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Date: 23/09/2026

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Dear Sir or Madam

GREATER CAMBRIDGE LOCAL PLAN - PROPOSED SUBMISSION (REGULATION 19) CONSULTATION - REPRESENTATIONS ON POLICY S/AMC/PH: PAPWORTH HOSPITAL, PAPWORTH EVERARD

Consultation	Proposed Submission Greater Cambridge Local Plan (Regulation 19), 3 August to 25 September 2026 (5.00 pm)
Submitted by	Bidwells, on behalf of our client
Part of the Plan	Policy S/AMC/PH: Papworth Hospital, Papworth Everard; supporting paragraphs 3.5.33 to 3.5.35; Proposed Submission Policies Map
Legally compliant	No objection is raised on legal compliance at this stage. Our client reserves its position on the treatment of reasonable alternatives for this site in the Sustainability Appraisal.
Sound	No
Tests of soundness not met	Justified; Effective; Consistent with national policy
Modifications sought	Replacement of criteria 1 and 3 and paragraph 3.5.34 (Section 7)
Participation at examination	Our client wishes to participate in the hearing sessions on this policy

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1.0 Introduction

1.1 These representations are submitted by Bidwells on behalf of our client – Formic Investments - in response to the Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation. They relate to Policy S/AMC/PH: Papworth Hospital, Papworth Everard, its supporting text at paragraphs 3.5.33 to 3.5.35, and the associated designation on the Proposed Submission Policies Map.

1.2 Our client objects to Policy S/AMC/PH. The policy is not sound because it is not justified, not effective and not consistent with national policy. Section 7 sets out the changes required to make the Plan sound.

1.3 Our client supports the principle of a comprehensive, heritage-led redevelopment of the site, and supports the heritage requirements added to criterion 2 at this stage. The objection is directed at the land use strategy in criteria 1 and 3.

1.4 As the Cabinet report of 21 July 2026 confirms (paragraph 4.24), the Plan is being prepared under the legacy plan-making system and its consistency with national policy will be considered against the December 2024 National Planning Policy Framework (NPPF). References to the NPPF in these representations are to that version.

2.0 The site

2.1 The former Papworth Hospital site lies within Papworth Everard, approximately eight miles west of Cambridge and within one mile of the A14. It is previously developed land and lies outside the Cambridge Green Belt. The site is within the Papworth Everard Conservation Area, and the Grade II* listed Papworth Hall lies to the south.

2.2 Royal Papworth Hospital relocated to the Cambridge Biomedical Campus in 2019 and the site has since been progressively vacated. Paragraph 3.5.33 of the Plan confirms that the former hospital site is now vacant. This occurred in May 2019 and since that date there has been no use of the site and no planning application submitted for its redevelopment or reuse.

2.3 Papworth Everard is identified as a Minor Rural Centre in Policy S/SH: Settlement Hierarchy, and the site is within the built-up area of the village.

3.0 Policy S/AMC/PH

3.1 Criterion 1 of the policy requires a sequential approach to replacement uses beginning with healthcare. Other employment uses compatible with the location may be permitted only where a suitable healthcare use cannot be found after the site has been marketed for healthcare for no less than two years.

3.2 Criterion 3 states:

> *"New housing development and/or redevelopment for housing will not be permitted. Conversion of existing buildings of character for residential use may exceptionally be permitted where it would be the most appropriate use of the buildings and recreate the character of the original Papworth Hospital buildings fronting the historic landscaped parkland setting of Papworth Hall."*

3.3 This is substantially the approach of Policy E/6 of the adopted South Cambridgeshire Local Plan (2018) and of the December 2025 draft policy. The changes made at the Proposed Submission

stage replace the reference to the former B1 use class with “other employment uses compatible with this location”, add a requirement to maintain or enhance the setting of the Conservation Area, Papworth Hall, the scheduled moated site and the nearby Grade II listed lodge, and require a Heritage Impact Assessment to inform the masterplan. The land use approach is unchanged.

4.0 The policy is not justified

4.1 NPPF paragraph 36(b) requires a plan to be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

4.2 The justification for the policy is set out at paragraph 3.5.34:

> *“The hospital provided over 1,000 jobs in the village and therefore the loss of employment from the hospital site will have had a significant impact on the economy of the village, and the ability of people to find work locally. A healthcare use would achieve the continuance of the mutually beneficial relationship between hospital and village. Other employment uses on the hospital site would at least maintain a balance between homes and jobs in the village, but would not provide the current jobs profile, make best use of the existing resources, or reflect the history and character of the village.”*

4.3 This reasoning describes the position before the hospital relocated. The hospital and its jobs have moved to the Cambridge Biomedical Campus, and the policy cannot reinstate them. The relevant question for the Plan is which use can realistically bring the site back into use over the plan period.

4.4 The site has been marketed for healthcare and employment uses for over six years, including the Cambridge West offering prepared in 2021, and recent marketing periods have generated no interest. That period is more than three times the two-year marketing period the policy itself specifies. The supporting text does not refer to any assessment of current healthcare or employment demand for the site, and we have not identified such an assessment in the published evidence base.

4.5 A residential-led mixed-use redevelopment is a reasonable alternative for a vacant brownfield site within a Minor Rural Centre. The supporting text does not explain why that option has been rejected, other than by reference to the housing and employment balance of the village. A residential-led scheme that includes employment floorspace and care provision would contribute to that balance rather than undermine it.

4.6 The prohibition on new housing and redevelopment for housing in criterion 3 is therefore not supported by proportionate and current evidence, and the policy does not take into account the reasonable alternatives.

5.0 The policy is not effective

5.1 NPPF paragraph 36(c) requires a plan to be deliverable over the plan period.

5.2 On the marketing evidence, there is no reasonable prospect of a healthcare or employment use of the site coming forward. The policy provides no route beyond its sequence: if neither use is found, criterion 3 continues to prohibit housing. The policy therefore does not provide a deliverable means of bringing the site back into use, and the likely outcome is continued vacancy.

5.3 Continued vacancy increases the risk of deterioration of the buildings that criterion 2(d) seeks to preserve, and of harm to the setting of the Conservation Area and listed buildings that criterion

2(c) seeks to maintain or enhance. The heritage objectives of the policy depend on a viable use of the site being secured.

5.4 Retaining a site-specific policy that is unlikely to be implemented also means the Plan does not make use of a previously developed site within a Minor Rural Centre to help meet identified housing needs.

6.0 The policy is not consistent with national policy

6.1 NPPF paragraph 125(c) requires planning policies and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Criterion 3 prohibits new housing on a brownfield site within a settlement. That is inconsistent with paragraph 125(c).

6.2 NPPF paragraph 127 requires planning policies to reflect changes in the demand for land. Where there is no reasonable prospect of an application coming forward for the use allocated in a plan, the local planning authority should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs. The Greater Cambridge Local Plan is that plan update. The site has been vacant for over 7 years with no planning application submitted on the site. The marketing evidence indicates no reasonable prospect of the uses sought by the policy, yet the Plan carries forward the adopted Policy E/6 approach without change to the land use strategy. That is inconsistent with paragraph 127.

6.3 The Cabinet report of 21 July 2026 states that the development strategy seeks to use brownfield land opportunities and includes better served villages in its search sequence (paragraph 4.7), and that the Plan identifies a need for at least 48,195 additional homes between 2024 and 2045 (paragraph 4.6). The Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2026) records 5.6 years of housing land supply for 2026 to 2031. On our calculation, a reduction of approximately 11% in the identified five-year supply would take the position below five years. Such a reduction is considered highly likely given the housing trajectory is not reflective of the current issues with housing delivery in the country. The site is consistent with the Plan's stated strategy and could make a contribution to meeting housing and affordable housing needs within the plan period, rather than the current approach of relying on a series of very large sites which may have their delivery rates slowed in the coming years.

7.0 Changes required to make the Plan sound

7.1 Our client seeks the replacement of criteria 1 and 3 of Policy S/AMC/PH, and a consequential change to criterion 2(b), as follows. Criterion 2(a) and 2(c) to 2(e) are retained as published.

Policy S/AMC/PH: Papworth Hospital, Papworth Everard

1. The redevelopment of the former Papworth Hospital site for healthcare, employment or care uses compatible with its location in the centre of Papworth Everard will be supported.

2. Residential-led mixed-use redevelopment of the site will be supported where marketing evidence, prepared in accordance with Appendix F of this Plan, demonstrates that there is no reasonable prospect of a healthcare or employment use of the site coming forward. Marketing undertaken since the relocation of Royal Papworth Hospital will be taken into account. A residential-led scheme will include:

a. new homes, including affordable housing in accordance with the Plan's affordable housing policy;

b. employment floorspace and/or care or specialist accommodation for older people, of a scale appropriate to the village;

c. the retention and enhancement of the lake, mature woodland and parkland landscape; and

d. a heritage-led masterplan informed by a Heritage Impact Assessment.

3. Across this policy area, proposals will: (a) maintain the vitality and viability of Papworth Everard village; (b) contribute to the housing and employment balance of the village; and (c) to (e) as published.

4. The conversion of existing buildings of character for residential use will be supported where it would be the most appropriate use of the buildings and recreate the character of the original Papworth Hospital buildings fronting the historic landscaped parkland setting of Papworth Hall.

7.2 Paragraph 3.5.34 should be replaced with the following text:

> *"The hospital relocated to the Cambridge Biomedical Campus in 2019. The Councils' preference is for a healthcare or employment use that would continue the relationship between the site and the village. Where marketing demonstrates that there is no reasonable prospect of such a use, a residential-led mixed-use scheme, including affordable housing, employment or care provision and a heritage-led masterplan, will provide for the reuse of this previously developed site in accordance with national policy on brownfield land."*

7.3 The Policies Map should be checked and, if necessary, corrected so that the boundary and recorded site area are consistent (paragraph 2.4).

8.0 Evidence and examination

8.1 Our client wishes to participate in the hearing sessions at which Policy S/AMC/PH is considered, in order to present evidence and respond to the Councils' case.