Greater Cambridge Local Plan – Regulation 19 Representation

Respondent: Haslingfield Parish Council
Policy: I/ST – Sustainable transport and connectivity
Position: Object

This representation is submitted by Haslingfield Parish Council (HPC) and is closely aligned with, and substantially similar in content to, the representation submitted by Cambridge Approaches on the same. HPC has reviewed Cambridge Approaches' representation and endorses its analysis and conclusions. Cambridge Approaches has applied relevant technical and evidential expertise to this issue and has devoted considerable time to reviewing the transport evidence underpinning the Plan's reliance on East West Rail. HPC considers it appropriate to adopt a substantially similar position and submits this representation in its own right to ensure that its distinct interests as a directly affected parish council are formally recorded on the Plan's examination record.

Summary of this representation

This representation considers that the Local Plan's transport strategy for Cambourne North is not justified because it relies heavily on East West Rail without demonstrating that the railway can provide the transport benefits attributed to it, or that reasonable non-EWR alternatives have been properly assessed, rather than on the facts that follow. East West Rail Company has not published a business case for the Bedford-to-Cambridge section, the one value-for-money figure it has published is poor, and its modelling explicitly excludes the traffic this same housing will generate (Sections 3 and 5 below). On the evidence at Section 4 below, at most 2–3% of Cambourne North's households will contain a resident commuting to a new Cambridge job by rail; the Plan has not demonstrated a sufficiently evidenced transport strategy for the journeys of the large majority of residents that will not use EWR. Sections 6 and 7 show that a funded, deliverable, non-rail transport solution already exists for the immediately adjoining site, and that others directly involved in delivering land in this corridor do not regard East West Rail as necessary either. Section 9 sets out why this makes the Plan unsound and non-compliant, and Section 10 sets out the modifications sought. At root, this is not an objection to East West Rail: it is an objection to a Local Plan that has assumed East West Rail's solution before establishing that one exists.

1. The applicable tests

1.1 A local plan is sound only if it is positively prepared, justified, effective, and consistent with national policy.[1] 'Justified' requires an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence; 'effective' requires that the plan is deliverable over the plan period. Both tests are engaged by this representation.

1.2 The National Planning Policy Framework was comprehensively rewritten and republished on 17 August 2026, and no longer uses the terms 'justified' and 'effective' for plans examined under it. However, the new Framework's transitional provisions[2] confirm that a plan submitted for independent examination before 31 December 2026 continues to be examined against the December 2024 Framework. The Regulation 19 stage of this Plan closes on 25 September 2026; a 'Proposed Submission' consultation is, by definition, the final stage before submission for examination, and there is no indication

that submission will be delayed beyond the end of 2026. HPC accordingly addresses this representation to the December 2024 tests, as the Councils themselves have done in framing this consultation.

1.3 Separately, where a plan-making authority is required to prepare an environmental report under the Environmental Assessment of Plans and Programmes Regulations 2004[3], that report must identify, describe and evaluate the likely significant effects of reasonable alternatives to the plan, and give an outline of the reasons for selecting the alternatives dealt with. This is not a paper exercise: the Court of Appeal has confirmed that the duty requires a genuine and adequately reasoned assessment of the alternatives realistically available, not merely of the alternatives the plan-making authority happens to have already considered on other grounds.[4] As set out below, the Sustainability Appraisal supporting this Plan has never applied that exercise to the question this representation raises: whether Cambourne North needs to be served by East West Rail at all.

2. The Plan's transport strategy for Cambourne North depends on an assumed East West Rail mode share

2.1 The Plan's vision and policy text for Cambourne and Cambourne North[5] are framed around the delivery of an East West Rail station. The supporting text states that *'Planned new infrastructure means that Cambourne will become one of the best-connected places in the region with the A428 upgrade, Greater Cambridge Partnership's proposed public transport corridor and East West Rail project connecting Cambridge with Oxford delivering a new railway station*', and that it is *'Through the new railway station being delivered by the East West Rail project… Cambourne will become a destination in its own right*'. The supporting text further records that *'The new East West Rail station and busway provide good opportunities to enable greater density of development*' – that is, the quantum and density proposed for Cambourne North is itself justified by reference to the station.

2.2 The scale of that dependency is not incidental. At a meeting between East West Rail Company and a representative of the Councils on 10 December 2025, recorded in Cambridge Approaches' representation on the Transport Evidence Report[6], it was confirmed that all of the up to 13,500 houses proposed north of the A428 at Cambourne North had been 'allocated to' East West Rail. The Plan does not simply anticipate a station at Cambourne; it treats the entire Cambourne North allocation as a function of the railway's delivery.

2.3 This is consistent with East West Rail Company's public justification for its preferred route. At the May 2023 Route Update Announcement, the then Chief Executive of East West Rail Company, Beth West, explained the choice of a southern approach to Cambridge in these terms: *'It's to unlock sustainable growth between Oxford and Cambridge. The southern route connects to the Biomedical Campus, which has a huge opportunity for growth across the region.*'[7] Sections 4 and 5 below test that justification, and the scale of reliance the Plan places on it, against East West Rail Company's published evidence.

3. East West Rail's business case has not been published, and the one figure that has been is very poor value for money

3.1 East West Rail Company published its Economic and Technical Report in May 2023, but that report is not the business case for the Bedford-to-Cambridge section on which Cambourne North's transport

strategy depends, and none of the formal stages of that business case have been published. The Strategic Outline Business Case was reportedly completed in 2019 and has still not been published, despite Freedom of Information requests. The Outline Business Case, which East West Rail Company intends to complete before its Development Consent Order application, has likewise not been published, and East West Rail Company has given no commitment to publish either document. East West Rail Company has confirmed only that the outline, and then full, business case will be submitted to government as part of the standard approval process for Nationally Significant Infrastructure Projects, and the Department for Transport has confirmed that publication, if it happens, will follow only once planning consent has been secured[8] – that is, after the decisions this Local Plan and East West Rail Company's Development Consent Order both depend on have already been taken.

3.2 The published evidence on value for money is no better. The Department for Transport's cost-benefit analysis, examined by the National Audit Office, put the return at between 30p and 60p of benefit for every £1 spent on 'connection stages 2 and 3' – the Bletchley-to-Bedford-to-Cambridge sections that include the Bedford-to-Cambridge section on which Cambourne North depends – down from an already poor 50p to £1.10 assessed in 2021.[9] On the Department's value-for-money categories, a Benefit-Cost Ratio below 1.0 does not demonstrate value for money; even at the upper end of this range, the scheme's monetised costs exceed its monetised benefits. The Councils are being asked to allocate the great majority of Cambourne North's housing, and to justify its scale and density, by reference to a project whose published cost-benefit assessment records it as questionable value for money by a wide and worsening margin, and whose full justification neither the public nor, on the evidence available to HPC, the Councils themselves have been shown.

3.3 Two petitions have been raised on this specific point, and they should not be conflated. The first, on Change.org, calls on East West Rail Company to publish the Bedford-to-Cambridge business case and remains open; it passed 1,000 signatures within two weeks of its launch in August 2026.[8] The second was a petition to South Cambridgeshire District Council itself – one of the two Councils preparing this Plan – asking the Council to debate requesting that East West Rail Company publish that business case. It required only 100 signatures to trigger a Council debate, met that threshold, and HPC understands it has since been removed and is no longer available online.[10] The significance of the second petition is not the debate itself, but what the debate is about: South Cambridgeshire District Council debating whether to ask East West Rail Company for its business case is only intelligible if the Council does not itself have it. A Plan should not be adopted on the strength of a scheme whose business case is unknown even to one of the planning authorities responsible for allocating housing to it.

3.4 East West Rail Company disputes that this undermines the project's value, describing it as *'a once in a generation opportunity to unlock up to £78bn of economic growth in the region*'.[8] That figure, however, is dated to 2035. East West Rail Company's current published timeline states that the full railway, including the new Bedford-to-Cambridge section, is planned to open only 'by the mid-to-late 2030s',[11] and HPC understands from a direct account given to Cambridge Approaches by East West Rail Company representatives in September 2026 that construction of this section is now expected to run from around 2030 to 2037. On either account, a Cambridge rail connection that will only just have opened, if it has opened at all, by 2035 is most unlikely to be the cause of growth claimed 'by 2035'; if anything, the gap between the claimed benefit date and the likely completion date has widened, not narrowed, since the £78bn figure was first published. HPC does not ask the Councils to resolve the wider dispute over East West Rail's economic case in this representation. It asks only that the Plan should not proceed on the assumption that the £78bn claim has any real bearing on the case for Cambourne North within this Plan

period, while the business case said to support it, and the questionable value-for-money figure that has already been published, remain unexamined by the Councils allocating housing on its strength.

3.5 This is not new criticism. The National Audit Office investigated the project in a report published 13 December 2023[9], which found that the Department for Levelling Up, Housing and Communities' housing growth plans for Cambridge were being prepared separately from East West Rail Company's business case, even though '*[DLUHC's plan] intend[s] this to enable significant housing and business development in a new section of the city, while the business case for EWR depends on development along the rail route'*, and concluded that *'Government risks the planning for both projects being at cross purposes.*' It recommended that the responsible departments establish effective cross-department governance *'to focus on achieving the benefits of East West Rail*' – in substance, a call from Parliament's independent auditor for the scheme's proponents to demonstrate how its claimed benefits would actually be delivered. Almost two years on, and with this Local Plan now at Proposed Submission stage, that demonstration has still not been provided to the public or, on the evidence available to HPC, to the Councils. The fragmentation the National Audit Office identified between housing growth plans and the railway's business case is the same fragmentation addressed at paragraph 5.3 below, between this Local Plan, East West Rail Company and Cambourne North's developers.

4. East West Rail Company's evidence does not support the scale of reliance placed on it

4.1 The Transport Evidence Report[12] – prepared for the Councils by Cambridgeshire County Council, independently of East West Rail Company's modelling – gives a breakdown of trip destinations for an extended Cambourne. Despite Ms West's justification for the route, only 1% of trips originating in an extended Cambourne have the Cambridge Biomedical Campus as their destination, and that 1% is not broken down by mode. The single destination said to justify the route choice barely features in the Councils' evidence of where Cambourne's residents actually, or would, travel.

4.2 East West Rail Company's Economic and Technical Report Appendix 4[13] gives a forecast of rail demand from Cambourne, using a trip-end model calibrated against 2011 census travel-to-work data. Two scenarios are presented: a 'Conventional' scenario, reflecting market sizes and mode shares experienced today, and a 'Transformational' scenario, which East West Rail Company itself describes as 'a plausible but very aspirational world… which may not be transferrable between contexts'. HPC relies only on the Conventional scenario, being the one scenario East West Rail Company has calibrated against observed evidence rather than aspiration. On that scenario, Table 4.1 gives Cambourne a 30% share of the employed population commuting to Cambridge, a 10% rail mode share, 920 regular rail commuters per day and 540 peak-hour passengers.

4.3 Those figures cannot be checked against the housing actually proposed at Cambourne North, because Table 4.1 does not state how many dwellings its 'increase in population planned from dependent development' of 53,400 for Cambourne assumes. The only table in the same appendix that attaches a dwelling count to comparable growth – Table 4.6, headed 'D: Strengthen', which gives 19,300 homes for Cambourne – is generated under a different methodology entirely: the appendix states that this table applies 'the transformational scenario… to infer… what proportion of new residents in an area would commute to Cambridge', and Table 4.6 itself uses a 40% Cambridge-commuting share, not Table 4.1's 30%.[13] It cannot be used to supply the dwelling figure missing from the Conventional-scenario table on which paragraph 4.2 above, and the Plan's reliance on East West Rail, actually depend. On the evidence

East West Rail Company has published, nobody – not the Councils, not the public, not, it appears, East West Rail Company itself within this appendix – can say how many homes its 920-daily-commuter figure for Cambourne is meant to represent.

4.4 What Table 4.1 does supply, and what HPC relies on here, are its stated ratios, which set a ceiling on East West Rail's realistic contribution regardless of dwelling numbers. On the Conventional scenario, 30% of the employed population of an extended Cambourne commutes to Cambridge, and 10% of those commuters travel by rail – together, 3% of the employed population, or approximately 1.5% of total population, applying Table 4.1's stated 49.2% workforce-participation ratio (30,800 of 62,600). Converting that population share to a household share, using South Cambridgeshire's average household size of 2.40 persons (Census 2021),[13] gives an illustrative ceiling of some 3–4% of households in an extended Cambourne containing any resident who commutes to Cambridge by rail, for any job, new or existing. Since Table 4.1 does not distinguish new employment from existing employment, the share of households containing a resident travelling specifically to a new Cambridge job created by the growth East West Rail is said to unlock will be smaller again – plausibly, on this evidence, in the region of 2–3% of households.

4.5 On this evidence, the great majority of Cambourne North's households – on the ceiling calculated above, some 96–97% or more – will contain no resident who commutes to Cambridge by rail at all, whether to a new job or an existing one (see paragraph 10.1 below). That is a ceiling, not a conservative estimate: it assumes the employed residents of a brand-new settlement will commute to Cambridge, and use rail once there, at the same rate as a long-established commuter village, calibrated on 2011 census data. East West Rail Company's justification for this route is that it unlocks new growth and new jobs, including at the Biomedical Campus itself (see paragraph 2.3 above); nothing in this evidence base tests whether residents of a settlement built around that premise would in fact travel to Cambridge by rail at anything like this rate, let alone specifically to the new jobs the scheme is said to unlock. On the illustrative calculations above which are based on EWR's published assumptions, at most a small fraction of Cambourne North's housing can be said to depend on EWR for access to work in Cambridge at all.

4.6 There is a further, more basic problem with the housing allocation this evidence is used to justify. Cllr Bridget Smith, Leader of South Cambridgeshire District Council – one of the two Councils preparing this Plan – stated at a pre-election radio hustings in May 2026 that there are some 37,000 homes in South Cambridgeshire with planning permission that remain unsold and unbuilt.[14] Before allocating yet more housing at Cambourne North, the Plan should have examined why that is the case. It has not. The point matters directly to the design response the mode-share target invites: reducing parking provision and specifying higher-density, higher-rise development around the East West Rail station may be a logical way to attempt to increase the rail mode share on paper, but it may equally reduce the probability that the housing concerned will actually sell, adding to rather than addressing the 37,000-home backlog the Leader of the Council has herself identified.

4.7 HPC heard the institutional response to this directly. At a meeting on 15 July 2025 between South Cambridgeshire District Council, Greater Cambridge Shared Planning and South Cambridgeshire's parish councils, the meeting was told that only 71 houses had been sold at Northstowe in the preceding year.[16] Stephen Kelly, Joint Director of Planning and Economic Development at Greater Cambridge Shared Planning, explained the Councils' response: because a Local Plan concentrated in a small number of large strategic sites will see delivery vary more, site by site and year by year, than one spread across many smaller sites, more planning permission needs to be granted than the arithmetic housing requirement strictly calls for, to guard against the risk that any one site underperforms. It was suggested at the

meeting that Northstowe's sales figures might indicate this approach would not work. HPC does not dispute the underlying statistics: concentrating housing in a small number of large sites will indeed produce more variance between sites than spreading it more widely. What that response does not do is ask why Northstowe is underperforming. If the cause is that the housing on offer does not match what buyers actually want, whether on price, space, or car parking, then adding margin by allocating still more of the same kind of housing elsewhere does not correct the shortfall; it risks reproducing it at a larger scale. This is the same habit of mind noted at paragraph 4.6 above: a shortfall in a plan that assumes people will behave as the plan requires is treated as a technical problem to be solved by adding more of the same kind of supply, rather than as a signal that the underlying assumption needs testing.

4.8 It may be the case that the design of Cambourne North around an EWR station pushes the rail mode share above 10% and/or the market share for Cambridge above 30% meaning more than 3% of commuters use EWR to commute to jobs in Cambridge. It is a very long way from 3% to a 100% allocation of Cambourne North houses to EWR. The argument that EWR is a catalyst or an enabler is hard to test and does not fix the problem of what the 97% of houses that do not use EWR to commute to Cambridge actually do.

5. East West Rail Company's transport modelling explicitly excludes the traffic this same housing will generate

5.1 East West Rail Company's Transport Update Report[17] states, at paragraph A7.3.6: 'Dependent development will not be considered within the traffic modelling.'

5.2 This is not an isolated statement. Paragraph A5.1.13 of the same report states that passenger demand forecasts supporting the project's business case *'will not include demand associated with dependent developments*', and paragraph A4.4.3 states that '*[d]ependent development is not proposed to be considered as part of the [Transport Update Report] or [Transport Assessment]*'. All three provisions use the same defined term addressed at Section 4 above.

5.3 The significance of this is straightforward, and a useful comparator illustrates why. In Japan, several major private railway companies also develop and let or sell the housing and employment sites along their lines, so the whole package – the railway's costs and revenue, and the property side that depends on it – is planned, and made to break even, together, by one body accountable for all of it. Nothing of that kind happens here. 'Dependent development' is the term East West Rail Company uses, in the very same Economic and Technical Report tables addressed at paragraphs 4.2–4.5 above, to claim rail-demand credit for Cambourne North's housing towards the business case for the railway. The same population is then expressly excluded from the assessment of the road traffic it will generate. East West Rail Company takes the benefit of this housing on the demand side of its case, while declining to take responsibility for it on the traffic-impact side, and the split between the Local Plan, East West Rail Company and the housing developers who will actually build Cambourne North lets each disclaim responsibility for the parts that do not add up. That fragmentation is what is allowing what may, on the evidence at Section 3 above, be a fundamentally poor overall business case to go untested by anyone, rather than examined as a whole.

5.4 Neither East West Rail Company nor the Councils have accepted responsibility for that gap. Cambridge Approaches' representation on the Transport Evidence Report[6] records that '*[t]he lack of justification for EWR and this development of Cambourne is falling between GCSP and EWRCo. Both are*

responsible for this failure… But EWRCo. say they are not responsible for the housing and GCSP feel they have no responsibility of EWR.' The road traffic generated by up to 13,500 new houses at Cambourne North is accordingly at risk of never being properly modelled or mitigated by either authority, notwithstanding that the Plan relies on East West Rail to justify allocating that housing in the first place.

6. The Sustainability Appraisal has never tested a non-East West Rail transport-led alternative for Cambourne North – and a deliverable one has now been approved for the immediately adjoining site

6.1 The Sustainability Appraisal of the Greater Cambridge Local Plan[18] explains its approach to Cambourne in these terms: *'E.60 The First Proposals preferred development strategy identified Cambourne as a broad location for future development, in association with the opportunities provided by East West Rail and in particular the proposed new railway station… E.61 Ahead of the draft plan stage, East West Rail Company had developed the East West Rail project further. It confirmed a proposed new railway station location at Cambourne. Drawing upon this additional certainty regarding the project, the Councils determined that it was now possible to be more specific regarding the scale, form and location of development at Cambourne… E.63 Between the draft plan and Proposed Submission stages, East West Rail Company has continued to progress the East West Rail project towards its statutory Development Consent Order application. As such the Councils have maintained the Draft Plan approach… including the approach to reasonable alternatives described above.*'

6.2 The 'reasonable alternatives' referred to throughout this passage are alternative sites for development within the Cambourne area – land to the north and west of existing Cambourne against land to the south and east, and individual parcels rejected or preferred by reference to proximity to the East West Rail station. They are never an alternative transport-led delivery strategy that does not assume East West Rail. The Sustainability Appraisal's Appendices covering strategic spatial options and site selection criteria[19] contain no reference at all to a guided busway, bus rapid transit, mass rapid transit or light rail as an alternative means of serving Cambourne North. The question this representation raises – whether Cambourne North needs East West Rail's contribution at all, on the evidence addressed at Sections 3 to 5 above – has accordingly never been asked, let alone answered, in the Plan's evidence base.

6.3 That omission is not academic, and it is not because no alternative exists. On 8 September 2026, the Secretary of State for Transport – acting through the Rail Minister, Lord Hendy – approved the Cambourne to Cambridge (C2C) guided busway under a Transport and Works Act Order, with deemed planning permission, following an eight-week public inquiry at which the Planning Inspectorate recommended the scheme be granted.[20] The approved route runs from Cambourne to Cambridge via the Bourn Airfield New Village, Hardwick, Coton and the University's West Cambridge site, together with a 2,000-space travel hub at Scotland Farm.[21]

6.4 Bourn Airfield New Village adjoins the Cambourne North allocation and lies within the same travel corridor. It was allocated for some 3,500 homes in the adopted 2018 South Cambridgeshire Local Plan, with outline planning permission granted in July 2024[22], and it is now to be served, on the Government's decision, by a dedicated public transport scheme that does not depend on East West Rail.

6.5 The point is a simple one. If a transport-led, non-rail alternative can be tested, consented and secured for 3,500 homes sharing this corridor and this road network, there is no rational basis on which the Sustainability Appraisal could have treated an equivalent transport-led alternative for Cambourne North's larger allocation as unworthy of testing. Yet, as paragraphs 6.1–6.2 above show, it was never tested at all.

6.6 This sharpens, rather than simply adds to, the objection at Sections 3 to 5. A funded, consented, non-East-West-Rail public transport solution already exists in, and was designed to serve, this corridor, and the economic case for the railway that is meant to justify preferring it remains unpublished. The Plan's continued exclusive reliance on an assumed East West Rail mode share to justify Cambourne North's scale and density – without the Sustainability Appraisal ever testing whether the C2C corridor, reinforced or extended, could perform some or all of the same function – is not a reasoned choice between evidenced alternatives. It is the one alternative that was never examined.

7. Independent corroboration that Cambourne North does not depend on East West Rail for its deliverability

7.1 This is not only HPC's assessment. In a representation dated 30 January 2026 on behalf of Martin Grant Land – the promoter of land north of Cambourne – Savills stated: *'Whilst MGL note that the East West Rail (EWR) scheme and the Cambourne to Cambridge (C2C) will enhance the sustainability of development in this location, Cambourne North can come forwards and be delivered (and shown to be sustainable) without either scheme going ahead*.'[23] The same representation states, of Policy S/CBN, that *'development at North Cambourne has been shown to be economically, environmentally and socially sustainable without either of the two proposed Infrastructure schemes, the benefits of both are significant and recognised by MGL.*' This is the assessment of the site's promoter, who has every commercial interest in the scale of infrastructure investment attracted to the site, not a party seeking to resist development there. (The word 'sustainable' is examined further, from a carbon perspective, at Section 8 below.)

8. The Plan's reliance on East West Rail as 'sustainable' has not been tested against its carbon impact

8.1 The Plan's transport strategy for Cambourne North is repeatedly described as 'sustainable', but that word is never tied to an assessment of carbon emissions. Policy S/CBN's vision for Cambourne North describes it as a 'well-connected, sustainable, thriving and prosperous town', in the same policy that credits the East West Rail station with delivering that connectivity (paragraph 2.1 above), and requires a 'Cambourne North Climate and Sustainability Strategy' as part of a *'holistic approach to Cambourne's environmental, economic and social sustainability which provides effective responses to the climate and ecological emergencies*'.[24] The promoter's representation, addressed at paragraph 7.1 above, uses the same word in the same way, describing Cambourne North as capable of being 'shown to be sustainable' with or without East West Rail.

8.2 No whole-life carbon assessment of East West Rail Company's Bedford-to-Cambridge section has been published that would test whether this description is accurate.[25] Based on the available evidence reference 25 demonstrates quite the opposite. HPC does not ask the Councils to resolve that question in this representation, which is concerned with transport rather than climate policy; but a Plan that relies on 'sustainable' language to help justify East West Rail's role in Cambourne North's transport strategy should not be allowed to treat that word as equivalent to 'low-carbon' without the evidence to support it.

9. Consequence for legal compliance and soundness

9.1 Because the Sustainability Appraisal has never identified, described or evaluated a transport-led alternative to East West Rail for Cambourne North – notwithstanding that such an alternative has now been tested through public inquiry, recommended by the Planning Inspectorate and approved by the Secretary of State for Transport for the immediately adjoining site – HPC considers that the Sustainability Appraisal has failed to demonstrate that it has adequately identified, described and evaluated the reasonable transport alternatives under the Environmental Assessment of Plans and Programmes Regulations 2004.[3] HPC considers, therefore, that the Local Plan is not legally compliant.

9.2 For the same reason, the Plan is not justified: the evidence base for Cambourne North's transport strategy rests on an East West Rail mode-share case whose published tables do not state the number of dwellings assumed, so that its correspondence to the 13,500 homes actually proposed cannot be checked, that excludes the resulting road traffic from assessment altogether, that has never been tested against an alternative which the Government has, in the meantime, found deliverable for the adjoining site, and that ultimately depends on a business case the Councils have not themselves been shown and which the only published metric records as poor value for money. Nor is the Plan effective: the deliverability of the S/CBN allocation as currently drafted is not demonstrated, since it depends on a rail contribution that East West Rail Company's evidence does not support at the scale claimed.

Please provide a 100 word summary of your representation.

The Local Plan's transport strategy for Cambourne North relies on an East West Rail mode share the evidence does not support. East West Rail has published no business case for its Bedford-to-Cambridge line, the published value-for-money figure is poor, and its modelling excludes the traffic this housing will generate. At most 2-3% of households will contain a resident commuting to a new Cambridge job by rail; the Plan has not demonstrated a sufficiently evidenced transport strategy for the journeys of the large majority of residents that will not use EWR. A funded, deliverable, non-rail alternative already exists for the adjoining site. The Plan is unsound and not legally compliant; modifications are sought.

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.

Endnotes

1. National Planning Policy Framework (December 2024), paragraph 35: https://webarchive.nationalarchives.gov.uk/ukgwa/20250225172715/https://www.gov.uk/government/publications/national-planning-policy-framework--2

2. National Planning Policy Framework (17 August 2026), Annex 1, paragraphs 4–9 (transitional arrangements): https://www.gov.uk/guidance/national-planning-policy-framework . Annex 1 confirms that plans submitted for independent examination before 31 December 2026 continue to be examined against the December 2024 Framework.

3. The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), regulation 12(2) and Schedule 2, paragraph 8: https://www.legislation.gov.uk/uksi/2004/1633/regulation/12/made and https://www.legislation.gov.uk/uksi/2004/1633/schedule/2

4. Ashdown Forest Economic Development LLP v Wealden District Council [2015] EWCA Civ 681; [2016] PTSR 78, Court of Appeal, on the duty to give genuine and adequately reasoned consideration to reasonable alternatives under the Environmental Assessment of Plans and Programmes Regulations 2004.

5. Draft Greater Cambridge Local Plan, Policy S/CBN ('Cambourne North') and supporting text: https://consultations.greatercambridgeplanning.org/draft-greater-cambridge-local-plan-consultation/site-allocations/new-settlements/policy-scbn

6. Cambridge Approaches' representation on the Greater Cambridge Local Plan Transport Evidence Report (October 2025), submitted alongside the Regulation 18 Greater Cambridge Local Plan consultation, paragraphs 3, 5 and 6 (£8 billion capital cost figure at paragraph 5).

7. Beth West, then Chief Executive Officer of East West Rail Company, speaking at the launch of the May 2023 Route Update Announcement: https://www.youtube.com/watch?v=mgd10ZiriUo (1:26).

8. 'More than 1,000 sign petition urging East West Rail to reveal Bedford to Cambridge section business case', Cambridge Independent, 27 August 2026: https://www.cambridgeindependent.co.uk/news/more-than-1-000-sign-petition-urging-east-west-rail-to-revea-9480284/ ; petition: 'Publish the Business Case for East West Rail CS3 (Bedford-Cambridge)': https://www.change.org/p/publish-the-business-case-for-east-west-rail-cs3-bedford-cambridge

9. National Audit Office, 'Investigation into the East West Rail project (Oxford – Cambridge)', published 13 December 2023: https://www.nao.org.uk/reports/investigation-into-the-east-west-rail-project-oxford-cambridge/ . DfT's 2021 assessment (50p–£1.10 of benefit per £1 spent) and its later assessment for 'connection stages 2 and 3' (30p–60p of benefit per £1 spent) are given in the report and accompanying press release; the DLUHC/EWR Co 'cross purposes' finding and the recommendation for cross-department governance are also from the press release: https://www.nao.org.uk/press-releases/investigation-into-the-east-west-rail-project-oxford-cambridge/

10. Petition to South Cambridgeshire District Council requesting that the Council debate asking East West Rail Company to publish its business case for the Bedford-to-Cambridge section; threshold of 100 signatures required to trigger a Council debate, met. HPC understands the petition page is no longer available online; details on file.

11. East West Rail Company, 'Consultation 2026 FAQs' (consultation ran 14 April to 9 June 2026): 'We plan to open the full railway by the mid-to-late 2030s. By this time, the new section of railway between Bedford and Cambridge would have been completed, and all new stations would have been opened.': https://eastwestrail.co.uk/consultation/frequently-asked-questions . The 2030-to-2037 construction estimate is from a direct account given to Cambridge Approaches, who in turn informed HPC, by East West Rail Company representatives in September 2026; details on file.

12. Greater Cambridge Local Plan Transport Evidence Report (October 2025), Table 90: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-10/EBGCLPDCGTEROct25.pdf

13. East West Rail Company, Economic and Technical Report, Report Appendices (May 2023 Route Update Announcement), Appendix 4 'Theory of Change Trip-End Modelling': Table 4.1 (Conventional Scenario, p.59); Table 4.2 (Transformational Scenario, p.59, giving Cambourne a 40% Cambridge-commuting share); and Table 4.6 ('D: Strengthen', p.63, giving 19,300 dwellings for Cambourne), introduced at p.60 as applying 'the transformational scenario… to infer… what proportion of new residents in an area would commute to Cambridge': https://eastwestrail-production.s3.eu-west-2.amazonaws.com/public/Route-Update-Announcement/9a2d6ec314/ETR-Appendices-2023.pdf . Average household size for South Cambridgeshire, 2.40 persons (Census 2021): Cambridgeshire & Peterborough Insight, 'Households and population commentary': https://cambridgeshireinsight.org.uk/population/census-2021/ward-demography-dashboard/households-and-population-commentary/ . The calculations at paragraphs 4.4–4.5 and 10.1 of this representation are Cambridge Approaches' calculations, applying Table 4.1's stated ratios and the cited household-size figure; East West Rail Company's evidence does not itself state either a dwelling count for Table 4.1 or a household-level commuting share.

14. Cllr Bridget Smith, Leader of South Cambridgeshire District Council, speaking at a pre-election radio hustings, May 2026. Recollection of Cambridge Approaches; details on file.

15. Adam Smith, The Theory of Moral Sentiments (1759), Part VI, Section II, Chapter II, paragraph 42.

16. Minutes of a meeting between South Cambridgeshire District Council (Cllr Bridget Smith, Leader), Greater Cambridge Shared Planning (Stephen Kelly, Joint Director of Planning and Economic Development) and South Cambridgeshire's parish councils, 15 July 2025, attended by Cambridge Approaches; details on file.

17. East West Rail Company, Transport Update Report (2024 non-statutory consultation), Appendix A – TA Scoping Report, paragraphs A4.4.3, A5.1.13 and A7.3.6: https://eastwestrail.co.uk/previous-consultations/consultation2024/transport-update-report ; PDF version: https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/2024-con-docs-/b9bfa9d5ca/Transport-Update-Report-online-PDF.pdf (paragraph A7.3.6 appears at p.234 of 242).

18. Sustainability Appraisal of the Greater Cambridge Local Plan, Appendices E and F (July 2026), paragraphs E.60–E.63: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-07/ACPSGCLPSAAEF_2026.pdf

19. Sustainability Appraisal of the Greater Cambridge Local Plan, Appendices C and D (July 2026): https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-07/ACPSGCLPSAACD_2026.pdf

20. Department for Transport, 'Cambourne to Cambridge guided busway: Transport and Works Act order', decision published 8 September 2026: https://www.gov.uk/government/publications/cambourne-to-cambridge-guided-busway-transport-and-works-act-order

21. 'Government gives green light to controversial £192m Cambourne to Cambridge busway', Cambridge Independent, 8 September 2026: https://www.cambridgeindependent.co.uk/news/government-gives-green-light-to-controversial-192m-cambourn-9481977/

22. South Cambridgeshire Local Plan (2018), Policy SS/7 (Bourn Airfield New Village, approximately 3,500 dwellings): https://www.scambs.gov.uk/media/ghxi3aly/south-cambridgeshire-local-plan-2018-chapter-3-strategic-sites.pdf ; outline planning permission ref. S/3440/18/OL, granted July 2024.

23. Savills (UK) Ltd, on behalf of Martin Grant Land, representation on the Draft Greater Cambridge Local Plan (Regulation 18 consultation), 30 January 2026, executive summary and commentary on Policy S/CBN, paragraph 3.

24. Proposed Submission Greater Cambridge Local Plan, Policy S/CBN: Cambourne North, paragraphs 5 and 36(d): https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan/site-allocations/new-settlements/policy-scbn

25. Cambridge Approaches, 'EWR Bedford to Cambridge: Does it reduce CO2 emissions?' https://cambridgeapproaches.org/ewr-bedford-to-cambridge-does-it-reduce-co2-emissions/

26. Elizabeth line: central-section construction cost of approximately £18.9 billion; ridership of 243 million passengers in the financial year ending March 2025, an average of approximately 665,000 passengers per day: https://en.wikipedia.org/wiki/Elizabeth_line

27. Cambridge City Council, 'Initial response to government's Development Corporation for Greater Cambridge' (3 June 2026): https://www.cambridge.gov.uk/news/2026/06/03/initial-response-to-governments-development-corporation-for-greater-cambridge . The Greater Cambridge Development Corporation was established by government Order on 23 July 2026, and is expected to take on development management powers for schemes above 250 dwellings and 5,000 sq.m of commercial space from 2027, and to take over Local Plan-making after this Plan.

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.

10. Modifications sought

10.1 This representation identifies two distinct harms, and the modifications sought address both. The first is that allocating the whole of Cambourne North's housing to East West Rail forecloses any search for a transport solution that could actually serve the rest of it. On the evidence at paragraph 4.4 above, at most 2–3% of Cambourne North's households will contain a resident commuting to a new Cambridge job by rail; the Plan has not demonstrated a sufficiently evidenced transport strategy for the journeys of the large majority of residents that will not use EWR – not because none exists, but because the paper allocation makes East West Rail look sufficient when it is not, and Section 6 shows a deliverable alternative has in the meantime been secured for the adjoining site without ever being tested here. The second is that the road traffic Cambourne North's development will actually generate is, on East West Rail Company's evidence (Section 5 above), not being modelled or mitigated by anyone at all. HPC does not seek to prescribe the mechanism by which the Councils address these harms, but whichever mechanism is adopted should: (a) test a transport-led alternative for serving Cambourne North that does not assume East West Rail is delivered at the mode share currently claimed, informed by the now-approved C2C scheme and its capacity for extension or reinforcement, so that the housing this railway cannot realistically serve is not left without any transport strategy at all; (b) require the road traffic actually generated by Cambourne North's development to be modelled and mitigated regardless of East West Rail's rail-demand claims, given that East West Rail Company's evidence confirms this traffic will not otherwise be assessed by anyone; and (c) condition the housing trajectory and phasing for Cambourne

North on the delivery of transport capacity actually secured for it, rather than on an assumed rail contribution that does not match the housing being allocated or the business case supporting it.

10.2 Cambridgeshire County Council, as local highway authority, East West Rail Company and the Greater Cambridge Development Corporation should each be asked, as part of the Examination, to clarify which of them accepts responsibility for modelling and mitigating the road traffic generated by Cambourne North's housing, given that East West Rail Company's evidence confirms neither of the first two currently does. The Development Corporation's position is particularly material: this is the last Local Plan the Councils will prepare before the Development Corporation takes over responsibility for strategic development management above 250 homes – which covers Cambourne North many times over – from 2027, and for Local Plan-making thereafter.[28] The Councils should not adopt a transport strategy for Cambourne North that the body about to inherit responsibility for delivering it has not itself confirmed it accepts. That commitment also needs to reckon with a structural bias against the alternative sought at paragraph 10.1(a) above: once housing is described, as it is here, as 'essential' or 'strategic' to East West Rail rather than examined on the numbers, it becomes correspondingly harder to justify funding or delivering any other transport solution for the same housing, because the paper allocation is treated as though the need has already been met. All three responses should be published as part of the Examination evidence base.

10.3 If reliance continues to be placed on an assumed East West Rail mode share to justify Cambourne North's scale, density or phasing, the evidence for that mode share should be tested and secured – for example through a Statement of Common Ground with East West Rail Company – before adoption, clarified to state the number of dwellings it assumes and tested against the housing actually proposed at Cambourne North, and supported by publication of the underlying business case rather than the single, adverse value-for-money ratio currently available.

11. Conclusion

11.1 HPC is not seeking through this representation to determine the outcome of the EWR project. Its concern is that the Local Plan should not allocate and design development on the assumption that EWR will provide transport capacity which the evidence does not demonstrate. For the reasons set out above, HPC object to the Proposed Submission Greater Cambridge Local Plan on the grounds that its transport strategy for Cambourne North relies on an East West Rail mode-share case that East West Rail Company's evidence does not support, that excludes from assessment the very road traffic this housing will generate, that has never been tested against a transport-led alternative which the Government has, in the meantime, approved for the immediately adjoining site, and that depends on a business case which remains unpublished and whose only disclosed metric records poor value for money. We do not prescribe the mechanism by which that gap should be closed, but what the Sustainability Appraisal Regulations and the tests of soundness do not permit is what the Plan currently does: allocating housing to East West Rail on the basis of a rail contribution larger than the evidence supports, while leaving the traffic that housing generates assessed by neither East West Rail Company nor the Councils, and while the underlying business case remains unseen. We ask that the Proposed Submission Greater Cambridge Local Plan should not be submitted for independent examination, or adopted, until this has been addressed. Failing that, we ask that the Planning Inspector be asked to consider this as a legal compliance and soundness matter requiring modification. We wish to be notified of further stages in the preparation of the Plan and to participate in any hearing session dealing with this matter at the Examination in Public.