Greater Cambridge Local Plan – Regulation 19 Response
The Church Commissioners for England
Bidwells LLP
September 2026

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LAND WEST OF CAMBOURNE (KINGS FIELD)
GREATER CAMBRIDGE LOCAL PLAN - REGULATION 19 RESPONSE

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1.0 Land West of Cambourne (Kingsfield)

1.1 The Church Commissioners for England (the Commissioners) welcomes the opportunity to comment on the Proposed Submission Greater Cambridge Local Plan (Regulation 19). The Commissioners are the landowner of approximately 342 hectares of land between Cambourne and Eltisley, which has previously been promoted through the Call for Sites process (under site reference HELAA 51668) and the Regulation 18 consultation (attached at **Appendix 1**). The current combined masterplan is provided at **Appendix 2**. However, the site is capable of being brought forward either as a comprehensive scheme or as two standalone developments, comprising the land north of the A428 and the land south of the A428 respectively, together called Kingsfield. The combined land north and south of the A428 presents a strategic opportunity to deliver a comprehensively planned mixed-use extension to Cambourne, including circa 3,000 new homes, approximately 83 hectares of employment land, renewable energy generation, education provision, green infrastructure and associated community facilities. Together, these elements would form a logical, well-connected expansion of Cambourne.

1.2 The Church Commissioners for England (the Commissioners) is a registered charity, established in 1948 to manage the Church of England's historic assets, and is responsible for providing financial support for the work and mission of the Church of England across the country. This is achieved through the responsible and ethical management of the Church's permanent endowment fund, a diverse investment portfolio which enables the Commissioners to provide financial support for the Church, by helping to ensure funding is intentionally used for mission and growth. The Church's historic land holding is held by the Commissioners as part of this investment portfolio and equates to c. 80,000 acres of land across England, a proportion of which already has significant identified development potential. This landholding is national, from Cornwall to Cumbria, Tyneside to Kent, and across the heart of the country.

1.3 The Commissioners is a Responsible Investor, seeking to drive the Sustainability agenda within the development industry and integrate this within its work. It believes in the creation of new communities and not just the delivery of new homes, and looks to prioritise engagement with local authorities, communities and stakeholders, and ensure development partners deliver high-quality homes and meet affordable housing needs where possible. The Commissioners takes a long-term approach to the stewardship of their land, striving to deliver new developments which enhance their surroundings, providing safe and stable new homes and job opportunities to local areas, and facilitating the curation of communities that can thrive for generations to come. With these landholdings, the Commissioners is engaged in all stages of the planning system; promoting suitable land through local plan call for sites, supporting local plan examinations, delivering new development through planning applications and working with development partners to achieve on-site delivery.

1.4 Having reviewed the Proposed Submission Plan, we note that the overall structure and direction of the Plan remain largely consistent with the Regulation 18 draft. Whilst there have been refinements to the policy wording, updates to the Sustainability Appraisal and amendments to strategic allocations, including Cambourne North and Grange Farm, the fundamental growth strategy remains unchanged. Accordingly, our principal concern is not with the overall spatial strategy but with ensuring that the Plan remains sufficiently flexible and effective to accommodate future growth opportunities associated with the emerging East West Rail (EWR) corridor and avoid unintentionally constraining the delivery of strategic sites in this location.

2.0 Soundness and Effectiveness

2.1 The National Planning Policy Framework ('the Framework') requires Local Plans to be positively prepared, justified, effective and consistent with national policy. In our view, the soundness of the Greater Cambridge Local Plan will depend upon its ability to respond to changing circumstances throughout the plan period, particularly in relation to nationally significant infrastructure projects such as EWR.

2.2 The proposed submission plan identifies Cambourne as one of Greater Cambridge's principal locations for growth and continues to place significant emphasis on the opportunities arising from EWR and the proposed Cambourne station. The Plan recognises the importance of integrating homes, jobs, services and transport infrastructure to create sustainable patterns of development.

2.3 Land West of Cambourne is uniquely positioned to support these objectives. The site sits immediately adjacent to the proposed EWR and the proposed Cambourne station and is capable of accommodating both substantial employment growth and residential development in a coordinated manner. As previously set out through our Regulation 18 representations, land north of the A428 is capable of delivering approximately 83 hectares of employment land alongside renewable energy and strategic green infrastructure, whilst land south of the A428 is capable of accommodating approximately 3,000 homes together with education and community infrastructure.

2.4 We therefore continue to consider that the site represents a logical long-term growth opportunity which should be recognised within the Local Plan framework.

3.0 East West Rail and Deliverability

3.1 Since submission of our Regulation 18 representation, EWR has undertaken further statutory consultation and design development in relation to the Croxton to Toft section of the route affecting the Commissioners' landholding. Through this process, it has become apparent that certain aspects of the emerging EWR design assumptions could unintentionally restrict future delivery opportunities for strategic development west of Cambourne if not appropriately addressed.

3.2 The proposed submission plan identifies Cambourne as a key location for future growth and places significant emphasis on the delivery of EWR for Cambourne North and the proposed Cambourne station to support its long-term spatial strategy. In this context, land west of Cambourne represents a highly sustainable and logical opportunity for future strategic growth, given its immediate relationship with the proposed station and ability to deliver homes, employment and supporting infrastructure in an integrated manner. The Plan should therefore ensure that it does not inadvertently sterilise land which may be required to support future growth objectives or constrain opportunities that are intrinsically linked to the successful delivery and long-term benefits of EWR.

3.3 The Commissioners supports the delivery of EWR and recognises its significance in delivering sustainable economic growth across the Oxford-Cambridge corridor. However, the EWR consultation material identifies substantial areas of environmental mitigation, drainage infrastructure and access works across the site. The Commissioners' technical review concluded that further work remains necessary to demonstrate that access, drainage and mitigation requirements have been minimised and appropriately designed to support future development potential.

3.4 Importantly, EWR itself confirmed during ongoing design discussions that elements of the scheme remained under development and that opportunities exist to refine access arrangements, drainage infrastructure and mitigation proposals as the project progresses. Furthermore, the Commissioners met with EWR following the submission of the representation to their consultation which concluded in further refinement and the Commissioners will continue to work proactively and positively with EWR as the design and development of the railway progresses. We attach our EWR consultation response at **Appendix 3**. The Plan should avoid embedding assumptions based on a design that is still evolving through the Development Consent Order (DCO) process.

3.5 In these circumstances, it is essential that the Local Plan does not prejudice future development opportunities by assuming fixed infrastructure constraints which have yet to be finalised. Given the plan period extends to 2045 and EWR remains subject to ongoing refinement through the DCO process, the Local Plan should avoid making permanent assumptions regarding access, mitigation land, drainage infrastructure and developable areas where alternative design solutions remain under active consideration.

4.0 Representation on the Proposed Submission Plan

4.1 We therefore request that the Council ensures the Proposed Submission Local Plan:

Soundness and Effectiveness of the Plan's Approach to East West Rail-Led Growth

4.2 The Proposed Submission Plan identifies Cambourne as a key location for growth and places significant emphasis on the delivery of EWR for Cambourne North and the proposed Cambourne station to support the spatial strategy. The supporting text recognises the role of transport-led development in delivering sustainable growth and integrating homes, jobs and services. However, the Plan does not adequately recognise that the design of EWR remains subject to ongoing refinement through the DCO process and, as drafted, there is a risk that current assumptions regarding infrastructure requirements, mitigation land and associated land take could be interpreted as fixed constraints on future growth opportunities.

4.3 The Plan should therefore be amended to ensure it remains effective throughout the plan period and sufficiently flexible to respond to opportunities arising from the evolving EWR programme. Failure to do so risks prejudicing sustainable development opportunities in locations specifically identified by the Plan as appropriate for growth.

4.4 The Plan should continue to recognise that EWR is a strategic opportunity for growth and should avoid introducing policy wording which could unnecessarily sterilise land or preclude future development opportunities associated with the corridor.

4.5 As EWR's design development continues through the DCO process, access arrangements, environmental mitigation requirements, drainage infrastructure and associated land take will continue to evolve. The Local Plan should therefore support future growth opportunities that emerge alongside the delivery of the railway rather than adopting overly prescriptive assumptions regarding developable land.

Contribution and Deliverability of Land West of Cambourne

4.6 Land West of Cambourne represents a logical and sustainable growth opportunity directly related to the proposed Cambourne EWR station. The landholding has the capacity to support the Plan's objectives through the coordinated delivery of housing, employment, supporting infrastructure, education provision, renewable energy generation and green infrastructure.

4.7 The current Plan does not adequately recognise the strategic role that this land could play in supporting longer-term growth associated with EWR. Given Cambourne's identified role as a principal growth location, it is important that the Plan does not inadvertently sterilise land capable of contributing towards future housing and employment requirements.

4.8 Importantly, the land north and south of the A428 is complementary and capable of forming a comprehensive station-focused extension to Cambourne. However, each component is also capable of coming forward independently. The employment-led proposals north of the A428 could be delivered alongside the proposed station regardless of the timing of residential development to the south, whilst the residential-led proposals south of the A428 are not dependent upon the delivery of the employment land. This flexibility enhances deliverability and provides resilience to changing market conditions throughout the plan period.

Policy S/CBN (Cambourne North)

4.9 Whilst policy S/CBN is founded upon the opportunities created by EWR and the proposed Cambourne Station, it does not sufficiently recognise the potential for additional sustainable growth opportunities to merge around the station as the railway progresses through detailed design and delivery.

4.10 The Plan identifies EWR as a key catalyst for growth and investment yet does not expressly support future development opportunities on land adjoining the station where such proposals would maximise the benefits of nationally significant transport investment. This is inconsistent with the wider strategy of concentrating growth in sustainable, transport-connected locations.

4.11 Land West of Cambourne (Land north of A428) lies immediately adjacent to the proposed station area and is uniquely capable of supporting the Plan's objectives through the delivery of employment, housing, green infrastructure and community facilities. The site is capable of supporting station-led growth either comprehensively across land north and south of the A428 or through independently deliverable phases, with employment land north of the A428 and residential-led development south of the A428 capable of coming forward separately.

4.12 The current policy framework does not adequately acknowledge this flexibility and therefore we would suggest the following addition to Policy S/CBN or its supporting text:

4.13 *"The Council will support additional sustainable development opportunities associated with the proposed Cambourne East West Rail Station where they maximise the benefits of investment in public transport infrastructure. In considering future growth opportunities, the Councils will have regard to the evolving design of East West Rail and will not regard land requirements associated with the railway as fixed constraints where alternative access, mitigation, drainage or infrastructure solutions may reasonably come forward. Strategic growth opportunities west of the proposed Cambourne East West Rail Station, comprising land north and south of the A428 may be delivered either comprehensively or independently where development would contribute towards sustainable development objectives and maximise the benefits of investment in public transport infrastructure."*

Review of Sustainability Appraisal Conclusions

4.14 The Sustainability Appraisal (SA) accompanying the Proposed Submission Plan has been updated since the Regulation 18 consultation and provides a comprehensive assessment of the social, economic and environmental implications of the Plan's preferred strategy. The SA identifies the importance of integrating housing, employment and transport infrastructure in order to achieve sustainable development outcomes and specifically assesses the cumulative effects arising from strategic growth locations and major infrastructure projects, including Nationally Significant Infrastructure Projects (NSIPs)

4.15 The Church Commissioners support the Council's commitment to considering the cumulative effects of future development and infrastructure delivery. However, it is important that the conclusions of the SA are interpreted in the context of the evolving EWR scheme, which remains subject to further design development through the DCO process. As highlighted through our statutory consultation response to EWR, key matters relating to access arrangements, environmental mitigation, drainage infrastructure and land take are continuing to evolve and should not be regarded as fixed constraints on future development potential.

4.16 It is unclear from the Sustainability Appraisal whether the assessment of growth opportunities west of Cambourne has been undertaken on the basis of fixed assumptions regarding the design, mitigation requirements and land take associated with EWR. Given that EWR remains subject to ongoing refinement through the Development Consent Order process, there is a legitimate question as to whether the Sustainability Appraisal accurately reflects the long-term sustainability performance of land west of Cambourne or has discounted opportunities on the basis of infrastructure assumptions that may subsequently change.

4.17 In particular, the SA should clearly demonstrate that all reasonable alternatives have been fully assessed, including scenarios where access arrangements, environmental mitigation, drainage infrastructure and severance impacts are reduced, reconfigured or otherwise addressed through the detailed design process. Without such assessment, there is a risk that potentially sustainable opportunities associated with the proposed Cambourne Station are undervalued and that the evidence base does not fully reflect the development potential of land west of Cambourne.

4.18 The SA recognises the role of improved public transport connectivity in supporting sustainable growth patterns across Greater Cambridge and acknowledges the importance of locating development where opportunities exist to access employment, services and facilities through sustainable modes of transport. Land West of Cambourne directly supports these objectives through its relationship with the proposed Cambourne station, its ability to integrate substantial employment provision with residential development, and its capacity to deliver active travel connections between existing and proposed communities

4.19 In reviewing the updated SA, we therefore request that the Council ensure that:

- The assessment fully recognises the long-term economic and sustainability benefits associated with employment growth alongside EWR and the proposed Cambourne station.
- The cumulative assessment appropriately reflects the potential for EWR design refinements to mitigate current concerns regarding access, severance, environmental mitigation and drainage infrastructure identified by landowners and stakeholders.
- The sustainability performance of future growth opportunities west of Cambourne is assessed having regard to the integrated delivery of homes, jobs, education provision, renewable energy generation, green infrastructure and sustainable transport connections promoted through the masterplan.
- The assessment does not rely on assumptions regarding permanent development constraints arising from EWR proposals where the evidence demonstrates that alternative design solutions remain under active consideration by EWR and its technical team.

4.20 The SA should therefore adopt an evidence-based and forward-looking approach which recognises the evolving nature of EWR and does not foreclose future growth opportunities on the basis of present-day infrastructure assumptions. This is particularly important given the Plan period extends to 2045 and seeks to maximise the benefits of nationally significant transport investment.

4.21 A rigid reliance on current EWR design assumptions may result in the SA failing to fully assess reasonable alternatives and consequently underestimating the long-term sustainability benefits of development opportunities west of Cambourne.

5.0 Conclusion

5.1 The Church Commissioners remains supportive of the overarching strategy of the Greater Cambridge Local Plan and the continued focus on growth associated with EWR and Cambourne.

5.2 The principal changes between the Regulation 18 and Regulation 19 versions of the Plan do not alter the strategic opportunity presented by Land West of Cambourne. The Site remains well placed to support the delivery of homes, employment, renewable energy, green infrastructure and community facilities in a highly sustainable location adjacent to the proposed Cambourne station. The opportunity for substantial employment growth north of the A428 is particularly significant in helping to maximise the economic benefits arising from EWR investment. However, given the ongoing evolution of EWR proposals, it is essential that the Local Plan remains sufficiently flexible to support future development opportunities and does not inadvertently constrain the delivery of homes, jobs and infrastructure in this strategic location.

5.3 Furthermore, the updated SA should be amended, where necessary, to acknowledge the evolving nature of the East West Rail proposals and the consequent opportunity for future strategic growth west of Cambourne, ensuring that the Local Plan remains flexible, effective and responsive to maximise infrastructure-led development opportunities throughout and beyond the plan period.

5.4 The Commissioners therefore request that the Inspector and the Councils ensure that the Plan and its supporting Sustainability Appraisal remain sufficiently flexible and evidence based to respond to the evolving EWR design. Neither document should rely on assumptions that current infrastructure proposals represent fixed constraints where design refinement remains ongoing. The policy framework should continue to support future opportunities for employment and mixed use growth associated with the proposed Cambourne station and recognise the long-term development potential of Land West of Cambourne.

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