

Responses of Great Shelford Parish Council to draft Greater Cambridge Local Plan consultation

We have set out our responses below by reference to chapters, page and paragraph numbers or policies within the draft Local Plan.

1 ABOUT THE PLAN

P36, para 1.18

We note that the Stapleford and Great Shelford Neighbourhood Plan (adopted Oct 2025) has not been incorporated into the draft greater Cambridge Local Plan and that this will need doing before the next version of the Local Plan is produced. The Policies Map will also need updating to reflect this.

2 DEVELOPMENT STRATEGY

P47, para 2.4

We broadly agree with the seven strategic priorities. However, we suggest that the wellbeing and social inclusion priority is modified with the addition of the following italicised text to read, “Help improve equality of access and opportunities for people in Greater Cambridge to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes, *jobs and access to nature and green spaces*.” Access to nature and green spaces is also vital to leading healthier and happier lives, and will be increasingly important as housing density increases and where apartments are the major form of housing.

P53, para 2.25

As regards hotels at the Cambridge Biomedical Campus, please see our detailed comments on Policy S/CBC at paragraphs 7 and 30(c).

P53, para 2.26

This paragraph refers to transport improvements, with the draft Infrastructure Delivery Plan referring to a number of new projects. What it does not acknowledge is that much of the existing transport network is inadequate and some of it is in a poor state of repair. These issues also need to be addressed as many of them are urgent.

Great Shelford is a critical transport nexus combining rail, bus and non-motorised routes into the Cambridge Biomedical Campus (“CBC”) and Cambridge itself. It sits adjacent to both the city boundary and CBC. The parish is also separated from Cambridge and surrounded areas by Green Belt which represents some of the most valuable undeveloped countryside near the city of Cambridge and CBC. It performs the function of separating the city from its nearest necklace villages and links with “green fingers” running into the heart of the city. While the ongoing development of Cambridge and particularly CBC offers potential opportunities for residents of Great Shelford by way of employment and healthcare, the village carries the burden of many of the major transport routes in the South Cambridge area and bears the brunt of their ongoing development.

Current routes include:

- M11 motorway and two important A roads (the A1301 - London Road, Tunwells Lane, High Green and Cambridge Road - and the A1307 – Babraham Road), all traversing the parish
- two major rail lines to London (and potentially the East West Rail southern approach route, to which the Parish Council is opposed - see our comment on paragraph 2.67)
- three public bus routes of variable frequency (7 - to and from Cambridge centre via CBC, T3 - between Fulbourn and Granchester and 7a – Cambridge centre to Royston)
- a number of dedicated private transport routes for out of Cambridge facilities such as Granta Park, the Wellcome Genome Campus and Babraham Research Campus.

In addition many local roads are used by commuters, particularly east west traffic to CBC and beyond, as well as local journeys by parishioners. Many local streets were laid down in mediaeval times and are encompassed by a conservation area; they are entirely unsuitable for current, and future projected, traffic volumes. It is important that long term future traffic developments in and around Great Shelford are carefully planned to accommodate the physical infrastructure of the village and also the interests of the village inhabitants.

It is unclear how current transport plans will achieve this. Known existing problem areas identified in the draft Infrastructure Delivery Plan at page 28 do not, but should, include the A1301 through Great Shelford and the level crossings on Granhams Road and Hinton Way. Outside Great Shelford, the Addenbrookes Relief Road is a significant problem.

Rail

Shelford benefits from having a station on the Cambridge to Liverpool Street railway line. However trains typically stop only every hour during the day and every 30 minutes at peak times. This is insufficient to provide a realistic alternative to much car use.

The level crossing adjacent to Shelford station is closed for up to 8 or more trains per hour leading to significant congestion on Hinton Way, including to the traffic lights with the A1301. The much watered down and poorly planned Sawston Greenway proposals will narrow Hinton Way to one lane close to the junction with Mingle Lane and will worsen this problem.

Similarly, congestion at the Granhams Road crossing leads to significant and dangerous congestion at the adjacent hazardous junction with High Green. Anecdotally, the recently completed rail re-signalling programme seems to result in longer level crossing closure times.

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.

Shelford station has no means of crossing from one platform to another. Increased closure of the crossing (to be sure to get across one currently needs to allow 10 minutes) will lead to increased anxiety for passengers to reach platforms in time and again dissuade some from using the rail route into Cambridge South station and the other Cambridge stations.

CSET

The current planned route for the CSET effectively destroys a region of Green Belt adjacent to Great Shelford, but provides no realistic additional transport options for the vast majority of village residents. Routing CSET along the so-called southern access road (page 51 of the draft Infrastructure Delivery Plan) extended to the Hinton Way roundabout and then on a dedicated bus

lane along the A1307, whilst not benefiting any travellers from Great Shelford, would greatly diminish the destruction to the village Green Belt amenity and also reduce traffic along Hinton Way.

Great Shelford Parish Council is very strongly in favour of the alternative route for CSET proposed by Better Ways for Busways along A1307; it is both more economical and efficient and less deleterious to the countryside. Please also see our further detailed comments on Policy S/CBC at paragraph 32 and more detail on the negative environmental impact of CSET in our comments on Policy BC/GI.

We note that the slides used by GCSP on 15 January suggest that development at CBC will need to contribute to CSET. This has the potential to introduce a re-examination of the costs of the proposals of the Greater Cambridge Partnership relative to alternatives.

Active Travel

It would be very beneficial to residents of the parish to have a direct active travel route to Whittlesford Parkway station, taking in Dernford Reservoir and the nearby SSSI and Sawston Business Park (the former Spicer's site). We note by comparison that page 43 of the Infrastructure Delivery Plan suggests that by 2035 there should be "Active travel improvements along the A505 to connect Babraham site to Whittlesford Parkway station".

Great Shelford benefits from the Genome/Chisholm cycle path (referred to in the Infrastructure Delivery Plan as the DNA Path) which connects the village to both CBC and also onto the busway route into Cambridge station. However it has a poor surface with very poor lighting. In addition the connection into CBC is currently very poor due to construction work for Cambridge South station. It will need to be greatly improved to provide a realistic alternative to motor transport for most people.

Similarly the extension in the form of the Sawston Greenway (referred to on page 37 of the draft Infrastructure Delivery Plan) is a shadow of the original proposals. It suffers from poor route planning alongside motorised traffic and is unlikely to realise its potential for onwards non-motorised transport, especially for students of Sawston Village College. As noted above, we favour a direct active travel route to Whittlesford Parkway, along with e-bike mobility hubs in appropriate places such as Shelford station to facilitate and encourage non-motorised travel into CBC and beyond. This could also improve the non-motorised connection to Sawston.

The draft Infrastructure Delivery Plan refers on pages 44 and 45 to "Proportionate contributions to Addenbrooke's Road to Shelford Tier 2 active travel network (LCWIP route)" and "Additional pedestrian and cycle connections from Babraham Road, south of Nine Wells". We are not familiar with these projects, both of which appear to be within the parish.

Buses

Great Shelford is *relatively* well served by bus routes. However like all other motorised transport buses suffer from extreme levels of congestion in and out of Cambridge and CBC at rush hours. Infrequent service in the evenings and at weekends contributes to the use of cars and taxis.

Cambridge access

Despite being just 4 miles from the centre of Cambridge the road journey into the city is both unreliable and slow, often taking a disproportionate time to travel the four miles. This is due to traffic congestion and the failure of the City Access Programme to improve non-car travel into the centre of Cambridge. This long standing issue requires urgent attention, especially as a City Access Proxy is identified in paragraph 20.1.3 of the Greater Cambridge Local Plan Transport Evidence

Report (Part 4) Draft Plan Update as necessary to support the draft Local Plan. We note that the CPCA has committed to preparing, engaging on - there appears to be no commitment to public consultation - and finalising the sub-regional Greater Cambridge Transport Strategy in time to support the finalisation of the draft Local Plan. This seems an extremely ambitious timetable as we have not seen any proposals on City Access Proxy or any other related matter to date.

CBC's long-standing "cut-through driving" problems

We note the continuing failure of the landowners at CBC to identify and put in place the arrangements necessary to facilitate the effective enforcement of the provisions of The City of Cambridge Area G (Consolidation) Order 1993 (as amended) as they apply to the roads within CBC. Proper enforcement may be disadvantageous to Great Shelford as it may increase traffic on the A1301 and along Granhams Road and Hinton Way. Notwithstanding this, we consider that their failure in this regard is symptomatic of their general disinterest in matters that are of potential benefit to neighbouring communities.

We are also concerned that this failure may well delay blue light vehicles and most especially ambulances. We also note that the land reserved for the new acute hospital is in a very different position from that currently occupied by Addenbrookes (as it that for the children's hospital) and that preferred blue light routes may well change in the future. For these reasons, effective enforcement must be a pre-condition to any further expansion of CBC.

We also assume that any such solution could contribute to the requirement on CBC to monitor its proposed trip budget.

P54, paras 2.28 and 2.29

We do not believe that the draft Infrastructure Delivery Plan makes adequate provision for the secondary and tertiary healthcare needs of the existing, let alone the growing, population. As paragraph 1.5 of the draft Local Plan also acknowledges "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". Please see:

- (a) the "where are the hospitals" section of our detailed comments on Policy S/CBC.
- (b) our comments on Policies WS/HD and WS/NC regarding end-of-life care services and facilities.

We note with despair that the Infrastructure Delivery Plan says "There may also be a need to consider the implications of Children and Adult Social Services for healthcare and community provision." There is surely no "may" about it; these implications **MUST** be considered. These services are crucial to the "wellbeing and social inclusion" aspects of the draft plan.

P64, paras 2.44-2.45

We agree that identifying large numbers of small sites is not a practicable approach, given the lack of necessary infrastructure that such sites in rural areas have and the undesirable impact that this could have on the Green Belt which often surrounds such small rural sites.

P69, paras 2.62-2.66

As a rural parish surrounded by Green Belt which is highly valued locally as a landscape setting for the village and for its benefits to nature, health and recreation, we agree with the assertion that it is not necessary to release Green Belt to meet the general development needs identified in the

draft Local Plan and that, consequently, it is not necessary for the Local Plan to identify grey belt land.

P70, para 2.67

This paragraph refers to the significant benefits provided by East West Rail. Its chosen southern approach to Cambridge (which we oppose) requires it to solve two very significant problems, to which it does not currently appear to have solutions. The first is its potential impact at both construction and operational stages on the rare barbastelle bat maternity roosts at Eversden and Wimpole Woods SAC. In responding to East West Rail's 2024 non-statutory consultation, 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. 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 the 2024 non-statutory consultation.

Further, the figures in Table 90 of the Transport Evidence Report (Part 4) 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 East West Rail 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.

P71, para 2.70

We agree that it is not necessary to release land behind Mingle Lane from the Green Belt given opportunities for significant residential development elsewhere (particularly at Grange Farm). There are insufficient exceptional circumstances to justify releasing this Green Belt land, notably: it represents inappropriate over-development of the rural hinterland (Policy S&GS 6); its proposed affordable housing is not of the dwelling size needed within the Neighbourhood Plan area (Policy S&GS 1); it lacks car parking spaces (Policies S&GS 6 and 18); it would lead to a loss of locally valued views and is not in accordance with the characteristics of the landscape character area (Policy S&GS 12); the basis of its BNG calculations is fundamentally flawed; it does not respect the identity of Stapleford and Great Shelford as two villages distinct and separate from the City of Cambridge (Policy S&GS 12) and indeed would actively erode the gap between them (contravening draft Policy S/GB1c); a single access/egress for emergency vehicles is demonstrably insufficient, as proven by the extensive field fire behind Mingle Lane in August 2025; its negative impact on traffic volumes on narrow Mingle Lane and on the Sawston Greenway (Policy S&GS 18). If requested, the Parish Council can elaborate on these points.

P74, para 2.79

Healthcare infrastructure and, in particular, the necessary new acute hospital (see the "where are the hospitals" section of our detailed comments on Policy S/CBC) must be included in this paragraph. GCSP should also consider whether Grampian conditions could be applied to a failure to build appropriate healthcare infrastructure. If not, some other mechanism will be needed.

P75, para 2.84

We do not share the optimism expressed here. In particular:

- (a) the Cambridge Water Supply Area Evidence prepared for GCSP does not highlight 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));

(b) Cambridge Water's WRMP24 refers, in relation to the Cambridge Water Recycling Centre effluent re-use scheme (7 Ml/d) referred to in that evidence, to "new intake and treatment works, associated infrastructure, new reservoir and transfer pipelines, raw and potable" at a cost of £400 million. They also seem to be associated with the currently stalled Anglian Water Honey Hill proposals;

(c) your Infrastructure Delivery Plan refers to the possibility that "imports of water to the region may mean that there are opportunities for a new surface abstraction from the River Cam". The Cam runs through the parish and this strikes us as unlikely;

(d) the evidence report also refers to water credits. The Government has said nothing publicly about water credits since March 2024. We find this silence surprising given their apparent importance. They also made no appearance in Cambridge Water's WRMP24 and will depend on accurate metering. Are they anything more than mythical? It would surely be preferable to seek urgently to solve the problem identified in the evidence that water reuse and recycling for large new development sites may be an option, but that 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;

(e) please also see our comments on draft Policy CC/IW;

(f) the new water regulator proposals announced on 19 January carry the risk of slowing projects down.

We could not see any explicit plan for funding of the infrastructure essential to permit the development envisaged in the draft Local Plan, although costs (in relation to effluent re-use only partial costs) have been identified in the Infrastructure Delivery Plan.

P75, para 2.90

We agree that improvements to key corridors should be pivotal to the transport strategy. However, CSET *is not proposed to sit within a public transport corridor*. Rather, it will create a new bus road across Green Belt land from the A11 at Grange Farm travelling north to terminate at Cambridge South Station. Better Ways for Busways has proposed an alternative route which *does* recognise the existing transport corridor and is, therefore, less environmentally destructive, improves accessibility for a range of different users, and is more cost-efficient. We would be happy to provide more detail of this alternative route if requested.

P79, paras 2.108-2.109

We agree that specialist housing should be in sustainable sites with access to services and facilities and we support plans to increase numbers of accessible/adaptable homes (e.g. via application of M4(2) building standards). We request that planning decisions relating to large retirement living facilities or institutions take into consideration the number of units already provided via such facilities/institutions within a neighbourhood area to ensure that healthcare facilities are not overwhelmed and that neighbourhoods do not become dormitory communities with a top-heavy population pyramid. A balanced population pyramid is required to deliver a sustainable community. Data in the Housing Needs Assessment (AECOM 2023) conducted to support the Stapleford and Great Shelford Neighbourhood Plan (adopted Oct 2025) already predicts that the population aged 65 and over in the two villages will increase by 79% between 2011 and 2043. Unrestrained specialist housing to meet the needs of older people would further exacerbate the problems that this will present.

Policy S/SH: settlement hierarchy

P82, clauses 4 and 5

We challenge the inclusion of a combined 'Great Shelford and Stapleford' as a 'rural centre', which would mean that "Residential development and redevelopment *without any limit on individual scheme size* will be permitted within the defined development extents of rural centres, as defined on the Policies Map, provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development." The convenience of treating the two villages as a unified entity in their allocation as a single 'rural centre' masks what is actually seen on the ground and contravenes clause 1a of Policy S&GS 12 (in which, to be supported, development proposals should respect the identity of Stapleford and Great Shelford as two villages distinct and separate from the City of Cambridge). Each village has its own distinct history and identity; they have a very different range of amenities and services; geographically, they are dispersed, with only two touch points but a very broad expanse of high value farmland and Green Belt between them in all other places; the civic core is located in Great Shelford, with few amenities meeting daily needs located in Stapleford; many residents rely heavily on private cars to travel between the two villages.

We suggest that minor rural centre is a more appropriate classification for Great Shelford.

Policy S/DE: Defined development extents

The data supporting this policy is incorrect.

The defined development extent of Stapleford is incorrect as it is portrayed on the Draft Greater Cambridge Policies Map (2025). Stapleford and Great Shelford Parish Councils raised this issue during the examination process of the Stapleford and Great Shelford Neighbourhood Plan because it could have undermined acceptance of a proposed new important countryside frontage (which is actually between two built-up areas but according to the out-of-date defined development extent map lies outside of the development framework).

Our ability to comment on this aspect of the draft Greater Cambridge Local Plan is limited by the inability to locate 'Strategy topic paper Appendix 14: Defined Development Extents Report', which does not yet appear to have been published. In this instance and more generally, it would be hugely beneficial if references to any and all supporting evidence/documentation could be hyperlinked throughout pdf consultation documents.

Policy S/GB: The Cambridge Green Belt

We strongly support this policy and, as a rural parish, particularly value clause 1c which protects the role of the Green Belt in preventing communities in the environs of Cambridge from merging into one another and with the City. However, we are disappointed that clause 1 of the policy does not explicitly pick up on supporting para 2.145: "National planning policy also requires local planning authorities to plan positively to enhance the beneficial use of Green Belts, such as looking for opportunities to provide access..." Despite our parish being surrounded by Green Belt, we have very limited access to it or links between our green spaces; hence, the Stapleford and Great Shelford Neighbourhood Plan (Policy S&GS 19) proposes multiple new off-road routes and linkages between existing routes. It is wrong that such a basic need as access to green spaces for recreation, health and wellbeing remains aspirational unless facilitated by major development.

P91, Policy S/GB clause 2 – the draft Policies Map is incorrect, as an example it does not accurately depict the Green Belt boundary to the east of Stapleford. The map needs amending to show land removed from the greenbelt and now occupied by Strawberry Fields retirement care village on Haverhill Rd, Stapleford.

Policy S/MO: monitoring

No comments.

3 SITE ALLOCATIONS

Section 3.1 Cambridge Urban Area (5 policies)

No comments.

Section 3.2 Edge of Cambridge (6 policies, one of which is CBC)**Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)**

Paragraph 1 of the draft policy should be amended to read:

“The Cambridge Biomedical Campus ... is appropriate for a mix of uses centred on the Campus’s unique function of bringing together clinical care, clinical education and clinical research including medical research institutes which meet local, regional, and national health care needs – together with directly related biomedical and biotechnology research and development activities...”

This amendment should also be reflected in paragraphs 3.2.20 and 21 of the supporting information and in paragraph 2b)ii) of Policy S/DS.

The reason for this proposed amendment is set out in our detailed comments on Policy S/CBC which are included as an Appendix to this document. In summary:

1. GSPC is opposed to any further expansion of the Cambridge Biomedical Campus (“CBC”). CBC needs to focus on healthcare and R&D first and foremost, not commercial activities.
2. The rebuilding of the acute hospital, in particular, is crucial not only to the achievement of CBC’s unique purpose, but also to the viability of the draft Local Plan. The healthcare needs of the current and growing population cannot be met without it, especially as the average age of that population is increasing. The need for the new acute hospital is not recognised either in the draft Plan or in this policy.
3. The case for expansion has not been established because the underlying data used overestimate potential demand, by failing to identify and focus on those businesses which *need* to be co-located with anchor institutions, such as Addenbrooke’s and the LMB. This is a fundamental flaw. “Cambridge Biomedical Campus Vision 2050: Creating a life sciences quarter for Cambridge” (“Vision 2050”) is not fit for purpose. Despite this, it underpins the supporting evidence submitted by landowners, which has been relied on by GCPS. In particular, the current plans propose disproportionately to expand the commercial activities at CBC.
4. As a result the case for the removal of further land from the Green Belt for expansion has not been made out. This is compounded by a failure to recognise accurately the level of harm this removal will cause.
5. The underlying data and plans for CBC submitted by landowners and Vision 2050 itself have not been subject to public consultation, yet the proposals in this policy (such as for 687,000 net additional sq m (GIA) of research and development floorspace (use class E(g)(ii)) specifically related to biomedical and biotechnology uses and clinical healthcare and hospital facilities) are derived from the relevant documents.

6. If, despite our opposition, the proposed release is included in the final Local Plan:

(a) it must be conditional on funds for the building of the new acute hospital being secured and consideration should also be given to making it conditional on the building of the Cancer Research and Children's hospitals, each of which also appears important to the continuing success of CBC.

(b) it must also be conditional on a solution to the continuing failure to enforce the prohibitions in The City of Cambridge Area G (Consolidation) Order 1993 (as amended) as they apply to the roads within CBC. Further, the proposed southern access road from Granhams Road should not be multi-modal. Private cars should not be permitted to use it.

(c) the draft policy must properly recognise CBC's unique and limited purpose and consideration should be given to including occupation use restrictions. Amenities should also be limited to those which need to be there.

(d) we support the proposals for a single integrated campus-wide masterplan for CBC and for the use of a single delivery body capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces.

(e) insufficient regard is paid in the draft policy to the impact of CBC on the shrinking Green Belt that separates Cambridge from its necklace villages and, in particular, on the neighbouring fragile Nine Wells Local Nature Reserve. Tall buildings are a particular issue and we oppose a prominent entrance from Granhams Road.

Policy S/EOC/SWO: Land south of Worts 'Causeway

We strongly support the policy to reduce the urbanising impact on this edge of the Green Belt, to facilitate access to the countryside, and to manage car use.

Section 3.3 – new settlements

No comments on:

- Policy S/CBN: Cambourne North
- Policy S/CB: Cambourne
- Policy S/NST: Northstowe New Town
- Policy S/WNT: Land north of Waterbeach
- Policy S/BA: Bourn Airfield New Village

Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

We are broadly supportive of proposals to develop a new town at Grange Farm with placemaking and nature at its heart. We note and support the benefits of providing a range of planned housing, jobs, amenities, services and other infrastructure at one location in preference to a more ad hoc approach in which fewer dwellings are appended to multiple existing rural locations, putting strain on existing infrastructure and increasing car reliance.

However, we do not believe that a new town at Grange Farm will be sustainable. Instead, it will effectively be a large 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 and amenities. With respect to the latter, we are particularly concerned that the location of Grange Farm and the number of new residents that it will bring to S. Cambs will increase pressure on existing open and biodiverse spaces Such as Nine Wells, Beechwoods and Clay Pit. Established recreational spaces will be more attractive and rewarding for people to visit than new sites, and the associated overcrowding that will result at mature sites will have a significant negative impact on these natural assets. CIL/S106 funds may need to be used to assist owners of existing natural assets to manage and mitigate an increase in footfall.

Section 3.4 – the rural southern cluster

Policy S/WGC: Wellcome Genome Campus, Hinxton

We are concerned that:

- In contrast to plans for the Babraham Research Campus, none of the 1,500 residential dwellings proposed for Wellcome Genome Campus workers will contribute towards the total number of affordable dwellings coming forward in Greater Cambridge. This will increase demands on nearby settlements to provide land for affordable housing to support growth of the Wellcome Genome Campus, given that not all Campus workers can, or want to be, accommodated on site
- The development is too small to be sustainable and is not adequately plugged into the public transport network to overcome this without reliance on private cars. Residents will have to travel to access, for example, large-scale retail and leisure facilities, secondary education, and existing open spaces and sites of biodiversity. This will put further pressure on key existing congestion points, such as the A1301 into/out of Cambridge at peak times, junction 9 of the M11 at Duxford, and the 'McDonald's roundabout' junction of the A1301 and A505. As such, significant infrastructure upgrades are needed
- It will further contribute to a significant expansion in the population of S. Cambs which travels by private car to enjoy existing open spaces, notably Magog Down and Wandlebury Country Park. These biodiverse assets are already under pressure and will need S106/CIL support to manage the impact of additional users. Additionally, "Securing general public access to the existing and expanding campus..." (p342, clause 26) should be prioritised to reduce the impact of population growth on existing recreational and natural assets.

Policy S/BRC: Babraham Research Campus

P349, clause 15 – with the loss of Green Belt that expansion of the Babraham Research Campus will involve, we strongly support the need for substantial compensatory improvements to the environmental quality of, and accessibility to, the proposed Strategic Enhancement Area (S/SEA/BRC). As supporting para 3.4.26 notes, "These measures are important because they will support South Cambridgeshire District Council's aim to improve biodiversity in the region." Development at the Campus must also maintain key views, enhance existing tree coverage, relate sensitively to its surroundings, and maintain and enhance the wider landscape (paras 2.4.25 and 2.4.26). These requirements are all laudable. Yet they are entirely at odds with plans by the Greater Cambridge Partnership to construct a busway (i.e. a concrete road), with all the visual, noise and particulate pollution that it will bring, straight through the Strategic Enhancement Area as part of the Cambridge South East Transport scheme. The double standards here are extraordinary.

Policy S/RSC: Other site allocations in the rural southern cluster

Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston – we agree with clause 1c (development proposals must demonstrate how they will... "Contribute financially to strategic public transport and active travel schemes in the south east corridor appropriate to the scale and nature of the development, including active travel links to Sawston and Shelford and other nearby

villages”). Stapleford and Great Shelford Neighbourhood Plan outlines aspirational active travel routes linking Great Shelford, Dernford Fen SSSI and Sawston Village College, which could benefit from such financial contributions and extend the existing Sawston Greenway network. A Greenway is also necessary to link Stapleford/Great Shelford to Whittlesford Parkway Station to access fast trains to and from London Liverpool St without having to negotiate fast-moving and dazzling traffic on the A1301. We are also keen to ensure that pedestrian and cycling access in the vicinity of the former Spicers site is maintained, noting that previous planning approval for Huawei to redevelop the site would have reduced passage through/nearby on the grounds of contamination issues.

Policy S/SCP: Policy areas in the rural southern cluster

Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge:

- We strongly support clause 1: a multimodal hub with access and station improvements is crucial to providing sustainable transport in this area
- We support clause 2 (“An extended network of dedicated cycle links and safe crossing points” from which to access the station). A safe, more direct and dedicated connection between Stapleford/Great Shelford and Whittlesford Parkway Station is needed to replace cycling in fast-moving and dazzling traffic on the A1301.

Section 3.5 Rest of the rural area

No comments on:

- Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)
- Policy S/RRA: Site allocations in the rest of the rural area
- Policy S/RRP: Policy areas in the rest of the rural area

4 CLIMATE

Policy CC/SD: Sustainable development and the climate emergency

Policy CC/SD clause 1 – we are broadly supportive of this policy, but we are concerned about the exclusion of individual household applications from Sustainability Statement requirements, most particularly household applications for sizeable extensions or knock-down-rebuild. This is an important missed opportunity to improve the sustainability of existing properties. Many households would wish to do this as part of their renovation/building work and would benefit greatly from a single point of direction in what and how to prioritise their resources in this respect. We appreciate that creating a separate Sustainability Statement would be untenable, but it could and should be included in the Planning Statement provided alongside the application. Much of what is listed in para 4.11 as guidance on Sustainability Statement content could be readily incorporated into a Planning Statement for an individual householder application.

Policy CC/DC: Designing for a changing climate

We are broadly supportive of this policy. However, consideration of the albedo effect of new development should be given in para 4.17. Albedo is the measure of a surface’s reflectivity, representing the fraction of sunlight it reflects back into space. High albedo surfaces reflect most sunlight, while low albedo surfaces absorb more. This has an impact on climate, microclimate and building comfort and can be mitigated through building design.

Policy CC/NZ: Net zero carbon new buildings

We are broadly supportive of this policy and note that proposed policy wording in Parts A and B aligns well with supporting text of adopted Policy S&GS 7: Mitigating and adapting to climate change through building design.

Policy CC/WE: Water efficiency in new development

Policy CC/WE clause 2 – we have two comments: (a) it is unclear whether this clause applies to householder applications and we believe that it should, and (b) we see no reason why clause 2e should not also apply water efficiency standards to refurbishment and change of use of existing buildings, rather than merely requiring retrofitting to “increase water efficiency”.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

We have significant concerns about the deliverability of this policy, which cumulatively threatens the deliverability of the entire draft Local Plan. The assumption (see p23 of the Summary of the Greater Cambridge Local Plan) that “We consider that there are now solutions available such that the development needs of Greater Cambridge can be met by sustainable water supplies, and we are able to move our Local Plan forward” is undermined by, for example:

1. the government’s decision in Aug 2025 not to fund relocation of the Cambridge Waste Water Treatment Plant (CWWTP) through its Housing Infrastructure Fund
2. the motion approved by Cambridge City Council in Oct 2025 which recorded its “...huge disappointment at the decision not to fund the relocation (and expansion) of the Anglian Water waste water treatment plant from North East Cambridge which will...make future waste water treatment capacity a new potential obstacle to all development in our area”
3. a delay announced in Jan 2026 to the Regulator’s key decision on the Fens Reservoir Project because it is not yet ready for its next major approval stage due to unresolved concerns about where the water will come from to fill the reservoir, design issues and environmental protection requirements.

There was an opportunity before publishing the draft Local Plan to address points 1 and 2 in the text, but this was not taken up. Instead, the draft Local Plan ploughs on regardless, even though it clearly acknowledges in para 2.82 of p74 that delivery and phasing will need to respond to the availability of water supply improvements. If Policy CC/IW and the wider strategic issues relating to water scarcity and management cannot be delivered in a timely manner, the Greater Cambridge Local Plan will not be able to supply even a fraction of the new jobs and new homes demanded of our region, and certainly not in the desired strategic locations. Instead, growth will occur piecemeal across the region – negatively impacting our existing communities, infrastructure, Green Belt and green spaces – and rely predominantly on short-term water efficiency measures. This is an utterly unsustainable strategy.

Policy CC/IW clause 4 – this clause is predicated on the assumption that SuDS are suitable for all locations, but they are not. To pass examination, wording of Policy S&GS 7: Mitigating and adapting to climate change through building design had to be amended to require their use wherever practicable and subject to being suitable to the location.

Policy CC/FM: Managing flood risk

No comments.

Policy CC/RE: Renewable energy projects and infrastructure

P441 Policy CC/RE clause 7 – we suggest that clause 7 (community-led renewable and low-carbon initiatives) is clarified such that initiatives will be supported *as long as they protect or enhance*

landscape character in line with other policies in the Development Plan. See Policy S&GS 8: Renewable energy schemes in Stapleford and Great Shelford for guidance.

Policy CC/CE: Supporting a circular economy and sustainable resource use

We are broadly supportive of this policy, notably clause 2 which may help to reduce the number of bungalows in our parish being knocked down and replaced by larger detached or semi-detached homes. Bungalows are an important part of our housing mix, particularly given our ageing population pyramid, and more generally of the history and character of our neighbourhood area.

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

We are broadly supportive of this policy.

5 BIODIVERSITY AND GREEN SPACES

Policy BG/BG: Biodiversity and geodiversity

We are broadly supportive of this policy, with the following exceptions:

Policy BG/BG clause 3 – the Local Nature Recovery Strategy is inaccurate and hence the parish would not benefit from delivery of replacement habitat within areas identified as LNRS priority areas. The LNRS needs urgently amending to recognise Wandlebury Country Park and Magog Downs (both are County Wildlife Sites) and Clay Pit and Beechwoods (a Local Nature Reserve), as designated in Policy NH/5: Sites of biodiversity or geological importance. We cannot fathom their omission from the LNRS.

Policy BG/BG clause 3 – where neighbourhood plans are in place and have identified suitable off-site locations for BNG within the neighbourhood area in circumstances when BNG cannot be fully delivered onsite, they should supersede delivery via biodiversity credits or schemes registered with Defra. Otherwise, the net result will be biodiversity depletion of not just the development site but also the wider locale. The latter is recognised in para 5.11 but a logical solution, as proposed here, is not provided. See clause 4 of Policy S&GS 10: Mitigation hierarchy and delivering biodiversity net gain and enhancements for how Stapleford and Great Shelford Neighbourhood Plan addresses this issue.

Policy BG/BG clause 6 – it is important for the Local Planning Authority to question the basis on which baseline biodiversity is measured for every prospective development. Sadly, it is not uncommon for developers to reduce the biodiversity of prospective sites prior to submitting a planning application as a means of reducing their future BNG commitments. We have seen this at Green Belt land behind Mingle Lane in Great Shelford/Stapleford where, until 2024, a large area of land within the proposed development site had not been planted for arable use in over 30 years. It was occasionally used for sheep grazing and, more recently, for horse pasture. However, in 2024 it was ploughed and planted with a crop by contract farming company Coxalls. The crop has been harvested and a second crop is now growing. The upshot of this is that the mature and undisturbed biodiversity value of this tract of land has been eroded which, conveniently for the developer, reduces the overall biodiversity of the site and hence the BNG required of any future development.

Policy BG/BG clause 6 – this clause should take the biodiversity of field margins into consideration, whether managed specifically for nature or not.

P458, Para 5.16

We have looked at the Habitats Regulations Assessment of the draft Local Plan in the Document Library. Although it acknowledges that it is important to consider “in-combination effects” (its paragraph 3.24) it does not consider the East West Rail project, a strategic project on which the development at North Cambourne is said to depend, which has the potential to impact significantly the Eversden and Wimpole Woods SAC. This deficiency must be remedied. In responding to East West Rail’s 2024 non-statutory consultation, both South Cambridgeshire District Council and Cambridgeshire County Council expressed significant concerns about East West Rail’s proposals and their potential adverse impact on the maternity roost of rare barbastelle bats at the SAC. We are assuming that neither GCSP nor its constituent local authorities want to see this rare population wiped out - there is no evidence that captive breeding is possible and the bats cannot be moved.

Policy BG/GI: Green and blue infrastructure

We are broadly supportive of this policy with the following caveats:

P461, para 5.31-5.32 – the title of this section is green and blue infrastructure, yet there is nothing in these paragraphs about the aims of the policy which mentions blue infrastructure. This should be addressed. With respect to the policy itself, green infrastructure seems to be an all-encompassing term and this is confusing; look at, for example, the so-called ‘green infrastructure’ initiatives listed in clause 5, the majority of which are actually water-related and so, surely, would be more accurately described as ‘blue infrastructure’.

Policy BG/GI clause 2b – we strongly support the use of green infrastructure to improve links within the landscape for the benefit of nature and people. With respect to benefits to people, our parish is surrounded by Green Belt, but we have very little access to it. And when we do, access is often limited to ‘out and back’ routes. Better links between open/green spaces would also reduce use of private cars to travel to sites. Policy S&GS 19 in the Stapleford and Great Shelford Neighbourhood Plan highlights aspirational routes into and through our countryside that residents of these parishes, and elsewhere, would like to enjoy.

Policy BG/GI clause 4 – where it is not possible to meet the greening factor onsite but a neighbourhood plan is in place for that location which identifies suitable opportunities to enhance green or blue infrastructure within the neighbourhood area, then those opportunities should take priority over resorting to off-site opportunities, otherwise the net effect of development on green infrastructure within that neighbourhood area is negative.

Policy BG/GI clause 5(3) – we note the rightful inclusion of the Gog Magog Hills and chalkland fringe in the list of identified priorities for enhancing strategic green infrastructure across Greater Cambridge. However, (1) data underpinning this policy is flawed in its inaccurate portrayal of the extent of the Gog Magog Hills (2) the Gog Magog Hills are, unfathomably, not included in the Local Nature Recovery Strategy, and (3) the Gog Magog Hills will be negatively impacted by CSET. We expand upon these points below.

1. We are very concerned that the mapped extent of the Gog Magog Hills in supporting documents for the LPA is arbitrarily shrinking over time. This will undermine the aims of the Policy BG/GI. With respect to our immediate area, the northwestern extent of the Gog Magog Hills for the purposes of the draft Greater Cambridge Local Plan is established in Landscape Character Area 7B: Gog Magog Chalk Hills. This is incorrect: (a) it is at odds with the underlying local geology (b) it excludes the prominent slope and bulk of the open chalk hill in Stapleford which puts the ‘character’ into the ‘character area’ (c) it excludes the aptly named Chalk Hill Down, a new countryside park on rare open chalk soil managed by The Magog Trust as calcareous grassland, and (d) it is at odds with the pattern of early development which occurred below the spring line (which occurs at the junction

between chalk and clay) at the 20m contour to avoid contamination of valuable fresh water supplies and the need to dig deep wells.

The consequences of inaccurately mapping the extent of the Gog Magog Hills have already been felt in Stapleford. In fact, it critically influenced the Appeal Inspector's decision in Dec 2021 (appeal ref. APP/W0530/W/21/3280395) to approve major development of a retirement care village on Green Belt outside Stapleford's development framework. As the Inspector noted in his decision report (paras 15-19): "Two recent landscape character assessments place the boundary between the two local character areas in different places, either side of the site. The Cambridge Inner Green Belt Study produced in 2015 as part of the evidence base for the extant South Cambridgeshire Local Plan adopted in 2018 places the boundary between what it calls Landscape Character Area 4B Granta Valley and Landscape Character Area 3B Gog Magog Hills along the edge of the built extent of Stapleford village, hugging the 20m contour line but rising to the 30m contour line further to the east of the site. The Greater Cambridge Landscape Assessment, produced in 2021 as part of the evidence base for the emerging Greater Cambridge Local Plan places the boundary between what it calls Landscape Character Area 3D Cam and Granta Tributaries Lowland Farmlands and Landscape Character Area 7B, Gog Magog Chalk Hills along the track which hugs the northern boundary of the site. In effect, one landscape character assessment places the site within the valley; the other places it on the hills." Against this discrepancy, the Inspector effectively created a third location for the boundary, at the 25m contour line, and was then able to approve major development below this height because it placed it in the 'valley area' rather than on the higher chalk hills, which rightly have greater protection from development.

2. There is a glaring inconsistency between the draft Local Plan, which prioritises the Gog Magog Hills for enhancing strategic green infrastructure, and the Local Nature Recovery Strategy, which inexplicably fails to recognise them appropriately. There is no recognition of Wandlebury Country Park or Magog Downs (both are County Wildlife Sites), or of Stapleford Pit (a Local Nature Reserve) in the LNRS, all designated in Policy NH/5: Sites of biodiversity or geological importance. Ironically, the LNRS hails S. Cambs for its growing network of chalk grassland yet singularly fails to map them accurately; we are alarmed about the impact this will have on opportunities to enhance calcareous grassland sites, buffer and enlarge them, and to create habitat stepping stones and corridors.

3. Inaccurate mapping of the Gog Magog Hills and their exclusion from the LNRS means that, despite being a priority for enhancing strategic green infrastructure across Greater Cambridge, they are not being accorded sufficient value and hence protection when evaluating the environmental and landscape impacts of the proposed route of the CSET busway. As proposed by the Greater Cambridge Partnership, the lengthy section of the busway from where it crosses the track to the east of Stapleford Granary and continues in a north-westerly direction to where it passes Nine Wells Local Nature Reserve near Cambridge South Station will use the lower slopes of the Gog Magog Hills. There is, therefore, a glaring inconsistency between the green infrastructure aims of the draft Local Plan and its transport strategy. This inconsistency could be at least partly mitigated if an alternative, on-road route along the A1307 corridor from the A11 to the Cambridge Biomedical Campus was pursued instead. If requested, we can provide more evidence of the benefits of this on-road route.

Policy BG/GI clause 5(13) – we fully support the inclusion of allotments and community gardens as an identified priority for enhancing strategic green infrastructure across Greater Cambridge.

Policy BG/TC: Improving tree canopy cover and the tree population

We are generally supportive of this policy but surprised to see no reference to prioritising native trees and hedgerows.

Policy BG/TC clause 1 – would it be possible to state in the policy within what timeframe this 30% canopy cover should be achieved? Or at least that more than half of this 30% canopy cover should be achieved within x years of development commencing.

P467, para 5.43 – we agree that LPAs need to understand the existing tree resource so that they can make an informed judgement about what might be needed/appropriate, in terms of tree impact, from development. However, the problem remains that land/homeowners can generally remove as many trees and hedgerows without TPOs as they wish *prior* to submitting a planning application. Cumulatively, this represents a significant loss of canopy cover over time. Consideration needs to be given to how data on tree/hedgerow resources pre-submission can be captured and compared with the resources in place at the point at which a planning application is submitted. Google Earth or similar could play a role in this.

Policy BG/RC: River corridors

There is a lack of joined up thinking in the draft Greater Cambridge Local Plan. Whilst it recognises the desecration of our globally significant and rare chalk streams, this appears to be only within the context of how it limits water abstraction and places limits on development. There is a specific need to consider the impact of development on our chalk rivers and river corridors in greater Cambridge because of their local and global significance, something which neither Policy BG/RC nor its supporting text fails to do. We recommend seeking input from, amongst others, Hobson's Conduit Trust, for how to improve the wording and strength of this policy.

Policy BG/PO: Protecting open spaces

We are broadly supportive of this policy but make the following comments:

1. The draft Policies Map needs updating to include new open spaces, Local Green Spaces and Protected Village Amenity Areas arising from adoption of the Stapleford and Great Shelford Neighbourhood Plan in Oct 2025
2. We value the policy's emphasis on protecting open space of environmental and/or recreational significance in *undesigned* areas that fulfil the criteria used to assess protected open space (clause 1)
3. We value the policy's emphasis on protecting space *immediately around* designated areas such that their value to the community is not compromised (clauses 3 and 4)
4. The draft Policies Map needs updating to include Stapleford's cemetery (land north of Mingle Lane) as 'open space'
5. The draft Policies Map needs updating to include Great Shelford's cemetery (off Cambridge Rd) as 'open space'
6. The draft Policies Map needs updating to include Great Shelford's Davey Field Rugby Football Ground off Cambridge Rd as 'open space'
7. The open space designation at More's Meadow, Great Shelford (site ref. ZA 032) is in the wrong place. It covers land which has been developed since 2021 by Great Shelford Village Charity as affordable almshouses but should instead be immediately to the NW of this on land allocated to allotments and a community garden
8. The extensive new countryside park (Chalk Hill Down) between Haverhill Rd (Stapleford) and Hinton Way (Great Shelford) is not shown as open space on the draft Policies Map
9. The Clay Pit on Granhams Rd needs to be included in the open spaces map (see Map 4 on p72 of the Stapleford and Great Shelford Neighbourhood Plan for its location)
10. Within the Great Shelford area there is already a lack of recreation space and natural assets, and population growth will only exacerbate this. Green space commensurate with accelerating development must also be provided.

Policy BG/EO: Providing and enhancing open spaces

We are broadly supportive of this policy. We are particularly pleased to see the inclusion of open space management provisions in clause 1. The burden of insurance, grounds maintenance, health and safety checks, etc, is likely to fall on parish councils, yet the additional precept generated from the expanded population is unlikely to cover these and other eventualities associated with major development once occupied. It is not enough for a developer to supply new open spaces and have no responsibility and accountability for their longer term maintenance.

6 WELLBEING AND SOCIAL INCLUSION

Policy WS/HD: Creating healthy new developments

We are broadly supportive of this policy, with the following caveats:

1. Nowhere in the policy or its supporting text is consideration given to the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population: more people living in Greater Cambridge will mean more people dying in Greater Cambridge, and even, given the role of Greater Cambridge as a regional and national centre of healthcare excellence, more people coming to Greater Cambridge to die. Providing for more and better end-of-life care is critical to overall quality of life and needs to be explicitly captured in the draft Local Plan. Recent pushback from the community and many healthcare providers about a proposed reduction in bed capacity at Arthur Rank Hospice (in Great Shelford parish) is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care.
2. Clause 1c of the policy should be expanded to read, "Providing, protecting and enhancing accessibility to green and blue open spaces *for sporting, recreational and mental health purposes* (Biodiversity and Green Spaces)." The benefits of access to green and open spaces are noted in supporting para 6.8 but should also be explicit in the policy's wording.

Policy: WS/NC: Meeting the needs of new and growing communities

We are broadly supportive of this policy, with the following caveat: nowhere in the policy or its supporting text is consideration given to the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population: more people living in Greater Cambridge will mean more people dying in Greater Cambridge, and even, given the role of Greater Cambridge as a regional and national centre of healthcare excellence, more people coming to Greater Cambridge to die. Providing for more and better end-of-life care is critical to overall quality of life and needs to be explicitly captured in the draft Local Plan. Recent pushback from the community and many healthcare providers about a proposed reduction in bed capacity at Arthur Rank Hospice (in Great Shelford parish) is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. Para 6.25 of the supporting text to Policy WS/NC lists examples of the facilities and services which could be required to meet the needs of new and growing communities; provision for burials is included in the list but nothing relating to palliative/hospice care provision; para 6.33 is explicitly about healthcare facilities but, again, does not mention end-of-life care.

Policy WS/CF: Community, sports and leisure facilities

Leisure facilities in Great Shelford are limited.

Policy WS/CH: Cultural and creative hubs

No comments.

Policy WS/MU: Meanwhile uses during long term redevelopments

No comments.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

No comments.

Policy WS/HS: Pollution, health and safety

We are broadly supportive of this policy, most notably those clauses relating to light pollution, which tally well with the aims of Policy S&GS 15: Preserving our dark landscape.

Policy WS/PH: Public houses

No comments.

7 GREAT PLACES**Policy GP/PP: People and place responsive design**

Where neighbourhood plans have been adopted, local communities have invariably undertaken extensive community engagement to produce at the very least a design guide and, in many instances, a detailed design guidance and codes. No mention of this (other than an oblique reference in para 7.12 to village design guides, which can be created outside of the neighbourhood planning process) is made in either the policy or supporting text. Design guidance and codes are invaluable documents with long lifespans which should be a major influence on development design and, by their very nature, already demonstrate people and place responsive design. We request that clear reference is made to them at an appropriate place in either the policy or its supporting text. Such reference is made in clause 4 of Policy GP/QD: Achieving high quality development, but we strongly suggest that there is need for it in Policy GP/PP as well.

Policy GP/QD: Achieving high quality development

Policy GP/QD clause 4 – we are very pleased to see reference to the role of neighbourhood plans in setting design principles. We request that a similarly explicit reference is also incorporated into Policy GP/PP: People and place responsive design.

Policy GP/HD: Housing density

There is enormous tension between the NPPF's requirement for local plan policies to make efficient use of land versus clauses b and c of this policy. In the absence of further evidence for the policy (as noted in para 7.27), it is difficult to comment on its merits or otherwise. This is unfortunate given how significant this policy will be in determining future planning applications in Greater Cambridge.

When considering how density should be applied in different locations, it is vital that explicit consideration is given to appropriate building densities for land released from Green Belt which is adjacent to an existing development framework. Such densities should reference density in the immediate surroundings but also present a soft edge to the surrounding landscape. A soft edge is created not just through planting but by gaps and longer sightlines between buildings, which will inevitably – and appropriately – reduce building density.

Policy GP/ST: Skyline and tall buildings

Policy GP/ST clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.

Policy GP/QP: Establishing high quality landscape and public realm

No comments.

Policy GP/LC: Protection and enhancement of landscape character

We are broadly supportive of this policy.

The draft Policies Map needs updating to include the Stapleford and Great Shelford Neighbourhood Plan (adopted Oct 2025), in particular to include Policy S&GS 13 which introduces a new Important Countryside Frontage between 41 Gog Magog Way and houses at Chalk Hill, Stapleford.

Policy GP/HE: Historic environment

No comments.

Policy GP/HA: Designated heritage assets

No comments.

Policy GP/ND: Non-designated heritage assets

No comments.

Policy GP/CC: Adapting heritage assets to climate change

No comments.

Policy GP/AR: Archaeology

No comments.

Policy GP/SF: Shopfronts

No comments.

8 JOBS

Policy J/NE: New employment development proposals

No comments.

Policy J/RE: Supporting the rural economy

We strongly agree with this policy including:

- Not changing the character and impact
- Where there are no environmental improvements
- Not well-designed in form and bulk
- Not consistent in scale with its rural location
- Not located near to a settlement

In respect of change of use of the large barn at Shelford Bottom to be used as a Phlebotomy Centre, this proposed development is entirely inconsistent with its rural setting.

Policy J/AL: Protecting the best agricultural land

Our parish's development framework is surrounded by high quality farmland (Grade 2). As such, we strongly support this policy. However, the best agricultural land should not be used for solar farms and words to this effect should be incorporated into the policy or supporting text, and/or a more explicit link made between this policy and Policy CC/RE: Renewable energy projects and infrastructure.

Much of the higher quality farmland in S Cambs is also Green Belt land. It would be helpful to link Policy J/AL to Green Belt policy, either explicitly in policy wording or in the supporting text, as a double safeguard of the best agricultural land.

Policy J/PB: Protecting existing business space

No comments.

Policy J/AW: Affordable workspace and creative industries

No comments.

Policy J/EP: Supporting a range of facilities in employment parks

No comments.

Policy J/MS: Markets and street trading

No comments.

Policy J/RC: Retail and other complementary town centre uses

Supporting data for Clause 2 is incorrect. It is inappropriate to combine 'Great Shelford and Stapleford' as a single entity in defining them as a 'local centre'. They are two villages with their own history and identities, offering a very different range of amenities and services, which just happen to be adjacent to each other at a small part of the boundaries of their respective development frameworks but otherwise separated by Green Belt.

It is also inappropriate to consider Great Shelford as a local centre in its own right with its limited service and falls a long way short of the criteria to be deemed a 'local centre'.

Failure to treat the two villages as separate entities would result in the inappropriate application of this policy to planning decisions relating to retail and other complementary uses, and lead to unacceptable development pressures on the two communities.

Policy J/SA: Cambridge City's Primary Shopping Area

No comments.

Policy J/VA: Visitor accommodation, attractions and facilities

No comments.

Policy J/FD: Faculty development and specialist / language schools

No comments.

Policy H/AH: Affordable housing

We are broadly supportive of this policy, with the following caveats:

- P615 Policy H/AH clause 2 – it is unclear how affordable housing requirements (type, size, affordability and design) set out in adopted neighbourhood plans will be dealt with under this policy, particularly where they differ from requirements set out in the policy. We suggest that the policy and/or its supporting text is amended to address this
- P618 para 9.14 – First Homes may be unlikely to be a suitable affordable housing tenure on the majority of new developments in Greater Cambridge, but that does not preclude them from coming forward where they are suitable. Affordable housing policy should allow for First Homes rather than discourage it.

Policy H/ES: Exception sites for affordable housing

We are broadly in agreement with this policy as it dovetails with aspects of Policies S&GS 1, 2 and 3 of the Stapleford and Great Shelford Neighbourhood Plan. However, we note that almshouses at the rural exception site in Great Shelford (which make a significant and valuable contribution to our area's genuinely affordable housing stock) are owned and maintained by Great Shelford Village Charity and that clauses in Policy H/ES do not take into account the specific circumstances of charitable almshouse associations in providing affordable housing.

Policy H/HM: Housing mix

We are broadly supportive of this policy. However, it is unclear how affordable housing mixes as set out in adopted neighbourhood plans would be dealt with under the policy, particularly where they differ from requirements set out in the policy. We suggest that the policy and/or its supporting text is amended to address this.

Policy H/GL: Garden land and subdivision of existing plots

We are supportive of this policy, which broadly aligns with Policy S&GS 5: Residential annexes to facilitate multi-generational living.

Policy H/SS: Residential space standards and accessible homes

We are broadly supportive of this policy.

Policy H/SH: Specialist housing

We are broadly supportive of this policy. We strongly support para 9.60 on p637, which makes clear the need for C2 and C3 developments to contribute towards the delivery of affordable housing.

Policy H/CB: Self and Custom Build homes

No comments.

Policy H/BR: Build to Rent homes

No comments.

Policy H/CO: Co-living

No comments.

Policy H/MO: Houses in Multiple Occupation (HMOs)

No comments.

Policy H/SA: Student accommodation

No comments.

Policy H/DC: Dwellings in the countryside

We are broadly supportive of this policy.

Policy H/RM: Residential moorings

No comments.

Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots

No comments.

10 INFRASTRUCTURE

Policy I/ST: Sustainable transport and connectivity

We are broadly supportive of this policy.

Policy I/ST clauses 2d and 2e – it should be recognised that many walking routes in daily use are not public rights of way but are instead either informal tracks used without permission (often around the edges of farmland) or permissive paths (lapsed or otherwise). They are an integral and largely unmanaged part of the daily walking network and improve connectivity in the absence of an adequate network of public rights of way. It is unclear how clause 2e could be applied under such circumstances. Therefore, routes in daily use should be upgraded to PRoW status such that they can be managed appropriately and better and more safely improve local connectivity. Dual benefits will accrue from their use for recreational purposes.

Policy I/TH: Travel Hub facilities

We are concerned that:

- Policy I/TH and supporting paras 10.16-10.17 give undue precedence to P&R facilities. Building new and expanding existing P&Rs encourages driving to those P&Rs and merely provides a more sustainable alternative for part of the journey. In so doing, it undermines the commercial viability of local bus services, which would otherwise have the potential to provide a sustainable alternative for the whole journey.
- Travel Hubs and Travel Hub facilities must be appropriate to the location. For example, we would support them in principle at Whittlesford Parkway, where there is currently an underused station.

Policy I/EV: Parking and electric vehicles

No comments.

Policy I/SD: Servicing and last-mile deliveries

No comments.

Policy I/SI: Safeguarding important infrastructure

No comments.

Policy I/AD: Aviation development

No comments.

Policy I/EI: Energy infrastructure masterplanning

No comments.

Policy I/ID: Infrastructure and delivery

We are broadly supportive of this policy.

Policy I/DT: Digital and telecommunications infrastructure

No comments.

Policy I/CM: Construction management

We are broadly supportive of this policy. We have learnt through recent experience of major development in the Green Belt to the east of Stapleford that clause 2j on p708 (compliance monitoring) is critical; however, the emphasis should not be on self-monitoring by the constructor but should instead sit with the LPA/planning enforcement.

APPENDIX - detailed comments on Policy S/CBC

General comments

1. Great Shelford Parish Council remains opposed to any further expansion of the Cambridge Biomedical Campus because, in summary, it believes that the estimates of demand on which the draft Local Plan relies are fundamentally flawed and the exceptional circumstances required under the NPPF for removal of further land from the Green Belt have not been established. These conclusions are explained below.

2. We would also like to remind GCSP of the 3 December 2022 paper “Where we do not and do agree with CBC – summary” prepared by Trumpington Residents’ Association (TRA) ourselves and Queen Edith’s Community Forum (“the Community Comments”). This paper was submitted to GCSP with the draft Spatial Framework prepared by Hawkins Brown on the instructions on Cambridge Biomedical Campus Limited (“CBC Ltd”), and alongside, notably, the December 2022 CBC Case for Expansion (prepared by Quod) and the CBC Demand and Deliverability Report (prepared by Knight Frank) included in the third party documents in your Document Library. The issues raised in the Community Comments remain relevant and have not been addressed in this policy or elsewhere in the draft Local Plan.

3. “Cambridge Biomedical Campus Vision 2050: Creating a life sciences quarter for Cambridge” (“Vision 2050”) is a key third party document included in your Document Library. Most, if not all, of the other third party supporting documents in the Document Library are based on Vision 2050. In February 2024, we and the TRA went to the considerable trouble of preparing an assessment of Vision 2050. This was sent to many parties, including GCSP, and remains relevant. Our conclusion was “Vision 2050 is not fit for purpose and needs to be updated with an open mind and replaced with the benefit of public consultation. Its failings are fundamental. The collective reputation of the CBC and the bodies it comprises are at stake. Vision 2050 cannot and should not be relied upon by the CBC as its forward vision or by others, such as the Government and EWR; nor, in its unrevised form, should it be central in CBC Ltd’s constitution.” The minor amendments made to Vision 2050 during 2024, which are included in the version in your Document Library, do not alter this view (the fact that one of the few changes made was to delete the reference on page 33 to the establishment of a community fund “to support local initiatives” is not encouraging). Vision 2050, which clearly underpins your draft policy, has never been consulted on, or voluntarily subjected to, proper public scrutiny and comment.

4. None of our comments on this policy should be taken to qualify our fundamental position on the expansion of CBC as set out in paragraph 1 above.

5. We also note that, in February 2024, CBC Ltd reviewed the landowners’ plans and sent a letter setting out the five core conditions for their support for the landowners’ plans. CBC Ltd has summarised these conditions as follows (in a slide presented at its Open Forum on 16 June 2025):

- Infrastructure Delivery Plan (IDP) required, Campuswide, deliverable, phased and funded
- Submission, agreement and implementation of a Transport Strategy
- Prioritisation of mental health services space on phase 4 land
- Programme of community engagement before GCSP submission
- Legally binding agreement for holistic vision including IDP.

6. There has been no programme of landowner engagement with the community. The opportunity to comment on landowners’ proposals (in so far as they are discernible through this consultation) does not even begin to fulfil the relevant condition. We note that the draft policy and supporting information refer to the “Spatial Framework” in at least six places. While we assume that this means the indicative Spatial Framework prepared by GCSP and presented as figure 63, this has clearly been heavily influenced by the CBC Emerging Spatial Framework, Part 1 of which

(context review, design principles and emerging framework plan) was prepared by Allies and Morrison in October 2023 and is included in the Document Library. Part 3 (updated, as regards phasing only in July 2025) is also in the Document Library was also available in 2023, including its critically important proposals as regards development quantum (absolute and relative) and the siting of that development. The landowners have had plenty of time to engage with the public and have failed to do so. Great Shelford Parish Council has sought to meet with Cambridgeshire County Council on the subject to no avail. Their only genuinely public appearance regarding the plans, as far as we are aware, was at an event organised by GCSP itself in October 2024, which presented scant information and allowed little opportunity for questions or feedback.

7. Paragraph 25 of the draft policy refers to “the Amenity Strategy” and “Infrastructure Delivery Strategy”. We assume that these are intended to be references to the amenity strategy required to be prepared under paragraph 10 of that policy and the infrastructure delivery strategy required to be prepared under its paragraph 27(e) and not to, for example, the Cambridge Biomedical Campus Early Assessment of Need for Amenity on Campus (2023) third party document in the Documents Library. The latter document has not been subject to consultation, but has clearly influenced GCSP’s thinking as, for example, the policy (see its paragraph 10) appears to have accepted unquestioningly the need for more than one hotel (contrast the position taken in paragraph 16 of the Community Comments and please also note what its paragraph 15 says about a conference centre).

What is CBC for?

8. As GCSP acknowledged at its presentation on CBC at 1000 Discovery Drive on 15 January 2026, CBC is unique and its purpose is different from other life sciences campuses such as Babraham Research Campus, the Wellcome Genome Campus and Granta Park. This unique character - its “secret sauce” needs to be reflected in the draft policy and is not. There are probably a number of reasons for this, a key one being the failure of CBC’s owners and occupiers to identify and bring forward appropriately the purpose envisaged in “2020 Vision at Addenbrooke’s – the future of the hospital campus”, Cambridge University Hospitals Trust, 1999, updated July 2004 (“Vision 2020”) and to examine critically what Vision 2020 proposed and what has not been achieved as much, if not all of what remains undone is crucial to CBC’s true purpose. Several of the third party documents in the Documents Library, including Vision 2050, imply that Vision 2020 has been achieved largely or in its entirety (eg the Cambridge Biomedical Campus Case for Expansion (2022) prepared by Quod says at paragraph 4.2 “Having largely fulfilled Vision 2020...” . This is factually inaccurate in several respects as is abundantly clear from our comments under the heading “where are the hospitals?”.

9. The third party document in the Document Library “the Power of Proximity” (2025) starts to unpack what makes CBC unique in the examples it gives from pages 14 to 20. We are particularly struck by two statements on its pages 10 and 12 respectively:

- “Close proximity to the mother institute is particularly important for life science spin offs and startups during the early phases of growth.” (Schaft, J. and Fuller, S. (2023). Supporting a vibrant entrepreneurial ecosystem. EMBO Reports, 24(9).)
- “The team observed that clustering was most significant within a quarter of a mile radius and that the impact of clustering drops off quickly as the distance increases to around half a mile.”

10. We draw four conclusions from this:

(a) it is important to understand what the mother (or anchor) institutes are on CBC. They clearly include the hospitals (including the proposed ones) and the LMB. As regards the latter, in their report “A New National Purpose: Innovation Can Power the Future of Britain”, Tony Blair and William Hague noted “Our own life sciences industry did not happen by chance, but by a concerted

national strategy of anchoring investment in research organisations such as the Laboratory for Molecular Biology backed by the capabilities of an integrated health care system.” [Page 18];

(b) only businesses which have a “mother institute” at CBC ought to be permitted at CBC. Some, perhaps many, life sciences businesses do not need the sort of physical proximity to the hospitals (eg for human tissue) described on page 10 of the “Power of Proximity” as being provided to the companies in the Bio-Incubator at the Milner Therapeutics Institute. This is well illustrated by the 2022 Cambridge Biomedical Cluster map, prepared by letscellit.com in collaboration with Brockton Everlast, and which showed the significant range of biomedical businesses situated around Greater Cambridge. Unfortunately this map is no longer accessible on the internet, but it would be surprising if GCSP has not seen it;

(c) the balance between the various strands of activity on CBC is crucial. We are sceptical about the shift in relative balances envisaged in the CBC Emerging Spatial Framework, Part 3 in the Document Library ((percentages taken from the diagrams labelled Existing Campus Land Uses and Quantum and CBC Vision 2050 Land Uses).

- lab/office 15% to 37%
- institutional and academic research/education 19% to 12%
- healthcare 47% to 28%.

This seems likely to us to be driven more by the commercial desires of the landowners than a careful consideration of the appropriate balance of institutions at CBC necessary for its continuing success;

(d) bigger is not necessarily better. This is not explored at all in any of the third party documents submitted in support of the expansion of CBC, which uncritically assume it to be an axiomatic truth.

11. We also note that, in general terms, the studies used in the “Power of Proximity” document to argue for physical proximity (eg the landmark study referred to on page 10 and the 2010 study referred to on page 12) pre-date the pandemic. Even the 2021 study referred to on page 11 analyses 10 years of data most, if not all, of which must pre-date the pandemic.

12. Paragraph 1 of the draft policy should be amended to read:

“The Cambridge Biomedical Campus ... is appropriate for a mix of uses centred on the Campus’s unique function of bringing together clinical care, clinical education and clinical research including medical research institutes which meet local, regional, and national health care needs – together with directly related biomedical and biotechnology research and development activities...”

This amendment should also be reflected in paragraphs 3.2.20 and 21 of the supporting information and in paragraph 2b)ii) of Policy S/DS.

13. By way of explanation of these proposed changes, in our comments to GCSP on the draft supplementary planning document for CBC in January 2025, we suggested the following italicised amendments to GCSP’s wording:

“The Cambridge Biomedical Campus will be a world-leading location for excellence in healthcare, *education*, medical innovation and life science research integrated with surrounding communities as well as the wider landscape beyond the city.

Campus occupiers will collectively pursue a shared mission of

- *advancement in healthcare*
- *research and development related to human health*
- *the education and training of the healthcare workforce*
- *Health technology and healthcare process innovation.*

Individual organisations will focus on a different aspect, or aspects, of the quadripartite mission, with overlaps. The campus is also home to a mixed economy of public, private and third sector

organisations. Balanced development between the different strands of the shared mission, and between sectors will be critical to the achievement of the vision, as will the fostering of productive connections between organisations and sectors.”

14. We went on to explain why. “[This formulation] more accurately describes the complex four-stranded mission at CBC and the need for a balance between those strands than the wording included in the draft SPD. At the heart of CBC is Addenbrookes, which is described in accurate, but less than flattering, terms and which has a maintenance backlog in excess of £[238] million [figure updated to 2024/25 - this includes high risk maintenance of £29 million and significant risk maintenance of £105 million]. Land for the redevelopment of the acute hospital is reserved in the 2010 Strategic Masterplan.”

15. We also endorse what TRA says in their response to this consultation under the heading “why do we propose this amendment?”

16. The Development Strategy Topic Paper prepared by GCSP for the “First Proposals” consultation said at its page 130 “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.” It hasn’t adequately been continued. The draft policy should include a restriction on the kinds of biomedical and biotechnology businesses that can occupy CBC designed to restrict them to the kinds of business which need the relevant proximity to a CBC anchor institution (for example, the planning permission for S/4329/18/OL Wellcome Genome Campus includes occupation use restrictions).

Where are the hospitals?

17. In our comments to GCSP on the draft supplementary planning document for CBC in January 2025 we said “We would like GCSP to look for ... opportunities.... to emphasise the importance to CBC of sufficient and properly maintained healthcare provision at CBC for the population the hospitals need to serve and which includes enough space, equipment and staff to undertake clinical research and innovation. How else can it play its part in the continuing success of CBC? ... significant parts of the Campus (in particular, Addenbrookes) have been left behind. So far as possible, this should not be allowed to continue and new development should be encouraged ... to make, and should actually make, appropriate contributions (including financial ones) to improvements to the existing parts of CBC (including the hospitals), to the infrastructure that is needed to service it or to enhancement of the Green Belt.”

18. The introductory paragraph of the draft policy says (emphasis added) “[This policy] establishes requirements for a new masterplan which will secure a coordinated approach to infrastructure, services and facilities to meet the needs of campus users, *to ensure a campus which can deliver high quality local health services* as well as compete internationally as a centre of research”. We do not see anything in the policy itself or in the Infrastructure Delivery Plan which gives us any confidence on the italicised point. Quite the opposite. The latter is completely silent on the subject of hospitals and the supporting information for the draft policy merely acknowledges that many of the older buildings (by implication NHS ones) are now in need of renewal and improvement. It does not put this important issue where it should be - at the heart of CBC’s needs - and with appropriate contributions and support from those who benefit from new development.

19. CUH NHS Foundation Trust (“CUH”) has plans in progress for three new hospitals. None yet have full business case approval and so none have committed government funding. These are:

(a) the Cancer Research Hospital. This hospital is partly dependent on philanthropic funding. It is also part of the troubled New Hospitals Programme. On 16 January, the National Audit Office (“NAO”) issued its latest report on that programme. In it, the opening date for the Cancer Research

hospital has slipped to 2030. Further the NAO says “The New Hospital Programme is ambitious in that it seeks to transform how hospitals perform. It is important that DHSC takes the time needed to get the design for new hospitals right, plans the programme well and then executes the plan efficiently...The construction schedule over the next few years is challenging as schemes adapt to the new approach, and there are risks of delivery dates slipping and construction activity being squeezed into later spending review periods.” The profile given to the Cancer Research Hospital in “the Power of Proximity” suggests it is very important to CBC and it is clearly very important to its potential patients. Will its full business case be signed off in 2026?

(b) the Children’s Hospital. This hospital is dependent on significant philanthropic funding and has a funding gap. The latest official word from CUH appears to be a statement in its annual report and accounts that “..In November 2024 we saw hoardings installed around the site – a visual reminder of how far the project has come. The Outline Business Case for the Cambridge Children’s Hospital was approved by ministers in August 2024, and the process of appointing a contractor has begun as work on the Full Business Case continues.” As far as we have been able to see there is no publicly available timetable. Again, the “Power of Proximity” document suggests it is important to CBC.

(c) the new acute hospital. As noted above, land was secured in the 2010 Strategic Masterplan for the redevelopment of the acute hospital. 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 disappeared from public view until 6 March 2024 when the Government (from what is now MHCLG) gave CUH £3 million to develop its long term plans. It is now understood to be seeking £10 million from the Government to prepare the strategic outline business case for the new acute hospital.

In order to explain to you what we understand is required, we cannot do better than to attach the slides CUH NHS Foundation Trust used at the 17 September CBC Open Forum. These emphasise the scale of the problem Addenbrooke’s currently faces, the urgency of it and the proposed solution at a cost of £2.3 billion. The slides also explain how the acute hospital is complementary, and in addition, to the projects described in section 12 of your Infrastructure Delivery Plan. More detail is provided in CUH’s “update on the Acute Care Strategy” paper prepared for the SCDC Overview and Scrutiny Committee meeting on 8 December 2025. This notes, in its paragraph 2.2, a current acute care bed deficit of 162 beds.

It should be obvious from the content of these documents that the need is high and growth cannot go ahead without this investment being secured and planned. It needs to be appropriately reflected and prioritised in the draft policy (for example, its paragraph 8a could be more specific) and in your Infrastructure Delivery Plan. Without the new acute hospital, we would suggest that the Local Plan is not viable and certainly does not deliver “health...facilities; in the right places and built at the right times to serve our existing and growing communities” (paragraph 2.5 of the draft Local Plan). Moreover, CBC’s continued success is potentially at stake. If further supporting evidence for this is needed, we suggest that can be found in CUH’s position at 71 (out of 134) in the NHS’s acute trust league table for Q2 2025/26. Even Knight Frank acknowledges this at page 7 of the CBC Demand and Deliverability Report (2022) in the Document Library 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”.

19. Royal Papworth is not mentioned at all in the draft policy, yet the “Power of Proximity” document makes clear that it is very important to CBC. Its move to CBC was a key achievement of Vision 2020. It ranks at 1 in the NHS acute trust league table for Q2 2025/26.

20. As we noted above, CBC Ltd has asked for prioritisation of mental health space on the Phase 4 land. Page 39 of the CBC Demand and Deliverability Report (2022) in the Document Library refers to a CPFT hospital on the Phase 4 land of 20,000 sq m. It is not mentioned anywhere else, but the Power of Proximity refers on page 8 to a Brain and Mind Science Institute. No healthcare is shown on Phase 4 land in figure 63 of the draft policy.

21. We note that none of the NHS trusts which operate in Greater Cambridge are listed in paragraph 6.36 of the Draft Plan Duty to Cooperate Compliance Statement or in paragraph 2.29 of the draft Plan itself. This is surprising.

22. The supporting information to this policy says (emphasis added) “Given the importance of the Campus both the local and national economy, and *in its role in meeting the health needs of the region*, it is considered that there are exceptional circumstances for this Green Belt release.” We do not see how CBC’s hospitals can be used to justify the Green Belt release. Land for all of them has been identified and reserved on Phase 1 of CBC. Nor should proposed meanwhile uses of land reserved for healthcare provision distract from the basic need for hospital provision.

Further release of land from the Green Belt

23. As your supporting information acknowledges, there must be exceptional circumstances to permit a further release of land from the Green Belt. The Development Strategy Topic Paper says (paragraphs 5.79 and 80) “the Councils conclude that our general development needs alone do not provide the ‘exceptional circumstances’ required in national policy to justify removing land from the Green Belt on the edge of Cambridge in this Local Plan....Notwithstanding, for site specific reasons we have concluded that exceptional circumstances exist to justify release from the Green Belt at Cambridge Biomedical Campus.”

24. We dispute this for two main reasons:

(a) 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 purpose (see “what is CBC for?”). In other words, it is not restricted to those which fit with CBC’s unique mission. As regards the estimates of demand which underlie Vision 2050, these are unprovenanced and unreliable, please see paragraph 7 of the Community Comments. These data and estimates result in an over-estimate of potential demand and, we understand from you underlie the figure of 687,000 net additional sq m (gross internal area) in paragraph 8e of the draft policy. We note that paragraph 2b)ii) of draft Policy S/DS mentions an alternative figure of 530,000m2 employment floorspace for office and research and development for CBC. This may be a GEA figure, taken from table 6 of the CBC Case for Expansion document, prepared by Quod in 2022, which is in the Document Library, with 20,000 sq m GEA anticipated for research institutes.

(b) 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 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 draft policy causes “only” high harm to the Green Belt. It causes very high harm and see (a) for why we believe that consideration i) identified by LUC is not fulfilled. Nor are we convinced about ii) and iii). This makes the proposed increase in release from 19 to 22 hectares particularly objectionable. The supporting information to the draft policy says “the realignment of the road will

allow improved access into the campus, and development of a comprehensive landscape response to the edge of the city alongside the developments happening a Worts Causeway.” We do not understand or agree with the first point and we do not believe the second is relevant to the question of exceptional circumstances. Paragraph 2.65 of the draft Local Plan explains the justification as “to provide an opportunity to meet development needs of the campus and deliver a world leading campus”. As noted in (a), the development needs on which the assessment is based are over-estimated.

25. A small point, but GCSP suggests that the additional release of land through the diversion of Graham’s Road is around 3 hectares, whereas the CBC Granhams Road Realignment document prepared by Quod suggests it is 5.8 hectares. There is a very considerable difference between the two. Which is correct?

26. There is a gas main to the south of Granham’s Road where it meets the Babraham Road (see page 21 of the CBC Emerging Spatial Framework Part 1 in the Document Library). This may potentially undermine the scope for realigning Granham’s Road, as proposed, or for developing at least some of the additional land.

27. An alternative would be to realign Granham’s Road, but either to leave the additional 3 hectares to the north of it in the Green Belt and undeveloped or to, in effect, swap it for 3 hectares from the Phase 3 land and allow development in the newly included area to increase the protection for the Nine Wells Local Nature Reserve.

28. Particularly bearing in mind LUC’s conclusion referred to above that the release of additional land in connection with the realignment of Granham’s Road would cause “very high harm” to the Green Belt, any entrance to CBC at this point would need to be appropriately modest in scale and in keeping with its Green Belt backdrop (compare the proposal on page 16 of Quod’s document “Realignment of Granham’s Road” (2024) included in the Document Library to “create a prominent gateway site for the campus”).

29. If the Phase 4 release is included in the finalised Local Plan (either at the originally proposed 19 hectares or at the now proposed 22 hectares), we consider it important that there is a strong, and ideally enforceable, arrangements with landowners that no further Green Belt releases related to CBC will be sought during the lifetime of the Plan.

Other

30. Our more detailed comments are:

(a) in paragraph 4, we would prefer “area of Cambridge” instead of neighbourhood, which has an inappropriately residential implication.

(b) in paragraph 7, we suggest the inclusion of a reference to the need to protect Nine Wells Local Nature Reserve.

(c) as regards paragraph 10, please see our point about the need for hotels in paragraph 7 above and note what we said in the Community Comments about conference space. We understand that large conference space is in short supply in and around Cambridge, but it doesn’t have to be part of a hotel. The Colliers Greater Cambridge Future Hotel Need Study 2025 supporting the draft Local Plan does not display significant enthusiasm for hotel provision at CBC. We would not like to see, for example, retail offerings at CBC that take away custom from businesses in Great Shelford.

(d) as regards paragraph 11, the CBC On-site Housing Document (2025) in the Document Library says (at paragraph 6.3) “The majority of the need for affordable housing is driven by the health and research uses on campus such as Papworth, CUH and LMB. The majority of the long term affordable housing need on CBC exists today. This suggests that demand for truly affordable housing will be highest in early years of masterplan delivery as the majority of these uses already exist. This supports the current focus on whether and how the on-campus sites can be delivered in isolation from the discussions relating to wider campus expansion.” The words “ahead of and” are missing from before “in isolation” and should surely be reflected in the draft policy (recognising that one of the proposed sites for such accommodation will not be available until the acute hospital has moved, as to which see “where are the hospitals?” above).

(e) paragraph 12j could be taken to imply renovation of existing buildings, but all four proposed hospitals for CBC (see “where are the hospitals?” above) will be on new sites. Only the new acute hospital could relatively naturally fall into this wording. See also paragraph 3.2.23 of the supporting information.

(f) we are broadly supportive of paragraphs 14, 17 and 18 (e.g. new development must “Integrate sensitively with adjoining residential neighbourhoods, the wider Green Belt, and countryside to the south, ensuring appropriate transitions in height, scale, and landscaping” and “Retain and enhance key strategic and local views and landscape features, especially from Nine Wells Local Nature Reserve, Magog Down and wider countryside approaches”). We attach a diagram showing important view points identified as part of the process of preparing the Stapleford and Great Shelford Neighbourhood Plan. We are concerned that the cumulative breadth, density and height of building on CBC will increasingly present a ‘concrete wall’ on the southern approach into Cambridge and from high points on the Gog Magog Hills, which no amount of dense planting will be able to soften. Greater consideration needs to be given to ‘fingers’ of trees and other plants penetrating into and through the site from the southern fringe to break up the visual and environmental impact of this concrete wall.

(g) in paragraph 14a greater specificity should be given to the phrase “appropriate transitions in height, scale and landscaping”. Information in ‘Appendix 1 Skyline and tall buildings guidance’ does not alleviate these concerns, supporting the tallest of all buildings within Greater Cambridge on CBC (Appendix 1, para 5.6) and validating the use of building height as a status symbol. This appears contradictory given that Appendix 1 simultaneously notes that consideration should be given to the impact of tall buildings on long-distance views from the Green Belt, from high vantage points and strategic views towards Cambridge and approach routes.

(h) in paragraph 14d, we suggest that adverse impacts should be minimised, as well as mitigated and the the Nine Wells Local Nature Reserve should also be mentioned.

(i) as regards paragraph 16c, we are concerned that a lack of building height restriction will encourage taller and taller buildings over time, reduce views towards the City from the southern gateway and key viewpoints, and overshadow/dominate the soft edge and Green Belt to the south. In particular, building heights should be restricted at new site allocations removed from the Green Belt to the south of the existing CBC (S/SEA/CBC) to ensure that they don’t overshadow/dominate public amenity areas, strategic enhancement areas and landscape improvement areas. Medium-mature trees should be incorporated into the planting mix to reduce the time that a raw built edge is visible at the southern fringe. Paragraph 16g might well benefit from a reference to public safety.

(j) as regards paragraph 17d, we support the provision of a vegetated landscape buffer within the Strategic Enhancement Area to the south of the campus (S/SEA/CBC). This will be key to securing the ambition in paragraph 18a of the draft policy. However, we would like to see the Strategic Enhancement Area expanded: additional benefits to nature and landscape character would accrue if the Strategic Enhancement Area extended further south, along the SW side of Babraham Rd (i.e. that part of Babraham Rd which falls between Hinton Way and Haverhill Rd) all the way to Magog Down.

(k) as regards paragraphs 17 and 18, we do not consider that sufficient attention has been given to incorporating improved landscaping policies from the 2008 Cambridge Southern Fringe Area Action Plan (notably Policy CSF/5 Countryside Enhancement Strategy). This is something which the Stapleford and Great Shelford Neighbourhood Plan deliberately set out to do in Policy S&GS 20 to ensure that these benefits to the local community and environment are (i) not lost and (ii) can direct future CIL/S106 funds, because we predicted that the 2008 Cambridge Southern Fringe Area Action Plan would not be taken forward in the new Local Plan. Policies CSF/5 and S&GS 20 list and map specific landscape improvements over a wider area of, and around, the southern fringe. We therefore request that more specificity from Policies CSF/5 and S&GS 20 is incorporated into these paragraphs. In addition, we would like to see references to our “Pocket Park” in this part of the policy. It is described on our website in the following terms “Our Pocket Park is a one acre nature reserve off Granhams Road with a variety of native flowers in a central grassland area surrounded by trees. It is of high biodiversity value with over 60 recorded plant species that provide food and shelter for bees, butterflies, birds and other wildlife...The site was formerly used for the extraction of clay for making building bricks used in local buildings, hence it is officially known as the Clay Pit.” It would also be useful to add references to the Red Cross Lane Drain City Wildlife Site as much as anything else to raise awareness of it. These comments apply equally to paragraph 3.2.27 of the supporting information. In particular, there is a risk of Nine Wells Local Nature Reserve being overwhelmed due to its proximity to Phase 3.

(l) in the context of paragraph 17, we note that on page 10 of the CBC Emerging Spatial Framework Part 1 in the Document Library it says “The CBC Green Belt Enhancement land, south of the CBC Expansion Land, is of value locally for biodiversity, particularly for red-listed farmland bird species.” This could be read to imply that Phases 3 and 4 (and indeed Phase 2) are not relevant to these bird species. John Meed’s book, “A haven for farmland birds” directly contradicts this.

(m) not of direct relevance to paragraph 18, but the site reserved for the new acute hospital has often visible surface water flood risk. How might this be dealt with?

(n) as regards paragraphs 23 to 25, generally, we note that the general introduction to the Local Plan says that “We will require our large developments to prepare energy masterplans, to consider how their power needs can be met most effectively.” This is not mentioned here - Might a CBC-wide energy masterplan be in order? And what about a CBC-wide water masterplan? For example, it is understood that hospitals are not permitted to use rainwater/grey water in toilets, but they will have huge roofs and could collect water for other CBC occupants? It is also understood that any discharge of water into the Hobson’s catchment area requires a written agreement with Hobson’s Conduit Trust. It would be helpful for this to be mentioned, including the significance of the frequency at which water is discharged (which can impact the levels of oxygenation) and its temperature. Similarly, use of salt for de-icing can also have a deleterious effect on the catchment.

(o) we assumed paragraph 26 is intended to capture the planned, but not implemented, developments on Phases 1 and 2, such as the relocation of the acute hospital. This could be made clearer in the drafting. This might also be the place to include something about the appropriate balance of different institutions (see “what is CBC for?” above). Paragraph 3.2.26 of the supporting information could also expand on this point.

(p) we strongly welcome the proposal for a single integrated, comprehensive campus-wide masterplan in paragraph 27a as we consider it essential. In paragraph 27c, we would like see a reference to the prioritisation of the new acute hospital and in paragraph 27e, we consider that the reference to infrastructure ought to include the new hospitals (see “where are the hospitals?” above).

31. Paragraph 3.2.30 of the supporting information says “Recognising the importance of implementation, the policy is contingent on the identification and agreement of a delivery body

capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces.” We agree and applaud this. The current situation with several landowners and CBC Ltd with a limited mandate makes abdication of responsibility far too easy. The failure for many years to take properly engage with and take appropriate steps to monitor and enforce the City of Cambridge Area G (Consolidation) Order 1993 (as amended) with its prohibitions on driving through CBC is a telling example of why the equivalent of a managing agent is needed for CBC, as are the examples of anti-social behaviour spilling out from CBC unchecked into neighbouring communities given at the GCSP presentation and Q & A at 1000 Discovery Drive on 15 January.

32. As regards paragraph 20 of the draft policy:

(a) 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). Careful consideration needs to be given to the impact of additional traffic accessing the multi-modal access road via the A1301 at the 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. Granhams Rd level crossing is already recognised in local planning policy as a key congestion point (see Policy S&GS 18: Managing the impacts of new development in the neighbourhood area with respect to the movement of people and vehicles).

(b) It is unclear in the policy what forms of transport and who will be able to use this road; either way, private car access should be limited - see our comment on this on paragraph 2.26 of the draft Local Plan under the heading “Rail”.

(c) We question whether this multi-modal access road is needed at all if the Better Ways for Busways’ alternative for a busway spur off the A1307 Hinton Way roundabout was adopted. Furthermore, it would connect all parts of the CBC with Cambridge South Station, which CSET completely fails to do. This spur would significantly reduce traffic volumes in the immediate vicinity of Addenbrooke’s, and offers proximity to Babraham P&R as an active travel route.

(d) It would also have the added advantage of offering direct access to the hospitals for emergency vehicles.

(e) To facilitate the alternative CSET route, we support upgrades to Francis Crick Avenue and Dame Mary Archer Way, as per paragraph 20b.

33. Effective enforcement of the driving prohibitions referred to in paragraph 31 must be a pre-condition to any further expansion of CBC. We would expect a system that achieves it would facilitate the monitoring by CBC of its trip budget. We ask for this, recognising that proper enforcement may be disadvantageous to Great Shelford as it may increase traffic on the A1301 and along Granhams Road and Hinton Way. Notwithstanding this, we are concerned that this continued enforcement failure may well delay blue light vehicles and most especially ambulances. We also note that the land reserved for the new acute hospital is in a very different position from that currently occupied by Addenbrookes (as is that for the children’s hospital) and that preferred blue light routes may well change in the future.