Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name		Lyana Powlesland
Organisation (where relevant)	The Church Commissioners for England	Bidwells LLP
Job Title (where relevant)		Associate, Planning
Address, including Post Code		Eaton House, Wallbrook Court, North Hinksey Lane, Oxford, OX2 0QS
Telephone		[redacted]
Email address		[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/CBN and spatial strategy relating to Cambourne North and Cambourne Station
Proposed Submission Policies Map	Land West of Cambourne
Sustainability Appraisal	Chapter 5
Habitats Regulations Assessment	N/A

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	Yes / No
Legally compliant	Yes
Sound	Yes, subject to the modifications set out in this representation

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

The Church Commissioners support the Plan's recognition of Cambourne as a key focus for sustainable growth and acknowledge the strategic importance of East West Rail (EWR) and the proposed Cambourne Station in delivering sustainable communities, improving connectivity and supporting economic growth.

However, the Plan, including Policy S/CBN and the supporting Sustainability Appraisal, does not sufficiently recognise the opportunities for additional sustainable growth associated with the delivery of EWR and the proposed station. While EWR is identified as a catalyst for growth, the Plan does not adequately support future development opportunities that may emerge as the railway progresses through detailed design, consent and delivery.

A key concern is that the Plan and supporting evidence appear to rely upon assumptions regarding access arrangements, environmental mitigation, drainage infrastructure, severance impacts and associated land take that remain subject to ongoing refinement through the Development Consent Order process. Treating these evolving requirements as fixed constraints risks unnecessarily sterilising land and underestimating the long-term development potential of land west of Cambourne and around the proposed station.

Land West of Cambourne is uniquely positioned to support the Plan's objectives through station-led growth, integrating homes, jobs, community facilities, renewable energy generation and strategic green infrastructure. Land north of the A428 has potential to provide significant employment development alongside green and renewable energy infrastructure, whilst land south of the A428 is capable of accommodating substantial residential growth. Together, these opportunities would maximise the benefits of nationally significant transport investment and support the wider strategy of directing development towards highly sustainable, transport-connected locations.

Land West of Cambourne represents a logical and sustainable growth opportunity directly related to the proposed Cambourne East West Rail Station. The landholding has the capacity to support the coordinated delivery of housing, employment, supporting infrastructure, education provision, renewable energy generation and strategic green infrastructure, directly supporting the objectives of the Local Plan.

Importantly, the land north and south of the A428 should not be viewed solely as a single comprehensive development opportunity. Whilst the sites are complementary and capable of forming a comprehensive station-focused extension to Cambourne, each area is also capable of being delivered independently. Employment-led development north of the A428 could come forward alongside the station regardless of the timing of residential development to the south, whilst residential-led development south of the A428 is not dependent upon the delivery of employment land to the north. This flexibility enhances deliverability, supports resilience to changing market conditions and enables sustainable development opportunities to come forward throughout the plan period.

Given Cambourne's identified role as a principal growth location, the Plan should avoid inadvertently sterilising land capable of contributing towards future housing and employment needs. The strategic value of Land West of Cambourne should be recognised as part of a longer-term growth strategy associated with investment in East West Rail and the proposed station.

The Sustainability Appraisal should more clearly demonstrate that all reasonable alternatives have been assessed, including scenarios where EWR design refinements reduce or reconfigure current constraints relating to access, mitigation, drainage and severance. Without such assessment, there is a risk that sustainable growth opportunities associated with the proposed station are undervalued and that the evidence base does not fully reflect the long-term sustainability, economic and social benefits that station-led development can deliver over the Plan period to 2045.

Please provide a 100 word summary of your representation.

Cambourne and the proposed East West Rail station represent a major opportunity for sustainable, transport-led growth. While the Local Plan recognises the strategic importance of EWR, it does not sufficiently recognise the future development opportunities associated with the evolving railway scheme and the proposed station. Land West of Cambourne is capable of delivering homes, employment, education, renewable energy and green infrastructure either comprehensively or through independently deliverable phases. Greater flexibility is required within the Plan and Sustainability Appraisal to avoid treating evolving EWR requirements as fixed constraints and to ensure station-led growth opportunities are fully assessed and supported.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Greater Cambridge Local Plan Regulation 19 – Submission Version (The Church Commissioners for England)

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

To ensure the Plan is sound, effective and positively prepared, it should adopt a more flexible approach that recognises the evolving nature of the East West Rail project and the opportunities arising from investment in nationally significant transport infrastructure.

The Plan, Policy S/CBN and supporting text should be amended to include wording along the following lines:

“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 Council 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, including land north and south of the A428, may be delivered either comprehensively or independently where development contributes towards sustainable development objectives, integrates homes, jobs, infrastructure and green space, and maximises the benefits of investment in sustainable transport infrastructure."

The Sustainability Appraisal should also be updated to:

- Recognise the evolving nature of EWR design and delivery;
- Assess reasonable alternative scenarios that reflect potential design refinements;
- Fully consider the long-term economic, social and environmental benefits of station-led growth;
- Explicitly recognise Land West of Cambourne as a strategic station-led growth opportunity capable of delivering housing, employment, education, renewable energy generation and green infrastructure.

- Confirm that land north and south of the A428 may be delivered either comprehensively or independently where proposals contribute towards sustainable development objectives and maximise the benefits of investment in East West Rail infrastructure.
- Avoid assuming permanent development constraints where alternative technical solutions remain under consideration; and
- Reflect the potential integrated delivery of housing, employment, education, renewable energy, green infrastructure and sustainable transport connections west of Cambourne.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Participation is necessary because the representation raises matters relating to the soundness and effectiveness of the Plan's approach to East West Rail, Cambourne Station and Land West of Cambourne. The hearing sessions will provide an opportunity to explain why greater flexibility is required in the Plan and Sustainability Appraisal, particularly given the evolving nature of the East West Rail project, and to demonstrate how station-led growth opportunities can contribute towards the delivery of housing, employment, infrastructure and sustainable development objectives across Greater Cambridge.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes