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EWR/1708

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BY EMAIL ONLY: localplan@greatercambridgeplanning.org

Dear Sir / Madam,

Re: Greater Cambridge Local Plan – Draft Plan Regulation 19 Consultation

This consultation response to the Regulation 19 consultation on the draft Greater Cambridge Local Plan ('the draft Local Plan') is submitted on behalf of the East West Railway Company Limited (EWR Co).

Background and progress of East West Rail

EWR Co is the organisation responsible for delivering East West Rail (EWR), a project of national significance that will deliver frequent, fast, and reliable rail links for communities between Oxford, Milton Keynes, Bedford, and Cambridge.

Between 14th November 2024 and 24th January 2025, EWR Co undertook a non-statutory consultation ('NSC3') on its emerging proposals for the EWR project, which were set out in a series of consultation documents and plans. In total, EWR Co received 6,218 responses to the NSC which included feedback on route-wide matters as well as specific proposals in local areas. The feedback received, combined with previous consultation feedback and ongoing surveys and assessments, helped EWR Co to refine its proposals and inform design decisions about some elements of the project. On 19th November 2025, EWR Co published the You Said, We Did – Autumn Update ('the YSWD report'), setting out these design decisions and how consultation feedback has helped shape the EWR proposals.

EWR Co held a further consultation on its updated proposals for the EWR project between 14th April and 9th June 2026, taking account of further design work, ongoing engagement, environmental assessment

work, traffic and transport analysis and feedback from NSC3. EWR Co's updated proposals are set out in the 2026 consultation brochure and in a series of detailed route section plans. The route section plans relevant to the Greater Cambridge area, covering the route between Croxton and Toft, Comberton and Shelford, and in Cambridge, can be found here.

The Secretary of State for Transport announced the start of EWR Co's 2026 consultation in a Written Ministerial Statement on 14 April 2026 ('the WMS for EWR'), confirming that:

'East West Rail is central to the Government's economic growth mission and plans to unlock the potential of the Oxford to Cambridge growth corridor. By delivering new east to west connectivity, EWR can support up to 100,000 new homes, connecting new and established communities with improved access to employment, training, and education. By 2050, EWR is expected to boost the regional economy by £6.7 billion every year.

Strong alignment across Government to positively plan for development will help to capitalise on the transformational growth opportunity presented by EWR. Where development is near to existing or proposed EWR stations, the Government expect local and strategic authorities and developers to maximise housing densities to unlock economic growth. This should be in a way that promotes sustainable transport modes and improves connectivity to jobs and services, consistent with "Better Connected: A Strategy for Integrated Transport".

…

These proposals underline the benefits EWR will bring to communities along the route. The launch of this consultation reinforces the Government's commitment to their growth mission, realising the full potential of the Oxford to Cambridge growth corridor by supporting jobs, housing and economic activity.'

The 2026 consultation brochure includes updates on the following key topics and proposals relevant to the Greater Cambridge area and the draft Local Plan:

- Delivery of EWR and proposed train service specifications – see chapter 4 (pp.19-20)
- EWR Co's approach to good design – see chapter 7 (pp.35-43)
- Door-to-door connectivity, including active travel – see chapter 8 (pp. 45-49)
- EWR Co's approach to the environment – see chapter 9 (pp. 51-63)
- EWR Co's approach to traffic and construction – see chapter 10 (pp.64-73)
- Route-wide matters – see chapter 11 (pp. 75-79)
- EWR route between Croxton and Toft - see chapter 17 (pp. 217-235), including in particular:
    - Cambourne station (pp. 225-229)
    - A428 Bourn Airfield crossing (p. 233)
- EWR route between Comberton and Shelford – see chapter 18 (pp. 237)
- EWR route in Cambridge – see chapter 19 (pp. 257-277), including in particular:
    - The new eastern entrance for Cambridge station (pp. 262-266)
    - Cambridge East station (pp. 268-271)
    - Cambridge Eastern train care centre (pp. 272-276)

- North of Cambridge station (pp. 276-277)

Of these topics, the updates on Cambourne station, A428 Bourn Airfield crossing, the new eastern entrance for Cambridge station and Cambridge East stations are of particular relevance to the development allocations included in the draft Local Plan and to EWR Co's consultation response:

Cambourne station

As presented in the YSWD report and highlighted in EWR Co's response to the Regulation 18 consultation, taking account of consultation feedback and engagement with key stakeholders including the Councils, EWR Co is now proposing to locate Cambourne station 700m west of the previous proposal set out at NSC3 (see **Figure 1**). To accommodate this change, EWR Co has amended the locations of the active travel bridge over the A428 and the proposed passing loops.

EWR Co's proposed station design would include a station building, two platforms, active travel provision with cycle parking and facilities, bus stops, pick up and drop off facilities, and car parking, including a multi-storey car park. The main change to the station from the previous design at NSC3 is the proposal to provide an underpass beneath the railway, as opposed to a footbridge over the railway, with stairs and lifts to provide step-free access up to the platforms. EWR Co is continuing to liaise with the Councils and other stakeholders to understand how it could provide greater connectivity through the station, including through a potential enhanced station option which would be subject to additional funding from third party developer contributions to cover the increase in costs as against EWR Co's baseline station design.

EWR Co is continuing to explore opportunities with developers to further integrate the station with the proposed Cambourne North development, which could result in some reconfiguration of station facilities.

The proposed location for the station would require a change to the locations of the proposed passing loops and would enable an improved passenger timetable, while enabling freight services to continue to operate. EWR Co's previous design presented at NSC3 proposed a dedicated bridge to carry Knapwell Footpath 8 over the railway. Due to the revised station location, EWR Co now proposes to divert Knapwell Footpath 8 under the railway at the station, an active travel route which would also be available for people without train tickets. EWR Co also proposes to divert a watercourse alongside St Neots Road, which would pass beneath EWR close to New Inn Farm.

A428 Bourn Airfield crossing

As set out in the YSWD report and EWR Co's Regulation 19 consultation response, taking into account consultation feedback and further analysis, EWR Co is now proposing that the railway should run beneath the A428 and the Bourn Airfield development site through a mined tunnel (see **Figure 2**), instead of a cut-and-cover tunnel as presented at NSC3.

This would avoid the need for significant works at the surface, including road diversions. It would also reduce disruption to the proposed Bourn Airfield development and would have less environmental impact, including on nearby woodland and groundwater, and this change would have a lower overall construction

cost. In addition, this would avoid demolitions at Two Pots House Farm and a residential property at St Neots Road.

Compared to the previous tunnel alignment proposed at NSC3, EWR Co has moved the western tunnel portal slightly eastwards and repositioned the western portal further away from St Neots Road. The proposed position of the eastern portal has also been moved to the south-east to increase the distance from Waters Wood. This provides room for additional environmental mitigation planting, connecting priority habitats. This would help reduce the impact of the wide cutting on wildlife movement, particularly for protected species. EWR Co would carry out landscape screening earthworks at both ends of the tunnel and the approaches, which would also be planted with grass and trees to reduce visual impacts. The eastern portion of the tunnel intersects the existing Caldecote Footpath 9. EWR Co propose that this footpath is diverted west to Highfields Caldecote. Additionally, a new east-west route between Highfields Caldecote and Hardwick would be provided as an enhancement to existing provision for users in this area.

New eastern entrance for Cambridge station

As announced in the YSWD report and highlighted in EWR Co's Regulation 18 consultation response, EWR Co are proposing a new eastern entrance to Cambridge station at Clifton Road (see **Figure 3**), realising this long-held ambition to provide an eastern gateway to the station. This would allow a transformational change in how communities access Cambridge station. The new entrance would make the railway more convenient to access and more attractive for residents and local businesses. It would include:

- A new station entrance with step-free access to all platforms, a ticket gateline, and staff facilities;
- A small passenger pick-up and drop-off area outside the station entrance, including spaces for people with reduced mobility;
- An active travel hub outside the station entrance, connected directly to cycle lanes and footpaths, providing secure storage space for hundreds of bicycles, cargo-bikes, and other small vehicles that help to cut congestion and reduce emissions; and
- Landscaping and street improvements around the station entrance, such as seating and lighting, to improve the environment and to better integrate the station with surrounding neighbourhoods.

A new eastern entrance offers a once-in-a-generation opportunity to deliver on a long-held aspiration for Cambridge. It would kick start the transformation of the Clifton Road area, significantly improving access to the eastern side of the railway and the surrounding communities.

EWR Co will continue working closely with the Councils, landowners and other partners to identify how the new entrance will integrate with the wider masterplan area, and to ensure the new entrance integrates smoothly with buses, walking and wheeling routes, and other local transport services, including the future stages of the Chisholm Trail.

EWR Co's proposals for the Clifton Road Entrance reflect its commitment to delivering a station that is not only fit for the future, but also responsive to the needs of the local community and fundamental to stimulating the wider economic growth of the city.

Cambridge East station

EWR Co's proposed new station, Cambridge East, would improve connectivity and unlock economic growth in the east of the city. The new station would be near Cambridge City Airport and along the existing Newmarket Line, which would be upgraded as part of the wider EWR proposals (see **Figure 4**). This station would serve the villages to the east of Cambridge, as well as the proposed Local Plan allocations and future proposals in the area, while reducing pressure on Cambridge station. Emerging proposals for Cambridge East station were previously highlighted in the YSWD report and EWR Co's Regulation 18 consultation response. The inclusion of the Cambridge East station in EWR Co's proposals follows a review of feedback from NSC3 and ongoing discussions with a range of stakeholders including the Councils, Network Rail, and other third-party organisations. The provision of this station would be subject to third party funding.

The station will include step-free platforms, clear routes through the station, and passenger pick-up and drop-off, along with blue-badge parking. Connections to walking, wheeling and cycling routes would link to existing and proposed active travel corridors such as the Tins path and Phase 2 of the Fulbourn Greenway. EWR Co's proposals would also include passenger facilities.

EWR Co is in the process of developing the preferred station configuration including the station building and facilities. The proposed Cambridge East station location is on a historic landfill site. Whilst EWR Co's intention is to locate Cambridge East station building directly adjacent to the existing rail line, due to uncertain ground conditions, the location of the station or the design layout may need to be adjusted. EWR Co will look to reduce the amount of land needed for the station where possible.

If the station building is on land further to the north of the Newmarket Line, this could require realignment of Coldhams Lane, which would be subject to further design development and consultation. Any changes would be designed to reduce impacts on road users and the surrounding area, and further details would be developed as the station design is refined.

EWR Co is investigating active travel routes to connect Cambridge East to homes, key destinations, and existing walking, wheeling and cycling routes, including the Tins path. This would contribute to a sustainable integrated public transport network in the area. EWR Co would also connect rail and bus services at Cambridge East.

North of Cambridge Station

EWR Co's proposals north of Cambridge station include updates to the track layout and infrastructure to support EWR while improving operational capability to the north. EWR Co does not intend to introduce additional rail services to Cambridge North station. Noise mitigation would be provided between Mill Road and Coldhams Lane. At Cambridge North, the track layout would be modified to support the wider operational strategy for the Cambridge area and reduce construction impacts when EWR Co constructs the main scheme. These changes would enable the re-provision of railway sidings removed elsewhere as part of the station works at Cambridge, and provide flexibility for EWR services to terminate at Cambridge

North station if needed. EWR Co is considering a new footbridge north of the station to provide a secondary emergency evacuation route.

North of the existing Cambridge North station, Network Rail (NR) and EWR Co are proposing a new Maintenance Delivery Unit (MDU) on the west side of the railway. This MDU would provide a home for NR maintenance teams to enable efficient responses to maintenance incidents on the railway. The unit would comprise staff welfare facilities, equipment and materials storage and parking for staff maintenance vehicles. The MDU would replace existing NR facilities at Cambridge station and Foxton, providing new, modern, high quality facilities for NR staff.

EWR Co's proposals also include updates to rail access and supporting infrastructure north of Cambridge North, including changes to traction power and telecommunications assets, to enable the safe and reliable operation of services.

East West Rail Safeguarding Directions

To protect the planned route of the railway from conflicting development, the Secretary of State for Transport safeguarded land required for the EWR project by giving Safeguarding Directions to the relevant local planning authorities (LPAs), including South Cambridgeshire District and Cambridge City Councils, on 14th November 2024, under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

EWR Co also produced guidance for LPAs setting out how the Safeguarding Directions should be implemented and administered ('the safeguarding guidance'). The safeguarding guidance was provided to LPAs by EWR Co along with the Safeguarding Directions on 14th November 2024. Paragraphs 24-29 of the guidance set out how the Safeguarding Directions should be taken into account in the preparation of local plans. This includes the requirements that the limits of land subject to Safeguarding Directions ('the safeguarded area') be shown on the policies map and that LPAs should not include any proposals in their local plan that conflict with the Safeguarding Directions (paragraph 24).

On 19th November 2025, the Secretary of State updated the safeguarding directions to ensure that the safeguarded land aligned with EWR Co's proposals as outlined in the YSWD report.

On 30th June 2026, the Secretary of State updated the Safeguarding Directions to make amendments to include land required for EWR Co's proposals published in its 2026 Consultation ('the updated Directions'). The updated Directions replace the November 2025 Safeguarding Directions. The EWR safeguarding guidance was also updated with minor consequential amendments and provided to the relevant LPAs. EWR Co sent the Councils a copy of the updated Directions and the associated plans and guidance on 30th June 2026.

The Safeguarding Directions apply to any application for planning permission not finally determined by that date, where any of the land within the planning application boundary falls within the safeguarded area. As a result, relevant local planning authorities must consult EWR Co on any planning applications covered by the Safeguarding Directions before determining those applications.

The Safeguarding Directions, guidance, maps and GIS shapefiles showing the safeguarded area can be found at the EWR website: www.eastwestrail.co.uk/safeguarding.

EWR Co's consultation response

As highlighted in its response to the Regulation 18 consultation, EWR Co strongly supports the Councils' overarching growth strategy for Greater Cambridge that underpins the draft Plan (Policy S/DS: Development Strategy, Section 2), which is 'heavily informed' by the location of existing and proposed public transport schemes, including EWR (para 2.82, p. 56 of the draft Local Plan). EWR Co also continues to support the Plan's focus on promoting patterns of development that enable low carbon transport modes, shifting away from a reliance on private cars, which is reflected in the Climate Change and Connectivity and Infrastructure strategic priorities (Section 1 and throughout the draft Plan) and draft Policy I/ST: Sustainable Transport and Connectivity (Section 10). The EWR project will play a major role in helping the Councils achieve their ambitions for Greater Cambridge by 2045.

The proposed EWR station at Cambourne will help to unlock significant development within the Cambourne North site allocated under draft Policy S/CBN. EWR Co welcomes the draft Plan's recognition of the 'significant benefits' that will be provided by the proposed EWR Cambourne station, which the proposed strategic development at Cambourne will take advantage of (Section 2, para 2.64, p. 52). EWR Co agrees that the EWR project will make the town one of the 'best-connected places in the region' (Section 3, para 3.3.2, p. 277), providing an opportunity to grow and enhance the town and increase the critical mass of population, employment and services available to the existing and future communities in the area (para 2.64).

The Councils' recognition of the strategic opportunity presented by the proposed Cambridge East station, and support for its delivery set out in draft Policy S/AMC/SCL, is welcomed. EWR Co's proposed Cambridge East station will provide a step change in public transport connectivity for the Cambridge East development site, the South of Coldham's Lane sites within the Area of Major Change, and eastern Cambridge more widely. EWR Co would welcome recognition of this in the Local Plan, as was included in the Regulation 18 version.

With regard to a new eastern entrance to Cambridge station, EWR Co agrees that its delivery would be a significant factor in unlocking development of the Clifton Road site, that it would bring benefits to people using the railway, including those at Hills Road Sixth Form, and that it presents a significant opportunity to enhance the regional transport interchange capabilities around Cambridge railway station (Section 3.1, Policy S/C/LCR, paragraph 3.1.11, p. 90). As highlighted above and in its response to the Regulation 18 consultation, EWR Co has included a new eastern entrance to Cambridge station in its proposals, to realise this long-held ambition and deliver the significant benefits associated with it. EWR Co's comments regarding the provisions included in the draft Local Plan for a new eastern entrance are set out further below.

EWR Co also welcomes the draft Local Plan's focus on ensuring that land is used effectively when being developed, as set out in draft Policy GP/HD: Housing Density (Section 7), which requires that, subject to

meeting the policy's other requirements, high density development will be supported where the site is well served by existing or proposed high quality public transport infrastructure. In line with this draft policy, the Secretary of State's WMS on EWR and the revised National Planning Policy Framework (August 2026) ('the revised NPPF'), EWR Co would support maximising densities around stations which will be served by EWR at Cambourne, Cambridge South, Cambridge, and Cambridge East, as development in these areas would benefit from being in highly sustainable locations.

Having reviewed the policies and proposals in the draft Local Plan, EWR Co wishes to make the following specific comments requesting amendments to the Plan in the interests of ensuring that its proposals and those of the Council are aligned and that the Plan meets the tests of soundness set out in the National Planning Policy Framework (December 2024) ('the NPPF'):

Policy I/SI: Safeguarding important infrastructure (Section 10) - policies map

As set out in paragraph 24 of the EWR safeguarding guidance, the area safeguarded by the Safeguarding Directions should be represented on the policies map (in accordance with regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The draft Local Plan policies map includes the land identified as being required for EWR which was presented at 2026 consultation. In order to reflect the wording of Policy I/SI, which indicates that land subject to safeguarding directions is identified on the policies map, EWR Co recommends that the policies map is updated to show the current safeguarded land included in the Safeguarding Directions given in June 2026. The Councils should continue to update the policies map to reflect any further directions, or revisions to the directions, prior to submission of the Plan.

Showing the area safeguarded by the current EWR Safeguarding Directions will help those considering development in the area, as it will facilitate early engagement between developers and EWR Co, thus allowing EWR Co to consider how proposals interact with EWR and how they might be accommodated with the proposed railway project at an early stage. This will help to avoid the possibility of a recommendation for refusal being made to the LPA by EWR Co at the planning application stage.

Policy I/SI: Safeguarding important infrastructure (Section 10) - policy and supporting text

EWR Co strongly supports the provisions of draft Policy I/SI setting out that planning permission will not be granted for development that would prejudice the construction or effective operation of East West Rail proposals within the safeguarded area, and that consultation will be required with EWR Co. Inclusion of this criterion is necessary for the Plan to be positively prepared, effective and consistent with national policy including the WMS for EWR, and therefore to be sound.

EWR Co welcomes the amendments to the supporting text under paragraphs 10.46 and 10.47 which reflects its comments made at the Regulation 18 consultation, and provide clarity regarding the current safeguarding directions and align with paragraph 26 of the safeguarding guidance. Should any further revisions or updates be made to the EWR Safeguarding Directions prior to the submission of the Local

Plan, EWR Co recommends that paragraph 10.46 is amended to reference the latest directions, in order to provide clarity to developers, landowners and other stakeholders reading the Plan.

EWR Co notes that criterion 5 of Policy I/SI may be prohibitive to early development proposals in the vicinity of the proposed Cambridge East Railway Station including within the Area of Major Change (site S/AMC/SCL). EWR Co recommends the following amendments to link the safeguarding policy to the operations of the airport and thus allow for development proposals to progress seamlessly (additions bolded and underlined).

> *5. Development, including changes of use, which is likely to lead to an increase in the number of people living, working or congregating on land within Cambridge Airport Public Safety Zone, as identified on the Policies Map, will not be permitted* ***unless development would be occupied only following the permanent cessation of flight operations at Cambridge Airport.***

EWR Co notes that draft Policy I/SI safeguards Mullard Radio Astronomy Observatory (MRAO) at Lord's Bridge, in line with the adopted Local Plans. The EWR route will pass through the Lord's Bridge Restricted and Consultation Areas, as shown on the policies map. EWR Co is continuing to work with the University of Cambridge to determine the extent which electromagenetic interference and vibrations caused by the proposed railway would impact the MRAO, and how any impacts would be appropriately mitigated.

Policy GP/HD: Housing Density (Section 7)

EWR Co supports draft Policy GP/HD, which sets out that subject to satisfactorily demonstrating compliance with criterion 1, higher density development that exceeds local prevailing densities will be supported provided the site is well served by existing or proposed high quality public transport, including railway stations (criterion 5). In line with the WMS for EWR and the revised NPPF, EWR Co continues to support maximising densities on those sites which will be best served by EWR's high quality rail service, including at Cambourne and Cambourne North, Cambridge Biomedical Campus, Clifton Road, and Cambridge East as development in these areas would benefit from being in highly sustainable locations with excellent access to jobs and services.

In line with the WMS for EWR and the revised NPPF, EWR Co considers that the policy could more clearly recognise the role that existing and proposed railway stations can play in supporting sustainable higher-density development. Improved rail accessibility can create opportunities for additional homes, employment floorspace and mixed-use development in locations where dependence on private vehicles can be reduced and access to services, jobs and public transport can be maximised.

EWR Co suggests the following additional policy text which would reflect best practice and support the Plan at examination by aligning it with national policy (suggested additions bolded and underlined):

> ***High density development in sustainable locations:***
>
> *2. Subject to satisfactorily demonstrating the above, higher density development that exceeds local prevailing densities will be supported provided the site is:*

…

d. Within walking distance (800m) of existing and proposed railway stations. These areas should be planned as accessible, mixed-use and transit-oriented locations. Development proposals should optimise opportunities for higher-density growth and efficient use of land arising from investment in rail infrastructure where consistent with place-making, infrastructure capacity and other policy requirements.

Policy I/ST: Sustainable transport and connectivity (Section 10)

Whilst EWR Co are supportive of draft Policy I/ST and consider it to be suitable for the achievement of the Councils' ambitions, the Plan should go further to recognise the role of station locations as potential higher-density, transit-oriented growth nodes and avoid inadvertently constraining opportunities for additional homes, employment floorspace and mixed-use development that may be demonstrated to be sustainable through future masterplanning and technical assessment. EWR Co suggests that the following amendment is made to draft Policy I/ST to ensure consistency with the national policy including the WMS for EWR and revised NPPF (suggested additions bolded and underlined):

5. Where public transport infrastructure proposals will substantially enhance connectivity, development proposals which will be well-served by new infrastructure (within 800m radius) must be masterplan led and respond positively to the future context, following a Transit Oriented Development approach where density and land-use take advantage of future enhanced connectivity. However, proposals must be phased appropriately using an infrastructure first approach where the delivery of housing or other types of development corresponds with enhanced transport connectivity.

Policy S/CBN: Cambourne North (Section 3.3)

Draft Policy S/CBN allocates an area north of Cambourne for strategic development including approximately 13,000 homes and 108,000m^2 gross internal area of employment floorspace, with a range of supporting facilities. EWR Co strongly supports the proposed allocation and spatial framework (Figure 66 of the draft Plan), which aligns with its proposals for an EWR station at Cambourne and which will maximise the benefits of this highly sustainable location served by the new station and EWR services.

EWR Co agrees with the Councils' vision for the site, including that the new station will serve as a focal point and gateway to the town and provide a range of facilities (criterion 7).

As set out in criterion 10, integration of Cambourne North with the existing town will be critical to its success. EWR Co considers that its proposals for the new station to be located north-east of the A428/Cambourne Road double roundabout, with a new footbridge over the A428 and St Neots Road, will help to facilitate connectivity between the existing and new communities.

EWR Co supports criterion 2, which sets out that a site-wide masterplan will be prepared by the landowners/promoters in conjunction with the Council and in consultation with the local community and stakeholders including EWR Co.

EWR Co furthermore supports criterion 12, which sets out the uses the site is allocated for, including a 'range of housing sizes, types, and tenures based on identified existing and future local needs, including affordable housing and homes to accommodate people at all stages of life'.

The requirements for the new development as set out in the policy are also welcomed by EWR Co, including that:

- the development delivers a new 'Station Quarter and Town Centre, anchored by a new railway station, that will become the 'heart of the town extension' (criterion 16);
- highest densities (circa 90 dwellings per hectare) should be focused at the Station Quarter and Town Centre quarter (criterion 17(a));
- higher densities should be delivered in employment locations that are within walking and cycling distance of the new station (criterion 17(b));
- mitigation of any impacts from the new railway and station should be embedded in the design (criterion 22);
- a comprehensive movement and connectivity network for the town should be delivered, which prioritises sustainable and active travel modes and connects key locations including the new EWR station (criterion 37):
    - setting aside land and/or directly delivering transport measures including:
        - enhanced and new walking and cycling links across the East West Rail route (with the reprovision of existing road connections affected by the new railway) (criterion 37 (b)(i));
        - the new high quality and appropriately facilitated EWR station with suitable access arrangements by all modes, facilitated by a mobility hub and high-quality active travel infrastructure connecting the station to centres, neighbourhoods and surrounding villages (criterion 37 (b)(ii));
        - Public transport corridors providing connectivity across the development to the new railway station and towards Papworth Everard and the existing Cambourne town, integrating with the Cambourne to Cambridge high quality public transport corridor (HQPT) (criterion 37 (b)(iii));
    - directly delivering, or where this is not possible, making financial contributions towards
        - new and enhanced north-south connections, including a landmark 'landbridge' (criterion 37 (c)(i));
        - high quality and safe active travel connections to surrounding villages, pedestrian and cycle improvements at existing junctions on the A428 and strategic active travel improvements (criterion 37 (c)(ii), (iv) and (v));
        - a new public transport and active travel bridge to the west of the A428 dumbbell roundabout to link with the emerging Cambourne West development (criterion 37 (c)(iii));
    - improved local bus connections to coincide with the opening of the station, including between Cambourne North and nearby villages as well as other settlements and key employment areas where required (criterion 37 (d)(ii));

- highway improvements and mitigation, including additional enhancements to the 'dumbbell roundabout' A428 junction to coincide with and supplement measures implemented as part of EWR, and capacity enhancements at the junctions and on local roads where demonstrated necessary through transport modelling (criterion 37 (e)(i) and (ii)).

EWR Co has been working closely with the Councils to explore the opportunity for the enhancement of Cambourne station with facilities over and above those provided by its high quality baseline station option; including, for example, a road link under the station connecting the A428 and the proposed Station Quarter. EWR Co's baseline station option, served by its fast, frequent rail services across the Oxford-Cambridge Growth Corridor, will help to unlock significant sustainable development at Cambourne North. The enhanced station option would build on this, helping to maximise the opportunity presented by EWR.

Provision of the enhanced station option is subject to third-party funding, without which EWR Co will only be able to provide the baseline station proposals. EWR Co therefore supports criterion 16(b) requiring developers to pay a financial contribution to the delivery of an enhanced station, through a future Community Infrastructure Levy (CIL) tariff.

As set out in the Station Enhancement Study, EWR Co will be seeking consent for the baseline station option as part of its application for development consent. The baseline option integrates the high-quality placemaking principles set out in the Rail Integration and Station Enhancement studies, so far as these can be delivered by EWR Co. It is important that criterion 16(a) of the Plan is not a requirement for EWR Co to provide this enhanced station as part of its Development Consent Order proposals and is instead linked to third-party developers financial contributions necessary for its delivery. As otherwise, this would risk undermining EWR Co's application for development consent, which will not include the enhanced station option, and in turn delivery of Cambourne station, the wider project and the proposed Cambourne North allocation. To ensure that this outcome is avoided and Plan meets the tests of soundness of being positively prepared, effective and consistent with national policy including the WMS for EWR, EWR Co requests that the following amendments are made to Policy S/CBN:

> *The development of Cambourne North must do the following:*
> *…*
> *16. Deliver a new Station Quarter and Town Centre, anchored by a new railway station and multi-modal transport interchange, that will become the heart of the town extension. The design must:*
>
> *a. Include a landmark railway station, ~~based on high-quality placemaking principles outlined in the indicative Spatial Framework, Rail Integration Study and Station Enhancement Study,~~ forming a key component of the Station Quarter, Cambourne North and the overall town and serving the needs of the wider area;*
>
> *b. Developers will be required to pay a financial contribution to the delivery of an enhanced EWR Station**, based on high-quality placemaking principles outlined in the indicative Spatial Framework, Rail Integration Study and Station Enhancement Study,** to support the new station interchange that will be a focal point for Cambourne North, providing a range of facilities and acting as a new gateway to the town and strategic Cambourne expansion. This will include a direct link*

under the proposed station for both active travel and public transport and will be secured through a future Community Infrastructure Levy (CIL) tariff;

EWR Co strongly supports the Councils' leadership and collaborative working to bring forward draft Policy S/CBN and looks forward to continuing to engage closely to deliver a high quality new station at Cambourne, integrated seamlessly with new development to the north and existing communities to the south.

Land within the S/CBN allocation site identified as being required for the delivery of EWR is shown on **Figure 5**, and includes land needed for the new railway, Cambourne station, and associated development. This land is included in the EWR safeguarded area. EWR Co supports criterion 15 which requires that the development makes provision for and does not preclude the delivery of EWR and associated rail infrastructure. EWR Co furthermore notes that Policy I/SI and the Safeguarding Directions will also be relevant to future applications for the development of the site.

Policy S/CB: Cambourne (Section 3.3)

Draft Policy S/CB provides the planning framework for managing new applications for development within the existing Cambourne town, in the context of the new strategic allocation for expansion of the settlement to the north and the proposed EWR station at Cambourne.

EWR will provide significant benefits to the existing community and businesses at Cambourne and support further development within the town, with the EWR station to the north forming a new sustainable transport hub which will place Cambourne at the heart of the Oxford-Cambridge Growth Corridor. To ensure that these benefits are maximised, EWR Co agrees that seamlessly integrating Cambourne with the new railway station to the north of the A428 and the EWR route will be critical (criterion 61). To this end, it supports criteria 60-63 of draft Policy S/CB, which sets out that Cambourne and Cambourne North (draft S/CBN) will be planned as one town and the requirements to achieve effective integration and address potential barriers to movement including the A428 and the new railway.

In order to integrate the new station with Cambourne, EWR Co is proposing a new footbridge over the A428 to the north of Cambourne Sports Centre. The land required to deliver this new crossing within the S/CB allocation site is shown on **Figure 6**. This land is included in the EWR safeguarded area. EWR Co supports the requirement in criterion 62 that other new or enhanced connections must not conflict with, or prejudice the delivery of EWR proposals, and notes that Policy I/SI would also apply where development is proposed on land required by EWR.

Policy S/BA: Bourn Airfield New Village (Section 3.3)

Policy S/BA carries forward the allocation of the Bourn Airfield site included in the South Cambridgeshire Local Plan 2018, for a new village of up to 3,500 homes, together with associated community facilities and infrastructure improvements.

As previously highlighted, EWR Co is proposing to route the new railway through a mined tunnel under the A428 and the Bourn Airfield site. Land within the site which is within the safeguarded area, including the land required for the mined tunnel, is shown in **Figure 7**.

Much of the length of the new tunnel is within land identified for open space in the approved parameter plans under planning permission ref. S/3440/18/OL and the Spatial Framework for the site (Figure 72 of the draft Plan). However, part of the tunnel may be located under land identified for mixed use/residential-led development in the land use parameter plan and Spatial Framework. It is important that proposals for any built development above or near to the tunnel are suitable for such a location and would not conflict with or prejudice the delivery of EWR, or its operation, including through prejudicing the long-term integrity of the mined tunnel. There may also be a requirement for EWR to utilise land within the site in order to construct the proposed tunnel, mitigate impacts on A428, and/or undertake utilities diversions.

EWR Co notes that Policy I/SI would apply where development is proposed on land required by EWR. EWR Co supports the text in paragraph 3.3.97 highlighting that it will be important that construction is co-ordinated between EWR and the Bourn Airfield development to minimise disruption and avoid either project conflicting with or prejudicing the delivery of the other. Nonetheless, EWR Co considers that paragraph 3.3.97 should make clear that any built development above or near to the proposed EWR tunnel is suitable for such a location, in order to ensure the Plan is consistent with national policy and thus meets the tests of soundness. It therefore requests that paragraph 3.3.97 is amended as follows (additions bolded and underlined):

> *…The East West Railway (EWR) project proposes to go under this new settlement* ***via a mined tunnel****. It will be important that* ***any built development above or near to the tunnel is suitable for such a location, and that*** *phases of construction between the two proposals, as well as the high quality transport scheme linking the new village with Cambourne and Cambridge, are coordinated to minimise disruption as much as possible and do not conflict or prejudice the delivery of either project.*

Policy S/RRA/SNR: Land to the North of St Neots Road, Dry Drayton (Section 3.5)

Draft Policy S/RRA/SNR allocates a site north of St Neots Road for approximately 5,000m^2 of employment development. The land within the site which EWR Co has identified as being required to deliver its proposals is included within the EWR safeguarded area and shown on **Figure 8**.

EWR Co supports the requirements of draft Policy S/RRA/SNR, including that development must demonstrate how it implements measures necessary to provide good public transport and active travel access to the site from surrounding existing and planned developments (criterion 1 (b)) and that landscape proposals must take into account landscape enhancements associated with EWR (criterion 1 (a)).

Criterion 1 (c) requires that 'development must not prejudice the preferred East-West Rail route alignment or its delivery'. EWR Co also notes that Policy I/SI would apply where development is proposed on land required by EWR.

Policy S/RRA/H: Land at Highfields (Phase 2) (Section 3.5)

Draft Policy S/RRA/H proposes to allocate land at Highfields for 65 dwellings. The site is in close proximity to the proposed EWR route. EWR Co is currently developing its proposals for environmental mitigation and temporary Public Rights of Way (PRoW) in this area, which have the potential to interface with the eastern boundary of this allocation site. Since its comments on the Regulation 18 consultation, EWR Co has refined its proposals in this area and no longer requires land within this allocation site to deliver EWR.

Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital) (Section 3.2)

The draft Local Plan allocates Cambridge Biomedical Campus (including Addenbrooke's Hospital) ('the Campus') for continued development and expansion through the release of Green Belt, under draft Policy S/CBC. EWR Co continues to support the principle of the development and expansion of the Campus, as this aligns with EWR Co's objective to facilitate economic growth within the Oxford–Cambridge Growth Corridor.

As EWR services will stop at Cambridge South station, the project will support fast and easy travel to the Campus, reducing travel times from Cambourne and Bedford significantly, expanding the number of people within commuting distance of the Campus, and therefore will help it to attract and retain the best talent. EWR will thus contribute to the Councils' vision for the Campus as a place which continues to 'evolve as a globally significant centre of healthcare, research and innovation, where clinical, academic and commercial activities collaborate seamlessly to improve lives' (criterion 2). Given that EWR will support the continued development and expansion of the Campus, EWR Co would welcome recognition of this in the supporting text to draft Policy S/CBC.

EWR Co has identified that small areas of land within the Campus, along the existing West Anglia Main Line, are required to deliver its proposals in the area. This land is included in the safeguarded area and is shown in **Figure 9**. EWR Co's proposals in the area include the installation of two new tracks on the west side of the existing West Anglia Main Line between Shepreth Junction and south of Cambridge station; integration of the new tracks with Cambridge South station; and works to widen the bridge at Long Road to allow four tracks to pass under it. EWR Co notes that Policy I/SI would apply where development is proposed on land required by EWR.

Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) (Section 3.1)

Draft Policy S/C/LCR proposes to allocate the Clifton Road and Cambridge Junction and Leisure areas for approximately 300 homes, a hotel, concert and performance spaces, and employment and leisure uses. The draft policy requires a site-wide masterplan to be prepared by the landowners/promoters in conjunction with the Council and in consultation with the local community and other stakeholders including EWR Co (criterion 3). The masterplan must furthermore demonstrate that it 'makes provision for and positively responds to the proposed future eastern entrance to Cambridge railway station, providing seamless connections between active travel infrastructure and public transport serves both within and beyond the site' (criterion 4(d)). Criterion 26(a) requires the safeguarding and delivery of the new eastern

entrance, including space for essential infrastructure and security features required to deliver the new station entrance, which should include evidence of the possibility and feasibility of providing an unpaid pedestrian link over the railway as part of the station design.

As previously highlighted, EWR Co is proposing a new eastern entrance to Cambridge station. The proposals currently included in EWR Co's plans comprise the minimum development and land-take needed to deliver a functional station building with the necessary key facilities to meet forecast passenger demand. This is the 'baseline' option, which includes a new station building with key facilities such as: paid and unpaid concourse; ticketing area; drivers' facilities; a small area of retail; an active travel hub; and car parking. Outside of the station building footprint, the baseline option includes a railway crossing for station users only; cycle parking; and a minimal station frontage to support pick-up-and-drop-off (PUDO) and station access. The baseline station will be included in EWR Co's application for development consent.

Land identified as being required for EWR Co's baseline option is shown in **Figure 10** and included in the safeguarded area. EWR Co supports criterion 17 of Policy S/C/LCR which requires that development proposals must not prejudice the delivery of the preferred EWR alignment and associated rail infrastructure, including any eastern entrance to Cambridge railway station. EWR Co also notes that Policy I/SI and the Safeguarding Directions will be relevant to future applications for the development of land included within the safeguarded area.

Whilst EWR Co's baseline option will comprise a high quality station and facilities providing excellent connectivity, in order to maximise the benefits of EWR, it has undertaken work to explore other options for the station, including considering over-station and adjacent site development and urban integration opportunities. Further to its Regulation 18 response, EWR Co's view is that there is a once-in-a-generation opportunity for a landmark new station building, including the key functional features of the baseline option, together with over-station development including residential, hotel and employment uses; a new station square and approach with active travel playing a central role; and an 'unpaid' pedestrian footbridge allowing members of the public, including those living and working in the area, to cross the railway line without a ticket. This potential enhanced eastern entrance would form the core of a transformed Clifton Road, Cambridge Junction and Leisure area, unlocking significant additional mixed-use development, maximising the benefits of EWR, and both contribute to and justify the substantial investment which would be needed to provide a new station entrance.

Although the baseline station will form part of EWR Co's application for development consent and bring significant benefits, EWR Co is exploring how it could bring forward the enhanced station entrance described above to fully capitalise on the opportunity presented. Delivery of the enhanced station entrance option, including the unpaid pedestrian link, is dependent on third-party funding to be secured via over-station development and viable adjacent development. Without this additional funding, EWR Co would only be able to provide the baseline eastern entrance option, and the masterplan for the site required under criterion 4 would need to reflect this. In light of this, EWR Co welcomes the flexibility included in draft Policy S/C/LCR, noting that the Spatial Framework Diagram (Figure 13 of the Plan) is indicative.

EWR Co's view is that development of an enhanced station entrance, including the unpaid link, over-station development and redevelopment of the wider site, as described above, will make the most of the

once-in-a-generation opportunity which EWR presents for the area. EWR Co welcomes the changes to Policy S/C/LCR relating to Clifton Road and the new station entrance, which have been informed by close collaboration with the Councils and landowners since the Regulation 18 consultation, and provide the flexibility needed at this stage. EWR Co looks forward to continuing to work collaboratively with the Councils, landowners and the Greater Cambridge Development Corporation to build upon the strong policy basis set out in the Local Plan and maximise the opportunities presented by EWR in line with the WMS for EWR and the revised NPPF.

Policy S/C/SRW: Station Road West, Cambridge (Section 3.1)

The Station Road West site is allocated for approximately 11,300 square metres of office and research and development floorspace, and reprovision of station car parking.

Land within the allocation site identified as being required for the delivery of EWR is shown on **Figure 11**, and includes land needed for new railway infrastructure, utilities diversions, and construction access routes. This land is included in the EWR safeguarded area.

It is acknowledged that part of the allocation site has full planning permission for office and research and development floorspace, an apart-hotel and multistorey station parking. EWR Co is collaborating with the applicant to manage the interactions between the development and EWR. Policy I/SI and the EWR safeguarding directions will be important to ensuring that any forthcoming proposals for development of the site do not prejudice the delivery of EWR.

Policy S/AMC/BC: Beehive Centre (Section 3.1)

Policy S/AMC/BC allocates the Beehive Centre site as an AMC, setting out the requirements for any reconfiguration of the retail park.

EWR Co has identified that a small area of land within the Beehive Centre site is required for access to the railway to facilitate construction and operation of EWR. This land is shown on **Figure 12** and is included in the safeguarded area.

EWR Co acknowledges that redevelopment of the site, for a new local centre, employment floorspace, open space and supporting infrastructure, has outline permission granted by the Secretary of State for Housing, Communities and Local Government on 9th December 2025. EWR Co is working with the applicant to manage the interaction between the development and EWR. Policy I/SI will be important to ensuring that the detailed design of the development does not prejudice the delivery of EWR.

Policy S/AMC/SCL: South of Coldham's Lane (Section 3.1)

Draft Policy S/AMC/SCL allocates land south of Coldham's Lane as an AMC, divided into four separate parcels, for employment uses with complementary ancillary uses and car and cycle parking in the north-east; outdoor recreational uses and ecological enhancements and a safeguarded pedestrian and cycle

link in the south-west; residential-led mixed use and green infrastructure in the north, and the new Cambridge East station in the north-west.

EWR Co welcomes the support for, and safeguarding of, the new Cambridge East station and associated infrastructure set out in draft Policy S/AMC/SCL (criterion 2 (e)), together with the changes made to the Policy to promote higher density residential-led mixed use development on Area 3 of the site (criterion 2 (d)) and locate ecological enhancement and recreation on Area 2 (criterion 2(b)). The changes to the draft Policy support the delivery of Cambridge East station on the site and high density mixed-use development in a highly sustainable location, in line with the strategic priorities of the draft Plan, the WMS for EWR and revised NPPF.

Land identified as currently being required for EWR, including the new Cambridge East station, is included within the EWR safeguarded area and shown in **Figure 13**. As highlighted in EWR Co's Regulation 18 response, EWR Co is investigating potential land contamination issues relating to the land it has currently identified for Cambridge East station, which is included within the Policy S/AMC/SCL site. As such, EWR Co is exploring whether the station would need to be located on the Cambridge East site allocated under Policy S/CE. The new station, development of the South of Coldham's Lane AMC and Cambridge East are closely related and will need to be planned comprehensively to capitalise on the transformational growth opportunity presented by the new station. To account for the uncertainty regarding the new station location, the importance of comprehensive planning and its comments on draft Policy I/SI regarding the airport safeguarding areas, EWR Co requests the following changes to draft Policy S/AMC/SCL in the interests of meeting the tests of soundness of being positivity prepared and consistent with national policy including the WMS for EWR (additions bolded and underlined):

> *…*
> ***Comprehensive masterplanning and infrastructure delivery***
>
> *3. Development proposals must be supported by a comprehensive masterplan for the allocation to be approved by the Local Planning Authority. The masterplan must demonstrate:*
> *…*
> *h. Phasing and delivery arrangements, including how development would support and integrate with Cambridge East railway station* ***and the new city district planned at Cambridge East (Policy S/CE)****.*
>
> *4. Development proposals must:*
> *…*
> *d. Respond appropriately to site constraints, including the contamination, former landfill conditions, surface water drainage, groundwater, chalk stream environments, existing lakes, and operational and safeguarding requirements associated with Cambridge Airport and related height and use restrictions within the Air Safety Zone and Air Safeguarding Zones* ***until the permanent cessation of flight operations at Cambridge Airport; and***
>
> ***e. Demonstrate how they will contribute towards the coordinated planning and delivery of the wider Cambridge East area, including integration with the Cambridge East allocation***

(Policy S/CE) and Cambridge East railway station, ensuring a comprehensive approach to movement, public realm, land use, infrastructure and placemaking and avoiding the creation of physical or functional barriers between adjacent development parcels and policy areas.

Policy J/PB: Protecting existing business space (site J/PB 5(e)) (Section 8)

Draft Policy J/PB seeks to protect existing Strategic Industrial Estates, which are identified on the policies map. The draft policy in its current form may be prohibitive to a comprehensive masterplan for the area around the proposed Cambridge East railway station, including the Area of Major Change (draft Policy S/AMC/SCL) which it overlaps, due to the protection of site e. Coldham's Lane Business Park, for its current Industrial Estate use. This use may not be most appropriate for the future condition of the site when Transport Orientated Development, linked to the opportunities created by EWR proposals, should be prioritised. To ensure consistency with national policy, including the WMS for EWR, EWR Co considers that a fallback position should allow the site's safeguarded status to be reconsidered in this event, and recommends the following amendment (additions bolded and underlined):

1. Proposals for industrial and storage uses will be acceptable in principle on the Strategic Industrial Estates listed below. Development, including changes of use, which results in the loss of industrial and storage floorspace on Strategic Industrial Estates will be permitted only where there is compelling evidence that circumstances have changed to the extent that there is no reasonable prospect of floorspace, or land being used for these purposes, or where the strategic context of the site has materially changed, by reference to:

…

e. Whether changes in accessibility arising from existing or proposed strategic transport infrastructure have materially altered the strategic context of the site such that alternative forms of development would represent a more sustainable and efficient use of land.

Policy S/CE: Cambridge East (Section 3.2)

Draft Policy S/CE proposes to allocate Cambridge East for a new city district comprising a mixed-use development of 8,000 dwellings delivered from 2032, a wide range of supporting services and facilities, and significant employment floorspace. **Figure 14** shows the allocation site in relation to the EWR safeguarded area. EWR Co strongly supports the principle of a new strategic development on this site, which aligns with its proposals for a potential new EWR station at Cambridge East.

EWR Co supports the amendments to draft Policy S/CE, including under criterion 20 which reflects the need to realise the strategic opportunities presented by Cambridge East station by:

- not prejudicing the accessibility of the station or its delivery or operation or that of associated rail infrastructure (criterion 20(a));
- establishing a movement network, land use pattern and development density capable of supporting and benefiting from the new station (criterion 20(b));

- aligning the district centre and surrounding high-density mixed-use development to achieve high levels of accessibility to a potential station location (criterion 20(c));
- prioritising direct, safe and legible walking, wheeling, cycling and public transport connections between neighbourhoods, the district centre and mobility hubs, including the new station (criterion 20(d)); and
- enabling early phases of development to function effectively in advance of station delivery whilst remaining capable of integration with future rail services (criterion 20(e)).

EWR Co furthermore welcomes the clarification in the supporting text, that the boundaries of the Green Belt in the site are expected to be the output of a masterplanning exercise, and that following the completion of this exercise, the precise boundary will be confirmed via a review of the Local Plan (paragraph 3.2.13). As part of this masterplanning process, EWR Co would support consideration regarding whether land within the site could be released from Green Belt, in order to maximise the benefits of the proposed EWR station and support the draft Plan's vision and strategic priorities, whilst also aligning with national Green Belt policy.

Whilst the changes made to the draft Policy are welcomed, EWR Co considers that in the interests of ensuring consistency with national policy including the WMS for EWR, to capitalise on the step-change in sustainable connectivity presented by the new EWR Cambridge East station and improve connectivity to jobs and services, the Policy should allow for additional development beyond the proposed approximate 8,000 homes, where masterplanning demonstrates that additional growth would optimise the benefits of the station and remain sustainable. To ensure that the policy remains flexible and responsive to the opportunities provided by the future railway station, with potential for an uplift in final quantum of housing or employment floorspace in support of national policy, EWR Co requests the following changes to draft Policy S/CE (additions bolded and underlined):

> ***Lifespan***
>
> *24. In addition to the requirements of the validation checklist, the following will be required at the submission of an outline or major planning application:*
>
> *a. An overall masterplan, setting out the final capacity and mix of uses on site and demonstrating how the proposed development meets the requirements set out in this policy~~;~~.* ***The final capacity and mix of uses may exceed the indicative development quantum identified in this policy where it can be demonstrated through the masterplanning process that additional development would optimise the benefits of Cambridge East railway station, support transit-oriented development principles, make efficient use of land and satisfy all other policy requirements;***

As highlighted in its comments on draft Policy S/AMC/SCL set out above, EWR Co is investigating potential land contamination issues relating to the site it has currently identified for Cambridge East station, which is included within the Policy S/AMC/SCL site and within the safeguarded area shown on **Figures 13 and 14**. EWR Co therefore is exploring whether the station should be located on the Cambridge East site instead, and this is not currently reflected in the safeguarded area shown on **Figure 14**. Furthermore, the

new station, development of the South of Coldham's Lane AMC and Cambridge East are closely related and will need to be planned comprehensively to capitalise on the transformational growth opportunity presented by the new station and ensure seamless connectivity. To account for the uncertainty regarding the new station location and importance of comprehensive planning, EWR Co requests the following changes to draft Policy S/CE in the interests of meeting the tests of soundness of being positivity prepared and consistent with national policy, including the WMS for EWR (additions bolded and underlined):

> **Cambridge East station <u>and South of Coldham's Lane</u>**
>
> *20. Masterplanning and development delivery must realise the strategic opportunity presented by Cambridge East railway station by ensuring that it:*
> *…*
> *d. Prioritises direct, safe and legible walking, wheeling, cycling and public transport connections between neighbourhoods, the district centre, and mobility hubs including the railway station; ~~and~~*
> *e. Enables early phases of development to function effectively in advance of station delivery whilst remaining capable of integration with future rail services<u>;</u>*
> ***<u>f. Makes provision of land available for the new railway station, if land contamination assessments demonstrates that the preferred site for the station on land south of Coldham's Lane is not suitable for the station development; and</u>***
> ***<u>g. Is comprehensively planned and integrated with the new railway station and the South of Coldham's Lane Area of Major Change (Policy S/AMC/SCL)</u>***.

EWR Co considers that with the above proposed changes and those requested to draft Policy S/AMC/SCL, the Plan will have sufficient flexibility to respond to the significant opportunity presented by the station, and avoid inadvertently constraining its delivery or that of station-related growth, thus helping to maximise the sustainable development benefits of EWR and realise the full potential of the Oxford to Cambridge Growth Corridor in line with national policy set out in the WMS for EWR.

Paragraph 3.2.17 of the supporting text states that 'The delivery of any new station and associated rail infrastructure will be subject to a separate statutory consent process outside the control of the Local Planning Authority. Accordingly, the allocation does not depend upon delivery of the station in order for development to proceed or function effectively.' EWR Co's view is that, whilst early phases of development could proceed in advance of station delivery, the new Cambridge East station will provide significant benefits to the development in terms of sustainable connectivity and access to jobs and services, and that delivery of a sustainable high density district quarter in the south of the development will require the step-change in connectivity provided by the new EWR station. EWR Co would therefore welcome further recognition of the benefits of the new station to the proposed development in the supporting text. The Government has reiterated its commitment to EWR and EWR Co's growth mission of realising the full potential of the Oxford to Cambridge growth corridor by supporting jobs, housing and economic growth. Nonetheless, it is important to note that EWR Co would need to secure funding from a third-party to be able to build the station at Cambridge East.

Building on the partnership working to-date, EWR Co wishes to collaborate closely with the Councils, the Greater Cambridge Development Corporation, landowners and developers regarding proposals for the

new station and the wider Cambridge East and South of Coldham's Lane developments, to discuss how the station can be integrated with development to maximise local growth and opportunities for communities to the east of Cambridge.

Development strategy – Key Diagram (Figure 4 of the Plan) (Section 2)

EWR Co suggests that the proposed key diagram is revised to include the proposed Cambridge East station in both the main diagram and the inset to make clear that this new railway station is proposed and would support the overarching development strategy for Greater Cambridge.

Policy S/AMC/GT: Optimisation of Gypsy and Traveller Sites (Section 3.5)

The draft Plan highlights the need to provide additional Gypsy and Traveller pitches within Greater Cambridge. Policy S/AMC/GT sets out requirements for the optimise the use of land for Gypsy and Traveller pitches at Chesterton Fen Road (Milton).

EWR Co has identified that a small area of land within the Chesterton Fen Road site is required for railway infrastructure works for EWR. This land is shown on **Figure 15** and is included in the safeguarded area. Policy I/SI and the EWR safeguarding directions will be important to ensuring that any forthcoming proposals for development on the site do not prejudice the delivery of EWR.

Policy S/AMC/NEC: North East Cambridge (Section 3.1)

North East Cambridge is identified as an Area of Major Change proposed for a mixed-use innovation district. As highlighted above and in its previous Regulation 18 response, EWR Co has identified the requirement for land within the North East Cambridge site for new railway infrastructure and a Maintenance Delivery Unit (MDU). The MDU is required for Network Rail maintenance teams to enable efficient responses to maintenance incidents on the railway and will support the delivery of EWR. Land required for the new railway infrastructure and the MDU for NR within the North East Cambridge site is shown on **Figure 16** and is included in the EWR safeguarded area. EWR Co wishes to collaborate closely with the Councils, landowners and developers regarding masterplanning of the North East Cambridge site, taking into account the EWR requirements in this location. EWR Co furthermore notes that Policy I/SI and the Safeguarding Directions will also be relevant to future applications for the development of the site.

Participation in examination hearing sessions

EWR Co wishes to reserve the right to participate in the examination hearing sessions relating to the growth strategy and the specific policies referred to in this response, as these are relevant to the EWR project.

Summary and conclusion

EWR Co welcomes the significant and ambitious work undertaken by the Council to progress the Local Plan, including the positive work to refine the Plan and collaborate with EWR Co and other stakeholders

undertaken since the Regulation 18 consultation. EWR Co strongly supports the Councils' overarching growth strategy as proposed in the draft Local Plan. The EWR project will make a significant contribution to the Councils' vision for Greater Cambridge by 2045 and beyond, providing a transformational east-to-west rail link which will support the region's place within the Oxford–Cambridge Growth Corridor as an internationally significant innovation economy, whilst helping to reduce reliance on the private car and supporting carbon reduction goals.

EWR Co welcomes the Councils' recognition of the importance of EWR to Greater Cambridge, and in particular the significant opportunities and benefits presented by new stations at Cambourne and Cambridge East, and a new eastern entrance to Cambridge station at Clifton Road. EWR Co strongly supports the proposed allocation and spatial framework for draft Policy S/CBN: Cambourne North, which aligns with EWR Co's proposals for an EWR station at Cambourne and which will maximise the benefits of this highly sustainable location served by the new station and EWR services. The changes proposed to draft Policy S/CBN are supported and EWR Co proposes minor further amendments to ensure the Plan does not inadvertently undermine EWR Co's proposed baseline Cambourne station and in turn that the Plan meets the tests of soundness. EWR Co looks forward to continuing close partnership working with the Councils, Greater Cambridge Development Corporation, landowners and developers to progress the delivery of the Cambourne North development and the new EWR station.

Furthermore, EWR Co welcomes the changes made to policies S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure), S/AMC/SCL: South of Coldham's Lane and Policy S/CE: Cambridge East, which supports its proposals for Cambridge station and Cambridge East station. In respect of Policies S/AMC/SCL and S/CE, EWR Co requests further minor amendments to ensure that development in the east of Cambridge is planned comprehensively, and that the Plan includes sufficient flexibility to respond to the significant opportunity presented by the station and avoid inadvertently constraining its delivery or that of station-related growth. In order to capitalise on the once-in-a-generation opportunity presented by EWR, EWR Co wishes to continue collaborating closely with the Councils, the Greater Cambridge Development Corporation, landowners and developers regarding masterplanning to maximise the benefits of its proposed new Cambridge station eastern entrance supporting the Clifton Road development allocation, and of its proposed Cambridge East station supporting the Cambridge East and South of Coldham's Lane allocations.

EWR Co supports draft Policy GP/HD: Housing Density, which promotes high density development in sustainable locations. EWR Co continues to be supportive of maximising densities on those sites which will be best served by EWR, including at Cambourne and Cambourne North, Cambridge Biomedical Campus, Clifton Road, and Cambridge East as development in these areas would benefit from being in highly sustainable locations. EWR Co will continue to work closely with the Councils, the Greater Cambridge Development Corporation, landowners and developers to build on the work undertaken to-date and make the most of the opportunity presented by EWR stations, in line with the WMS for EWR.

The amendments to Policy I/SI, setting out that planning permission will not be granted for development that would prejudice the construction or effective operation of East West Rail proposals within the safeguarded area, are strongly supported and important for Plan to meet the tests of soundness. EWR Co

requests updates to the policies map to reflect the updated Safeguarding Directions given by the Secretary of State for Transport in June 2026.

In line with the approach it takes across the EWR route, EWR Co is committed to working closely with the Councils, landowners and developers in Greater Cambridge to seek to ensure that both EWR and proposed development allocations can be delivered alongside each other; develop design solutions which support EWR, the proposed developments and existing and future communities; and to seek to avoid or reduce conflicts between EWR and new developments and mitigate any impacts arising. EWR Co is furthermore committed to seeking to make the most of the benefits of EWR for existing and future communities within Greater Cambridge, making the most of the once-in-a-generation opportunities it presents.

EWR Co looks forward to continuing to work positively and collaboratively with the Councils as they proceed to finalise the draft Plan and submit it for examination.

If the Councils have any queries or require any additional information or clarification, then please do not hesitate to contact me.

Yours faithfully,

M. Barron

Matthew Barron
Associate

Figure 1: Updated location for proposed Cambourne Station (Figure 75 from EWR 2026 Consultation Brochure)

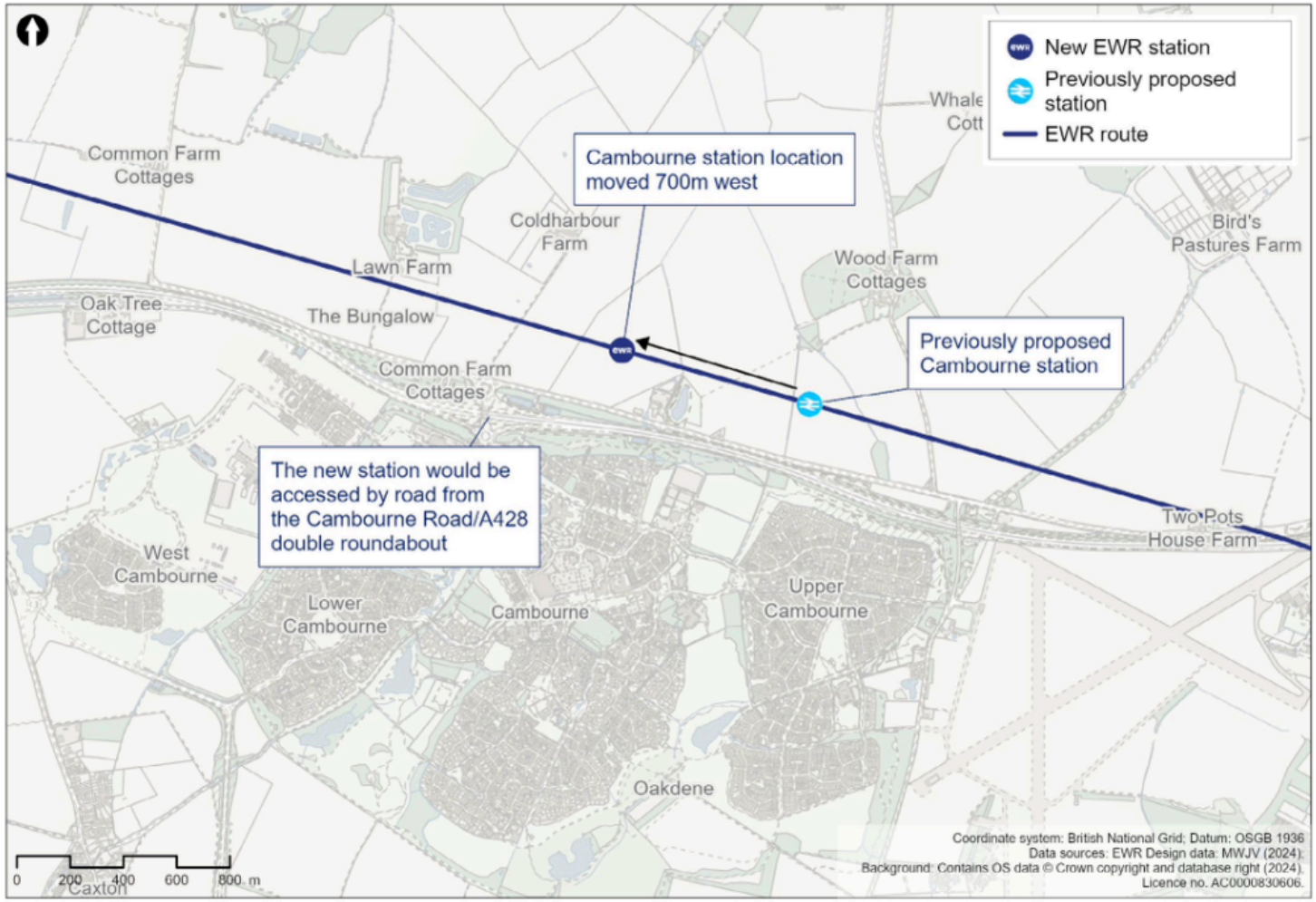


Figure 2: Proposed location of mined railway tunnel (Figure 79 from EWR 2026 Consultation Brochure)

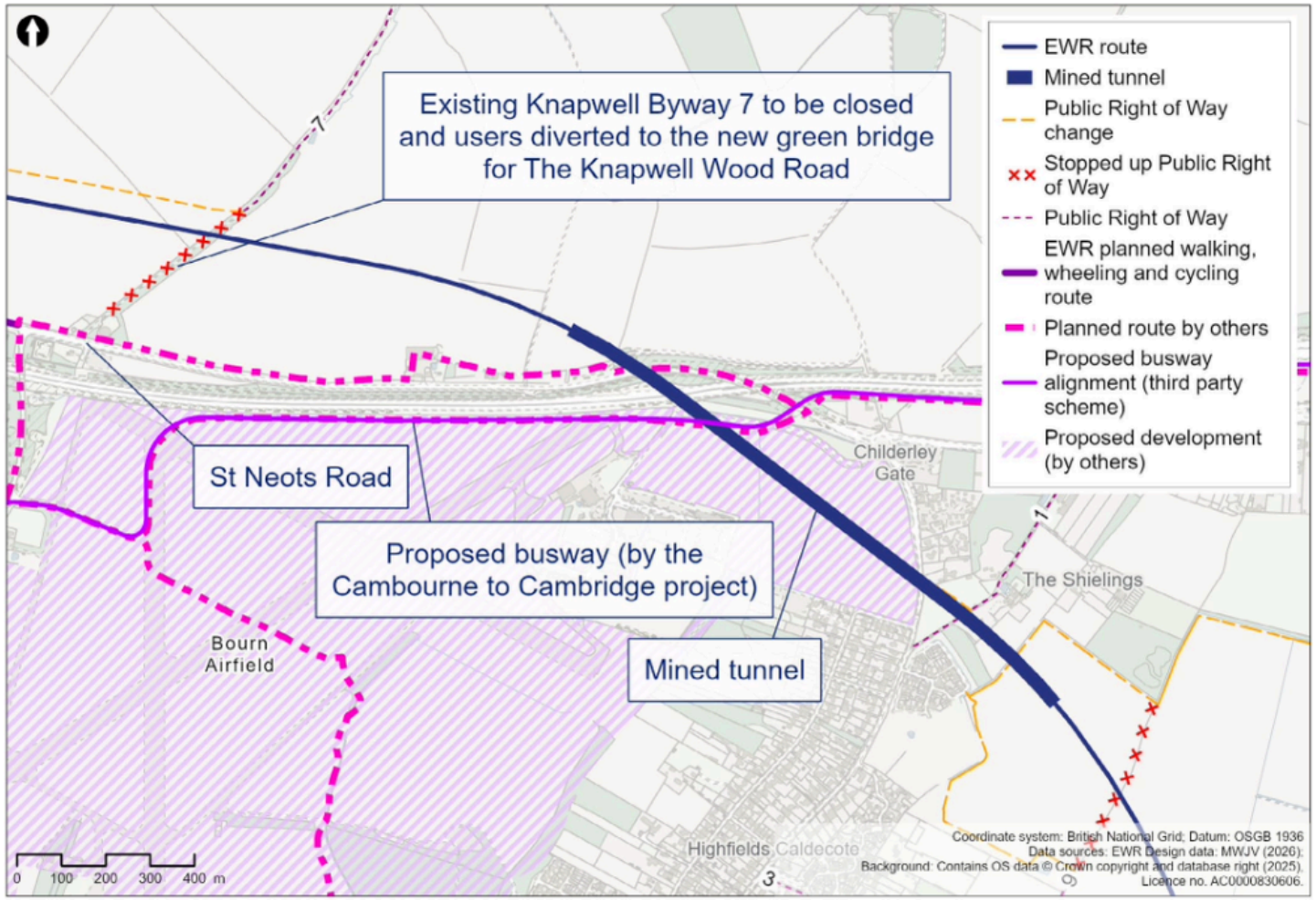


Figure 3: Proposed new eastern entrance to Cambridge Station at Clifton Road (Figure 95 from EWR 2026 Consultation Brochure)

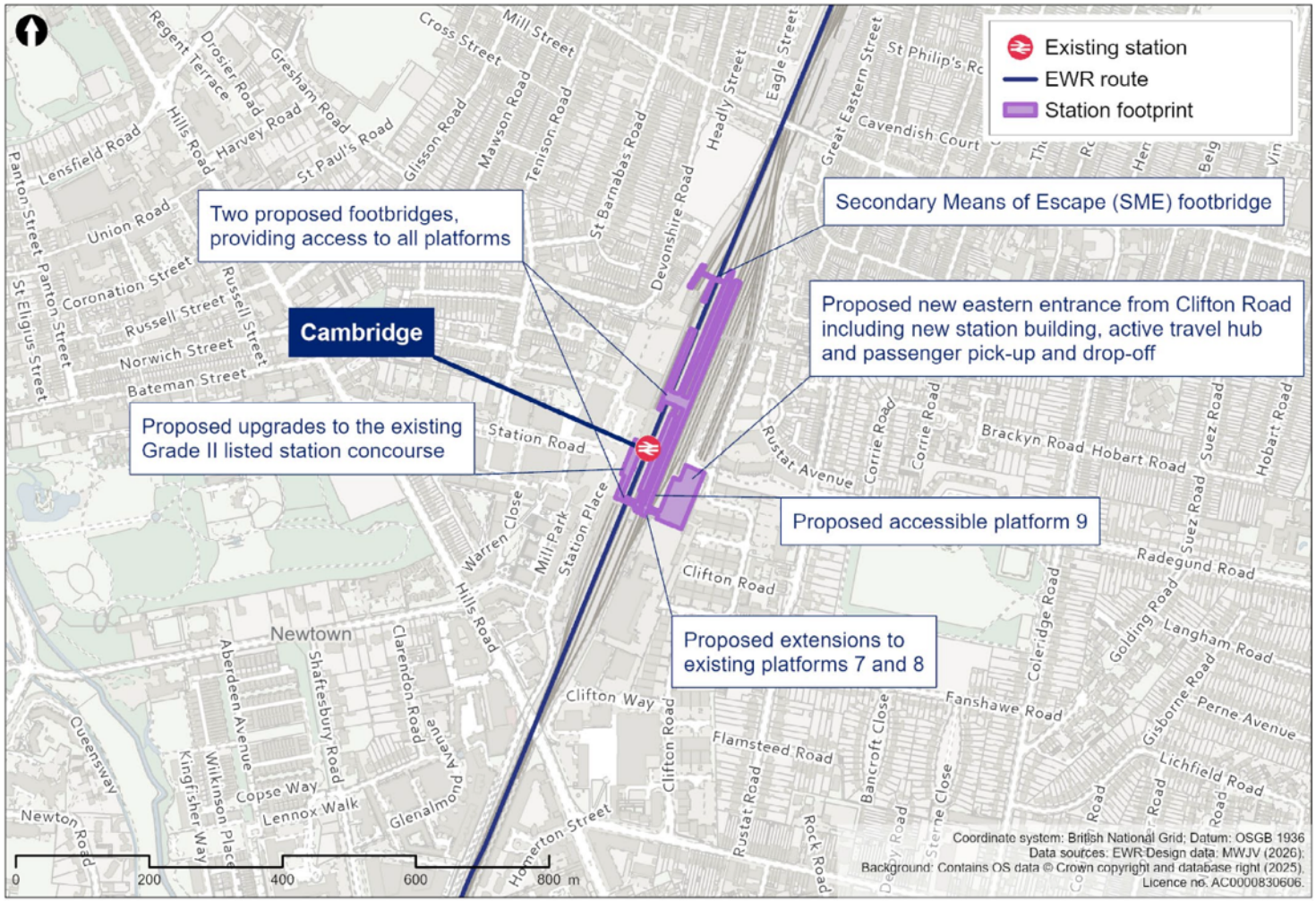


Figure 4: Map illustrating EWR proposals in Cambridge (Figure 93 from EWR 2026 Consultation Brochure)

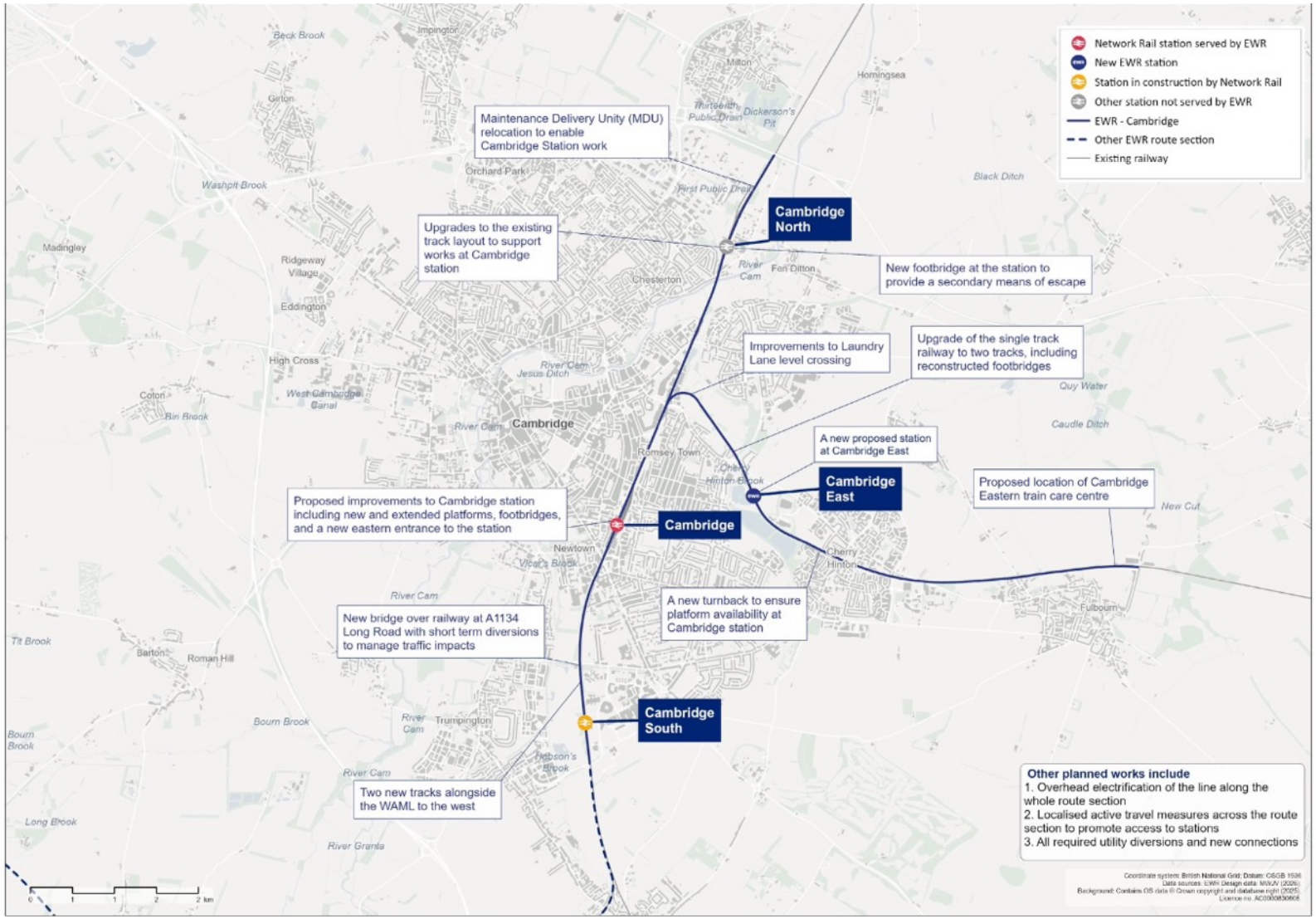


Figure 5: EWR safeguarded area in relation to the Cambourne North allocation site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

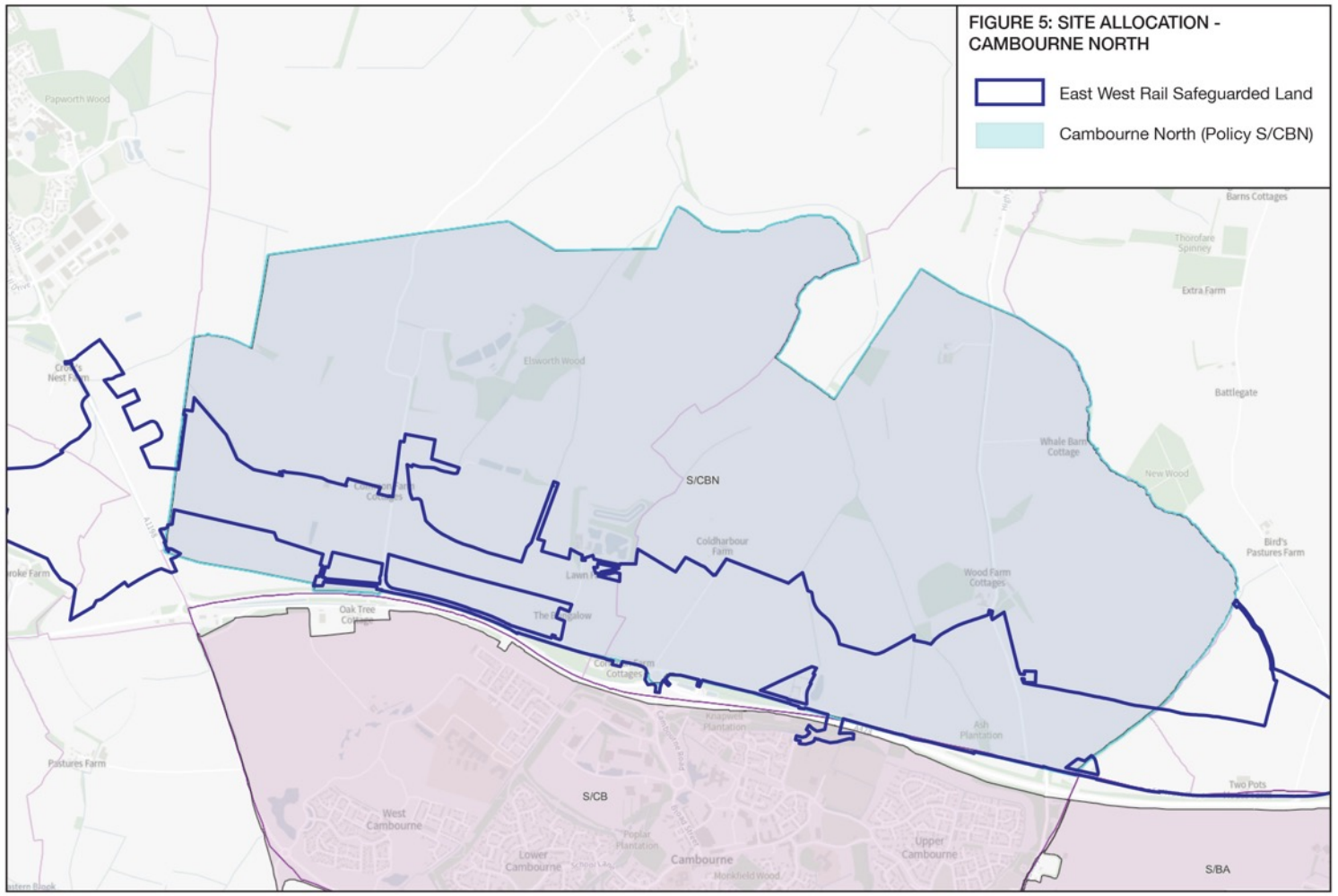


Figure 6: EWR safeguarded area in relation to the Cambourne allocation site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

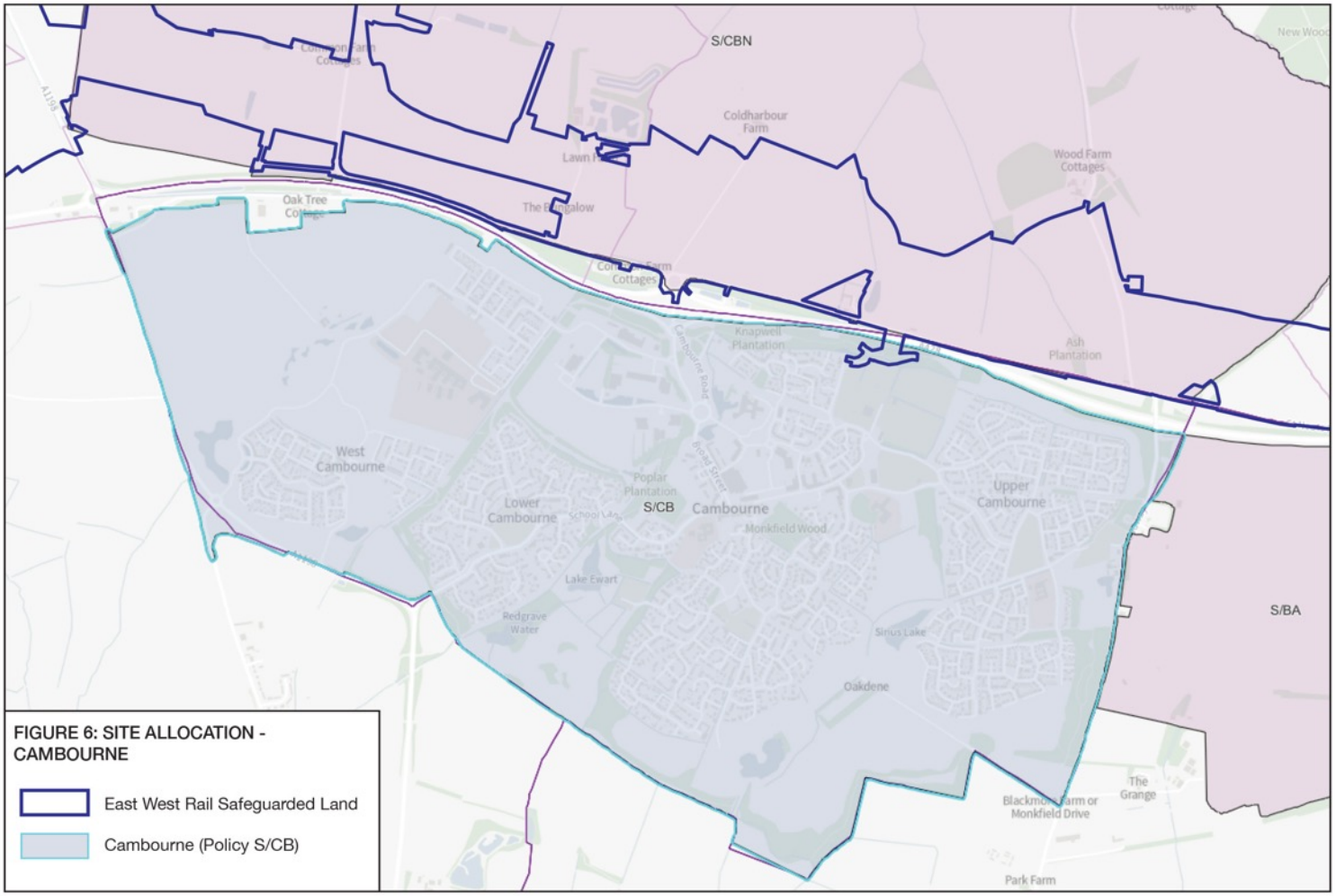


Figure 7: EWR safeguarded area in relation to the Bourn Airfield New Village allocation site (overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)

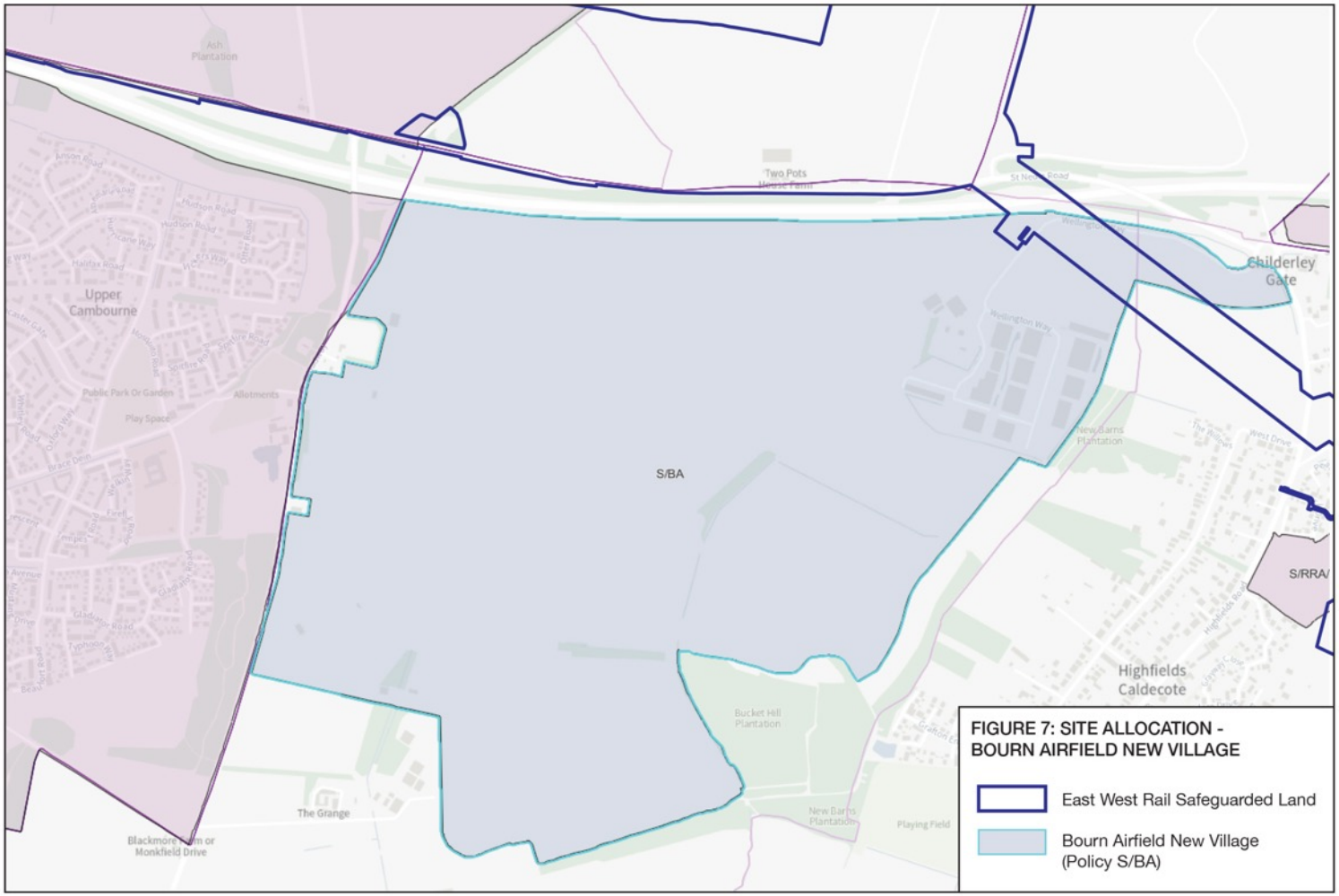


Figure 8: EWR safeguarded area in relation to the Land to the north of St Neots Road, Dry Drayton allocation site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

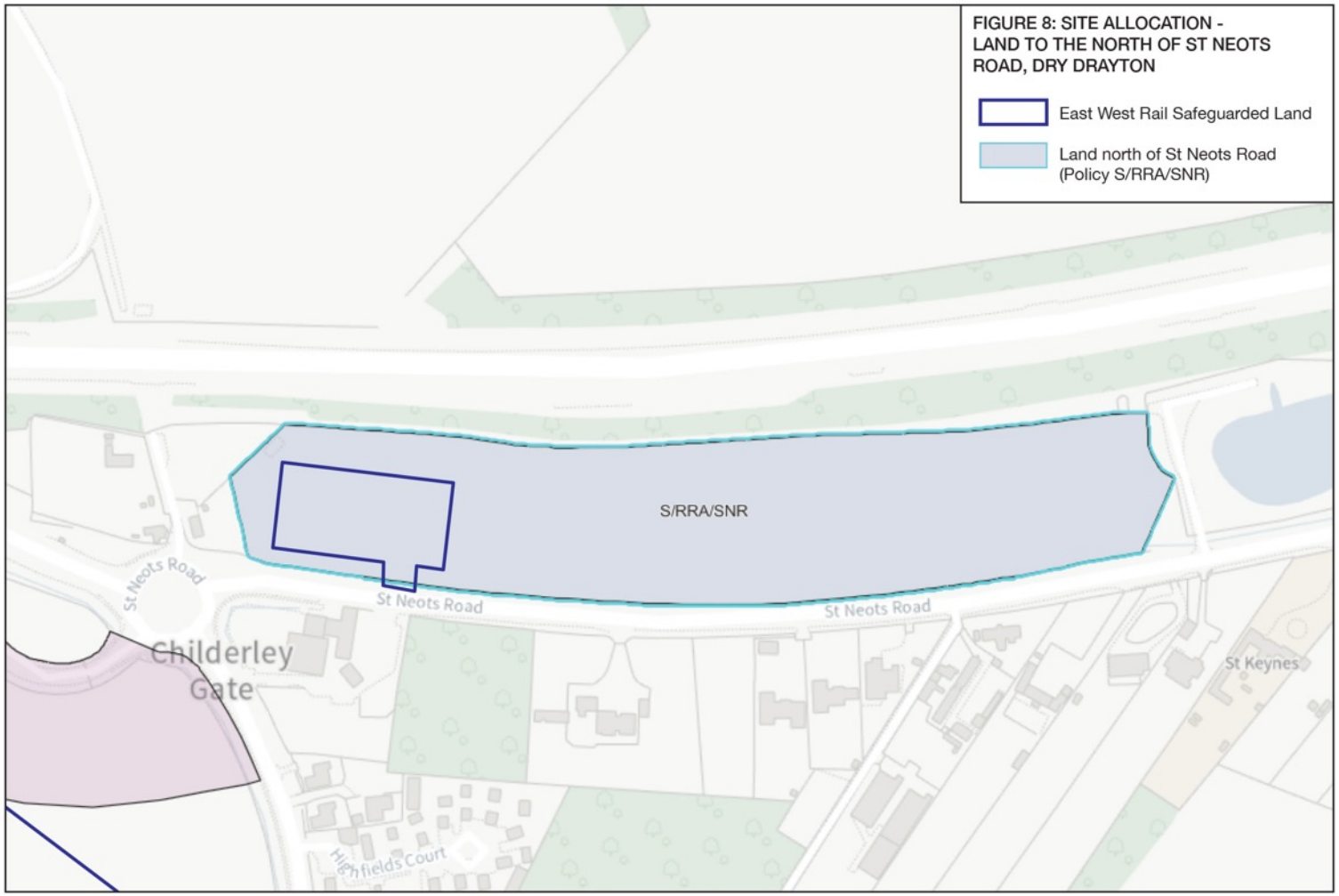


Figure 9: EWR safeguarded area in relation to the Cambridge Biomedical Campus (including Addenbrooke's Hospital) site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

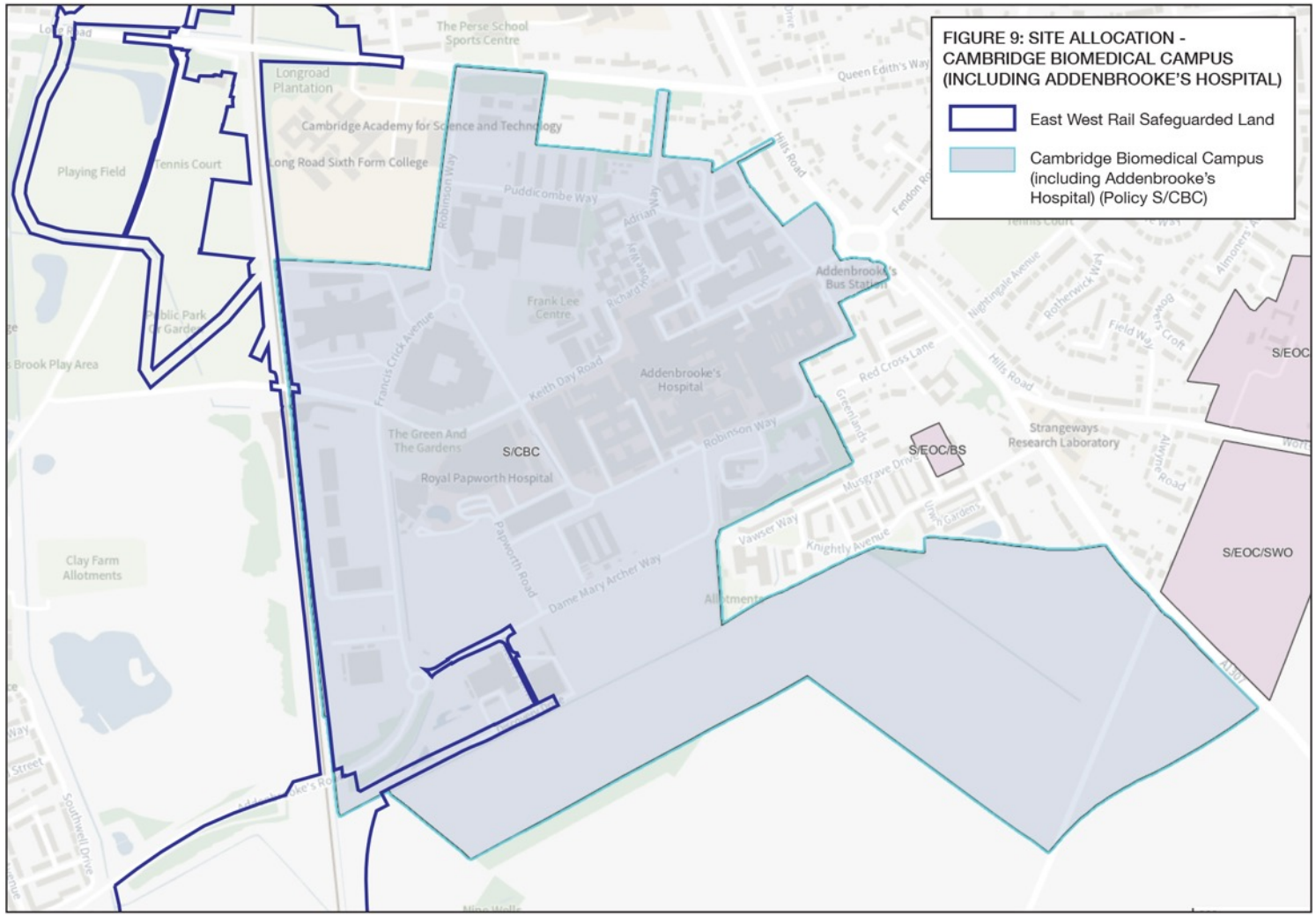


Figure 10: EWR safeguarded area in relation to the Land at Clifton Road allocation site ***(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)***

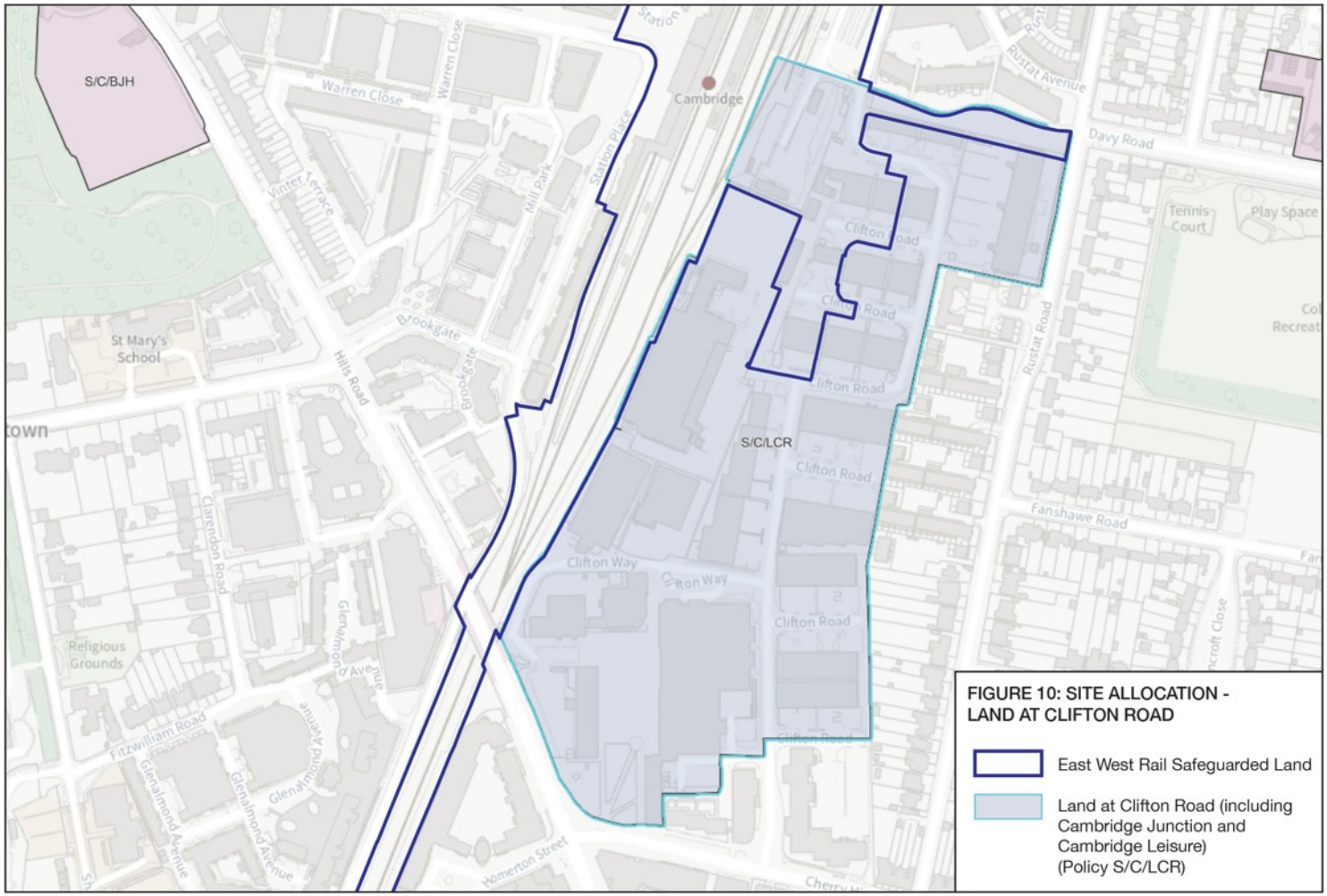


Figure 11: EWR safeguarded area in relation to the Station Road West allocation site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

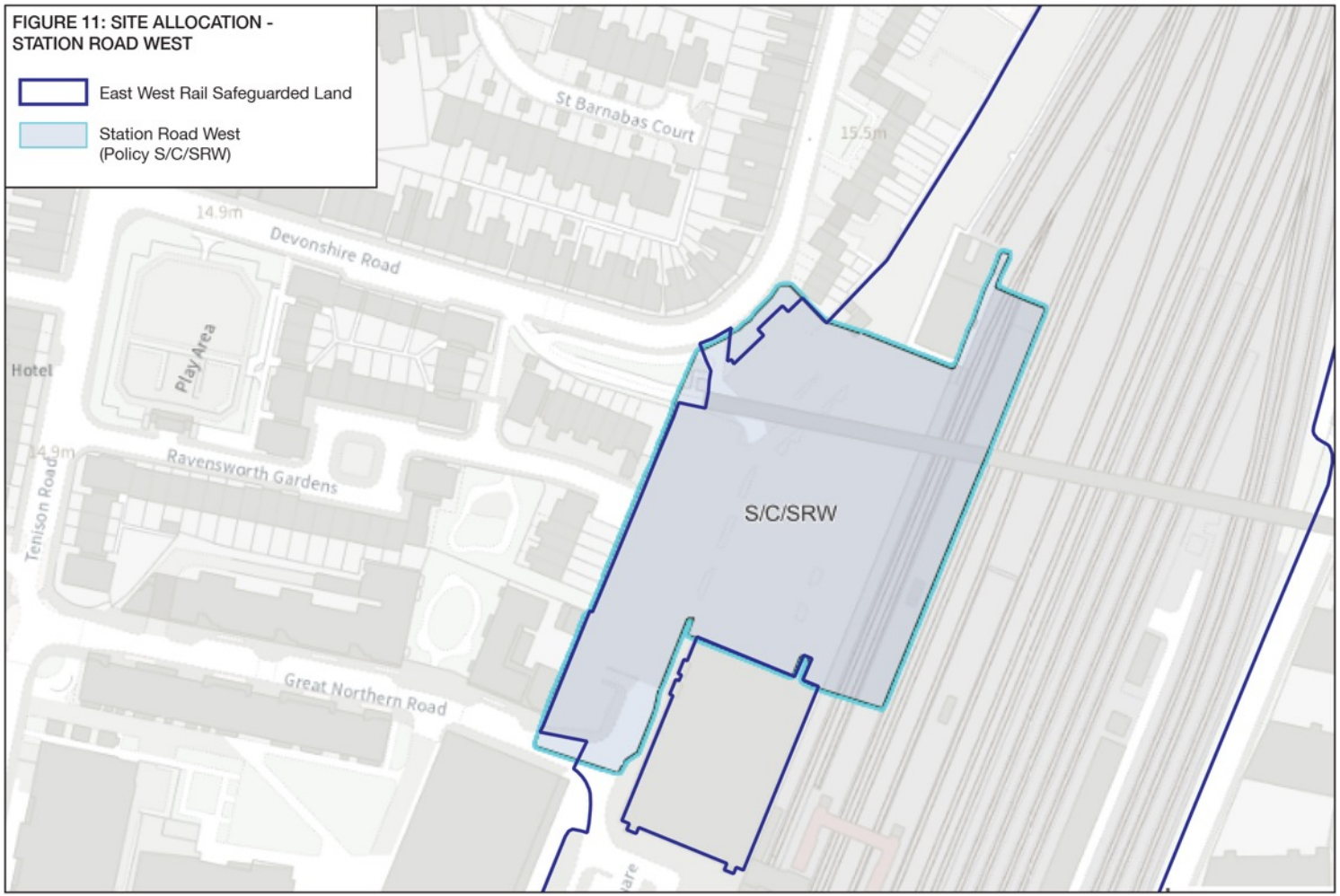


Figure 12: EWR safeguarded area in relation to the Beehive Centre Area of Major Change ***(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)***

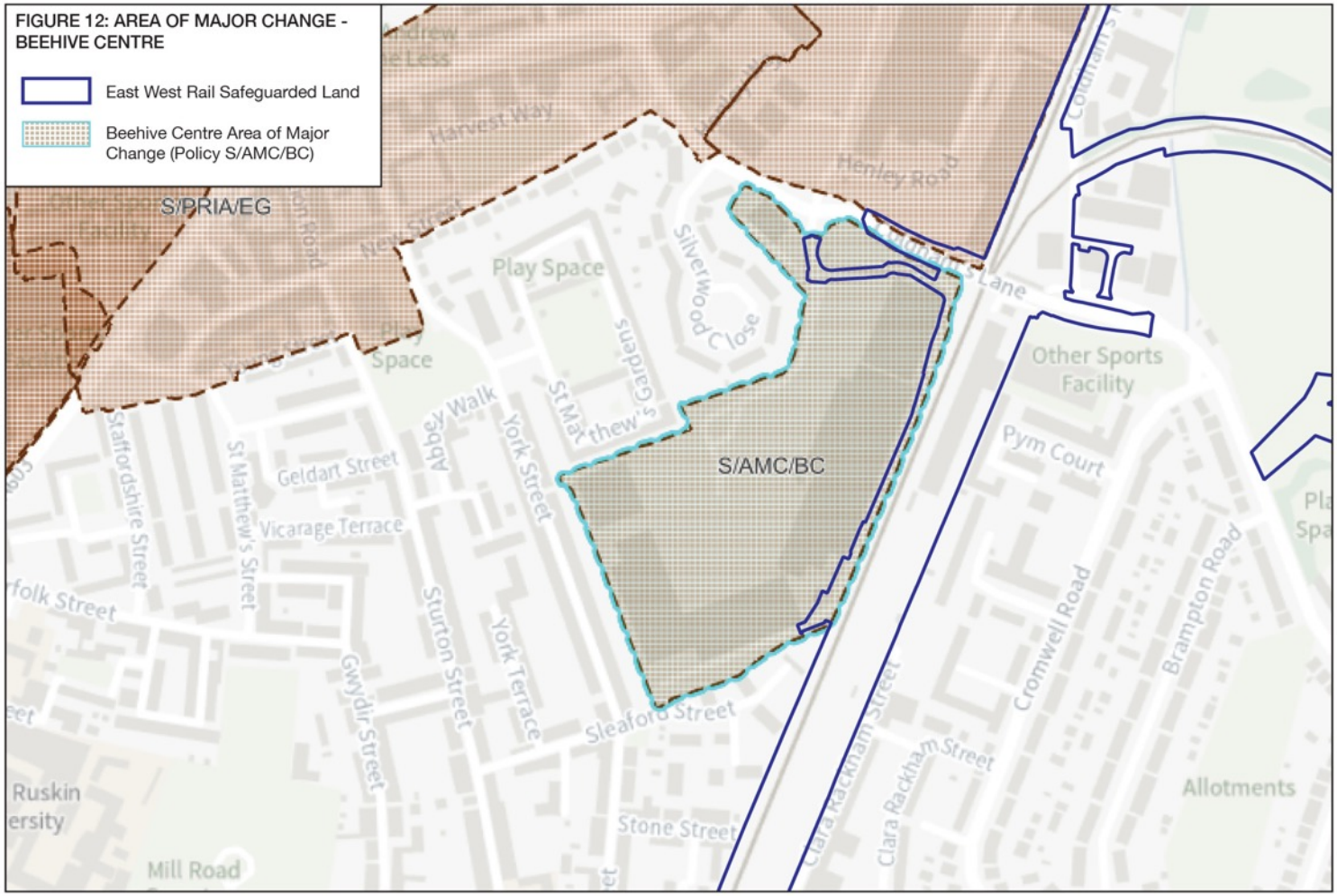


Figure 13: EWR safeguarded area in relation to the South of Coldham's Lane Area of Major Change *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

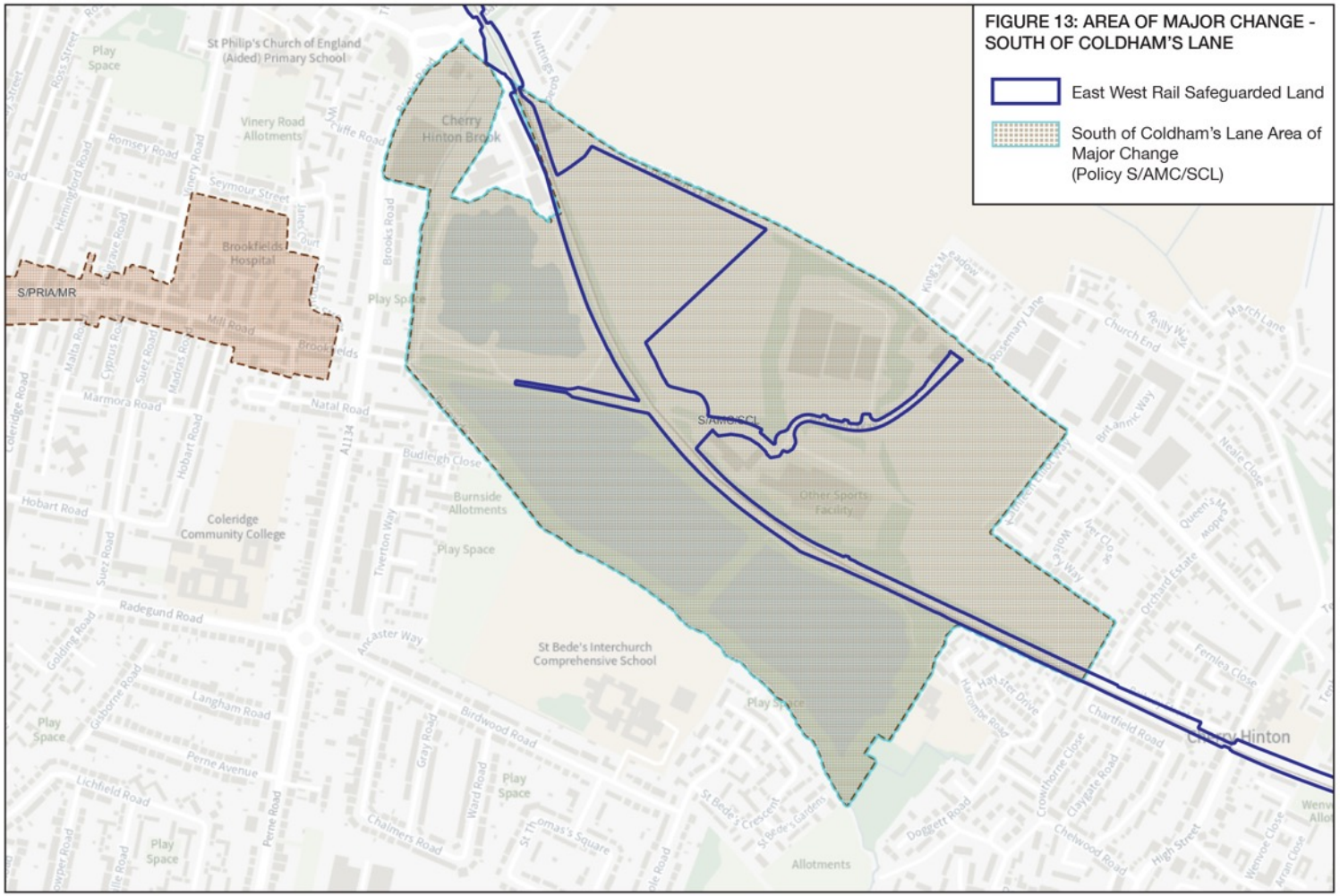


Figure 14: EWR safeguarded area in relation to the Cambridge East allocation site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

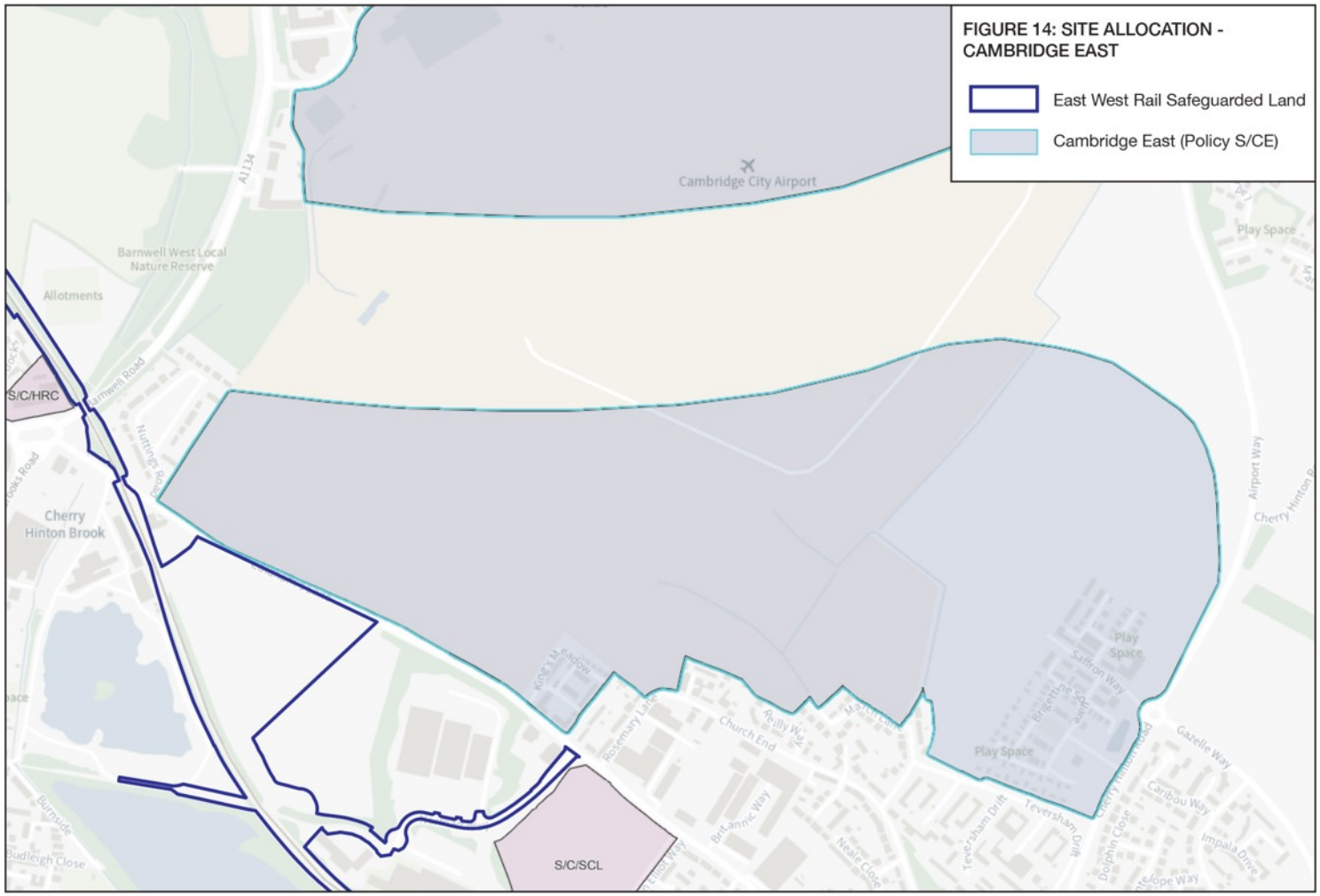


Figure 15: EWR safeguarded area in relation to the Chesterton Fen Road (Milton) Gypsy and Traveller Site ***(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)***

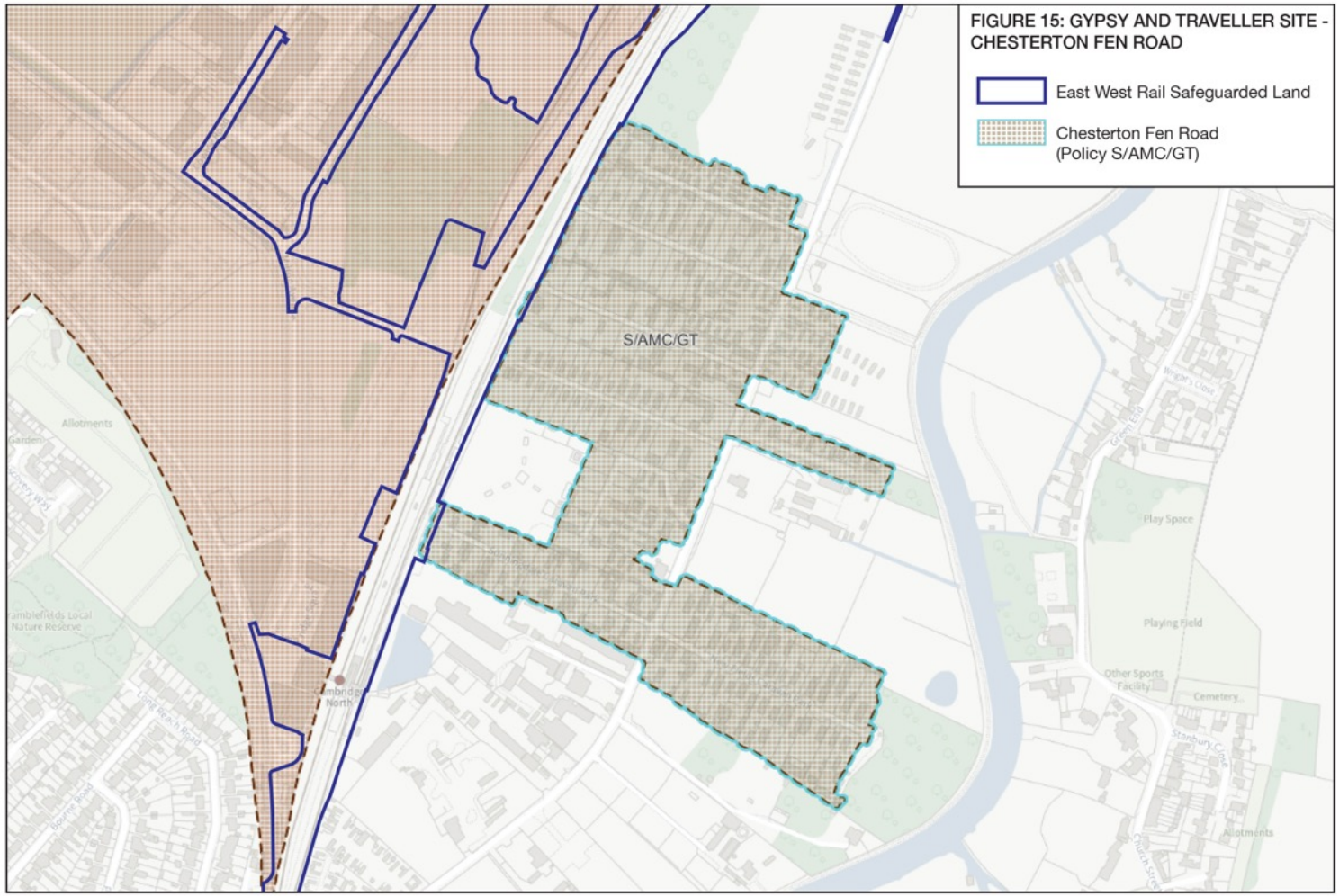


Figure 16: EWR safeguarded area in relation to the North East Cambridge allocation site *(overlay based on extract from draft Greater Cambridge Local Plan 2024-2045)*

