridge City Council and South Cambridgeshire District Council is both large in volume and light on detail, relying on modelling that contains many untested assumptions rather than real evidence from properly conducted infrastructure studies with road routes and traffic flows, and a lack of meaningful engagement with the affected communities. There is widespread fear and concern, which we share, that should this plan proceed without significant amendment and legally binding undertakings, our village and those around us face the risk of being coalesced into the sprawl of Cambourne North, losing their character, and placing

immense pressure on their limited infrastructure. Our village community's future depends on careful, participatory, and evidence-based planning rather than rushed indicative allocations, so as to protect its unique character, sustainability, and resources for current and future generations.

Our principal but not exhaustive concerns are as follows:

- **Coalescence:** The S/SEA/CBN 'Non-Development' areas, or landscape buffer of 'Cambourne Forest' (shown in Fig 1) is described as being a feature to screen the villages (which contain conservation areas in historic rural settings and delicate Sites of Special Scientific Interest) and provide separation from the urbanisation of EW Rail and Cambourne North by creating a barrier between the villages and these developments. This is not a forest, but proposed to consist of (i) a forest; (ii) open spaces; (iii) areas of open arable fields; and (iv) unspecified recreation areas, and would be traversed by cycle and footpaths as well as new roads taking traffic through the villages. Despite what is said in the Plan about this non-development area "ensuring sufficient separation between neighbouring settlements", we have serious concerns about both the Camborne North Development boundaries proximity to the villages, and the depth of this boundary as shown in Fig 1 being realistic, and even if it will be retained at all as the development grows as there have been no assurances about this. When asked at a first local recent presentation at Papworth Everard Village Hall about their surety of this 'buffer' being delivered and retained over time, the planners were not able to promise anything. We are concerned that without sufficient protections, this buffer could be diminished to nothing as Cambourne North grows, and the surrounding villages like Papworth will be subsumed.



Fig 1

- **Traffic:** We are concerned about the increased effects of traffic both in the construction of EWR and Cambourne North, and a substantial increase in traffic in and around the villages brought

by the station and housing development itself. The East of England has an average rate of ownership of 1.4 cars per household as of 2023 (National Centre for Social Research Car Ownership: Evidence Review for the Department of Transport, 2024). Added to the 18,000+ (70,000 if it grows to 50,000 houses) vehicles will be commercial vehicles making deliveries to dwellings and retail outlets, and those from the surrounding areas wanting to access the station, recreational areas, leisure facilities, and employment. Only a small percentage of the residents in these dwellings will travel to Cambridge by train for work or leisure each day, and many of these vehicles will regularly go to other destinations, with many of these travelling through the villages in order to do so, with it looking like there might be three new roads toward Papworth. It seems to be the presumption throughout the Plan that within Cambourne North and the immediate neighbouring areas, travel will increasingly be undertaken by active means rather than by private vehicle, but there is no evidence to show this. There seems to be no mitigations to the increases in traffic through the surrounding villages, and we have seen nothing thus far to indicate that any modelling has been undertaken of the traffic flows which will be generated by Cambourne North. We believe studies should be undertaken of current traffic flows, modelling undertaken of the cumulative effect of all the commercial developments along the A14 corridor on these villages, and this should feed into the scope of the development and mitigations for those effected.

- **Water supply & waste water:** The insufficiency of the water supply is a well-known issue for South Cambridgeshire, and has long delayed the Bourne Airfield development. It is unclear whether schemes for new reservoirs and foul water discharge will only prove sufficient for a much smaller number of additional dwellings. Papworth also suffers from periodic flooding due to run-off from the surrounding fields, and we are concerned that additional large-scale building on a greenfield site will exacerbate this. Further downstream effects also need to be investigated, as the run-off from the development will flow through into the Great Ouse catchment, which already suffers from flooding. Again, none of these studies seem to have been undertaken thus far.

- **Natural habitat & biodiversity:** Papworth has an ancient woodland that is designated as an SSSI. The Cambourne North development boundary runs right up to this, and with no current protections on the depth of the landscape buffer and how close to this any building work and development of housing might come, there is serious concern that development could come right up to this boundary and damage this delicate ecosystem. A large proportion of the area for development also sits higher than the surrounding villages, and we would wish to avoid noise, light, and visual pollution from this development and see no mitigations for how this might be achieved. Whilst biodiversity seems to be described as one of the benefits of the development, we are obviously concerned with the effect that development will have on the natural environment as inevitably trees and habitat will be lost, there seems to be little detail on how biodiversity will be retained or protected, and how both ‘Cambourne forest’ and the residual arable fields and the open spaces will be managed and maintained.

- **Lack of meaningful public engagement:** Papworth has only had one brief presentation (including for questions!) of the scheme from the District Council and City Council at Papworth Everard Village Hall. This 45-minute presentation was organised with little notice and minimal advertisement in the run up to Christmas, only giving the month of January for residents to

comment. This was the first time any maps had been shown, and notably these were described as ‘sketches’, and little detail of real substance was able to be given. When residents pressed on specific aspects such as where the actual limits of development might be and if these limits could be guaranteed, where new roads might be and how they might affect traffic in and around Papworth, the planners gave none committal responses and admitted that it could all be open to change. When asked if any planning had been undertaken for alternate routes for EWR, residents were told that the northern route as shown was ‘locked in’, but this isn’t true. We note that other such presentations have taken place in Cambourne, but with no real outreach to the surrounding villages, residents have just assumed that any development presentations titled ‘Cambourne’ will predominately be those affecting Cambourne, and not necessarily directly effecting the surrounding areas, so we feel that this has been misleading.

- **Infrastructure timeline:** South Cambridgeshire District Council do not have a stellar record in delivering the infrastructure required by new housing developments in a well thought out and appropriate timeline, with dwellings at Cambourne, Northstowe, and Waterbeach built out and residents living there well before the appropriate infrastructure to support them was delivered. In February 2023, the leader of South Cambridgeshire District Council, Bridget Smith suggested that South Cambridgeshire ‘cannot replicate the mistakes of the past’ when planning and building new homes across the district, and gave a ‘firm commitment’ that future development would be ‘infrastructure first’. She noted that ‘We cannot replicate mistakes of the past having houses and employment sites built before there is the water and infrastructure to support them’, saying that it was not the authority’s intention to see more homes built where there was ‘no strategic infrastructure’ and where it would be ‘detrimental to the environment’. We have seen no evidence that this will be any better with Cambourne North, and that there is an intent to schedule critical infrastructure before housing development gets underway. Indeed, only in the last two weeks (16 January 2026) there is a report by the BBC into the late and over budget primary school for Waterbeach. Required for a much smaller allocation of 6000 houses, it is now projected to cost £20 million pounds and will be delivered late. The lesson to be learned, and for which Bridget Smith has given a commitment to do so, is that the cost and timely delivery of infrastructure, and fundamentally the viability of new developments, MUST be fully and properly assessed and secured legally ahead of development allocations if the lessons of Cambourne, Northstowe and Waterbeach are to be learned. Bridget Smith’s commitment in 2023 is not reflected in the process to date. Developers regularly and routinely challenge SCDC and GCP on the viability of providing the infrastructure and S106 contributions they are legally required to do, and that provided the necessary mitigation to allow permissions to be granted. SCDC and GCP have been reluctant to defend these on the grounds of costs of appeals. We will provide numerous examples as part of our Judicial Review, should this prove necessary. It is critical that the lessons of the past be learned and acted upon, and the right time is now in the development of the Local Plan.

In addition to these principal concerns, we would also note that the ‘consultation’ is asking for general comments and not comments to specific detail, as most of these details seem to be unavailable or are based on assumptions. To quote directly from Stephen Kelly, Joint Director of Planning from his 14th January 2025 report to cabinet regarding East West Rail, ‘officers consider there to have been a lack of meaningful engagement’ a ‘lack of available information relating to impact’ ‘a lack of information shared prior to commencement of consultation period – this includes limited data and information within the consultation material to provide substantive technical responses’ ‘a limitation of consultation

timeframes that extent over the Christmas period'. We would suggest that this is exactly what we have seen from GCP and South Cambridgeshire District Council when it comes to the planning for Cambourne North.

This has lead Papworth Everard Parish Council to the conclusion that the consultation process and planning for Cambourne North, the transport schemes that it is predicated on, and the hugely expensive 1.5km bored tunnel required for the longer northern EWR route have been materially deficient. Responses to requests for additional detail on many aspects of this, and assurances about protections and mitigations have been inadequate. Papworth Everard Parish Council therefore challenge this as being a sufficient basis for such a significant development that would have such a serious impact on the environment, infrastructure, traffic flows, water and drainage, and the character of the surrounding villages. Consequently, at this time, and based on the process to date, Papworth Everard Parish Council consider: **Policy S/CBN is not legally compliant. Policy S/CBN is not sound. GCP has not complied with its duty to co-operate (SCI)**. Papworth Everard Parish Council stands ready to file for Judicial Review and has allocated funds to do so.