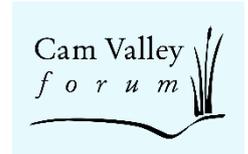


22370 CVF response to development corporation consultation, deadline 1 April 2026



<https://www.gov.uk/government/consultations/establishing-a-development-corporation-in-greater-cambridge/establishing-a-development-corporation-in-greater-cambridge>

1. What do you think about the current delivery of infrastructure and homes in Greater Cambridge?

We recognise the urgent need for more homes and infrastructure in Greater Cambridge, but are very concerned about the speed with which this is happening and the lack of attention that is being paid to the natural environment on which we all depend. Cambridgeshire is the driest part of Britain, with nationally important chalk streams and highly variable rainfall. The Chalk aquifer that supplies 97% of our public water supplies is under significant pressure: over-abstraction means that ALREADY the chalk streams tend to dry out in summer. Pollution of the water by faecal bacteria, nitrates and phosphates is becoming an increasing problem, and the pressures of increasing population, economic growth, intensive land management and climate change are only making a bad situation worse. Planning applications have already been refused on the basis of there being insufficient water. The consultation document recognises the water challenge but gives no convincing information as to how the new body would be able to address this effectively; stating that a centralised body will somehow do this better than those currently struggling with the problems is not reassuring.

As Cam Valley Forum (CVF), we think that the current approach to water abstraction in this region needs to be reformed and more thought given to developing sustainable approaches to water storage before development proceeds at the rate that is both currently planned, and the acceleration that is proposed under a future Urban Development Corporation. Our views on this are laid out clearly in our April 2025 response to the Cunliffe Review (<https://camvalleyforum.uk/wp-content/uploads/2025/04/CVF-Cunliffe.pdf>) and our November 2025 Submission to the House of Lords Select Committee on Environment and Climate Change for their inquiry looking at drought preparedness in England (<https://committees.parliament.uk/writtenevidence/153240/pdf>).

2. What do you think about the proposal to create a centrally-led urban development corporation (UDC) in Greater Cambridge?

Like many in the region, we do NOT believe that the proposal for the creation of a CENTRALLY-led Greater Cambridge Development Corporation (GCDC) is appropriate. Our views align with those of our local Councils: the proposed governance model, dominated by national government, and with minimal representation of local government, is undemocratic and will result in decisions being taken that are not based on the evidence that resides in local knowledge and expertise. While our current local government structure is far from ideal, it does allow for those with local expertise and understanding of the regional challenges to be central to any planning and decision-making. The lack of local knowledge of those involved in developing the proposal, in comparison with that of Greater Cambridge residents, was abundantly clear at the public meeting in Cambridge on 23rd March 2026, organised by Cambridge Past Present and Future.

In particular we OBJECT to the proposal that the GCDC should have planning powers, which will remove this key responsibility from our local, democratically elected councils and from the

award-winning Greater Cambridge Shared Planning Service. Whilst recognising that the Greater Cambridge Region desperately needs investment in a number of areas, we do not believe the proposed GCDC, will be better placed than the current local structure for achieving the transformational changes that are anticipated. Transferring plan-making and major decision-making powers to a new corporation risks loss of local expertise and long-term damage to planning capacity. The consultation's emphasis on "accelerating delivery" appears designed to push through development that would not normally be acceptable under a democratically accountable planning authority.

3. Do you have any views on the objectives of the Greater Cambridge Development Corporation, as set out in the consultation document?

Whilst BROADLY AGREEING WITH THE PRINCIPLES behind the five proposed objectives, WE HAVE SIGNIFICANT CONCERNS about the intent and expected interpretation of these objectives. Even if it is the intention for each of the objectives to carry equal weight, the order in which they are laid indicates that the list may end up being in order of priority. The placing of the objectives 'Environment and Climate' and 'Inclusion and Opportunity' last suggests that those involved in developing the proposal may be unaware that both of these are integral to the first objective of "transformational economic growth".

Object 4, "*Deliver environmentally sustainable and climate resilient outcomes*" can only be achieved if the first objective of significantly increasing jobs and homes incorporates an understanding that this development will only be sustainable if planned and developed according to environmentally sustainable and climate resilient principles. Environment and climate outcomes will not be achieved simply by "creating and maintaining large, connected, high-quality green and blue spaces". Object 5, "*Reducing inequality between people and places in Greater Cambridge*" similarly must be integrated with the objective relating to economic growth.

We therefore think that the objectives should be re-considered and re-drafted as part of revisiting the overall concept of the Development Corporation.

4. What matters most to you about the future of Greater Cambridge?

CVF was set up in 2001 with the mission of protecting and improving the health of the River Cam and its tributaries, for the benefit of the community and the environment. For us, therefore, the quality of the local environment, adequate water availability for both nature and the local community, flourishing biodiversity, and resilience to climate change are key priorities for the future of Greater Cambridge. We are therefore against accelerated development that would run counter to any of these pre-requisites for sustainable living.

In our view, priority actions are: protection of Chalk Streams; significant investment in Reservoir water storage, water transfer, leak reduction and domestic water efficiency measures to allow abstraction to be reduced by at least a half; and urgent attention to sewage and other forms of pollution. Without this, no growth can be environmentally sustainable. We recognise the great promise and intellectual capital of Greater Cambridge, but strongly feel that the envisaged growth does not need to be focussed specifically in this environment-stressed region, and that more thought is needed on how the economic advantages of such growth could be spread to other regions.

Historically, much of greater Cambridge, situated as it is in the River Cam Valley, was in a river flood plain only a few metres above sea level. There are five metre contours in the centre of Cambridge despite its distance from the sea. The heart of the City was built around extensive riverine silt and clay (riparian) pastures many of which were formed into extensive use as Commons for grazing and not built on by choice. This important ecological and historical context can only be maintained by ensuring protection of green space in the right places, very careful and appropriate land management, and maintenance of a resilient environment in which people are content to live and work.

5. What do you think about the proposed boundary of the Greater Cambridge Development Corporation, as set out in Annex B?

(No comment)

6. What do you think about the phased approach we have proposed in regard to plan making powers?

(No comment)

7. What do you think about the proposals to give the Development Corporation plan making powers as set out in the consultation document?

Growth is about more than just housing numbers; we need an “ecosystem-first” approach. A GCDC would need to be given the legal powers of “derogation” from the national planning standards laid out in the National Planning Framework (NPPF) to allow it to set HIGHER standards than in the NPPF. Local government and the majority of residents in Greater Cambridge are demanding a mandate that goes beyond the NPPF on energy efficiency and biodiversity, given local experience and expertise in these areas. For example, if national policy caps biodiversity net gain at 10%, GCDC should have the explicit legal power to mandate 20%. Furthermore, the definition of “infrastructure” must go beyond roads and pipes to include food infrastructure and supply chain resilience, protecting our agricultural land and promoting local building trades. If the GCDC goes ahead, the current powers with the existing Shared Planning Service must be maintained, with the GCDC working collaboratively to deliver the vision of a resilient, affordable, and sustainable Cambridge.

As proposed, the GCDC would have no additional powers to ensure biodiversity and environmental protection, mitigation of and adaptation to climate change, or any of the other activities that would be required to deliver the proposed Object 4 on Environment and Climate, than exist already under the current arrangements.

8. What do you think about the proposals to give the Development Corporation powers to determine planning applications as set out in the consultation document?

It is essential that the local councils and the Greater Cambridge Shared Planning Service retain the power to set HIGHER standards than the national default, in order to address water scarcity, biodiversity loss and climate change.

9. Do you agree with using thresholds for the Development Corporation taking decision making powers? Which minimum thresholds for determining planning applications do you think are appropriate?

(No comment)

10. Do you have any other views on the proposed approach to the Development Corporation's powers and functions?

(No comment)

11. What do you think about proposed local representation on the Development Corporation Board, as set out in the consultation document?

The proposals for local representation on the Board are totally inadequate. If the GCDC goes ahead, this should be only be with a board that includes specific expertise in ecological resilience, local food policy, and circular economics that will ensure development is sustainable. At least half of the seats on the board must be from the elected local government, to ensure accountability to the Greater Cambridge public.

The remaining 50% of the seats on the board must be representatives who advocate for the health of the river and chalk streams, for waste water management, for the green belt, for biodiversity, and for the highest environmental standards in building as set out in the Local Plan to ensure accountability to the environment.

12. What do you think about the board having expertise in areas such as planning, property development, design, environment, finance, and infrastructure delivery?

The consultation document states that the Board is expected to invite members with a range of skills and experience in various matters including 'environment'. If the GCDC goes ahead, it is essential that the Board has real expertise in environmental matters, that can be demonstrated to the Greater Cambridge population, and that these Board members have decision making power: they must not just be observers.

To date, there is widespread scepticism, based on past and current experiences, of any developer's understanding of the essential ecological interdependency that must be the foundation of any sustainable development. This was accentuated by the contribution of the Cambridge Growth Company's Environmental and Climate Adviser, a panellist at the CPPF meeting on March 23rd, who seemed to be largely ignorant of the work underway in Cambridge to improve the health of both the river and associated chalk streams. We were informed that the GCDC will be operating according to the five Environmental Principles developed under the Ox-Cam development initiative, but these are high level, not enforceable, and are principles under which the current local authorities are operating already. We were assured that there would be some change, implying an improvement, to the way in which these principles could be implemented but no evidence of this was given beyond the vague statement that size of areas to be managed for nature conservation would be on a much greater scale. Given that 'space' is already at a premium in the region, with the competing interests of housing, commercial operations, and agriculture tending to be prioritised, the statement came across as very naïve.