Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
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* 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	Chapter 2, in particular paragraphs 2.4, 2.26 and the Infrastructure Delivery Plan to which this paragraph refers ("the IDP"), paragraphs 2.76 to 2.79 and 2.82 and Policy S/DS. The water section is also at least indirectly relevant to Policy CC/IW and Policy CC/WE. The hospital infrastructure section is also relevant to Policy WS/NC and Policy S/CBC and to the Statement of Common Ground. The transport section is also at least indirectly relevant to Policy I/ST.
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

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

Test	**Yes / No**
Legally compliant	Yes
Sound	No

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.

We have noted and taken into account the limitations to the responses explained by Greater Cambridge Shared Planning ("GCSP") and applicable to this consultation. In this response, we focus on whether the Plan complies with the law and is 'sound'. For ease, we refer to the Proposed Submission Local Plan as "the Local Plan".

Compliance with national policy is an important test of whether the plan is 'sound'. Paragraph 2.76 of the Local Plan acknowledges that "National planning policy says that plans should be deliverable. Delivery of the sites included in this plan…is reliant on the provision of a significant level of infrastructure – in particular water supply, waste water treatment, and a sustainable and effective transport network. Delivery of this infrastructure is the responsibility of a range of local and national partners. As such, delivery of the plan's vision relies on these partners reflecting the strategy for Greater Cambridge in their own strategies and delivering on these in a timely way."

1. **The Local Plan overall**

We believe that the Local Plan does not pass the deliverability test because of very significant uncertainties/inadequacies in relation to:

(a) water supply;

(b) hospital infrastructure; and

(c) transport.

As a result the Local Plan is not sound. We explain in each case what we think is needed to rectify this below.

We have identified in the Local Plan a failure to recognise the full extent of the relevant problems, a lack of identification of the financial provision needed to fund the infrastructure and services in question and the source of that funding; and also insufficient co-operation and understanding between relevant bodies, together with a lack of shared vision and political will. The deterioration in the quality of life for existing residents we have already seen seems set to continue, especially as regards healthcare provision and public transport and congestion. Against this background, it is hard to see that the Local Plan can possibly deliver in a sustainable manner the very high level of jobs and growth it envisages.

1.1 Water supply

In summary, both the timing and funding of the Grafham Transfer and the Fens Reservoir look uncertain and there is neither an explicit funding plan, nor sufficient assurance that these and other more speculative projects described in the IDP as "critical" will be viable and Government-funded (especially in the light of the Honey Hill waste water plant debacle) for the Local Plan to be sound. There is nothing in the Local Plan that requires the situation to be monitored or which ties development to the availability of sufficient water resources or explains what might trigger Grampian conditions (as referred to in paragraph 2.78 of the Local Plan). These major deficiencies must be rectified.

In particular:

(a) The Cambridge Water Supply Area Evidence prepared by Atkins Realis for GCSP in October 2025 ("the Water Supply Evidence") does not mention that the Grafham Transfer has a key dependency in "the early delivery of the full Grand Union Canal transfer scheme between Water Resources West and Water Resources South East, offsetting the need for Anglian Water's existing transfer to Affinity Water" (page 10 of the Water Resources East Regional Water

Resources Plan for Eastern England (2023). We made this point in our response to the previous consultation, but it has not been picked up in the Atkins Realis June 2026 Addendum to the Water Supply Evidence ("the 2026 Addendum").

The most recent consultation relating to the Grand Union transfer scheme (February 2026) states that it expects the scheme to be operational in 2033 (see page 110 of the phase 2 public consultation brochure). Thus references in the Local Plan, the IDP, the Water Supply Evidence and the 2026 Addendum to the Grafham Transfer being available in 2032 are inaccurate.

(b) page 7 of the 2026 Addendum acknowledges, in reply to Cambridge Water's response to the previous consultation "Shared concern around the early part of the planning period (i.e. to 2032) driven by forecast domestic growth and planned abstraction reductions. This is planned for within the WRMP24, however deviations from already planned growth will be difficult to accommodate". The point we make in (a) above is highly relevant to this, as is the emergence of significant algal risk at Grafham Water.

The Environment Agency's recent publication "The Water Story of the Oxford to Cambridge Growth Corridor - A shared view of the challenges and opportunities ahead" ('the EA Water Story") says (page 12, emphasis added) "Pesticides from agricultural activities are causing… Grafham Water, to be increasingly 'at risk' due to an increase in algae. The advanced treatment required to effectively remove these pollutants at scale would likely involve technical complexity and significant cost considerations. Between 2025 and 2030, Anglian Water is working collaboratively with the Environment Agency and farmers, to stem chemicals and nutrients at source and prevent further deterioration. *This is vital to support a proposed 25-kilometre pipeline from Grafham to Cambridge, transferring supplies to this drier region for growth*."
This is a further key dependency in respect of the availability of water through the Grafham Transfer and the cost of the project and needs to be acknowledged in the Local Plan and monitored.

(c) in its response to the preceding draft of the Local Plan, Cambridge Water emphasised that it is restricting non-household connections to those that are below 20m3/day. Although this is acknowledged on page 7 the 2026 Addendum at 3 (which couples it with a non-sequitur reference to measures to limit household water use), we cannot see that this restriction has been actually reflected in the Local Plan itself and related documents. It must be. The EA Water Story suggests on its page 8 that the availability of supplies through the Grafham Transfer is key to a lifting of this restriction. Again, if correct, this should be made explicit in the Local Plan and other relevant documents.

(d) the EA Water Story (page 8) suggests that the Fens Reservoir is required by 2036 to meet demand. The 2026 Addendum suggests that this is the earliest possible date its supplies will be available. The Fens Reservoir website says in its most recent project update (24 June 2026) "As our understanding of the project has matured and we continue to refine the design, we now plan to hold our next phase of consultation in mid 2027 and will be preparing to submit an application for development consent in late 2028." The water sources for this reservoir have not yet been finalised (see page 2 of the consultation feedback summary document published by Anglian Water on its website in June 2026). The 2026 Addendum also acknowledges on page 10 uncertainty as to the amount of water this reservoir will supply. Both these factors and, the deferral, earlier this year, of the gate three submission timing for the reservoir from April 2026 to an as yet unspecified date (the reasons including design issues and environmental protection requirements) - see RAPID letter of 7 January 2026 - cast doubt on the project and undermine confidence that 2036 is a realistic delivery date.

(e) the IDP refers to as "critical" an effluent reuse scheme connected with the existing Cambridge Water Recycling Centre. Only part of the cost (attributable to Cambridge Water) is covered in the IDP.

(f) the IDP also refers to as critical "imports of water to the region may mean that there are opportunities for a new surface abstraction from the River Cam". We are not sure how something that "may" happen can be critical.

The Cam runs through the parish and this strikes us as unlikely especially given its extremely low levels after this summer's drought conditions. The river level remains low, despite the substantial amount of rain over the last couple of weeks.

(g) the Water Supply Evidence also refers to water credits. The Government has said nothing publicly about water credits since March 2024. We are pleased to see that the pursuit of these seems to have been abandoned. Sup SoCG (iv): Delivery of growth – Water Supply to GCSP's Statement of Common Ground says "A water credits system has also been considered, and could be subject to further work in future." This change should be recognised in the 2026 Addendum.

(h) we regret that neither local nor national government appears to have the will to seek urgently to solve the problem identified in the Water Supply Evidence that water reuse and recycling for large new development sites is not currently permissible. Eddington is currently not operating as planned because the Drinking Water Inspectorate requires non-potable supplies to be treated to potable standards due to concerns about cross-contamination. This is despite the laudable ambition of Policy CC/WE as regards water reuse and the use of rainwater. Solving this issue should have a positive impact on the current pressure on our chalk streams and the region's sewage spill issues.

(i) the plan fails to identify the water supplies to fight the wildfires of the kind Cambridgeshire has experienced this summer (especially deep down in the peat) and to provide the enormous amount of water needed in the construction of major infrastructure projects, such as East West Rail.

1.2 Hospital infrastructure

This section is also relevant to Policy WS/NC: Meeting the needs of new and growing communities, which entirely fails to mention the need for new development potentially to contribute to the costs of healthcare infrastructure of all kinds. It is also relevant to Policy S/CBC for reasons explained further below.

We are concerned about healthcare infrastructure provision across the whole spectrum from GP premises to acute hospitals, and we have noted the fragmented and incomplete treatment of this matter in the IDP. However, in this submission we focus on the hospital infrastructure deficit and the inadequacy of plans to address this. Our parish adjoins the Cambridge Biomedical Campus (CBC), and so we have taken a close interest in developments there and comment on these further below. We have observed the ongoing slippage in the delivery of promised investment in NHS clinical facilities and the stark contrast between private sector investment and undeveloped NHS land and deteriorating NHS facilities.

While we are pleased to see some significant changes to the IDP around acute and secondary care, they do not go far enough. Paragraph 2.76 of the Local Plan, which we have quoted above, does not even mention healthcare infrastructure, let alone hospitals. Paragraph 2.4 of the Local Plan lists as one of its strategic priorities "Connectivity and infrastructure: Plan for … health… facilities; in the right places and built at the right times to serve our existing and growing communities". The Local Plan has not grasped this nettle and, as a result is not sound.

CUH NHS Foundation Trust ("CUH") has held out the promise of three new hospitals 'soon'. Only one of these three schemes has identified government funding and none of them has yet reached the stage of full business case (FBC) approval. These schemes are:

(a) the Cancer Research Hospital. This hospital has provisional government funding through the national New Hospitals Programme (NHP) and is well-positioned in the next phase of that programme. Despite this, the hospital will not open until 2031 at the earliest (see NHP annual report 2025/26 and CUH Board papers 9 September 2026 report for agenda item 9).

(b) the Children's Hospital. CUH Board papers 9 September 2026 (report for agenda item 9) say (emphasis added) "CUH, the University of Cambridge and Cambridgeshire and Peterborough NHS Foundation Trust are finalising the …design, programme, price and funding arrangements ahead of Building Safety Act … submission in January 2027 and Full Business Case submission shortly thereafter. *The most significant risk to these timelines is securing the full capital funding required.* Following approval by regulators construction is due to begin in July 2027, with the building operational in the Summer of 2031". Our previous enquiries have identified that a substantial funding gap will remain even if philanthropic fundraising targets are met.

(c) the new acute hospital. Land was secured in the 2010 Strategic Masterplan for the Cambridge Biomedical Campus ("CBC") for the redevelopment of those parts of Addenbrooke's hospital dating back to the 1960s and 1970s. Critically, this includes the Emergency Department, which is physically constrained, of compromised functional suitability, and hugely overloaded. In the 2019/2020 annual report and accounts CUH said "Our new hospitals programme is central to our future and we are pressing ahead with our plans for … the rebuilding of Addenbrooke's." The project then disappeared from public view until the 2024 Spring Budget when the Government (from what is now MHCLG) gave CUH £3 million to develop its long term plans. CUH is now understood to be seeking £10 million from the Government to prepare the strategic outline business case for the new acute hospital. CUH's 9 September Board papers (BAF 011 relevant to agenda item 8) note the lack of funding to progress this. They go on to say "lobbying nationally and with the Cambridge Growth Company on funding…Identifying alternative funding streams to support delivery…Preparatory work to be able to commence procurement as soon as possible once funding is secured…"

The timetable for all these projects continues to slip and the necessary exchequer funding has not been forthcoming in a timely fashion.

All three hospitals are important and would be welcome, but it is the rebuild of the acute parts of Addenbrooke's and its funding and timing that is absolutely critical in the context of the Local Plan. CUH prepared an "update on the Acute Care Strategy" paper for the South Cambridgeshire District Council Overview and Scrutiny Committee meeting on 8 December 2025. It says (emphasis added) "Due to its accelerated population growth, Cambridgeshire is ahead of the National trend in facing increased demand. Census data shows that over the past decade Cambridge's population has grown by c.18% (against a c.6% national average) and its local population is set to grow by in excess of 60% by 2040 to meet the Government's ambition for economic growth in this region. *By contrast, hospital facilities have not kept pace with rising demand*. CUH's emergency department (ED) was built for a quarter of the patients it now services, and over 70% of CUH's acute estate is classified as being in poor or bad condition. We currently have an acute bed deficit of c.162 beds…*We are clear that our current care model is not serving our population, and will not be sustainable from a staffing, funding or space perspective in the future*."

Not only has the population increased, but it continues to age. Relevantly, paragraph 1.5 of the Local Plan says "Whilst Greater Cambridge continues to attract young working adults and students, long-term demographic trends highlight a rapidly ageing population. Forecasts suggest that by 2031, the number of people aged 65 or over will grow by a further 26%, the majority of whom will be in the over-80s age band." This factor increases the need for and use of acute facilities.

CUH's paper (which is now nearly a year old) estimates the cost of the new acute hospital that is needed at £2.3 billion. In the context of a Capital Departmental Expenditure Limit (CDEL) for the Department of Health and Social Care of around £14 billion per annum (rising to £15 billion by 2029) it appears unlikely that full exchequer funding could be found for such a project.

Addenbrooke's Hospital also reported a backlog maintenance bill of £238 million at 31 March 2025, of which more than half is categorized as 'high' or 'significant risk'. Updated figures as at 31 March 2026 will be reported in October. CUH Board Papers (BAF006) indicate a further increase in the high risk maintenance backlog and an inability to complete fire safety work, due to a lack of space into which patients can be decanted while wards are remediated. A recent newspaper article suggests that the Queen Elizabeth II hospital in King's Lynn may discontinue the provision of emergency, intensive care and maternity services. The parlous state of other RAAC hospitals in neighbouring Huntingdon and Bury St Edmunds, and the relaxed timetable for rebuilding these (through the NHP), adds further to the risk of an unplanned service collapse in the region. This would add further to pressure on Addenbrooke's, which is the regional centre of last resort.

Paragraph 12.3.2 of the IDP provides limited recognition of the issues facing CUH and says "[CUH's Acute Care Strategy] demonstrates that, with full implementation of this model, future acute healthcare needs generated by Greater Cambridge growth can be met more efficiently, but only if strategic infrastructure investment is brought forward in parallel with development." The words "more efficiently" are superfluous. They refer back to the description of current care models earlier in the paragraph and the aspiration to further improve on these. Hospital infrastructure investment is needed *now* in order to support the proposed population growth in the Local Plan as the infrastructure is struggling to cope with the health needs of the existing population. Without recognition of these facts, the Plan is not sound and the growth it proposes cannot go ahead.

The necessary investment must be secured and planned and the IDP must reflect the need for it and its overall cost. Its chapter 12 is seriously deficient in only addressing primary care requirements and costs. Other significant exclusions include: social care (critical for the functioning of the NHS and not limited to adult social care, which paragraph 15.10 of the Statement of Common Ground suggests will be covered in the next draft); maternity care, specialised services/tertiary care (these receive only a passing mention on page 120 IPD); and the role of the NHS in research, innovation and education and also in ambulance and hospice (and other end-of-life) services.

These requirements must also be reflected in the remainder of the Local Plan as regards the phasing of development. Realistic timelines and checkpoints must be inserted plus any other appropriate measures, so that GCSP is in a position to take steps to ensure that growth does not run even further ahead of CUH's ability to provide appropriate care. Funding mechanisms must also be built into, for example, Policy WS/NC.

The new hospitals and their funding are also relevant to Policy S/CBC because CBC's continued success as an academic/clinical/ industrial cluster is potentially at stake. The case for further CBC (commercial) expansion has steadfastly chosen to avoid any discussion of this risk and to disregard the potential downsides of unbalanced growth between the private and public sectors. If further supporting evidence for these risks is needed, even Knight Frank acknowledges them at page 7 of the CBC Demand and Deliverability Report (2022) which says "Knowledge that the clinical needs of the hospitals can be accommodated during the Local Plan period and beyond give credibility to the project".

The developers that benefit from CBC's expansion should also be expressly required in Policy S/CBC to contribute financially to its hospital provision through material planning obligations. This is especially so given the acknowledged anchor role of hospitals in CBC (see paragraph 2 of Policy S/CBC) and the likelihood that the "new east-west 'high street' for active travel and public

transport, to improve the permeability of the site" (paragraph 22(b)(i) Policy S/CBC) cannot be built unless and until the acute hospital is redeveloped.

In addition, at minimum CUH (and - due it its role in the Children's Hospital - East of England Community Health Care NHS Trust into which Cambridgeshire and Peterborough NHS Foundation Trust has merged) should be included in the Statement of Common Ground. They are, after all, the statutory bodies that will receive any funds for planning and building hospitals and whom GCSP will wish to be able to hold to account for time line slippage or failure to deliver. This is not to undermine the importance of the Central East Integrated Care Board, which should be fully engaged in the spatial planning discussion as it has strategic oversight for ensuring balanced provision of NHS infrastructure, across both sectors and geographies. Its predecessor, Cambridgeshire and Peterborough ICB did some useful work in engaging with local authority planning and this must not be lost as a consequence of re-organisation.

We understand that the IDP is being redrafted and suggest that its acute and secondary healthcare sections are somewhat repetitive and could be combined. In the first paragraph of 12.3.1 of the IDP, the total running cost of the acute sector is given as c£178 million. This seems far too low. Could it be £1.78 billion?

1.3 **Transport**

This section is also relevant to the draft interim Greater Cambridge Transport Strategy.

Successful, innovative and substantial improvements to the region's transport and travel infrastructure are absolutely necessary to deliver the Local Plan and support the proposed housing and economic growth. Without them the delivery of new settlements will be blighted by poor transport communications and access for both physical materials and personnel and they will be as car-dependent as many existing settlements in South Cambridgeshire. The settlements themselves will not form part of the interconnected society envisaged by the Local Plan and economic development in this nationally priority region will be stifled by poorly mobile physical and human resources. At present, we do not believe that the transport proposals underpinning the Local Plan are effective for the reasons set out in the remainder of this section. As a result, the plan itself is not sound.

Paragraph 2.82 of the Local Plan states that "Our proposed strategy is heavily informed by the location of existing and committed public transport schemes." However the IDP includes a number of uncommitted transport infrastructure projects including GCP's South East Transport Phase 2 Scheme ("CSET") and East West Rail ("EWR"). Figure 10 of the Local Plan wrongly indicates that CSET is a committed scheme.

1.3.1 ***General***

1.3.1.1 **Co-ordination**

Responsibility within the Greater Cambridge area for transport infrastructure is currently spread over a range of national (Network Rail, EWR, train operating companies, National Highways, Stagecoach, etc.) and local (Mayor/CPCA, Cambridgeshire County Council and the Greater Cambridge Partnership) bodies, both commercial and governmental, soon to be joined by the Greater Cambridge Development Corporation. As planning authority, GCSP also has a role to play.

The Local Plan and documentary base provide no evidence of any serious attempts to coordinate these various operators. Added to this is the continuing serious condition of many road surfaces and NMU paths and other elements of the current transport infrastructure.

This mishmash of responsibilities will continue to frustrate attempts to improve both the existing transport infrastructure and services and the provision of much-needed new infrastructure in both existing and planned new settlements. The current situation therefore is not fit for purpose and we can detect no serious steps to rectify this position in the transport proposals underlying the Local Plan.

1.3.1.2 **Innovation**

The general approach of these proposals is conservative, incremental and evolutionary. The population which transport serves will undergo a step-change expansion during the Local Plan's time frame, doubling or more the transport needs for sections of our community. The plan is not geared to this fact and needs to be much more ambitious and 'revolutionary' to deliver a satisfactory and sustainable solution to the transport needs of our area. As examples:

- within the time frame of the Local Plan autonomous vehicles will become common place. There is no consideration of how the transport infrastructure will be adapted to cater.
- communications and data services will allow a common Smart Travel token to be used on the full range of transport elements from buses and trains to scooters and taxis. There is no mention of 'soft' improvements of this kind within the Local Plan.
- the ownership of personal transport means will be significantly supplemented by rent-as-required services for everything from cars and trucks to e-scooters and cycles (both electric and conventional).
- many of the transport issues affecting Great Shelford and surrounding southern villages could be significantly alleviate by a purpose-built southern relief road. The original route proposed in the 1990s and turned down would no longer serve the purpose as an external ring road and, as noted in our comments on Policy S/CBC, we are concerned about certain of its roads becoming an unofficial southern relief road unless steps are taken to prevent this. See 1.3.2.3 for a possible southern relief route, using the A505.

None of these and their effects on local transport are given any consideration within the current proposals underlying the Local Plan.

In the longer term Cambridge city will require a dedicated mass transport infrastructure, possibly of trams and light rail. There is no recognition of this need within the Local Plan nor any attempt to include pre-emptive provision.

1.3.2 ***Elements***

1.3.2.1 **EWR**

The planned East West Railway is featured as contributing to the planned expanded commuting needs from Cambourne to Cambridge Station. EWR itself has not provided any passenger numbers since the Economic and Technical Report supporting its non-consultative Route Update Report and those then provided (Appendix 4, Tables 4.1 and 4.2) were low and based on the overall growth at Cambourne, not on the different destinations to which residents might travel (see the final paragraph of this section). With no other planned new stations within the Greater Cambridge area, the contribution of EWR to the alleviation of local traffic will be almost negligible and should be excluded from the Local Plan's transport calculated provisions.

EWR has not yet been given planning approval (the DCO application is not expected until mid-2027) or funding for the final leg from Bedford to Cambridge Station. It's chosen southern approach to Cambridge (which GSPC opposes) requires it to solve two very significant problems, to which it does not currently appear to have solutions.

The first is its potentially catastrophic impact at both construction and operational stages on the rare barbastelle bat maternity roosts at Eversden and Wimpole Woods Special Area of

Conservation. In responding to East West Rail's 2024 and 2026 non-statutory consultations, both South Cambridgeshire District Council and Cambridgeshire County Council expressed significant concerns about the potential adverse impact of East West Rail's proposals on the bats. Please also see our separate comments on your Habitats Regulations Assessment.

The second is its potential adverse impact (also at both stages) on the Mullard Radio Astronomy Observatory, a point made forcefully by the University of Cambridge in its response to East West Rail's 2026 non-statutory consultation.

Further, the figures in Table 90 of the 2025 County Council Transport Evidence Report (Part 4) prepared for GCSP for the purposes of its previous consultation do not provide enthusiastic support for a southern approach to Cambridge and beg the question how will the larger number from Cambourne who go to work in north east Cambridge or Northstowe get there by public transport? If EWR were to take a northern approach to Cambridge, not only could a station be built at Northstowe, but it could call at all three Cambridge stations, not something a southern approach can achieve.

In our response to the recent East West Rail consultation we said "We note that building EWR will increase the amount of traffic on Great Shelford's roads, based on evidence provided [in the EWR Transport Update Report] at the previous consultation. This was confirmed most recently at a meeting between GSPC and EWR Co on 27 May, during which EWR Co stated that the projected increase in traffic was due to the presence of two railway stations in or near the village. Despite this, no mitigations have been suggested to improve the road network to reduce the projected pressure of traffic in roads that are already over-capacity."

1.3.2.2 **CSET**

The plan assumes the construction of CSET which has not yet gained planning approval (preliminary hearings start on 20 October) and which does not have funding (contrast figure 10 of the Local Plan).

The IDP states 'this project aims to provide better public transport, walking and cycling options for those who travel on the A1307 and A1301 corridors, improving journey times and linking communities and employment sites in the area south east of Cambridge'.

However, CSET will create a new bus road across Green Belt land from the A11 travelling north to terminate at Cambridge South station. This is a long way from the existing CBC bus station and the proposed expansion land.

Better Ways for Busways has proposed an alternative route which is less environmentally destructive, improves accessibility for a range of different users, and is more cost-efficient. Furthermore, it would connect all parts of the CBC with Cambridge South station, which CSET completely fails to do. Great Shelford Parish Council is very strongly in favour of this alternative route.

This alternative is to route CSET along the so-called Southern Gateway access road (page 51 of the IDP and paragraph 22(d)(iv) of Policy S/CBC) extended to the Hinton Way roundabout and then on a dedicated bus lane along the A1307. Whilst this would not benefit any travellers from Great Shelford, it would greatly diminish the destruction to the village Green Belt amenity and also reduce traffic along Hinton Way. This spur would significantly reduce traffic volumes in the immediate vicinity of Addenbrooke's, and offers proximity to the existing Babraham Park and Ride as an active travel route.

The current planned route for the CSET destroys a region of Green Belt adjacent to Great Shelford, but provides no realistic additional transport options for the vast majority of village residents. The route will bypass Great Shelford village centre by almost a mile and will therefore

provide very limited improvement for villagers wishing to travel to CBC and beyond who will still need to rely upon the A1301 and A1307 routes towards Cambridge. Similarly CSET will bypass the population centres of Stapleford and Sawston and provide no direct access to the Babraham and Granta Park research facilities.

We do not believe that a new town at Grange Farm (linked by a proposed extension to CSET) will be sustainable. Instead, it will effectively become a large Cambridge suburb in the countryside. Residents will have to travel to access, for example, large-scale retail and leisure facilities, cultural and religious amenities, secondary education, and mature open spaces and sites of biodiversity. This will put further pressure on existing congestion points, including those within our parish.

1.3.2.3 **National Highways**

Alongside the two A routes that transect Great Shelford, the village is surrounded and accessed by major national highways (M11, A11, A10 and A428). These are already at capacity at rush hours around Cambridge. With the exception of dualling and junction improvements to A10, the IDP makes no reference to the needs for capacity improvements. In practice a number of improvments to these major routes will be desirable/required:

- enlarging the M11 to three lanes
- providing a full interchange at the M11/A14/A428 junction
- re-routing the A10 to bypass Harston and Foxton
- re-routing the A505 from Royston to a fully-fledged interchange at Stump Cross with the A11 and M11.

1.3.2.4 **City Access**

Currently the final 2 miles access to and from Cambridge City centre can take up to an hour for road traffic at peak times. This is major disincentive for people in Great Shelford and surrounding villages to work, shop or recreate in the city centre during the daytime.

None of the motor vehicle-related priority projects in the IDP address this issue. Most deliver travellers at ~ 1 mile distance point from the city centre. As the recent Cambridge to Cambourne Busway decision acknowledges (at its paragraph 42) "the Scheme would not relieve congestion or improve journey times east of Grange Road in the City Centre". See also the trenchant criticism in the recent Cambridge Area Bus Users' statement.

Since the failure of the City Access Scheme proposed by GCP, there have been no significant or realistic proposals aimed at reducing congestion in Cambridge itself. The paper prepared for the CPCA Transport Committee in November 2025 entitled Greater Cambridge Transport Strategy speaks of 'establishing a comprehensive evidence base' (3.4) towards 'Establishing a long-term, practical solutions to congestion in and around Cambridge' (3.5: Updated Vision and Objectives). We are unable to find any concrete output from this programme in either the draft interim Greater Cambridge Transport Strategy or the IDP.

The bulk of remedial proposals focus on active travel improvements i.e. cycling, electric scooters, etc. While these are to be greatly welcome, none of these are suitable for the ageing population of the southern fringe settlements – 24.8% inhabitants of the Shelfords are over 65 years of age (2021 census) and see further the "elderly/disabled travel" section below.

1.3.2.5 **CBC Southern Gateway Access Road**

The proposed general access to CBC from Granham's Road will produce significant extra traffic through Great Shelford on the A1301 from both directions. In particular the turning onto Granham's Road from the A1301 is already very hazardous, close to a busy level crossing and

prone to queuing. Without further restrictions on the range of vehicle access granted by this route and/or traffic restrictions along Granham's Road by way of one way schemes, etc. travellers will revert to existing routes. This proposal is likely to fail to reduce existing traffic bottlenecks on Addenbrookes and Hills Roads. For further details please see our comments on para. 22(d) iv of policy S/CBC.

1.3.2.6 **Active travel**

Proposed improvements to active travel are to be welcomed. However the experience of recent proposed improvements to the Sawston Greenway through Great Shelford and Stapleford suggests these are not sufficiently funded to provide safe and reliable NMU journeys. In addition these improvements are of very limited value to the ageing population of Great Shelford and surrounding necklace villages in South Cambridgeshire.

1.3.2.7 **Elderly/disabled travel**

There is no consideration given in the IDP or the Local Plan itself to the increasing needs of disabled and elderly travellers, again within a region with an ageing population. The Local Plan itself says in paragraph 1.5 (emphasis added) "Whilst Greater Cambridge continues to attract young working adults and students, long-term demographic trends highlight a rapidly ageing population. Forecasts suggest that by 2031, *the number of people aged 65 or over will grow by a further 26%, the majority of whom will be in the over-80s age band.*" This change in the population profile impacts on many aspects of societal well being by way of employment opportunities, access to health care facilities and contributions to the societal and economic life of the region.

A component of the Local Plan, Greater Cambridge Transport Strategy and IDP addressing the specific needs of disabled and elderly travellers is urgently needed to make it sound.

Please provide a 100 word summary of your representation.

The Local Plan does not pass the deliverability test (see its paragraph 2.76) because of very significant uncertainties/inadequacies in relation to:

- water supply – Grafham transfer timing is inaccurate, Fens Reservoir timing is uncertain and other projects described as "critical" in the IDP are not funded or viable;

- hospital infrastructure – inadequate recognition of what is needed, its timing and funding sources and the necessary link with population growth to prevent development outstripping resources; and

- transport – incoherent proposals which lack the step change needed to match population growth, ignore ageing/disability and are inadequate in relation to Cambridge itself.

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.

Draft Infrastructure Delivery Plan

Proposed Submission Plan Draft Statement of Common Ground

1.1 Water supply

Cambridge Water Supply Area Evidence prepared by Atkins Realis for GCSP (October 2025)
Atkins Realis Addendum to the Water Supply Evidence (June 2026)
Water Resources East Regional Water Resources Plan for Eastern England (2023) - https://wre.org.uk/wp-content/uploads/2023/12/WRE-Regional-Water-Resources-Plan-for-Eastern-England.pdf and confirmed on page 22 of the Water Resources East Progress Report (January 2026) - https://wre.org.uk/wp-content/uploads/2026/01/WRE-Regional-Plan-2025-progress-report-Final.pdf
February 2026 consultation brochure for the Grand Union Canal transfer scheme downloadable from this page - https://guctransfer.co.uk/consultation-materials/)
The Water Story of the Oxford to Cambridge Growth Corridor - A shared view of the challenges and opportunities ahead - https://cdn.prod.website-files.com/62de70239e21734fcc1d5873/6a54a18a15e0c0cded95f192_The_Water_Story_of_the_Oxford_to_Cambridge_Growth_Corridor.pdf
Project update 24 June 2026 - https://fensreservoir.co.uk/latest-news/24-june-2026/
Feedback summary - https://fensreservoir.co.uk/assets/images/downloads/Anglian-Water-Con3-Feedback-Summary-Report-Fens.pdf
RAPID letter of 7 January 2026 deferring gate three submission timing for Fens Reservoir - https://www.ofwat.gov.uk/wp-content/uploads/2026/01/RAPID-letter-to-Anglian-Water-on-Fens-Reservoir-gate-three-submission_Redacted.pdf

1.2 Hospital infrastructure

New Hospital Programme annual report 2025/26 - https://www.gov.uk/government/publications/new-hospital-programme-annual-report-financial-year-2025-to-2026/new-hospital-programme-annual-report-2025-to-2026

CUH Board papers 9 September 2026 (report BAF006 “Estate environment, compliance and resilience” and report BAF 011 “population growth” both for agenda item 8 and paragraphs 6.3 and 6.4 of the Chief Executive and Executive Team Report for agenda item 9) - https://media.cuh.nhs.uk/documents/Item_00-_Board_held_in_public_-_9_Sept_2026.pdf
Planning application 096/0796/OUT - https://applications.greatercambridgeplanning.org/online-applications/applicationDetails.do?activeTab=documents&keyVal=J308FQDXD1000 - see the Masterplan for CBC included in the supporting documents
CUH 2019/2020 annual report and accounts (page 9) - https://www.england.nhs.uk/wp-content/uploads/2021/08/cambridge-university-hospitals-nhs-foundation-trust-ara-2019-20.pdf
Spring Budget 2024, paragraph 3.26 £3 million for CUH - https://assets.publishing.service.gov.uk/media/66b33a42a3c2a28abb50de0b/E03057752_HMT_Spring_Budget_Mar_24_TEXT_PRINT.pdf
Paragraphs 1.3, 2.2 and 2.3 of “update on the Acute Care Strategy” paper for the South Cambridgeshire District Council Overview and Scrutiny Committee meeting on 8 December 2025 (agenda item 6) - https://scambs.moderngov.co.uk/documents/g10403/Public%20reports%20pack%20Monday%2008-Dec-2025%2017.30%20Scrutiny%20and%20Overview%20Committee.pdf?T=10
Hospitals backlog maintenance published 15 October 2025 - https://digital.nhs.uk/data-and-information/publications/statistical/estates-returns-information-collection/summary-page-and-dataset-for-eric-2024-25
Newspaper article on QE2 King’s Lynn - https://www.edp24.co.uk/news/26513480.kings-lynns-qeh-lose-e-maternity-icu/
CBC Demand and Deliverability Report (2022) prepared by Knight Frank

1.3 Transport

East West Rail 2023 Route Update Economic and Technical Report Appendix 4 - https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/Route-Update-Announcement/9a2d6ec314/ETR-Appendices-2023.pdf
Response by South Cambridgeshire District Council to East West Rail’s 2024/25 non-statutory consultation - https://www.greatercambridgeplanning.org/media/zotfxp1j/appendix-a-table-of-comments-south-cambridgeshire-distirct-council-final-10.pdf
Response by Cambridgeshire County Council to East West Rail’s 2024/25 non-statutory consultation - https://cambridgeshire.cmis.uk.com/CCC_live/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=gkvc4WEuo%2be80HCQt0fw3EjA14vbo4rIcavU4bb%2b1gC2vzSeqvJypw%3d%3d&rUzwRPf%2bZ3zd4E7Ikn8Lyw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWCtPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJFf55vVA%3d&FgPlIEJYlotS%2bYGoBi5olA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3d&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJFf55vVA%3d
Response by Cambridgeshire County Council to East West Rail’s 2026 non-statutory consultation - EWR-Spring-Consultation-Response-Cambridgeshire-County-Council.pdf
Response by South Cambridge District Council to East West Rail’s 2026 non-statutory consultation - https://www.greatercambridgeplanning.org/media/yyklrcgo/ewr_public-consultation-spring-2026_south-cambridgeshire-district-council.pdf
Response by University of Cambridge to East West Rail’s 2026 non-statutory consultation - https://www.em.admin.cam.ac.uk/sites/default/files/University%20of%20Cambridge%20EWR%20Consultation%20Response%202026%20Q1%20-%2017%20FINAL.pdf

Greater Cambridge Local Plan Transport Evidence Report (Part 4) Draft Plan Update - Cambridgeshire County Council October 2025

260621 EWR Consultation Respons

Great Shelford Parish Council response to EWR 2026 Consultation.

EWR Transport Update Report (November 2024) chapter 14 - https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/2024-con-docs-/b9bfa9d5ca/Transport-Update-Report-online-PDF.pdf
Better Ways for Busways alternative route https://www.bw4b.org/the-better-way
Cambridge to Cambourne Busway decision (paragraph 42) - https://assets.publishing.service.gov.uk/media/6aa2a96992e72b8ac437f0f4/cambourne-to-cambridge-decision-letter.pdf
Cambridge Area Bus Users statement 17 September 2026 - https://cambridgebususers.org/2026/09/17/statement-regarding-approval-for-the-cambourne-to-cambridge-busway/?fbclid=IwY2xjawUavPtwZG9mBWV4dG4DYWVtAjExAHNydGMGYXBwX2lkEDIyMjAzOTE3ODgyMDA4OTIAAR7bLcEibQg3b0_A1EA4EQF3pioD5EVL1-yegel_vCJHL2gONAi4xYYTU2CBLQ_aem_mRaQN7MP_6Kx243fsu5sXA
*2021 census Shelford www.ons.gov.uk/explore-local-statistics/areas/E05011304-Shelford

data Shelford.xlsx

Paper prepared for the CPCA Transport Committee in November 2025 entitled Greater Cambridge Transport Strategy https://democracy.cambridgeshirepeterborough-ca.gov.uk/documents/s7449/Appendix%20C%20-%20Updated%20Interim%20Draft%20GCTS.pdf ?

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.

The timing and funding of the Grafham Transfer and the Fens Reservoir look uncertain (and, in the transfer's case, already inaccurate) and there is neither an explicit funding plan, nor sufficient assurance that these and other more speculative projects described in the IDP as "critical" will be viable and Government-funded (especially in the light of the Honey Hill waste water plant debacle) for the Local Plan to be sound. There is nothing in the Local Plan that requires the situation to be monitored or which ties development to the availability of sufficient water resources or explains what might trigger Grampian conditions (as referred to in paragraph 2.78 of the Local Plan). These major deficiencies must be rectified.

The necessary investment in hospital and other acute infrastructure must be secured and planned and the IDP must reflect the need for it and its overall cost. Its chapter 12 is seriously deficient in only addressing primary care requirements and costs. Other significant exclusions include: social care (critical for the functioning of the NHS and not limited to adult social care, which paragraph 15.10 of the Statement of Common Ground suggests will be covered in the next draft); maternity care, specialised services/tertiary care (these receive only a passing mention on page 120 IPD); and the role of the NHS in research, innovation and education and also in ambulance and hospice (and other end-of-life) services.

These requirements must also be reflected in the remainder of the Local Plan as regards the phasing of development. Realistic timelines and checkpoints must be inserted plus any other appropriate measures, so that GCSP is in a position to take steps to ensure that growth does not run even further ahead of CUH's ability to provide appropriate care. Funding mechanisms must also be built into, for example, Policy WS/NC and S/CBC.

CUH and East of England Community Healthcare NHS Trust should become parties to the Statement of Common Ground.

Successful, innovative and substantial improvements to the region's transport and travel infrastructure are absolutely necessary to deliver the Local Plan and support the proposed housing and economic growth. Without them the delivery of new settlements will be blighted by poor transport communications and access for both physical materials and personnel and they will be as car-dependent as many existing settlements in South Cambridgeshire. The settlements themselves will not form part of the interconnected society envisaged by the Local Plan and economic development in this nationally priority region will be stifled by poorly mobile physical and human resources. At present, we do not believe that the transport proposals underpinning the Local Plan are effective for the reasons set out in section 3 above. We have also made a number of suggestions there as to how some of the deficiencies in these proposals can be addressed (eg better co-ordination among responsible bodies, consideration of future developments in travel, an alternative routing for CSET and an elderly/disabled person travel policy). For others, we have merely pointed out the deficiencies.

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	No

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

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

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	S/CBC
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

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

Test	**Yes / No**
Legally compliant	Yes
Sound	No

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.

We do not believe the proposed release of land from the Green Belt, as shown on the Policies Map, and as an extension to the Cambridge Biomedical Campus ("CBC") is sound.

The Development Strategy Topic Paper (2026) says (paragraph 5.16) "we consider there to be no exceptional circumstances for releasing land from the Green Belt to meet development needs as a matter of principle. We did, however, identify site specific exceptional circumstances for releasing land from the Green Belt at the Cambridge Biomedical Campus". Paragraph 2.63 of the Local Plan comes closest to explaining what GCSP thinks these site-specific exceptional circumstances are. It says "a limited release is justified to provide an opportunity to meet development needs of the campus and deliver a world leading campus".

We do not believe such site-specific exceptional circumstances have been appropriately established. This is because, in summary:

- the estimates of demand on which the Local Plan relies in relation to CBC are fundamentally flawed, so the development needs of CBC have not been accurately calculated and so cannot be relied upon to establish the exceptional circumstances needed for the Green Belt release
- we do not understand why a world-leading campus can't be delivered on the existing site, together with the expansion land already allocated. This is, in any event, clearly an ancillary reason and falls away if the main reason - development need - has not been established.

We provide more detail below.

We are pleased to see that paragraph 1 of this policy includes wording that we supported in our response to GCSP's previous consultation on the Local Plan, namely "The Cambridge Biomedical Campus…is appropriate for a mix of uses centred on the Campus' unique function of bringing together clinical care, clinical education and clinical research including medical research institutes and life sciences which meet local, regional or national health care needs – together with directly related biomedical and biotechnology research and development activities." This appears to us to reflect what was said in the Development Strategy Topic Paper prepared in September 2021 by GCSP for the "First Proposals" consultation at its page 130, namely "After its original Green Belt release, successive policies have sought to reserve the campus for uses that need to be located there. It is proposed that this approach continues."

Unfortunately, the evidence submitted in support of the proposed expansion is not restricted to businesses which *need* to be located at CBC and meet the description in paragraph 1 of Policy S/CBC that we have reproduced above. The source data in the CBC Demand and Deliverability Report (2022) prepared by Knight Frank simply looks at life science businesses in general, not at those which will benefit from, and contribute to CBC's unique function. As regards the estimates of demand which underlie "Cambridge Biomedical Campus Vision 2050: Creating a life sciences quarter for Cambridge" ("Vision 2050") these are unprovenanced and unreliable. The estimates derive from the "Cambridge South" bid to the Local Plan Call for Sites in 2021. While the CBC has these projections, it does not have the source data, assumptions and calculations that sit behind them. Therefore, the initiative to extend the Campus yet again beyond its current land allocation is not based on a robust projection of the amount of land needed over the next twenty years for the Campus's essential development (see Annex C of Cambridge Biomedical Campus Vision 2050 – an Assessment, which sets out correspondence confirming this between Kristin-Anne Rutter and David Plank on behalf of the CBC Local Liaison Group, 2-20 May 2022). These data and estimates result in an over-estimate of potential demand and, we understand underlie the figures in paragraphs 9(b) and (c) of Policy S/CBC. They have not been revisited to include only those businesses which fall within paragraph 1 of Policy S/CBC and resubmitted. As result, the evidence base on which GCSP has relied to make the release of land shown in the Policies Map is not sound. An amended evidence base would have shown significantly lower levels of demand. This amended evidence base must be produced and rigorously assessed

before any conclusion can be reached on demand and, from that, on the size of Green Belt release that is appropriate.

There is a further issue as regards the removal of an additional 3 hectares through the realignment of the end of Granham's Road. In paragraph 2.23 of its "Greater Cambridge Green Belt Assessment - Response to CBC submission on justification for realigning Granham's Road", LUC concludes "..in weighing up the arguments we would suggest that the harm to the Green Belt purposes that should be taken into account is the 'very high' harm associated with the current contribution of land in RC11b, but that the factors weighing against this harm should be i) the need for additional floorspace, but also ii) any highways/traffic benefits of road realignment and iii) the lack of significant additional impact on adjacent Green Belt land that would result from development of land in RC11b and creation of a new boundary along a realigned Granham's Road."

Paragraph 3.107 of the Site Allocations Topic Paper (2025) misinterprets this and says "The alternative scenario assessments for parcels RC10 and RC11 suggest that the realigned course of Granham's Road would mark the distinction between land in RC11 that would cause 'high' harm if released from the Green Belt, and land in RC10 that would cause 'very high' harm. These are the same ratings that were assigned to RC10 and RC11 in the original assessment. Therefore, despite being located further into the open countryside, the realigned Granham's Road would still mark the transition from 'high' to 'very high' harm."

In other words, GCSP has applied the wrong test in concluding that the release proposed in the policy S/CBC causes "only" high harm to the Green Belt. It causes very high harm and we have already explained why we believe that consideration i) identified by LUC is not fulfilled (the evidence of demand is not restricted to businesses that need to be located at CBC). Nor are we convinced about ii) and iii).

The failure to provide an appropriate evidence base (as outlined above) goes to the heart of the question whether there are exceptional circumstances to permit the release of Green Belt land proposed in Policy S/CBC. The answer is that there may be. However - as supplied to date - the underpinning evidence base relating to demand is flawed. Thus the proposed allocation is not sound.

Further, if Granham's Road is to be realigned, we would suggest reducing the Green Belt release made in South Cambridgeshire District Council's Local Plan (2018) by 3 hectares to provide greater protection to the fragile Nine Wells Local Nature Reserve which is very close to the boundary of this earlier release.

If policy S/CBC stands we have a number of additional comments on it (using its paragraph numbers for ease of reference):

10 The masterplan should be required before any further major application is made on the existing Campus as well. Any application for a new acute hospital on the reserved site would presumably be a major application.

12 The developers that benefit from CBC's expansion should also be expressly required to contribute financially to its hospital provision through material planning obligations and this must be set out in Policy S/CBC. This is especially so given the acknowledged anchor role of hospitals in CBC (see paragraph 2 of Policy S/CBC) and the likelihood that the "new east-west 'high street' for active travel and public transport, to improve the permeability of the site" (paragraph 22(b)(i) Policy S/CBC) cannot be built unless and until the acute hospital is redeveloped. As noted above, this requirement goes to the soundness of the proposals in Policy S/CBC and its absence contributes to the lack of soundness in the Local Plan as regards healthcare infrastructure.

22a(iv) this must be strengthened to include a requirement that a robust and effective system is introduced to enforce the Cambridge Area G Traffic Regulation Order, Section 31, Prohibition of Driving applicable to CBC before the earlier of: (i) the approval of any major application being approved within land which forms part of Phase 3 or Phase 4; (ii) the realignment of Granham's Road; and (iii) the development of the Southern Gateway access road referred to in 22(d)(iv). The existing landowners have, to date, failed to devise and implement such a system. They should not be permitted to continue to flout existing and long-standing planning requirements in this way. Further, without this requirement, the combination of Addenbrookes Road and the Southern Gateway access road vastly increases the possibility of these roads being used as a Cambridge Southern Relief Road, a proposal that failed in the early 1990s. From this perspective, we are concerned that the reference to a modal filter at Dame Mary Archer Way has been removed.

This requirement for a robust and effective enforcement system goes to the soundness of the proposals in Policy S/CBC and its absence contributes to the lack of soundness of the transport proposals underpinning the Local Plan.

22(c) We are firmly opposed to the GCP South East Transport (CSET) Phase 2 Scheme for reasons addressed in our representations on the lack of soundness of the transport proposals supporting the Local Plan. There is a better alternative and this paragraph should allow for an alternative scheme that meets the objectives set out in it.

22(d)(iv) We are pleased to see that the the proposed Southern Gateway access road is not shown in the Indicative Spatial Framework as a "main vehicle access", even though it is described in this paragraph as "multi-modal". We are very concerned that a new multi-modal access road from a realigned Granhams Rd which is intended to relieve pressure on Babraham Rd and Hills Rd will merely shift this pressure westwards to the A1301 (which is already heavily congested at peak times). in particular:

(a) We are completely opposed to any private vehicle traffic (other than the vehicles of disabled drivers and blue badge holders) being able to use the proposed entrance to Phases 3 and 4 of CBC from Granhams Road as this will unquestionably worsen the traffic through the village and at the High Green junction. Private car parking for these parts of CBC should be in the Babraham Park and Ride or the Trumpington Park and Ride.
(b) In any event, careful consideration needs to be given to the impact of additional traffic using the access road via the A1301 at the poor junction with High Green/Granhams Rd. This will cause significant congestion at this turning and at the level crossing on Granhams Rd (which already often tails back onto the A1301), which will be further exacerbated by problems associated with access/egress to the Coop and other commercial properties at the same site.

This goes to the soundness of the proposals in Policy S/CBC.

30 The Campus-wide comprehensive masterplan should be subject to a public consultation requirement.

31 The masterplan should also address the question of integration with surrounding neighbourhoods and the wider community (see paragraphs 6, 14 and 20(b) of Policy S/CBC). Consideration should also be given to requiring it to address energy and water-use. Its (g) seems to have lost the requirement for a "delivery body capable of managing the delivery of infrastructure". This is regrettable. Generally, however, the requirements of paragraph 31 and Policy S/CBC will require a degree of collective endeavour that has been lacking to date. Key organisations will need to work together more effectively to achieve this.

The figures and description in paragraph 2(b)(ii) of Policy S/DS should better match those in paragraph 9(b) and (c) of Policy S/CBC.

Please provide a 100 word summary of your representation.

The failure to provide an appropriate evidence base goes to the heart of whether there are exceptional circumstances to permit the release of Green Belt land proposed in Policy S/CBC. The answer is that there may be, but the proposed allocation is currently not sound.

Policy S/CBC needs to be further altered so that:

- the developers are required to contribute financially to its hospital provision
- a robust and effective system is required to enforce the Cambridge Area G Traffic Regulation Order, Section 31, Prohibition of Driving
- the proposed Granham's Road entrance is restricted to essentially public transport

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.

Development Strategy Topic Paper (2026)
Development Strategy Topic Paper (2021)
CBC Demand and Deliverability Report (2022)
CBC Vision for 2050 (2024)
Cambridge Biomedical Campus Vision 2050 – An Assessment by Great Shelford Parish Council and Trumpington Residents' Association - https://www.greatshelfordparishcouncil.gov.uk/wp-content/uploads/sites/105/2024/03/FINAL-Cambridge-Biomedical-Campus-Vision-2050-An-Assessment-Feb2024-1.pdf
Greater Cambridge Green Belt Assessment - Response to CBC submission on justification for re-aligning Granham's Road
Site Allocations Topic Paper (2025)
South Cambridgeshire District Council's Local Plan (2018)
Cambridge Area G Traffic Regulation Order, Section 31, Prohibition of Driving - THE CITY OF CAMBRIDGE AREA G (CONSOLIDATION) ORDER 1993

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.

A revised evidence base is required for Policy S/CBC as it is likely to support a smaller area of Green Belt release. Such an evidence base must be rigorously assessed before any conclusion on release is reached and the appropriate measure of harm to Green Belt must be used in respect of any decision to release further Green Belt to realign Granham's Road.

Policy S/CBC needs to be further altered so that:

- the developers are required to contribute financially to its hospital provision

- a robust and effective system is required to enforce the Cambridge Area G Traffic Regulation Order, Section 31, Prohibition of Driving
- the proposed Granham's Road entrance is restricted to essentially public transport, blue light vehicles and blue badge holders.

Further detail is given in Section 3.

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.

Because we consider that the errors in the evidence base and in the Green Belt assessment have not been adequately dealt with to date

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

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	S/GB and the Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

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

Test	**Yes / No**
Legally compliant	Yes
Sound	Yes, but land misclassified

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.

We would like to challenge the following provisional grey belt classifications in the Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance ('the 2026 Assessment"), using the parcel numbers given in that document:

GS1 - Appendix B (Great Shelford to Hardwick) of the Greater Cambridge Green Belt Assessment Final Report 2021 ("Appendix B - GS") states that "Parcel GS1 makes a relatively significant contribution to preserving Cambridge's compact character" and awards an overall harm rating of "moderate high". Paragraph 5.5 of the 2026 Assessment says "LUC has reviewed the 'moderate-high 'rated parcels and determined that these align best with a 'moderate 'contribution rating as exemplified in the PPG, as they display characteristics which can be considered to limit their contribution to less than the 'considerable 'level the PPG suggests is required for a strong contribution to Purpose D." This approach appears too broad brush and formulaic and to apply insufficient analysis to the detail of the harm assessments. A parcel that makes a relatively significant contribution to preserving Cambridge's compact character would more naturally considered to make a considerable contribution to the special character of Cambridge. The factors on which this parcel of land scores less well are relatively insignificant to purpose GB 2 1d - to preserve the setting and special character of historic towns.

GS4b - Appendix A of the 2026 Assessment states that "Parcel GS4B makes a relatively significant contribution to preserving Cambridge's compact character" and awards an overall harm rating of "moderate high". Paragraph 5.5 of the 2026 Assessment says "LUC has reviewed the 'moderate-high 'rated parcels and determined that these align best with a 'moderate 'contribution rating as exemplified in the PPG, as they display characteristics which can be considered to limit their contribution to less than the 'considerable 'level the PPG suggests is required for a strong contribution to Purpose D." This approach appears too broad brush and formulaic and to apply insufficient analysis to the detail of the harm assessments. A parcel that makes a relatively significant contribution to preserving Cambridge's compact character would more naturally considered to make a considerable contribution to the special character of Cambridge. The factors on which this parcel of land scores less well are relatively insignificant to purpose GB 2 1d - to preserve the setting and special character of historic towns.

GS5 - this parcel is too large and not homogeneous in character. It should be subdivided and then reassessed for a more accurate result. While part of it may be grey belt, we are doubtful that the entirety of it is. The land between Granham's Road and the railway line is different in character from that on the other side of Granham's Road. We also note that Hobson's Brook rises in this larger area. The assessment appears unduly desk-based and guided by the shape on the map of the existing village development, rather than its appearance on the ground.

GS23 - the Great Shelford Inset Policies Map shows this parcel as having Important Countryside Frontage. It is, in truth, one of the lovelier bits of Great Shelford, with a

wide vista across open countryside. Appendix B - GS states “Overall, there is weak distinction between the parcel and the urban area”. This obviously desk-based assessment results in the conclusion that GS23 “makes a relatively limited contribution to preserving Cambridge's compact character”. We strongly disagree and would ask that GS23 is visited and reassessed.

RC13 - Greater Cambridge Green Belt Assessment Appendix B - Cambridge - Newtown to Trumpington states “Parcel RC13 makes a relatively significant contribution to preserving Cambridge's compact character” and awards an overall harm rating of “moderate high”. Paragraph 5.5 of the 2026 Assessment says “LUC has reviewed the ‘moderate-high ’rated parcels and determined that these align best with a ‘moderate ’ contribution rating as exemplified in the PPG, as they display characteristics which can be considered to limit their contribution to less than the ‘considerable ’level the PPG suggests is required for a strong contribution to Purpose D.” This approach appears too broad brush and formulaic and to apply insufficient analysis to the detail of the harm assessments. A parcel that makes a relatively significant contribution to preserving Cambridge’s compact character would more naturally considered to make a considerable contribution to the special character of Cambridge. The factors on which this parcel of land scores less well are relatively insignificant to purpose GB 2 1d - to preserve the setting and special character of historic towns. We also disagree with the conclusion that “The additional impact on the adjacent Green Belt of the release of the parcel would be minor”. Given its position at the base of one of the “Green Fingers” that reaches into Cambridge itself (Cambridge City Council’s 2003 Cambridge Landscape Character Assessment), the impact would be significantly more adverse than minor.

Please provide a 100 word summary of your representation.

Mischaracterisation of GS1, GS4b and RC13 as grey belt and request to reconsider the assessments of GS5 and GS23

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 Green Belt Assessment - Review following changes to National Policy and Guidance
Appendix B (Great Shelford to Hardwick) of the Greater Cambridge Green Belt Assessment Final Report 2021
Greater Cambridge Green Belt Assessment Appendix B - Cambridge - Newtown to Trumpington
2003 Cambridge Landscape Character Assessment (Cambridge City Council)



cambridge-landscape-character-assessme

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.

Alter grey belt classification of GS1, GS4b and RC13 to Green Belt and reassess the classification of GS5 and GS23

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.

Because accuracy of grey belt classification is very important to our Parish

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

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	
Proposed Submission Policies Map	Inset Map - Great Shelford
Sustainability Appraisal	
Habitats Regulations Assessment	

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

Test	**Yes / No**
Legally compliant	Yes
Sound	Yes, but inaccurate

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.

This map does not reflect two Local Green Spaces, shown in Policy S&GS14 of the adopted Stapleford and Great Shelford Neighbourhood Plan. These are:

LGS1 The Hermitage and Kings Mill Meadows (Church Street), Great Shelford and

LGS2 Great Shelford Recreation Ground.

The former appears not to marked at all and the latter is shown as Protected Open Space.

Please recognise these areas on the relevant inset map as Local Green Space. This will indicate clearly that they are entitled to the additional protection provided by HC8 1 of the National Planning Policy Framework.

Please provide a 100 word summary of your representation.

Omission of two Local Green Spaces from relevant inset map and request to rectify

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.

Adopted Stapleford and Great Shelford Neighbourhood Plan - https://www.greatercambridgeplanning.org/media/3ojhf3xz/stapleford-and-great-shelford-neighbourhood-plan.pdf

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.

The inset map relating to Great Shelford is inaccurate without these changes

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.

Because these modifications are very important to our Parish

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

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	Chapter 2 and Statement of Common Ground
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

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

Test	**Yes / No**
Legally compliant	Yes
Sound	Yes, but significant omission

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 Local Plan has an important relationship with the Greater Cambridge Development Corporation ("(CDC").

The position of CDC is described on its website as follows:

"The government has confirmed that its intention to grant the Development Corporation planning powers covering both the determination of planning applications for strategic development and plan-making powers.

At present, there is no change to current town planning arrangements. Any transfer of planning powers would require a separate Statutory Instrument, known as the Planning Functions Order, which would set out the proposed planning functions and implementation and transition arrangements.

The government is expected to prepare and lay the Order before Parliament in autumn 2026.

At this stage and subject to the drafting and Parliamentary approvals process it is anticipated that

The Development Corporation would take on development management powers for strategic developments (above a threshold of 250 dwellings and 5,000 sq.m commercial space) from 2027.

Plan-making powers would transfer to the development corporation, but it is intended that the Secretary of State will issue a direction preventing the Development Corporation from exercising plan making powers until a later date.

Until the necessary legislation is made and powers come into effect, all planning applications will continue to be handled by the Greater Cambridge Shared Planning Service (GCSP), as they are today."

We have heard the chair of CDC say, on a number of occasions, that CDC is supportive of the Proposed Submission Local Plan and the evidence underpinning it, yet CDC is not included in the Statement of Common Ground. In the interests of consistency and continuity and public confidence, we think it should be.

Please provide a 100 word summary of your representation.

CDC should be included in the Statement of Common Ground

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.

https://thecgc.org.uk/index.php?contentid=180

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.

CDC should be included in the Statement of Common Ground

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	No

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

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

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	
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	Chapter 5

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

Test	**Yes / No**
Legally compliant	No
Sound	

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.

We do not believe that the Habitats Regulations Assessment meets applicable legal requirements. Although it acknowledges that it is important to consider “in-combination effects” (its paragraph 3.3) and says at paragraph 3.35 “The HRA Screening assessment therefore considers whether the Local Plan policies could have likely significant effects either alone or in combination” we cannot see that it does so, as regards the East West Rail project.

This is a strategic project which is clearly integral to the development at North Cambourne (Policy S/CBN). It has the potential to impact significantly on the Eversden and Wimpole Woods Special Area of Conservation (”SAC”). Paragraph 3.40 HRA goes on to say “3.40 The potential for in-combination impacts will therefore focus on plans prepared by local authorities that overlap with Habitats sites that are within the scope of this HRA…Where relevant, any strategic projects in the area that could have in- combination effects with the GCLP will also be identified and reviewed.”

Paragraph 4.49 goes on to say “Further assessment is necessary (see Chapter 5 Appropriate Assessment) to determine the potential impacts of the site allocations in relation to offsite functional habitat damage and loss and whether mitigation measures are required. The effects would be significant due to the Local Plan alone (although there could be additional impacts in-combination, for example with East-West Rail, which proposes a new rail route between Cambridge and Oxford, through the area in which functionally linked habitats associated with Eversden and Wimpole Woods SAC occur).”

Chapter 5, however, assesses the impact on the Eversden and Wimpole Woods SAC arising out of the Local Plan *alone* (see paragraph 5.2). This is both irrational (given the integral importance of East West Rail to, for example, Policy S/CBN) and legally incorrect. The HRA must be re-done to include the in-combination effect of the East West Rail project.

Please provide a 100 word summary of your representation.

The Habitats Regulations Assessment is not legally compliant because it does not include an in-combination assessment of the effects of the Local Plan and the East West Rail project on the Eversden and Wimpole Woods Special Area of Conservation

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.

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.

The Habitats Regulations Assessment must be revised to include an in-combination assessment of the effects of the Local Plan and the East West Rail project on the Eversden and Wimpole Woods Special Area of Conservation

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	No

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

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