Greater Cambridge Local Plan – Regulation 19 Representation

Respondent: Haslingfield Parish Council
Policy: I/SI – Safeguarding Important Infrastructure
Position: Object

Representation

1. Haslingfield Parish Council supports the principle of protecting the Mullard Radio Astronomy Observatory (MRAO) at Lord's Bridge, but considers that Policy I/SI and the Local Plan as a whole are not sound in their present form because they fail to address a fundamental conflict between the proposed East West Rail (EWR) infrastructure and the Plan's own safeguarding requirements.

2. Policy I/SI establishes three geographical levels of protection for MRAO: the Lord's Bridge Restricted Area, Lord's Bridge Consultation Area 1 and Lord's Bridge Consultation Area 2. Within the Restricted Area, planning permission will only be granted for development that would "not result in any risk of interference" to MRAO. The policy therefore establishes a particularly stringent safeguarding regime.[1]

3. The proposed EWR Southern Approach passes through all three of these areas, including through the Lord's Bridge Restricted Area. Cambridge Approaches' June 2026 response records that the proposed alignment passes through the heart of the Restricted Area and would bring the railway to approximately 850 metres from MRAO, with the railway on an embankment approximately 10–11 metres above ground level.[2]

4. The potential impacts are not limited to conventional railway noise. The Cambridge Approaches evidence identifies two separate potential risks: electromagnetic interference from railway traction systems and ground-borne vibration affecting sensitive scientific equipment. The Observatory operates highly sensitive radio astronomy and optical interferometry facilities, some of which require extremely stable conditions.[3]

5. The University of Cambridge has raised substantial concerns about the proposed route. Cambridge Approaches records the University's position and states that the University cannot support the current route proposals because of the potential effects on MRAO.[4] East West Rail itself accepts that the railway could affect MRAO and states that it is continuing to work with MRAO/the University to determine how impacts can be avoided, reduced or, if unavoidable, mitigated.[5]

6. This is particularly important because the current Local Plan does not acknowledge this conflict. Policy I/SI establishes stringent protection for MRAO, but the Plan does not explain how the proposed EWR infrastructure, passing through the Restricted Area, can be reconciled with the policy's requirement that there be no risk of interference.

7. The issue cannot reasonably be dismissed on the basis that EWR will be determined through a Development Consent Order rather than through the Local Plan. EWR is nevertheless a material consideration for the preparation of the Local Plan, and the Local Plan itself relies upon the proposed railway in determining its development strategy. The EWR safeguarded area is expressly incorporated into Policy I/SI, demonstrating that the Plan already treats EWR as relevant infrastructure.[6]

8. Indeed, the relationship is more fundamental than this. The Local Plan's development strategy states that the most sustainable location for additional strategic-scale development away from Cambridge is expansion of Cambourne, specifically taking advantage of the significant benefits that will be provided by the proposed EWR station. The Plan's transport strategy is also described as being "heavily informed" by the location of existing and committed public transport schemes, including EWR.[7]

9. The Plan therefore relies, at least in part, on EWR to support its spatial strategy and its assessment of sustainable development. It cannot logically rely on the benefits of EWR while failing to address the possibility that the form of EWR currently proposed is incompatible with the Plan's own protection of internationally important scientific infrastructure.

10. The difficulty is reinforced by the evidence concerning the effectiveness of mitigation. Cambridge Approaches' June 2026 submission states that no specific mitigation solution had been identified in the consultation material and calls for the route to be relocated outside the Restricted Area or tunnelled through its passage near MRAO.[8] This is a matter which should be resolved through the Plan's evidence base rather than simply deferred to the DCO process.

11. The existing safeguarding regime demonstrates that protection of MRAO is not merely theoretical. Cambridge Approaches records that the University abandoned a solar-farm proposal at Lord's Bridge after planning permission had already been granted, because further work concluded that the development would be incompatible with the research undertaken at MRAO. It also records the abandonment of proposals for new quarrying equipment at Barrington Pit because of concerns relating to MRAO.[9]

12. These examples demonstrate that the protection of MRAO has materially constrained other development. The University does not have a formal statutory "veto" over development, but the safeguarding policy gives the University a critical technical consultation role and has resulted in development proposals being abandoned where interference could not be reconciled with the Observatory's operation.

13. It would therefore undermine the credibility and effectiveness of Policy I/SI if ordinary development is required to satisfy an exceptionally stringent MRAO safeguarding test, while a major and effectively permanent railway passing through the Restricted Area is not addressed against the same policy requirement.

14. This creates a further concern about the future effectiveness of the safeguarding regime. Once a major railway has been permitted and constructed through the Restricted Area, it could materially change the environmental and electromagnetic baseline around MRAO and constrain the University's ability to develop or operate scientific equipment in the future. Policy I/SI should protect not merely today's equipment but the Observatory's continuing scientific capability.

15. The Council therefore considers that the Local Plan has failed to establish a sufficiently robust evidence base concerning the compatibility of EWR with Policy I/SI. In particular, it has not demonstrated that the proposed railway can satisfy the policy's "no risk of interference" requirement.

16. There is also a significant Sustainability Appraisal and alternatives issue. The Local Plan relies upon EWR as part of the justification for the spatial strategy and sustainable transport provision. If the proposed form and alignment of heavy rail is incompatible with protection of MRAO, it is not sufficient simply to retain EWR as an assumption underlying the Plan.

17. The Councils should therefore assess whether the transport and development objectives attributed to EWR could be achieved by reasonable alternatives. These should include, where appropriate, alternative EWR approaches to Cambridge and alternative transport modes capable of providing the required connectivity without passing through the MRAO Restricted Area.

18. This does not require the Local Plan to determine which transport project should ultimately be constructed. It requires the Plan's sustainability evidence to demonstrate that the strategy is based on a realistic and environmentally sustainable transport solution, rather than assuming that the currently proposed Southern Approach will necessarily be delivered.

19. Cambridge Approaches has identified alternative EWR approaches, including a Northern Approach with turnback and a Long Tunnel, which it considers could avoid the MRAO entirely.[10] Whether or not those particular alternatives are ultimately preferable is not for the Local Plan to predetermine. Their existence demonstrates, however, that avoidance of the MRAO conflict is an issue which should be properly considered in the Plan's alternatives assessment.

20. Similarly, the Local Plan should not assume that heavy rail is the only means of delivering the relevant transport objectives. Where the proposed heavy railway cannot satisfy the Plan's own infrastructure-safeguarding requirements, reasonable alternatives involving other forms of public transport should be considered in the Sustainability Appraisal and transport evidence.

21. The Council considers that the Plan is therefore not justified or effective in its present form. It has not properly reconciled two of its strategic objectives: first, safeguarding internationally important scientific infrastructure at MRAO; and second, relying upon a particular heavy-rail infrastructure proposal to support its development and transport strategy.

22. The Council does not suggest that the Local Plan should itself determine the EWR DCO application or prejudge the Secretary of State's decision. Rather, it should establish an unambiguous planning framework under which EWR, like every other form of development, must be compatible with the protection afforded to MRAO.

23. The Council therefore requests that Policy I/SI and the supporting text be amended as set out below, and that the Sustainability Appraisal and relevant transport evidence be revised to consider the implications of the MRAO conflict, alternative EWR routes and reasonable alternative transport modes.

Proposed changes to Policy I/SI

24. Amend Policy I/SI to state explicitly that the MRAO safeguarding provisions apply to all development, including nationally significant infrastructure and development requiring a Development Consent Order.

25. Amend the Restricted Area provision so that major infrastructure can only proceed where robust and independently verifiable technical evidence demonstrates that it will not result in electromagnetic interference, vibration or other effects that would prejudice the existing or future scientific capability of MRAO.

26. Amend the supporting text to state explicitly that the proposed EWR Southern Approach passes through the MRAO safeguarding areas and that its compatibility with Policy I/SI must be demonstrated.

27. Replace any implication that harm to MRAO can necessarily be overcome by planning conditions or obligations with a requirement that potential interference must first be avoided, and that mitigation must not reduce the existing or future scientific capability of the Observatory or transfer the burden of achieving compatibility to the University.

28. Require consideration of route avoidance before mitigation. Where a major infrastructure proposal cannot demonstrate compatibility with MRAO, alternative alignments or alternative transport modes should be considered.

29. Amend the Plan's Sustainability Appraisal and transport evidence to test reasonable alternatives to the current EWR Southern Approach, including alternative EWR routes and appropriate non-heavy-rail public transport options, particularly where those alternatives would avoid the MRAO safeguarding areas.

30. The Policies Map should continue clearly to identify the Lord's Bridge Restricted Area and both Lord's Bridge Consultation Areas, and the supporting text should make clear that their safeguarding function applies notwithstanding the separate safeguarding of land for EWR.

Soundness and legal compliance

31. Legal compliance: Haslingfield Parish Council does not presently contend that Policy I/SI is demonstrably legally non-compliant merely because the Plan does not object to the EWR Southern Approach. The principal issue is one of the adequacy of the Plan's evidence, justification, effectiveness and Sustainability Appraisal.

32. Soundness: The Council considers Policy I/SI and the Plan as a whole to be unsound unless the conflict is addressed. In particular, the Plan is insufficiently justified, because it relies upon EWR without adequately assessing whether the proposed infrastructure is compatible with the protection of MRAO; and insufficiently effective, because it contains no mechanism for resolving the apparent conflict between the EWR proposal and the MRAO safeguarding regime.

33. The Council therefore requests that the Plan be modified to establish a clear requirement that MRAO protection is not compromised by EWR or any other major infrastructure, and that the Sustainability Appraisal properly examines reasonable alternatives where the currently proposed EWR infrastructure cannot meet that requirement.

Endnotes

[1] Greater Cambridge Shared Planning, *Greater Cambridge Local Plan – Policy I/SI: Safeguarding Important Infrastructure*. The policy identifies the Lord's Bridge Restricted Area and Consultation Areas and states that within the Restricted Area planning permission will only be granted for development that would not result in any risk of interference to MRAO.

[2] Cambridge Approaches, *East West Rail 2026 Consultation Response – Impact on the Mullard Radio Astronomy Observatory, Lord's Bridge*, June 2026, paras ES.1–ES.4. The response identifies the proposed railway's passage through the Restricted Area, approximately 850m proximity to MRAO and the proposed 10–11m embankment.

[3] Cambridge Approaches, June 2026 MRAO response, paras 2.1–2.3 and 4.1–4.6. The response identifies electromagnetic interference and vibration as separate potential impacts and describes the sensitivity of the Observatory's instruments.

[4] Cambridge Approaches, June 2026 MRAO response, including its summary of the University of Cambridge's position and the University's technical concerns.

[5] East West Rail, *Consultation Feedback Report – Chapter 3: The Approach to Cambridge*. EWR states that it has taken account of the potential effect on MRAO and is continuing discussions concerning avoidance, reduction and mitigation of impacts.

[6] Greater Cambridge Shared Planning, Policy I/SI and supporting paragraph 10.46. The Plan safeguards land for EWR and explains that the safeguarding reflects the EWR proposals and is intended to prevent development prejudicing the scheme.

[7] Greater Cambridge Shared Planning, *Policy S/DS: Development Strategy*, particularly paragraphs 2.64, 2.76 and 2.82. Paragraph 2.64 expressly identifies the benefits of the proposed EWR station as part of the justification for expanding Cambourne; paragraph 2.76 states that delivery of the Plan relies on significant infrastructure and a sustainable and effective transport network; and paragraph 2.82 states that the transport strategy is heavily informed by existing and committed public transport schemes, including EWR.

[8] Cambridge Approaches, June 2026 MRAO response, ES.4–ES.5 and demand (1). The response states that no specific mitigation had been identified and calls for route relocation outside the Restricted Area or tunnelling near MRAO. These are the views and technical conclusions of Cambridge Approaches and should be treated as an attributed submission rather than as independently established facts.

[9] Cambridge Approaches, June 2026 MRAO response, paras 2.4–2.5. The response records the University's abandonment of its permitted solar-farm proposal and earlier quarrying proposals in the context of MRAO safeguarding.

[10] Cambridge Approaches, June 2026 MRAO response, demand (1). It identifies a Northern Approach with turnback and a Long Tunnel as alternatives which, in its assessment, avoid MRAO. This is an attributed assessment by Cambridge Approaches and should not be treated as an established conclusion of the Local Planning Authority.