



DPV Consult

## CONSULTATION RESPONSE

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### **Greater Cambridge Local Plan**

Draft Preferred Options Consultation Document (Regulation 18 Consultation)

Land to the north and west of  
Wilbraham Road, Fulbourn

sm3

**On behalf of** Places for People  
Developments Ltd

jtp

January 2026

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## EXECUTIVE SUMMARY

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1. This document contains representations submitted by Places for People Developments Limited (PfP) concerning the Greater Cambridge Local Plan (GCLP) Preferred Options Regulation 18 consultation, specifically promoting Land to the north and west of Wilbraham Road, Fulbourn, as a sustainable site for over 2,500 new homes. It outlines the site context, planning policy alignment, and detailed responses to the draft Local Plan consultation, emphasizing the site's suitability, deliverability, and alignment with strategic objectives to 2045 and beyond.
2. PfP is the UK's leading social enterprise, operating through more than twenty specialist companies to deliver homes and services that support thriving communities, aligned with the Greater Cambridge Local Plan's priorities for climate action, biodiversity, sustainable transport, and quality placemaking. Its unique value proposition for large strategic sites is clear: a commitment to 50% affordable housing, long-term stewardship, and a proven record of working collaboratively with the public sector as a trusted partner.
3. PfP promotes the land North and west of Wilbraham Road, Fulbourn ("the Site"), highlighting its potential to deliver a high-quality new neighbourhood that supports Greater Cambridge's spatial strategy. The Site is well connected, sustainable, and being considered through the Call for Sites and Housing and Economic Land Availability Assessment (HELAA) processes.
4. The Site comprises two adjacent parcels: the northern parcel (234 hectares) north of the railway line, predominantly good to moderate arable land adjoining Wilbraham Fens SSSI; and the smaller parcel (12.5 hectares) south of the railway line near Fulbourn village centre, enclosed by existing residential areas. Both parcels benefit from strong physical containment, existing hedgerows, and proximity to services and transport links, and there are no major policy, environmental, or infrastructure constraints that cannot be appropriately mitigated through a comprehensive master planning and delivery strategy.
5. The representations reference the National Planning Policy Framework (NPPF) requirements for Local Plans to be positively prepared, justified, effective, and consistent with national policy. The current development plan includes South Cambridgeshire and Cambridge Local Plans (2018) and the Fulbourn Neighbourhood Plan (2023), with the GCLP aiming to extend the plan period to 2045.
6. The emerging GCLP strategic themes relevant to the Site include climate emergency response, sustainable growth, biodiversity enhancement, placemaking, housing mix, landscape and heritage protection, sustainable travel, infrastructure coordination, water management, and support for the

continued socio-economic success of Greater Cambridge through well-located, sustainable development.

7. The Site's key constraints identified by the 2021 HELAA include transport access, landscape and townscape sensitivity, archaeology, and Green Belt considerations. However, recent national policy changes introduce the concept of Grey Belt, under which the Site is assessed as making limited contribution to Green Belt purposes, indicating potential for sustainable development with limited harm. This aligns with the site-specific analysis, which demonstrates strong containment, no strategic separation function, and only a limited relationship to the setting of a historic town—characteristics that collectively support its classification as Grey Belt.
8. PfP has undertaken updated technical work addressing landscape and transport constraints. The Vision Document that accompanies this submission proposes a landscape-led masterplan with green infrastructure buffers, concentration of development in less sensitive areas, and enhanced transport connectivity including multiple vehicular access points and pedestrian/cycle links. The potential reopening of Fulbourn Station is being explored with Network Rail and Greater Anglia, representing a significant improvement in sustainable transport options and wider benefits to the surrounding communities.
9. Archaeological constraints are considered manageable through phased investigation and mitigation during planning and will not prove to be a barrier to the allocation of the Site.
10. The Site vision emphasises creating a cohesive, landscape-led, and sustainably connected new neighbourhood. This includes:
  - A green infrastructure framework buffering ecological assets and reinforcing landscape character
  - Sustainable movement prioritising active travel and public transport integration, including a proposed reopening of Fulbourn Station and the creation of new bus services connecting the proposed allocation with Cambridge City Centre and employment and education locations
  - Distinctive neighbourhoods reflecting the northern fen-edge and southern village-edge contexts
  - A balanced housing mix including the delivery of 50% affordable housing with community spaces and local amenities
  - Support for education provision, employment access, health and wellbeing, heritage sensitivity, and resilient drainage.

11. This table highlights the strong alignment of the Site’s proposals with GCLP objectives across climate action, biodiversity, transport, housing, placemaking, infrastructure, and spatial strategy, reinforcing its suitability for allocation.

Theme	Benefit	Description
Housing Delivery	Sustainable new homes	Capacity for over 2,500 homes including affordable housing
Climate Action	Low-carbon development	Energy-efficient homes and buildings, sustainable design, tree-lined streets, integrated SuDS
Biodiversity	Net gain	Habitat corridors, green infrastructure, ecological enhancements, connecting the Fens
Transport	Active travel	New pedestrian and cycle links to Fulbourn and Cambridge
Strategic Transport / Rail	Sustainable rail access	Opportunity to safeguard and support the potential reopening of Fulbourn Station, and connectivity to the bus network enabling low-carbon commuting and regional connectivity
Strategic Transport Bus	Modal share benefits for the existing community and proposed occupants through the provision of limited stop bus services connecting to the centre of Cambridge and employment and education locations	Using established techniques, the delivery of bus service provision, which is incentivised at the outset to create a culture of non-car use
Community	Social value	50% affordable housing; long-term stewardship of homes, public open space, and community assets; supporting social infrastructure; potential for enhanced leisure provision (e.g., new sports centre); Private Rental Sector and mixed-tenure options to support local services.
Economy	Employment access	Proximity to Cambridge Biomedical Campus and ARM HQ
Deliverability	Early delivery	The site is available now, unconstrained, and backed by PfP’s capacity and funding, enabling early delivery within the plan period.
Management	Long-term stewardship by PfP	Robust, integrated management of homes, public open space, community assets and social infrastructure, ensuring high-quality, well-maintained and enduring neighbourhoods over the long term.



12. PfP welcomes the GCLP's vision and strategic objectives but raises concerns about the draft Plan's failure to allocate the Site despite its sustainability and capacity. Key objections include:

- Requirement for a longer plan period to 2050
- Insufficient deliverable housing sites and supply flexibility
- Over-reliance on complex, infrastructure-dependent locations
- Lack of clear evidence on deliverability and realistic trajectories
- Inconsistencies in settlement hierarchy application, excluding a well-connected village like Fulbourn
- Missed opportunities for infrastructure and transport efficiencies, including low-carbon living benefits
- Risks to soundness tests under NPPF for positive preparation, justification, effectiveness, and national policy consistency. PfP argues that excluding Fulbourn undermines the Plan's ability to meet housing needs and sustainability objectives, advocating for its allocation to ensure a sound and effective Local Plan.

13. The document clarifies that while Fulbourn currently lacks a station, the nearby Cambridge-Ipswich railway line passes close to the Site. Existing plans focus on service enhancements and station upgrades elsewhere, with no published proposals for a new station at Fulbourn. However, community and regional initiatives aim to improve the line, and PfP has engaged with Network Rail and Greater Anglia in detailed discussions to understand the operational requirements for potential reopening of Fulbourn Station, which would significantly enhance sustainable transport options.

14. The land North and west of Wilbraham Road, Fulbourn, represents a sustainable, deliverable opportunity to contribute positively to Greater Cambridge's Local Plan. It aligns with the spatial strategy, supports climate and biodiversity goals, enhances sustainable transport and active travel, integrates well with the existing settlement, and can deliver over 2,500 homes within a landscape-led framework.

15. PfP welcomes the opportunity to work collaboratively with Greater Cambridge Shared Planning to refine the vision, masterplanning principles and delivery strategy for the Site as the Local Plan progresses. The proposals presented in this document form an initial framework that PfP is committed to developing further with the Councils to ensure the Site contributes effectively to meeting housing, climate, and infrastructure needs across Greater Cambridge.

# 1. INTRODUCTION

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- 1.1 These representations are submitted on behalf of PfP Group Limited (“PfP”) in response to the Greater Cambridge Preferred Options Local Plan (GCLP) Regulation 18 consultation being undertaken by Greater Cambridge Shared Planning (GCSP), covering the administrative areas of Cambridge City Council and South Cambridgeshire District Council.
- 1.2 PfP is promoting Land to the north and west of Wilbraham Road, Fulbourn (“the Site”), a sustainable and well-connected location with the potential to deliver a high-quality new neighbourhood of over 2,500 homes that contributes positively to the emerging spatial strategy for Greater Cambridge.

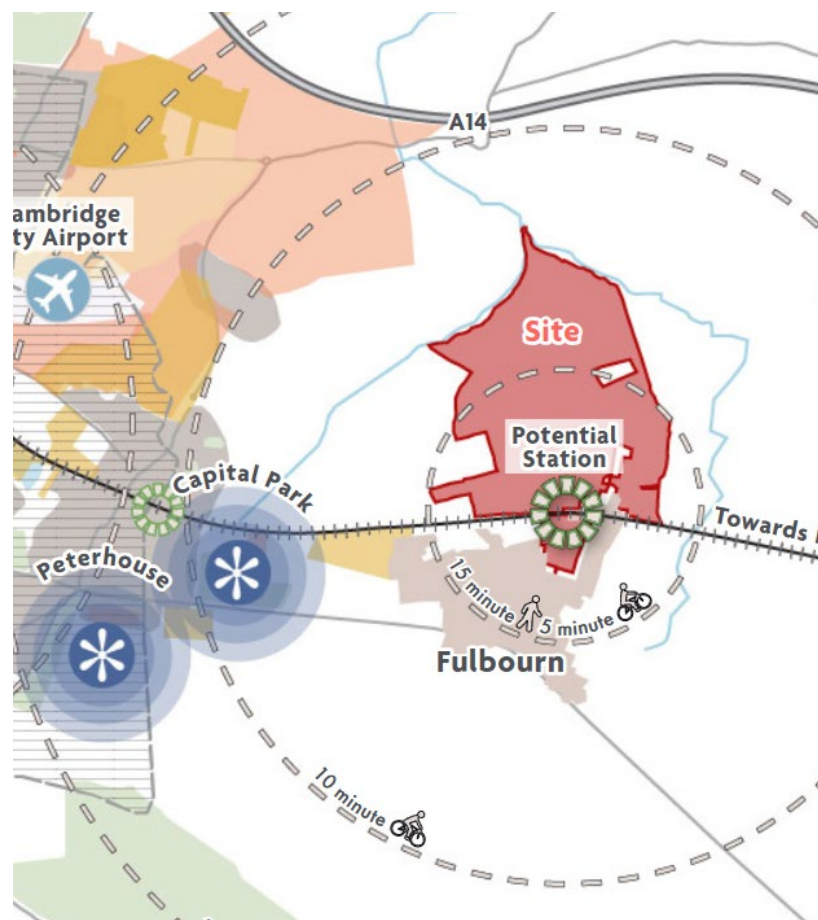


Figure 1: Site Location Plan © JTP

- 1.3 The Site is also being promoted through the Call for Sites and HELAA process that accompanies the Local Plan review.
- 1.4 The land has previously been submitted to the HELAA in both the 2021 assessment and the 2025 Update, where it was presented as two separate parcels:
- Land north of Wilbraham Road, Fulbourn, CB21 5GT, Site Reference 52761
  - Land west of Station Road, Fulbourn, CB21 5AB, Site Reference 40293
- 1.5 Taken together, the two parcels form a coherent and logical development opportunity, in single ownership, with complementary access, landscape and land-use characteristics. The promotion of the Site through both HELAA assessments demonstrates a consistent and long-standing intention to bring the land forward for sustainable development. These relationships, and the planning merits that arise from considering the parcels as a single unified Site, are explored further in Section 4 of these representations.
- 1.6 The purpose of this document is to assist GCSP in formulating a sound, justified and deliverable Local Plan that meets the area's housing, climate, and infrastructure needs to 2045 and beyond.

## **PfP**

- 1.7 PfP is the UK's leading social enterprise which operates through a group of over 20 specialist companies to deliver homes, services and opportunities that enable customers and communities to thrive. PfP delivers major strategic sites and sustainable communities nationwide and is committed to:
- High-quality design and long-term stewardship
  - Low-carbon development and climate-resilient construction
  - Biodiversity enhancement and nature-positive placemaking
  - Social value, community infrastructure and inclusive growth, including delivery and long-term management of public open space and potential enhanced leisure provision (e.g., new sports centre)
  - Through our strategic partnership with Homes England and access to grant 50% affordable housing alongside PRS and mixed-tenure options, underpinned by PfP's



- 1.8 These commitments align closely with the emerging Greater Cambridge Local Plan's emphasis on climate action, biodiversity, sustainable transport, and high-quality placemaking.

### **Land to the north and west of Wilbraham Road, Fulbourn**

- 1.9 These representations focus on issues particularly affecting this Site. It should be read in conjunction with the 'Land to the north and west of Wilbraham Road' Vision Document', prepared by JTP (January 2026).
- 1.10 The Site consists of two adjacent parcels North and west of Wilbraham Road, Fulbourn, on the village's east side.
- 1.11 As part of the early stages of preparing the emerging Greater Cambridge Local Plan, the Councils undertook a comprehensive Call for Sites exercise to identify land with potential to contribute to future housing and employment needs. The first Call for Sites was carried out in Spring 2019, followed by a further opportunity for submissions during the 'First Conversation' Issues and Options consultation in January 2020.
- 1.12 The submissions received informed the preparation of the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA), published in September 2021. With the First Proposals Preferred Options consultation also undertaken in 2021. The purpose of the HELAA was to establish a clear understanding of the future supply of land that is available, suitable, and achievable for development over the emerging plan period to 2045.
- 1.13 In response to the Call for Sites, Countryside Properties submitted Vision Documents with technical appendices in March 2019, promoting land north and west of Wilbraham Road for a residential-led development of up to 2,200 dwellings to the north of Wilbraham Road with a further 200 homes to the east of Wilbraham Road. Their concept included:
- A new village centre
  - An innovation quarter/business park
  - Enhanced sustainable public transport provision
  - A landscape buffer
  - New wildlife corridors to strengthen existing biodiversity networks



- 1.14 These submissions formed one of approximately 700 sites put forward during 2019 and considered by the Councils through the HELAA process.
- 1.15 Countryside Properties is no longer involved following a change in strategic priorities after its merger with Vistry Group. PfP has since entered into an option agreement with the landowner to promote the Site.
- 1.16 PfP has undertaken targeted updated technical work in response to the matters identified in the 2021 HELAA. The findings of this work, including landscape, transport, heritage and archaeological considerations, are set out in Section 3.

## Report Structure

- Section 2 – Planning Policy Context: Sets out the national and local policy framework relevant to these representations.
  - Section 3 – Land to the north and west of Wilbraham Road, Fulbourn: Provides an overview of the Site, summarises the updated technical work undertaken by PfP, and demonstrates the Site’s development potential within the plan period.
  - Section 4 – Preferred Options Consultation: Responds to the draft GCLP and identifies areas where the Plan requires modification to be sound.
  - Section 5 – Summary: Draws together the key points and conclusions of the representations.
- 1.17 PfP is committed to working closely with GCSP, statutory bodies and local stakeholders to refine the emerging vision for the Site. The concepts and capacities set out in these representations are intentionally flexible and will be developed further through continued engagement to ensure alignment with the Councils’ spatial strategy and infrastructure priorities.

## 2. PLANNING POLICY CONTEXT

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### National Planning Policy

- 2.1 These representations have been prepared regarding the National Planning Policy Framework (NPPF), December 2024 particularly Chapter 3 on plan-making and the tests of soundness
- 2.2 The NPPF requires that Local Plans are:
- Positively prepared
  - Justified
  - Effective
  - Consistent with national policy
- 2.3 The soundness tests provide the basis against which the emerging GCLP must be assessed.

### The Development Plan

- 2.4 The current development plan comprises:
- The South Cambridgeshire Local Plan (2018)
  - The Cambridge Local Plan (2018)
  - The Fulbourn Neighbourhood Plan (2023)
- 2.5 GCSP is now preparing a single joint Local Plan for Greater Cambridge, extending the plan period to 2045.
- 2.6 The emerging GCLP is informed by strategic themes that have been interpreted as follows:
- Responding to the Climate Emergency: Prioritising net-zero development, climate adaptation, water efficiency, and resilient design to help Greater Cambridge transition to net zero.



- Delivering Sustainable, Well-Located Growth: Focusing new development in places with strong access to jobs, services, public transport, and active travel networks.
- Supporting the Cambridge Innovation Economy: Ensuring sufficient homes and infrastructure to sustain the region's globally significant research and technology sectors.
- Enhancing Biodiversity and Nature Recovery: Increase and improve habitats for wildlife and green spaces for people, ensuring that development leaves the natural environment better than it was before.
- Great Places: Sustaining the unique character and identities of Cambridge and South Cambridgeshire and complement it with beautiful and distinctive development
- Creating Healthy, Inclusive and Well-Designed Neighbourhoods: Emphasising high-quality placemaking, walkability, access to open space, and community wellbeing.
- Providing a Balanced Mix of Homes: Meeting identified housing needs through a diverse range of tenures, types, and affordability levels.
- Protecting Landscape, Townscape and Heritage: Safeguarding the setting of Cambridge, village character, Conservation Areas, key views, and historic assets.
- Promoting Sustainable and Active Travel: Prioritising walking, cycling, public transport and integration with the Cambridge Greenways and wider mobility networks.
- Ensuring Infrastructure Keeps Pace with Growth: Coordinating development with transport, schools, healthcare, utilities, digital connectivity, and community facilities.
- Managing Water Resources and Drainage Sustainably: Addressing water scarcity, improving water quality, and embedding SuDS and blue-green infrastructure.
- Supporting Vibrant Villages and Local Centres: Strengthening local services, facilities, and employment opportunities across Greater Cambridge.

2.7 These themes reflect the overarching direction set out in the December draft GCLP's vision, strategic objectives, and policy framework. With reference to the Vision Document, the land at north and west of Wilbraham Road is well placed to contribute to these objectives, particularly in relation to sustainable growth, biodiversity enhancement, active travel, and the delivery of a balanced mix of homes.

### **Transitional Arrangements and the Status of the Emerging GCLP**

2.8 The current NPPF introduced a new plan-making system, supported by regulations due to come into force in early 2026. Transitional arrangements allow only "advanced" plans to continue under



the current system. To continue under the current system the draft GCLP will need to have been submitted to the Secretary of State for Examination by the 31 December 2026.

- 2.9 It is acknowledged that the current Local Development Framework targets a Regulation 19 consultation in the early Autumn and submission of the plan to the Secretary of State by December 2026. If the Greater Cambridge Shared Planning (GCSP) authorities of Cambridge City Council and South Cambridgeshire District Council fail to meet this deadline then they will almost certainly be required to transition the GCLP into the new 30-month plan-making system. This will necessitate restructuring the plan to meet the new format, evidence requirements and statutory timetable, with a new Local Development Scheme setting out the required milestones.

### **Emerging National Policy (Draft NPPF 2025)**

- 2.10 In December 2025 the Government published a consultation draft of a revised National Planning Policy Framework. While this draft NPPF carries no formal weight until adopted, several elements are material to the preparation of the emerging GCLP. The draft Framework confirms that plans submitted under the current system will be examined against the 2024 NPPF, but also makes clear that, upon adoption, any Local Plan policies inconsistent with the new national decision-making policies will be afforded very limited weight. This creates a strong imperative for emerging plans to anticipate the direction of national policy to avoid immediate obsolescence.
- 2.11 The draft NPPF also reiterates the requirement for effective cooperation and the need to consider unmet needs arising in neighbouring areas. Although the Duty to Cooperate will not be saved, the policy requirement to address cross-boundary housing needs remains. The GCLP will therefore need to demonstrate how unmet needs in adjoining authorities have been considered and addressed through Statements of Common Ground.
- 2.12 In addition, the draft NPPF highlights the importance of ensuring that housing supply does not constrain economic growth. Given the Government's recent £400m investment commitment to support Cambridge's innovation economy, the draft Framework reinforces the need for Local Plans to plan positively for higher growth scenarios where justified by economic evidence. This direction of travel is relevant to Greater Cambridge, where the Employment and Housing Needs Update identifies the potential for higher growth linked to investment in key sectors. Further detail on alignment with the governments vision for Greater Cambridge is set out within section 4.

### 3. LAND TO THE NORTH AND WEST OF WILBRAHAM ROAD, FULBOURN

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3.1 Land to the north and west of Wilbraham Road, Fulbourn Vision Document provides a concise overview of proposals for a sustainable, landscape-led new neighbourhood at Fulbourn, structured around four key sections:

- Who We Are: Places for People brings proven large-scale delivery, mixed-tenure housing expertise and long-term stewardship.
- Why Here: Fulbourn offers strong transport links, proximity to major employment centres and a landscape setting suited to sustainable, ecological growth.
- The Vision: A connected, landscape-led neighbourhood focused on green infrastructure, active travel and high-quality placemaking.
- Masterplan Framework: A fen-edge, landscape-driven structure with active travel routes, potential station safeguarding, green buffers, SuDS and new access to Newmarket Road/A14.

3.2 The Vision Document represents an initial iteration of the Site's potential. PFP intends to refine this work in partnership with GCSP, ensuring that the masterplan evolves in response to the Councils' evidence base, infrastructure planning and wider strategic objectives.

3.3 A scheme of this scale can deliver significant public benefits, including new public open space, ecological enhancements, improved connectivity, and contributions to local infrastructure. The Vision Document shows capacity for around over 2,500 homes within a coordinated, landscape-led master plan.

#### **Site Description and Context**

3.4 The Site comprises two adjacent parcels on the eastern side of Fulbourn: a northern parcel of approximately 234 hectares north of the railway line, and a southern parcel of approximately 12.5 hectares located close to Fulbourn village centre.

3.5 The northern parcel is predominantly good to moderate quality arable land (circa 90%), interspersed with hedgerows, drainage ditches, woodland pockets and a pond. Its northern boundary adjoins the



Wilbraham Fens SSSI, while the southern boundary is defined by the Cambridge-Ipswich railway line. The wider landscape is characterised by open farmland, watercourses and deciduous woodland, with long views across the low-lying fen-edge landscape.

- 3.6 The southern parcel comprises three good to moderate quality arable fields enclosed by existing residential development to the west, south and east, with the railway line forming its northern boundary. Its proximity to Fulbourn village centre provides strong access to local services and facilities.
- 3.7 Together, the two parcels form a coherent and logical development opportunity. They are well-related to the village, benefit from strong physical containment provided by the railway line and existing settlement edges, and sit within a landscape defined by agricultural uses, established field boundaries and accessible green infrastructure.
- 3.8 Key characteristics include:
- Approximately 246 hectares of predominantly agricultural land
  - Existing hedgerows, trees, and field boundaries
  - Proximity to Fulbourn village services
  - Access to Cambridge via bus, cycle routes, and rail
  - Relationship with the Fulbourn Conservation Area and local landscape character

### **Access and Connectivity**

- 3.9 The land North and west of Wilbraham Road currently benefits from a series of established access points and movement corridors that frame its relationship with Fulbourn and the wider Cambridge area. Vehicular access is presently taken from Wilbraham Road and Station Road, both of which connect directly into the village centre and provide onward access to Cambridge via Cambridge Road and Fulbourn Road. The railway line running eastwards from Cambridge forms a strong physical boundary to the south of the northern parcel and to the north of the southern parcel, with the Wilbraham Road level crossing acting as a key local connection point. Although this crossing is occasionally subject to temporary closures for maintenance and safety works, it remains an established part of the local movement network and provides an important link between Fulbourn and the Wilbrahams. Recognising the overarching aim of the Rail Industry to eliminate level crossings, discussions have been held with Network Rail regarding the implementation of a bridge crossing over the railway line to facilitate the eventual closure of the existing level crossing.



### Relationship to Public Transport and the Strategic Road Network

3.10 Fulbourn is already well served by public transport, with several bus routes—including the 18 service, which connects Fulbourn, Teversham, the Wilbrahams and Newmarket—running through the village and stopping along Station Road and the High Street. These services provide regular access to Cambridge, Newmarket and surrounding settlements, forming part of a wider sustainable transport network that also includes the emerging Fulbourn Greenway proposals. The Site sits within convenient cycling distance of Cambridge and major employment areas such as Capital Park and the Cambridge Biomedical Campus, and benefits from proximity to the A14 and A1303, which provide strategic road access to the wider region. The potential reopening of Fulbourn Station, now the subject of early positive discussions with Network Rail and Greater Anglia, would further strengthen the Site’s long-term connectivity by reinstating direct rail access to Cambridge and Newmarket, significantly enhancing sustainable travel choices for both existing and future residents.

3.11 In summary the Site benefits from:

- Direct access from Wilbraham Road
- Connections to local bus services and the ability to enhance the provision of limited stop services connecting to Cambridge City Centre and major employment and education locations
- Opportunities to enhance walking and cycling links to Fulbourn and Cambridge
- Proximity to employment clusters including the Cambridge Biomedical Campus and ARM HQ

3.12 PfP recognises that the detailed transport strategy for the Site will need to be shaped collaboratively with GCSP, the highway authority and Network Rail. PpP is committed to working with the Councils to refine access, movement and sustainable transport proposals to ensure they support wider modal shift and infrastructure objectives.

### Environmental and Planning Designations

3.13 The Land to the north and west of Wilbraham Road is influenced by a number of statutory and non-statutory environmental and planning designations that shape the context for future development. This includes the Cambridge Green Belt, which covers the entirety of both the northern and southern parcels.



- 3.14 The northern parcel directly adjoins the Wilbraham Fens Site of Special Scientific Interest (SSSI) along its northern boundary. This nationally important ecological designation reflects the fenland habitats and species present within the wider landscape. While the SSSI does not extend into the Site itself, its proximity is an important consideration for future assessment, particularly in relation to buffering, hydrology, and ecological connectivity. Several other SSSIs lie within the wider ecological network surrounding Fulbourn, including Fulbourn Fen SSSI, Little Wilbraham Fen SSSI, Great Wilbraham Common SSSI, and Fleam Dyke SSSI. These do not overlap the Site but contribute to the broader environmental context and underline the ecological sensitivity of the fen-edge landscape.
- 3.15 The southern parcel lies immediately adjacent to the Fulbourn Conservation Area, which encompasses the historic core of the village. Although no part of the Site lies within the Conservation Area boundary, the proximity of designated heritage assets—including several Grade II listed buildings within the village centre and along Station Road—forms part of the Site’s heritage context.
- 3.16 A Scheduled Monument (Iron Age ritual enclosure containing a Bronze Age barrow and Roman cemetery, List Entry 1465057) lies partly within the south-western edge of the southern parcel. The Scheduled area is fixed and defined on the national heritage register and forms part of the Site’s statutory heritage baseline.
- 3.17 Beyond statutory designations, the Site is also influenced by several non-statutory local designations. These include Important Countryside Frontages identified in the Fulbourn Neighbourhood Plan evidence base, which help to define the village’s rural setting, although none fall within the Site boundary. The northern parcel is bordered by a network of Public Rights of Way, including routes along Caudle Ditch and towards Teversham and the Wilbrahams, which provide opportunities for enhanced connectivity. The southern parcel is more enclosed and is not crossed by any PRow. No Local Wildlife Sites lie within the Site, although several are present within the wider fenland landscape.
- 3.18 There are no statutory archaeological designations affecting the northern parcel. The southern parcel contains part of a Scheduled Monument at its south-western edge, as noted above, the remainder of the Site does not lie within an Area of Archaeological Importance (AAI) or any other nationally designated archaeological protection zone.
- 3.19 The Site is not located within an area of fluvial (river) or tidal flood risk. According to the Environment Agency’s Flood Map for Planning, almost 80% of the combined land parcels lie within Flood Zone 1, which represents land at lowest probability of flooding (less than 1 in 1,000 annual probability). This



means that almost the entirety of the Site is considered appropriate for all forms of development under national policy, subject to standard sustainable drainage considerations.

3.20 There are no Main Rivers running through the Site, although several drainage ditches and minor watercourses—including Caudle Ditch and the Little Wilbraham River—lie along or beyond the Site boundaries. These features do not elevate the Site's fluvial flood risk classification.

3.21 Surface water flood risk is localised and manageable, primarily associated with low-lying field margins and existing ditch lines.

3.22 In summary the Site is subject to the following considerations:

- Cambridge Green Belt: covers the entire Site (north and south parcels).
- Wilbraham Fens SSSI: directly adjoins the northern boundary of the northern parcel.
- Fulbourn Fen SSSI: located west of the Site within the wider ecological network.
- Little Wilbraham Fen SSSI: located to the north-east of the Site.
- Great Wilbraham Common SSSI: located further east of the Site.
- Fleam Dyke SSSI: located within the wider fenland landscape to the east.
- Fulbourn Conservation Area: immediately adjacent to the southern parcel.
- Scheduled Monument: part of the designated area extends into the south-western edge of the southern parcel (List Entry 1465057).
- Listed Buildings (Grade II): present within Fulbourn village; none within the remainder of the Site boundary.
- Archaeology: no other statutory archaeological designations within the Site.
- Important Countryside Frontages: present in the wider village setting but not within the Site.
- Public Rights of Way: several routes adjacent to the northern parcel; none within the southern parcel.
- Local Wildlife Sites: none within the Site; several in the wider fenland ecological network.
- Landscape: no national landscape designations; the Site is not within a National Landscape, National Park or National Nature Reserve.
- Flood risk and drainage: most of the Site falls within Flood Zone 1 (lowest risk of flooding).



- 3.23 Taken together, these designations establish a clear environmental and heritage context for the Site. They do not preclude consideration of the Site through the plan-making process but form part of the baseline that will inform future assessment and master planning.
- 3.24 PfP acknowledges that the environmental and heritage context will play a central role in shaping the form and extent of development. PfP is committed to working with GCSP, Natural England, Historic England and local stakeholders to refine the masterplan so that it responds positively to these considerations.

### Site Opportunities and Influences

- 3.25 The site presents a series of clear opportunities and influences that shape a sustainable, landscape-led and well-connected masterplan:
- Rail and sustainable transport: Potential to safeguard a new Fulbourn Station and integrate with the Greenway, bus network and wider active-travel routes.
  - Strong active-travel potential: Ability to create new pedestrian and cycle corridors linking Fulbourn, Cambridge and the Fens.
  - Landscape-led development: Distinct fen-edge character supports a green-infrastructure-driven masterplan and sensitive village-edge transitions.
  - Ecological connectivity: Opportunity to link Wilbraham Fen and Fulbourn Fen, enhance watercourses and deliver meaningful biodiversity net gain.
  - Hydrology and SuDS: Existing rivers, ditches and drainage features provide a strong basis for blue-green infrastructure.
  - Deliverability and capacity: A large, available landholding capable of delivering over 2,500 homes, including 50% affordable housing, alongside community facilities and access to major employment centres.

### **HELAA Assessment 2021 and Updated Technical Work**

- 3.26 The Greater Cambridge HELAA (September 2021) referred to in Section 1 identified several critical constraints affecting the Site's suitability, including transport and site access, landscape and townscape sensitivity, and archaeology. The HELAA also drew upon the Greater Cambridge Green Belt Assessment (LUC, August 2021), which concluded that releasing the land from the Green Belt would result in high or very high levels of harm.



- 3.27 The Greater Cambridge HELAA (2021), and its 2025 Update, identified a number of positive attributes across both Fulbourn parcels. These include clear landowner willingness, strong market attractiveness, the absence of flood risk or contamination constraints, no ecological designations within the Site, and no utilities or infrastructure capacity barriers. Both parcels were also confirmed as physically unconstrained, with no third-party land or legal impediments to delivery. These findings demonstrate that the Site has a strong baseline for development and is capable of forming part of a strategic, master planned allocation.
- 3.28 The HELAA identified key accessibility advantages for the site. The southern parcel is conveniently located within walking distance of Fulbourn village centre, while both areas enjoy direct links to Cambridge via established roads, bus lines, and cycle routes. The site connects seamlessly with the Fulbourn Greenway and the broader active travel network, and its proximity to the Cambridge-Ipswich railway line presents long-term potential for improved rail access.
- 3.29 Accessibility was evaluated positively based on several factors:
- Close proximity to Cambridge.
  - Direct routes into Cambridge using Fulbourn Road, Cherry Hinton, and the A1307 corridor.
  - Excellent cycling connections to the Biomedical Campus and ARM (Arm Ltd).
  - Nearby services, with the southern parcel only 80 metres from Station Road and an easy walk to Fulbourn village centre.
  - Public transport options, including existing bus services along Fulbourn Road and Station Road, as well as direct integration with the Fulbourn Greenway.
  - Adjacency to the rail corridor, which could allow for station reopening in the future.
  - Internal accessibility features: Large, unified parcels without ransom strips, multiple viable entry points (Wilbraham Road and Station Road), and flat terrain that supports inclusive design and active travel.
- 3.30 Against this positive baseline, the HELAA identified a series of constraints relating to landscape, heritage, archaeology, and access. However, these constraints are design-mitigable and have been the focus of PFP's updated technical work, which demonstrates that they can be addressed through a coordinated, landscape-led master planning approach.
- 3.31 Recent changes to national policy mean that these earlier conclusions must now be reconsidered. The revised NPPF (December 2024) introduced the concept of Grey Belt—Green Belt land that does not strongly contribute to purposes (a) checking unrestricted sprawl, (b) preventing neighbouring

- towns merging, or (d) preserving the setting and special character of historic towns. This represents a material shift from the policy framework that informed the 2021 HELAA.
- 3.32 PfP has undertaken targeted updated technical work focused on the principal matters identified in the 2021 HELAA. This work has informed a revised, landscape-led master planning approach that directly addresses previous concerns and introduces new opportunities grounded in PfP's mission as a social enterprise, including long-term stewardship, community-focused delivery, and a commitment to maximising social value for Fulbourn and the wider area.
- 3.33 The Greater Cambridge HELAA (September 2021), referenced in Section 1, provides a valuable evidence base that helps shape a responsive and well-considered development strategy for the Site. It highlights matters such as transport and access, landscape and townscape sensitivity, and archaeology — all of which present opportunities for a design-led approach that enhances place-making and strengthens the Site's long-term contribution to the area. The accompanying Greater Cambridge Green Belt Assessment (LUC, August 2021) offers a clear baseline from which to explore how high-quality design, landscape enhancement, and biodiversity improvements can positively influence future policy considerations.
- 3.34 These combined attributes create a highly accessible and adaptable development platform.
- 3.35 Building on this positive baseline, the HELAA identified several considerations relating to landscape, heritage, archaeology, and access. PfP's updated technical work demonstrates that each of these matters is capable of being addressed through a coordinated, landscape-led masterplanning approach. This work shows that sensitive design, targeted mitigation, and proactive stewardship can successfully integrate the Site into its surroundings while enhancing local character and environmental quality.
- 3.36 PfP has undertaken targeted, updated technical work focused on the principal matters identified in the 2021 HELAA. This work underpins a revised, landscape-led masterplanning approach that not only addresses previous concerns but also introduces new opportunities aligned with PfP's mission as a social enterprise. These include long-term stewardship, community-focused delivery, and a commitment to maximising social value for Fulbourn and the wider area. Together, these elements position the Site as a deliverable, sustainable, and community-oriented opportunity within the emerging plan-making context.

## Grey Belt

- 3.37 The NPPF is clear for the purposes of plan making 'grey belt is defined as land in the greenbelt that does not strongly contribute to any of purposes (a), (b) and (d) as set out in paragraph 143.
- 3.38 In respect of purpose A, Fulbourn is a village and therefore is not a large built up area and therefore purpose A is not considered to be relevant to the site.
- 3.39 In respect of purpose B, Fulbourn is a village, not a town, and the Site does not perform a strategic role in preventing the merging of neighbouring towns. Development of the Site would not result in coalescence between Fulbourn and Cambridge or any other town, and therefore Green Belt purpose (b) is not considered to be relevant.
- 3.40 While Fulbourn is a historic village with a defined heritage core, it is not identified in policy as a historic town for the purposes of Green Belt designation. The Site lies outside the historic core of Cambridge and does not form part of its setting. Any localised sensitivity, particularly along the village edge, can be addressed through landscape-led design. As such, the Site Green Belt purpose (d) is not relevant.
- 3.41 Notwithstanding that Fulbourn is a village rather than a town and not a large built up area, the Site occupies a clearly defined location within the Green Belt, with strong physical boundaries that limit the potential for unrestricted development. To the south, it is bounded by the established edge of Fulbourn, forming a clear and defensible settlement boundary. To the north and east, mature tree belts aligned with the New Cut Drain and the Little Wilbraham River provide strong landscape containment, beyond which land is subject to flood risk and ecological constraints that would significantly restrict further development. The western boundary comprises of a tree belt separating the Site from adjacent agricultural land toward Teversham Road, but still provides a degree of visual and physical separation.
- 3.42 In summary, the site does not contribute strongly to Green Belt purposes a, b and d as they are not relevant to the site. Even in the event purposes a, b or c were considered to be relevant, the site benefits from strong visual containment and does not contribute strongly to any of the purposes. In addition, there are no protected areas or assets that would provide a strong reason for refusal of the development as set out within footnote 7 of the NPPF. Therefore, the site falls within the definition of Grey Belt.



## Landscape and Townscape

3.43 The earlier HELAA assessment identified landscape sensitivity as a key constraint. PfP's revised approach is explicitly landscape-led and includes:

- A robust green infrastructure framework that buffers key views and reinforces local landscape character.
- Concentration of built form in the least sensitive parts of the Site.
- A network of green corridors, multifunctional open space and habitat links.
- A settlement edge that is visually contained and appropriately scaled.

3.44 This ensures that landscape considerations shape the form, extent and character of development from the outset.

## Transport, Access and Rail Connectivity

3.45 The previous HELAA assessment raised concerns regarding access. In response, PfP has prepared updated transport work that:

- Identifies multiple points of vehicular access from Wilbraham Road.
- Establishes a connected internal movement network.
- Enhances pedestrian and cycle links to Fulbourn and Cambridge.
- Supports improved public transport connectivity.
- Aligns with the GCLP's emphasis on active travel and modal shift.
- With the closure of the level crossing improves safety and reduces delays by removing conflict between road users and trains

3.46 In addition, PfP is exploring the potential reopening of Fulbourn Station, which would significantly enhance sustainable transport options for the wider area. Preliminary discussions were held with Network Rail and Greater Anglia in December 2025, followed by further correspondence in January 2026. While these conversations are at an early stage, both organisations were generally positive about the prospect of further investigation. In its follow-up response, Network Rail has confirmed that:



*"Initial discussions with Network Rail and the East West Rail team indicate no issues of principle regarding the potential delivery of a station on the proposed allocation. However, this would be subject to funding, identification of appropriate consenting route and the exact details including rail and infrastructure requirements to support a new station in order to support the performance of the line. This will be developed pursuant to initial feasibility studies, which are to be undertaken with Network Rail and the East West Rail Team"*

3.47 This emerging position represents a material change in the Site's strategic transport potential compared with the position at the time of the HELAA.

### Built Heritage and Archaeology

3.48 The HELAA's identification of significant heritage and archaeological constraints is not justified when examined against the actual policy context or the spatial relationship between the Site and nearby designated assets. The Fulbourn Conservation Area lies adjacent to, rather than encompassing, the southern boundary of the southern part of the Site, and the Scheduled Monument (Iron Age ritual enclosure containing a Bronze Age barrow and Roman cemetery, List Entry 1465057) is confined to the south-western edge of the southern parcel rather than extending across its developable area. The HELAA's conclusions rely on precautionary assumptions about setting and archaeological sensitivity rather than a proportionate assessment of the Site's capacity for sensitive design, landscape mediation, and layout refinement.

3.49 Potential heritage and archaeological sensitivity is neither unique to this location nor unusual for strategic sites in Cambridgeshire. National and local policy explicitly recognise that:

- The setting of heritage assets can be conserved and enhanced through informed master planning.
- Development can be shaped to avoid harm through buffers, orientation, massing and landscape design.
- Archaeological interest can be accommodated and mitigated through proportionate investigation and design.
- Where appropriate, significant archaeological features can be preserved in situ without constraining development.
- Only demonstrable, unavoidable substantial harm would preclude allocation.



- 3.50 On this basis, neither the presence of a Scheduled Monument at the parcel's boundary nor the adjacency of the Conservation Area should be treated as reasons in principle to deem the Site unsuitable. These are well-understood planning considerations that are routinely addressed at allocation and application stages through design-led mitigation. There is no evidence that effects on setting or archaeological interest cannot be reasonably avoided, reduced or managed through established processes.
- 3.51 The HELAA's assessment appears to rely on precautionary desk-based assumptions rather than confirmed archaeological remains. As is standard practice across Greater Cambridge, the nature, extent and significance of any buried archaeology can only be reliably determined through targeted intrusive investigation, ordinarily undertaken at the planning application stage.
- 3.52 Accordingly, the potential for archaeological remains should not be treated as a prohibitive constraint to allocation. Both heritage and archaeological considerations are manageable, capable of proportionate mitigation, and do not represent barriers to the Site's deliverability.
- 3.53 PfP's revised approach to the Site is explicitly structured to respect, protect and enhance the significance of nearby heritage assets, including the Scheduled Monument and the Fulbourn Conservation Area. The emerging master planning framework has been developed to ensure that any development responds positively to its historic context, avoids harm through informed design, and delivers net benefits where opportunities exist. This approach provides a robust and proportionate basis for allocation, demonstrating that heritage and archaeological considerations can be successfully integrated into a high-quality, landscape-led scheme.
- 3.54 The framework includes:
- A calibrated buffer strategy maintaining an appropriate and respectful spatial relationship with the Scheduled Monument and Conservation Area.
  - A landscape-led edge treatment incorporating planting, open space and visual filtering.
  - Orientation and massing principles that position built form away from sensitive boundaries.
  - Opportunities for enhancement, including interpretation and improved legibility of the historic landscape.
  - Future engagement with the Historic Environment Team and Historic England.

## Vision and Master Plan Approach

3.55 The vision for the land north and west of Wilbraham Road is guided by a clear vision to create a sustainable, landscape-led and well-connected new neighbourhood that forms a natural extension to Fulbourn. The vision is rooted in the site's fen-edge character, its strategic location, and the opportunity to deliver a high-quality place that supports the wider objectives of the emerging Greater Cambridge Local Plan. Central to this is the creation of a cohesive community structured around green infrastructure, active travel, biodiversity enhancement and long-term stewardship.

### Vision Objectives

- Create a cohesive new neighbourhood that integrates seamlessly with Fulbourn while forming a distinct, high-quality place in its own right.
- Deliver a landscape-led development, shaped by the fen-edge character, existing watercourses and ecological assets.
- Strengthen ecological networks, linking Wilbraham Fen and Fulbourn Fen and creating a wider green corridor across the site.
- Promote sustainable movement, with active travel at the core and the safeguarding of land for a potential new Fulbourn Station.
- Support low-carbon living, through energy-efficient homes and buildings, tree-lined streets, SuDS and reduced car dependency.
- Provide a balanced, mixed-tenure community, including 50% affordable housing and opportunities for later living, PRS and supported accommodation.
- Embed long-term stewardship, ensuring high-quality management of homes, open spaces and community assets.
- Enhance social value, supporting local services, community facilities and inclusive neighbourhoods.
- Deliver a resilient and adaptable masterplan, capable of evolving with future needs while maintaining a strong sense of place.
- Maximise accessibility to employment, particularly Cambridge Biomedical Campus, ARM HQ and wider Cambridge clusters.

- 3.56 The objectives set out in the Vision Document as summarised above provide the strategic foundation for the proposals, underpinning the key themes and benefits summarised in the table below. Each theme - ranging from walkability, sustainable transport and housing delivery to climate action, biodiversity and community infrastructure - draws directly from these guiding principles that PfP has adopted to create and manage the new communities it delivers. Together, they ensure the development is responsive to local context, supports sustainable growth, and delivers meaningful social, environmental and economic outcomes for Fulbourn and the wider Cambridge area.
- 3.57 The vision demonstrates how the Site can deliver a cohesive, landscape-led and sustainably connected new neighbourhood.

### Summary of Key Benefits

3.58 The following table offers a concise overview of the key themes, benefits, and descriptions associated with the proposed development, highlighting aspects such as housing delivery, climate action, biodiversity, transport, community value, and deliverability

Theme	Benefit	Description
Housing Delivery	Sustainable new homes	Capacity for over 2,500 homes including affordable housing
Climate Action	Low-carbon development	Energy-efficient homes, and buildings, sustainable design, tree-lined streets, integrated SuDS
Biodiversity	Net gain	Habitat corridors, green infrastructure, ecological enhancements, connecting the fens
Transport	Active travel	New pedestrian and cycle links to Fulbourn and Cambridge
Strategic Transport / Rail	Sustainable rail access	Opportunity to safeguard and support the potential reopening of Fulbourn Station, and connectivity to the bus network enabling low-carbon commuting and regional connectivity
Strategic Transport Bus	Modal share benefits for the existing community and proposed occupants through the provision of limited stop bus services connecting to the centre of Cambridge and employment and education locations	Using established techniques, the delivery of bus service provision, which is incentivised at the outset to create a culture of non-car use

Theme	Benefit	Description
Community	Social value	50% affordable housing; long-term stewardship of homes, public open space and community assets; supporting social infrastructure, potential for enhanced leisure provision (e.g., new sports centre); Private Rental Sector and mixed-tenure options to support local services.
Economy	Employment access	Proximity to Cambridge Biomedical Campus and ARM HQ
Deliverability	Early delivery	The site is available now, unconstrained, and backed by PfP's capacity and funding, enabling early delivery within the plan period
Management	Long-term stewardship	Robust, integrated management of homes, public open space, community assets and social infrastructure, ensuring high-quality, well-maintained and enduring neighbourhoods over the long term.

## Policy Alignment

3.59 This table outlines the alignment of proposed site responses with the key objectives of the Greater Cambridge Local Plan. For each policy theme—such as Climate Action, Biodiversity, Transport, Housing, Placemaking, Infrastructure, and Spatial Strategy—the table details how the site's approach supports the relevant GCLP objective, describing specific measures taken (e.g., low-carbon homes, biodiversity enhancements, active travel links, and provision for community facilities). The final column summarises the anticipated outcome, confirming strong policy alignment, positive contributions to sustainable growth, and consistency with the overall strategic vision for Greater Cambridge.

Policy Theme	Relevant GCLP Objective	Site Response	Outcome
Climate Action	Reduce carbon emissions	Low-carbon homes, SuDS, tree-lined streets	Supports policy direction
Biodiversity	Enhance ecological networks	Net gain, habitat corridors, green infrastructure	Strong alignment
Transport	Promote active travel	New cycle/pedestrian links, public transport access	Supports modal shift

Policy Theme	Relevant GCLP Objective	Site Response	Outcome
Strategic Transport / Rail Connectivity	Support sustainable, low-carbon transport	Safeguards and enables potential Fulbourn Station, improving rail access and reducing car dependency	Significant strategic benefit
Housing	Meet identified needs	3,500–4,000 deliverable homes including affordable housing	Positive contribution
Placemaking	Create high-quality places	Landscape-led masterplan, strong Green Infrastructure framework that can support existing facilities in Fulbourn.	High compliance
Infrastructure	Support sustainable growth	Capacity for education, open space, community facilities	Deliverable and viable
Spatial Strategy	Direct growth to sustainable locations	Logical extension to Fulbourn, near employment	Consistent with strategy of long-term stewardship

3.60 In summary, the outlined principles establish a robust foundation for the sustainable and inclusive growth of Greater Cambridge. By prioritising high-quality placemaking, resilient infrastructure, and a coherent spatial strategy, the plan sets the stage for thriving communities that are well connected, environmentally conscious, and responsive to local needs.

## 4. THE GREATER CAMBRIDGE LOCAL PLAN CONSULTATION

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- 4.1 This section provides PfP's response to the Greater Cambridge Local Plan (GCLP) Preferred Options Regulation 18 consultation. It considers the emerging spatial strategy, the evidence base underpinning the draft Plan, and the implications of recent national policy changes for the direction and deliverability of the Plan.
- 4.2 The consultation represents an important stage in shaping the future development strategy for Greater Cambridge. However, the context in which the Plan is being prepared has changed significantly since the First Proposals were published. The introduction of the new plan-making system, the associated transitional arrangements, and the requirement for all but the most advanced plans to restart under the new framework have direct implications for the GCLP's progression, structure and evidence base. Alignment with the Cambridgeshire Local Growth Plan is also an important consideration.
- 4.3 PfP is keen to work proactively with GCSP as the Local Plan transitions into the new plan-making system. PfP welcomes the opportunity to refine the Site's role within the emerging spatial strategy, ensuring that the scale, mix and phasing of development are aligned with the Councils' updated evidence base and identified needs.
- 4.4 In this regard, whilst elements of the emerging Local Plan are supported, PfP's representations focus on the key areas where the draft Plan requires modification to ensure that it is positively prepared, justified, effective and consistent with national policy.

### **Vision and Strategic Objectives**

- 4.5 PfP supports the vision for Greater Cambridge to be a place where a big decrease in our climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities.
- 4.6 Achieving this vision is contingent upon the adoption of a sound Local Plan which sets ambitious targets for growth and is positively prepared, justified, effective, and consistent with national policy (in accordance with the tests set out in Paragraph 36 of the National Planning Policy Framework 2024

(NPPF). As acknowledged in the DLP, the plan is still very much a draft. It is important that level of growth and housing allocations reflect the Vision for Greater Cambridge as set out in the DLP.

4.7 PfP supports a vision focused on:

- A net-zero future through low-carbon, climate-responsive development.
- Nature-rich places delivering strong biodiversity gains.
- Compact, well-connected communities focused on sustainable travel.
- Healthy, high-quality neighbourhoods with excellent design and green space.
- A balanced housing mix meeting diverse local needs.
- A thriving innovation economy supported by homes and infrastructure.
- Resilient water systems addressing scarcity and integrating SuDS.
- Protected landscapes and heritage shaping high-quality growth.
- Infrastructure aligned with growth, including transport and community facilities.
- Vibrant villages and centres strengthened by improved services and access.

4.8 The Site aligns with these objectives and can deliver a development that reflects the distinctive character of Fulbourn while contributing to the wider needs of Greater Cambridge.

## **Growth Strategy**

4.9 The Site aligns with the emerging spatial strategy because:

- Fulbourn is a sustainable settlement with services, facilities and employment access
- The Site represents a logical, contained extension
- It can deliver over 2,500 homes within the plan period
- It supports the wider economic role of Greater Cambridge

4.10 The Site is deliverable, developable and suitable.

## Infrastructure Delivery

4.11 The Site can contribute to:

- Education provision
- Open space and recreation
- Sustainable drainage
- Community and social facilities
- Active and sustainable travel infrastructure
- Biodiversity and green infrastructure
- Other infrastructure that may be required or sought as part of the plan making process

4.12 PfP supports a coordinated approach to infrastructure delivery and the strategic objective of the plan which seeks to coordinate growth and infrastructure delivery.

## Key Areas Requiring Further Work

4.13 PfP considers that there remain several important areas where the draft Plan requires further refinement to ensure it can progress confidently to Regulation 19 and ultimately meet the tests of soundness set out in the NPPF. These comments are therefore offered in a constructive and collaborative spirit, with the intention of helping guide the Plan through this next vital stage.

- The need for an extended plan period to align with the governments vision for Cambridge and to align with the Cambridgeshire Local Growth Plan (2025)
- Insufficient allocation of deliverable sites to meet identified development needs, particularly housing, over the full plan period.
- A shortfall in supply flexibility, with too few sites capable of early delivery or responding to changing economic and demographic pressures.
- An over-reliance on complex or infrastructure-dependent locations, which may not deliver at the scale or pace required.
- A need for clearer evidence of deliverability, including realistic trajectories and robust assumptions on lead-in times.
- Further work required to demonstrate the Plan is “positively prepared”, ensuring it fully meets objectively assessed needs.



- Strengthening the case for “effectiveness”, including a more resilient spatial strategy and a broader portfolio of sites.
- Ensuring the Plan is “justified”, with a transparent comparison of reasonable alternatives and clearer rationale for site choices.
- Reinforcing “consistency with national policy”, particularly around housing delivery, sustainable transport, and climate-responsive growth.
- Ensuring that the sustainability credentials of well-located and sustainable settlements such as Fulbourn is recognised in the plan

## Regulation 18 Policies Response

### Plan Period

- 4.14 The Local Development Scheme currently envisages Adoption of the plan in 2028 and the plan period will cover a period until 2045.
- 4.15 Paragraph 22 of the NPPF states that strategic policies should look ahead to a minimum of 15 years period from adoption to anticipate and respond to long term requirements and opportunities, such as those arising from infrastructure. Where large scale developments such as new settlements or significant extensions to existing villages or towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account of the timescale for delivery.
- 4.16 The emerging Local Plan proposes a number of new settlements and significant urban extensions, which make up the vast majority of growth in the plan. Table 2 of the emerging Local Plan sets out a housing trajectory for the draft allocated sites. All the larger strategic draft allocations have a growth trajectory that is well in excess of the plan period.
- 4.17 In October 2025 the Greater Cambridgeshire and Peterborough Combined Authority Board approved the Local Growth Plan which has a core ambition to double the size of the area by 2050. The Local Growth Plan looks ahead to 2050, and the government has also set out a vision for growth in Cambridge between now and 2050.
- 4.18 As part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will be built on the Local Growth Plan and will include geographical and land-use designations.

The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028 when this Draft Plan is due to be adopted.

- 4.19 There will be a requirement for the new Local Plan to align with the mayor's spatial strategy, particularly given they are both due for adoption in 2028.
- 4.20 It is also relevant to note that, as a result of local government reorganisation, it is a distinct possibility that this will be the last Local Plan prepared to guide the growth and development of the Greater Cambridge area, it would seem sensible that the Council take this opportunity to deliver a development strategy which reflects and supports the approach being taken at the regional level and ensures that the District can maximise the benefits and opportunities available at the local level.
- 4.21 Therefore, to align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the plan, it is considered that the plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives. This amendment is required in order for the plan to accord with national policy and for it to be justified.

#### Policy S/JH: New Jobs and Homes

- 4.22 Policy S/JH New Jobs and Homes, sets out that development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for: 73,300 additional jobs and a minimum of 48,195 new homes.
- 4.23 The level of employment and housing growth proposed over the plan period is underpinned by the Employment and Housing Evidence Update 2025 (EHEU 2025), which forms an evidence based document published to support the Regulation 18 version of the Local Plan. The two key drivers for the proposed job and housing growth appears to be predicated mainly on how many jobs the government's mandatory minimum housing need calculation would support, and separately the most likely future forecast for jobs for Greater Cambridge and the homes that this would require.
- 4.24 The Development Strategy Topic Paper includes the below table which sets out the Standard Method, Central and High projected job increases and housing needs (Figure 3).

**Table 1: Projected housing need – range of job growth forecasts – Greater Cambridge (2024-45)**

	<b>Jobs change 2024-45 (Census 2011 commuting)</b>	<b>Dwellings per annum (Census 2011 commuting)</b>	<b>Dwellings change 2024-45 (Census 2011 commuting)</b>
Standard method	73,362	2,295	48,195
Central	73,248	2,292	48,132
High	90,936	2,829	59,409

*Source: Icenis analysis*

*Figure 3: Development Strategy Topic Paper Table 1*

- 4.25 For jobs, the EHEU 2025 identifies a “Central” most likely future jobs forecast. The Central forecast assumes growth of around 4,000 additional jobs per annum or more through to 2045. This is set out as a mixture of continuing the recent period of rapid growth seen in Greater Cambridge’s Knowledge Intensive sectors over the last 10 years, but also building in an assumption that there will be slower or contracting periods and unforeseen shocks. The EHEU 2025 also identifies a higher growth forecast, placing greater weight on what is described as ‘rapid growth in the recent past’, particularly in key sectors, and recommended providing flexibility in employment land in case the market delivers more jobs than anticipated.
- 4.26 For homes, the EHEU 2025 identifies that the outcome of the Government’s Standard Method for calculating minimum housing need, which increased significantly in 2024, would support the most likely forecast for future jobs.
- 4.27 It is argued that as the Standard Method figures broadly correlate with the Central (suggested most likely) job and housing projections and that adoption of these figures is appropriate. However, for

reasons explained within this representation, the level of growth proposed does not align with either the government's, or the Cambridgeshire and Peterborough Combined Authorities aspirations for growth within Greater Cambridge. It also does not provide sufficient flexibility to increase housing numbers, should employment growth continue at the pace it has for the last 10 years. In this regard, there is considered to be a very strong case that employment growth in Cambridge will continue at the pace it has for the last 10 years and that this should be the minimum level of growth planned for. Therefore, in accordance with the requirements of the NPPF, this is not considered to be appropriate strategy taking into account reasonable alternatives and other publicly available evidence. As it stands, for reasons explained below, Policy S/JH is not justified and the DLP could not be found sound.

4.28 Paragraph 36 a) of the NPPF is clear that to be positively prepared, the Local Plan should as a minimum, seek to meet the areas objectively assessed housing needs.' Therefore, the standard method housing requirement should be a minimum starting point for housing growth. Therefore, it is unclear why the Development Strategy Topic Paper identifies housing figures that are marginally below the standard method requirements for both housing and job growth as a 'central growth' figure. In reality, this is the absolute minimum level of growth that should be planned for and should be identified as the low growth scenario within the topic paper.

4.29 The Supporting test for Policy S/HJ states the following:

*'the continuing strength of the nationally important Greater Cambridge economy provides justification for exploring higher employment and related housing figures.'*

4.30 The EHEU dismisses the higher growth scenario, principally on the basis that it is considered that the standard method level of growth is considered to be the 'most likely' growth scenario. This is not considered to be a justified or sound basis for setting the growth targets, which should be plan and evidence base led.

4.31 Paragraph 39 ID: 61-039-20190315 of the National Planning Policy Guidance is clear that establishing the overall housing need should be conducted using the standard methodology unless specific circumstances justify an alternative. As evidenced by extensive research, over the recent years the level of job growth within the Greater Cambridge Area has been substantially higher than the Adopted Local Plan projections. In this regard, it is considered that within Greater Cambridge there is a compelling case that the level of growth should be higher than the minimum level of growth as proposed using the Central level of growth or standard method housing and job figures.

4.32 The arguments and evidence for ambitious growth targets for Cambridge have been set out in a multitude of high-profile studies, plans, and government statements, which are set out below.

*Cambridgeshire and Peterborough Independent Economic Review*

4.33 The Cambridgeshire and Peterborough Independent Economic Review September 2018 (CPIER) is referenced in detail within the evidence based documents to support the emerging Local Plan. The CPIER report sought to develop an authoritative evidence base on the economic performance and potential of Cambridgeshire and Peterborough and informed choices on policy priorities and strategic investment. Regarding employment and housing the report sets out:

*'we have reached the clear conclusion that recent employment growth rates have been rather stronger than indicated by official figures, and we believe that the area can continue to deliver rapid growth with the right support' ... 'growth in employment has not been matched by corresponding house-building, or developments in infrastructure'.*

4.34 Further to the above, it is explained that:

*'success here is of national significance... but it will only be attained if there is more ambition with regard to the development of new housing, and a careful prioritisation of infrastructure projects'.*

4.35 The CPIER report is clear that house building has for the last 30 years not kept pace with the level of job growth. This in turn has resulted in a substantial rise of house prices within Cambridge, with demand vastly outstripping supply, which in turn has created substantial affordability issues.

4.36 This data is strengthened by further data for example as set out in the Housing Key Facts, evidence based document published by Cambridge City Council (2025). This sets out that the current ratio of medium house price to medium income is 8.8 in Cambridge, which is above the national average of 7.7. For the lowest income quartile, this figure rises to 11.5, putting the city well above national affordability standards. This is further compounded by average rental prices, which are now on average £1,774 per month (based on ONS Housing Prices for Cambridge), which leaves little scope for professionals and workers renting to save money to get onto the housing ladder. Boosting housing supply in and around the City and within sustainable village such as Fulbourn is therefore critical to addressing this acute housing shortfall.

4.37 Clearly basing proposed housing growth on employment projections and the standard method alone is too narrow an approach and more ambitious aspirational targets should be set. Particularly given the long history in Greater Cambridge of underestimating the level of employment growth in the past.

### The Case for Cambridge

4.38 In March 2024 'The Case for Cambridge' was published by the government, which set out ambitious plans for growth in Cambridge noting:

*'population growth is causing problems: pressure on house prices; high levels of congestion... a truly ambitious plan for growing the city and population will bring benefits, as opposed to frustrations, to residents.'*

4.39 Two illustrative scenarios were put forward:

- *Building 100,000 new homes by 2050 has the potential to add approximately £4.3 billion to the economy (between £2.1 billion and £6.4 billion with a central estimate of £4.3 billion). This in turn has the potential to translate in today's terms into an annual increase of approximately £1.5 billion of additional receipts for the exchequer (income from taxes and other sources), which can be spent on public services.*
- *Building 150,000 new homes by 2050 has the potential to add approximately £6.4 billion to the economy (between £3.2 billion and £9.7 billion with a central estimate of £6.4 billion). This in turn has the potential to translate in today's terms into an annual increase of approximately £2 billion of additional receipts for the exchequer (income from taxes and other sources), which can be spent on public services.*

4.40 The current government subsequently reconfirmed its commitment to growth in Cambridge. In August 2024 Matthew Pennycook MP said the government was "ambitious for Cambridge" and that the city had been "constrained economically by the lack of housing". Again, the importance of setting bold aspirational targets for growth in Cambridge are highlighted at the highest levels of government. Whilst the current government has not provided a specific figure on housing growth, the government has set up the Cambridge Growth Company to accelerate growth in Greater Cambridge.



- 4.41 The emerging Local Plan covers a plan period to 2045. Table 2 of the plan sets out that the plan will deliver 51,328 dwellings between 2024 and 2045 or 55,328 if North East Cambridge is delivered. If the housing growth in the Local Plan is continued on a pro rata basis using the 2,295 dwellings per annum for another 5 years, this would still only deliver 62,803 homes by 2050, which is still almost 40,000 dwellings lower than the government's lower of the two Case for Cambridge growth scenarios. Whilst it is acknowledged that the aspiration to deliver 100,000 dwellings by 2050 is optimistic, there is considered to be a strong case to substantially increase the level of housing and employment growth above the standard method figures.
- 4.42 Paragraphs 1.19 to 1.21 of the DLP acknowledge that the government has set up Cambridge Growth Company to accelerate growth, but then conclude that this Local Plan is only based upon the Council's own evidence base for plan making. Given that Cambridge Growth Company do not currently have any planning powers, it is not clear how the higher growth aspirations of the government will be achieved unless the DLP is more ambitious.

#### Cambridgeshire Local Growth Plan

- 4.43 In October 2025 the Greater Cambridgeshire & Peterborough Combined Authority Board approved the Local Cambridgeshire Growth Plan. This growth plan was heavily informed by the CPIER Report and this plan includes three growth scenarios:

- *Baseline growth, or 'business as usual' would see the size of the economy grow to £42.5bn by 2050 - an annual growth rate of 1.2%.*
- *Doubling our Economy: our core scenario - would see the economy double in size by 2050 to £62.3bn GVA.*
- *Aspirational Growth: our growth ambition is to see the economy triple in size by 2050 to £97.1bn GVA, unlocking an economic powerhouse*

- 4.44 It is also noted that:

*'these growth scenarios have undergone rigorous modelling and can be deliverable by 2050 with the right levels of support and investment'.*

- 4.45 Page 155 of the Cambridgeshire Growth Plan is also clear that, to support a doubling of the economy by 2050, this would require a minimum of 214,760 dwellings to be delivered in the County during this timetable. Whilst the Local Growth Plan does not define a District by District breakdown of



housing figures, it is clear that Greater Cambridge, as the focus for growth within the County, should be responsible for a substantial proportion of this growth. On a pro-rata basis, if the 214,760 dwellings were delivered equally between the six local authority areas in Cambridgeshire and Peterborough, this would result in Greater Cambridge having a requirement to deliver a minimum of 71,586 dwellings between now and 2050. In reality, accounting for Cambridge being the International Life-Science and employment driver for the County, in accordance with the government's Case for Cambridge, the growth within the Cambridge City and South Cambridgeshire administrative areas would be expected to be substantially higher.

- 4.46 As set out above, as part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will build on the Local Growth Plan and will include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028.
- 4.47 Paragraph 25 of the NPPF is clear that strategic policy making authorities should collaborate to identify strategic matters, which they need to address in their plans. They should engage with elected Mayors and Combined Authorities. Paragraph 26 of the NPPF then goes on to state that effective and ongoing joint working between strategic plan-making authorities and relevant bodies is integral to the production of a positively prepared and joint strategy.
- 4.48 In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging Local Plan is aligned to the Cambridgeshire Local Growth Plan (2025) and the emerging Spatial Development Plan for Cambridgeshire. As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives of the Cambridgeshire Local Growth Plan.

#### Conclusion on Policy SJ/H – Homes and Jobs

- 4.49 Having regard to the clear growth aspirations set out both by the government and the Cambridgeshire Local Growth Plan, it is considered that the emerging Local Plan and Policy SJ/H needs to be revisited to provide a higher level of growth. A higher level of growth would align with both the governments and Mayors Vision for growth within the area and not providing this assessment is a current flaw of the plan and in turns results in the current plan not being justified and not being positively prepared.

- 4.50 As set out above, delivery of growth in Greater Cambridge is of national significance. In the past, employment growth rates have been stronger than official figures and have outstripped delivery of housebuilding and infrastructure. The government has confirmed its continued support for high levels of growth in Greater Cambridge. This ambitious level of growth is also supported by the Local Growth Plan and will likely be reflected in the Spatial Development Strategy.
- 4.51 Based on this evidence, it is considered that the levels of job and housing growth targeted are not justified and are not an appropriate strategy taking into account the reasonable alternatives. A far more ambitious level of job and housing growth should be planned for. As it stands, Policy S/JH is unsound and requires amendment.
- 4.52 As set out in these representations, sustainable sites which can make a meaningful contribution to growth, such as Land to the north and west of Wilbraham Road, Fulbourn, would support this ambitious level of growth and should be allocated in the DLP.

#### Policy S/DS: Development Strategy and Policy S/SH Settlement Hierarchy

- 4.53 Policy S/DS and Policy S/SH need to be considered in conjunction in that Policy S/SH sets out the proposed settlement hierarchy for the plan, which then informs the locations for growth as set out in Policy S/DS.
- 4.54 Draft Policy S/SH identifies Fulbourn is identified as a Minor Rural Centre, along with the settlements of Bar Hill, Bassingbourn, Comberton, Cottenham, Gamlingay, Girton, Linton, Melbourn, Milton, Papworth Everard, Swavesey, Waterbeach and Willingham.
- 4.55 Minor Rural Centres are described as follows:
- 'Minor rural service centres have a lower level of services and facilities and employment than rural centres, but a greater level than most other settlements in Greater Cambridge and often perform a role in terms of providing services and facilities for a small rural hinterland'*
- 4.56 Policy S/DS: Development strategy sets out the proposed strategy for the pattern, scale, and design quality of places created in Greater Cambridge, for the plan period to 2045 and beyond. This is one of the key strategic policies within the plan. The policy is set out in different parts. Part 1 of the policy states the following:

*Policy S/DS: Development Strategy, sets out that the need for jobs and homes will be met in the following order of preference, having regard to the purposes of the Cambridge Green Belt:*

- a) Within the Cambridge Area*
- b) On the outer edge of Cambridge*
- c) At an expanded Cambourne*
- d) At other new settlements*
- e) In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres*

Part 1 of Policy S/DS and Policy S/SH

- 4.57 No objection is raised to the five suggested locations for growth in the District as set out in Policy S/DS. However, it is not considered necessary to put them in an order of preference, given that different development in different locations will all contribute to meet the housing and development needs for the area. For example, growth in Cambourne and within Rural Centres and Minor Rural Centres will be particularly important to ensure choice and competition for market land and it will provide in many instances more affordable private housing for those unable to afford to live in Cambridge City or those that would prefer a village location. In this regard, it is considered important for sustainable and well connected villages such as Fulbourn to accommodate a suitable proportion of growth.
- 4.58 In terms of the size, the proposed minor rural service centres are logical, however this is considered to provide an over- simplistic approach and does not take into account the location of each settlement, which have contrasting sustainability and connectivity credentials. For example, Fulbourn benefits from being situated in very close proximity to Cambridge City and it is accessible both by cycle and a short bus journey to the city and to the major employment opportunities at Capital Park and Peterhouse Technology Park and Cambridge Bio- Medical Campus.
- 4.59 Land to the north and west of Wilbraham Road, Fulbourn also provides a unique opportunity to facilitate the re- opening of Fulbourn Train Station, which would have substantial benefits in terms of reducing car trips into Cambridge both for existing and new residents in the area and it will ensure a coordinated approach between housing and infrastructure delivery. It would also align with the

objectives of the Cambridgeshire Local Growth Plan (2025), which refers to the aspiration to increase capacity along the line to the east of Cambridge (between Cambridge and Newmarket). This could include provision for the introduction of the Snailwell Loop around Newmarket, which would increase the capacity and frequency of train provision.

- 4.60 The settlements of Gamlingay, Bassingbourn and Papworth Everard are situated in relatively remote locations with relatively poor transport connectivity and they are clearly not as a sustainable option for growth when compared to settlements such as Fulbourn.
- 4.61 It is therefore considered that the settlement hierarchy and development strategy needs to be reassessed and additional sub-category should be added to include 'Well Connected Minor Rural Centres'. Settlements such as Fulbourn, Milton, Melbourn and Waterbeach would be appropriate settlements for this category and they should clearly be preferable to the less sustainable minor rural centres, such as Gamlingay, Bassingbourn and Papworth Everard.
- 4.62 The following re- wording of Policy S/DS is suggested:

*Policy S/DS: Development Strategy, sets out that the vast majority of jobs and homes will be met in the following locations:*

- f) Within the Cambridge Area*
- g) On the outer edge of Cambridge*
- h) At an expanded Cambourne*
- i) At other new settlements*
- j) In Rural Centres and Well Connected Minor Rural Centres*

*More limited level of growth will be facilitated in other Minor Rural Centres and in the southern rural cluster*

- 4.63 Policy S/SH should be amended to identify Fulbourn, Milton, Melbourn and Waterbeach as well connected Minor Rural Centres. These amendments are required to ensure that the plan adequately responds to the sustainability credentials of well-connected minor rural services and would provide the most appropriate strategy when considered against the alternatives. This approach would be sound and in accordance with national policy.



Part 2 of Policy S/DS and Strategic Allocations

4.64 Part 2 of Policy S/DS sets out that the vast majority of growth will be met via the following new allocations:

- **North East Cambridge** – allocated for 8,350 dwellings and 350,000m<sup>2</sup> of employment space
- **Cambridge East (Marshalls Airport)** – allocated for 8,000 dwellings and 20,000m<sup>2</sup> employment space
- **Cambourne North** – allocated for 13,000 dwellings and 108,00m<sup>2</sup> employment space
- **Grange Farm Little Abington** – allocated for 6,000 dwellings and 35,000m<sup>2</sup> of employment space

4.65 This places a very high level reliance on the delivery of growth across only four sites, all of which are 6,000 dwellings or larger in size and all of which are predicated on significant infrastructure improvements. Whilst no objection is raised to delivering growth via larger strategic sites in principle, for reasons explained in this section of this report, the very limited number of sites allocated results in substantial concerns regarding the likelihood of housing delivery being delayed, which is likely to result in insufficient housing being delivered across the plan period.

4.66 Table 2 of the plan sets out a housing supply over the plan period of new sites allocated in the plan, along with Table 4, which provides a total supply over the plan period.

4.67 It is set out in the supporting text for table 2, in order to meet the minimum number of homes required by the standard method, it is proposed that once existing allocations and sites with permission are taken into account, a further 10,330 homes needs to be allocated.

4.68 Table 4 of the DLP sets out that the Council has identified sites to deliver a further 13,463 homes over the plan period. 9,050 of the new dwellings, (which represents the majority of the 13,463 dwellings) will be met via 3 new urban extensions/new settlements at Cambridge East (Marshalls Airport Allocated under Policy S/CE), Cambourne North (Allocated under Policy S/CBN), and Grange Farm, Little Abington (Allocated under policy S/GF). Due to uncertainty regarding its delivery, North East Cambridge has not been included in the baseline calculation. The plan provides for a 6.5% buffer in housing delivery against the standard method. Accounting for the high reliance on the delivery of growth via only 3 sites, all of which have complicated infrastructure constraints it is considered that a buffer nearer to 20% would be preferable and would assist with providing a robust plan.



4.69 Based on the housing trajectory set out in the plan, the housing land supply position does not exceed 5.5 years within the plan period and upon adoption it is estimated to be 5.15 years. This is not considered to align with the growth aspirations for Cambridge and, given the reliance on new settlements and urban extensions (of 6,000 dwellings and larger in size), there is a good prospect that the 5 year housing land supply will drop below 5 years. Figure 11 of the DLP shows the housing trajectory and it is clear that as a result of the vast majority of new growth being planned for within new settlements/urban extensions of more than 6,000 dwellings in size, if even one of these sites is delayed it will result in the Shared Planning Service being unable to maintain a 5 year housing land supply. This does not align with the NPPF's objectives to significantly boost housing land supply. This should be addressed by the allocation of deliverable sites, such as land to the north and west of Wilbraham Road, Fulbourn, which is of a strategic scale and can provide a very substantial contribution to housing supply and it will also provide choice and competition for market land, in a location not currently allocated for growth.

4.70 Further detail on the potential infrastructure and delivery constraints associated with the major new allocations are set out as follows:

#### North-East Cambridge

4.71 Policy S/NEC: North East Cambridge identifies north-east Cambridge will deliver, inter alia, approximately 8,350 new homes (including around 5,500 homes on the existing Cambridge Waste Water Treatment Plant site (CWWTP)), up to 320,000 square metres of additional business floorspace and 27,300 square metres of industrial floorspace.

4.72 In August 2025, the Government announced that it will not be funding the relocation of the CWWTP through the Housing Infrastructure Fund, which means there is significant uncertainty as to whether the majority of the residential component of the North-East Cambridge will take place in the time period previously envisaged (including the assumed delivery of a significant amount of housing within the plan period). Delivery of the development is subject to alternative funding being found to enable the relocation of the CWWTP.

4.73 As acknowledged within the supporting text for S/NEC as a result of the funding situation, there is now uncertainty in relation the effective delivery of a significant proportion of north-east Cambridge, including the assumed delivery of housing within the plan period. This has resulted in the housing proposed within S/NEC not being included within the housing trajectory. In accordance with paragraph 36 of the NPPF, in order to be effective, sites need to be deliverable over the plan period.



Accounting for the substantial uncertainty regarding the deliverability of north-east Cambridge, it cannot currently be considered a deliverable site and it will not deliver housing and job growth in the short term. It is therefore considered that the allocation should either be removed or if it is retained additional allocations on deliverable sites should be added to the plan to ensure that the plan is effective and that the plan provides a suitable buffer for growth. Land to the north and west of Wilbraham Road, Fulbourn, would provide a sound and effective alternative allocation and is for a strategic scale to assist with meeting this shortfall.

### Cambridge East

- 4.74 Policy S/CE: Cambridge East is a mixed-use development including 8,000 dwellings at Marshalls Airport. The land at Marshalls Airport was released from the Green Belt and safeguarded for development within the Cambridge Area Action Plan, which was adopted back in 2008, as a major new urban extension at Cambridge East. Since the publication of the Area Action Plan, schemes at Marleigh and Land north of Cherry Hinton have obtained consent and are currently being built out. However, some 17 years after the land was removed from the Green Belt, the development of the airport is still predicated on the relocation of Marshalls Airport to a new location.
- 4.75 Marshall announced in October 2025 that the business will not be moving to Cranfield but that the company is still committed to moving its aerospace business from its Cambridge Airport base by 2030 (with development anticipated to start in 2032). Notwithstanding this aspiration, there is still no certainty that the airport will move within these predicted timescales, particularly given that an alternative site to relocate to has not yet been secured. As a result, development at Cambridge East could be significantly delayed which could result in limited or no housing delivery for a number of years, particularly within the first 15 years of the plan period. In accordance with paragraph 78 of the NPPF, it is considered critical that additional allocations are included in the plan to boost supply within the first 15 years of the plan. This will assist in the Shared Planning Service maintaining a 5 year housing land supply.

### Grange Farm, Little Abington

- 4.76 The delivery of 6,000 dwellings at Grange Farm is predicated to an extent on the delivery of the Cambridge South-East Rapid Busway. This busway has not yet been subject to a Transport for Works Order and it is also not yet fully funded. Without the delivery of the busway the sustainability



credentials of Grange Farm will be substantially reduced and it is questionable whether this is the most appropriate location for growth when considered against the alternatives.

### Cambourne North

- 4.77 Policy S/CBN: Cambourne North sets out the proposed approach to the further expansion of Cambourne, taking account of the significant planned improvements to public transport in this area. The new settlement would include approximately 13,000 homes, 108,000 square metres of employment floorspace, with a range of supporting services and facilities.
- 4.78 The delivery of Cambourne North is predicated on the delivery of a new train line and a new train station as part of East-West Rail. The second and third stages of East West Rail, from Oxford through to Bedford and Bedford to Cambridge are still in planning & feasibility stages, and are dependent on final government funding and approval. Stage 1 of East-West Rail is currently under construction and services are due to commence between Oxford and Milton Keynes in 2026. Stage 2 will then extend services to Bedford as part of upgrades to the Marston Vale line by 2030. Accounting for the delays to stage 1 of East-West Rail, completion of the upgrades in stage 2 to Bedford by 2030 is considered to be optimistic and it is likely to be delayed. Stage 3, which is between Bedford and Cambridge, has no set timetable for construction works to commence or to be completed and it will be subject to a Development Consent Order. The Bedford to Cambridge stretch of East West Rail requires provision for a new rail line and is likely to be the most costly and complicated stretch of East West Rail to deliver. It is considered very unlikely that this stretch of East-West Rail will be delivered until the late 2030s at the earliest and therefore it is very unlikely that land to the north of Cambourne will be deliverable in the next 15 years at least.
- 4.79 As set out in the Cambourne Growth-Transport Vision and Principles Evidence Base Document, the residential growth in Cambourne North is situated to the north side of the railway. It is also proposed to build 3 road bridges and 2 active travel bridges across the new railway and A428 to connect to Cambourne. This major infrastructure will be complicated to deliver and it is not feasible for Cambourne North to be delivered until such time as the new rail line and station have been completed. The Cambourne Spatial Framework Strategy, prepared as an evidence based document to support the Local Plan, suggests that the First New Neighbourhood will be delivered between 2035–2040, with East-West Rail Station also opening in the same period. Accounting for the substantial uncertainty and major infrastructure required, it is plausible that delivery of the site could slip into the 2040s and the number of dwellings to be delivered as part of this plan period will be

very limited. In this regard, the proposed 2,550 dwellings to be delivered in Cambourne North within this plan period is considered to be optimistic.

- 4.80 The lack of certainty regarding the delivery of Cambourne North, further strengthens arguments as set out above that additional strategic sites such as land to the north and west of Wilbraham Road, Fulbourn should be allocated to boost housing supply and safeguard against the delay to delivery of the proposed allocated sites.
- 4.81 Overall, it is clear that allocation of land to the north and west of Wilbraham Road, Fulbourn will provide a number of benefits in terms of boosting housing supply, providing additional choice and competition of allocated sites to safeguard against slow delivery and to ensure that development is directed to the most sustainable locations. Its allocation is required in order for the plan to be positively prepared, justified, and effective having regard to the tests of soundness as set out within the NPPF.

## **APPENDIX A – PLACES FOR PEOPLE – LAND AND PLANNING BROCHURE**

# Creating Thriving Communities





East Wick and Sweetwater, Queen Elizabeth Olympic Park, London

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## → We are Places for People

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We change lives by creating, managing, and supporting thriving Communities.

As the UK's leading Social Enterprises, we operate through a Group of over 20 specialist companies to deliver homes, services, and opportunities that enable Customers and Communities to flourish.

We own or manage more than 245,000 properties, support over half a million Customers, and operate over 100 leisure centres that promote health and wellbeing.

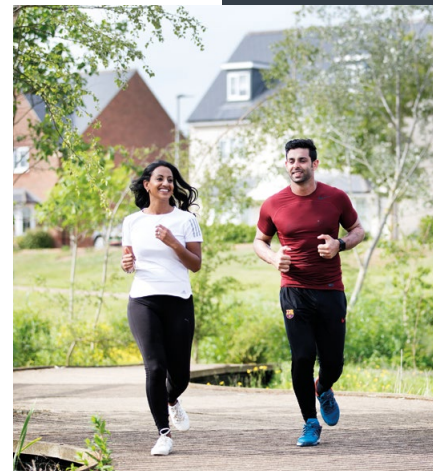
Our strength lies in our scale, our People and our purpose. With over 13,000 Colleagues and a deep commitment to social impact, we are uniquely placed to act as a catalyst for positive change.

1 2 3

*1 Attractive green spaces at Brooklands, Milton Keynes.*

*2 Chapelton, Aberdeenshire, Community charity Bike Ride.*

*3 Popular on-site Hillhead Cafe at Tornagrain, Inverness.*



## → We are Community

This is what we stand for and this is how we roll. When you're in our Community, this is what you sign up to.



**Do The Right Thing.  
Always.**



**Fired Up,  
Ready To Grow.**



**One  
Community.**



**Be Respectful,  
Earn Respect.**



**Enjoy  
Work.**



## → Introducing our developments

---

Our end-to-end development business unlocks land, shapes Communities, and delivers sustainable housing at scale.

We work across both the public and private sectors, delivering strategic land promotion, large-scale regeneration, consented developments, joint ventures, and bespoke schemes. Our unique model ensures every project is designed for long-term value, with Community at its core.

We build a wide range of homes — in varying sizes and tenures — to meet the needs of diverse local populations. These homes are set within high-quality, well-designed Communities, supported by the social and physical infrastructure needed to foster healthy, inclusive, and thriving places.

We're not just building homes — we're creating places where People can live, work, and flourish.

With legacy partnerships and flexible delivery models, we bring the experience, agility, and capability that make us the partner of choice.



Port Loop, Birmingham



Strategic land promotion

Subject-to-planning acquisitions

Package deals

Key delivery routes include:

Consented land acquisitions

Joint ventures and bespoke deals

Regeneration

## → Our regional reach

---

Our reach spans the UK — from city centres to rural villages, new towns to regeneration projects. We work in close partnership with landowners, local authorities and developers to unlock opportunities that others can't.

Our approach is scalable and responsive. Operating across five regions, and supported by a national strategic land division, our teams bring national capability and local insight, allowing us to deliver developments that are innovative, inclusive and commercially sound.

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1

*Transforming an architectural icon into a thriving, modern Community — Park Hill, Sheffield.*



2

*Poundbury, a pioneering urban extension of Dorchester.*



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# Sustainability isn't a bolt-on – it's built in.



*Beaufort Park, Colindale, London*



### Building a greener future

- We're on the path to net zero by 2050.
- 90%+ of our homes achieve EPC B or better.
- 20%+ use Modern Methods of Construction (MMC).
- Whole-life carbon assessments to be carried out on all new homes by 2026.
- All new homes to run on renewable energy tariffs by 2027.



### Efficiency in every detail

- Homes designed for water use of just 105L per person / day.
- 95% of site waste diverted from landfill by 2030.
- Sustainable choices made standard.



### Nature at the heart

- Delivering Biodiversity Net Gain in our new Communities.
- Creating spaces that support both People and wildlife.



### Social value, built in

- Homes designed for life, inclusion and wellbeing.
- Places designed to support thriving Communities.
- Supporting social mobility creating training, jobs, and apprenticeships on site and through our supply chain.
- Collaboration with local charities, businesses and residents to deliver lasting impact.



### Our sustainable, mixed tenure model

- A balance of tenures including affordable rent, private rent, market and shared ownership.
- 100% of profits reinvested back into social value.
- It's a model that builds more than homes — it builds futures.

→ We don't just develop places — we shape thriving Communities.

→ Our successes in 2024/25



2,000+

new family homes delivered

1,764

affordable homes ha



4

ended over

94.5%

Customer recommend score

## → **Creating thriving Communities** – from concept to Community

---

Across the UK, Places for People is delivering outstanding, place-led developments that reflect local context, sustainability ambitions and long-term value.

Here are just a few examples of how we're building thriving Communities through meaningful partnerships and innovation.





Port Loop, Birmingham

Creating Thriving Communities

## Gilston, Hertfordshire

*Greater London*

Located in the Harlow and Gilston Garden Town, this development is a bold, long-term vision for sustainable growth. With outline permission for up to 8,500 homes, this Garden Village is designed around six walkable neighbourhoods. It will deliver new schools, health services, and over 600 hectares of green space and parkland — creating a truly connected and future-ready Community.

*This is about more than just homes — it's about lasting infrastructure, nature, and identity.*



## Tornagrain, Inverness

*Scotland*

Developed in partnership with the Earl of Moray, Tornagrain is Scotland's newest town. Set in the Highlands, the masterplan includes 5,000 homes with retail, schools, green space, and jobs within walking distance. The town is inspired by traditional urban design and builds on a vision of sustainable, Community-first living.

*This is a model for placemaking in rural growth — attractive, inclusive and resilient.*



## Brooklands, Milton Keynes

*South East*

Brooklands is a highly successful, mixed-tenure Community that exemplifies our partnership approach. The development includes homes of all sizes and tenures, surrounded by green boulevards, parks, schools, and sustainable travel options. Residents enjoy an inclusive and well-managed neighbourhood.

*Designed with People in mind, Brooklands is proof that thoughtful infrastructure and design leads to better everyday living.*

## Park Hill, Sheffield

*Central and North*

An iconic example of Brutalist architecture, Park Hill is being reimagined through a multi-phase regeneration led by Places for People and Urban Splash. Phase 4 will deliver 125 new homes, 20% affordable, and new commercial space, all designed by Stirling Prize-winning architects Mikhail Riches. The scheme blends heritage with sustainable living, including EV charging, bike storage and green public spaces.

*Transforming an icon into a thriving, modern Community.*





## **Watchhouse, Doncaster**

### *Central and North*

A growing collection of 91 affordable homes including Shared Ownership opportunities, Watchhouse is helping more People in South Yorkshire access quality, secure housing. Offering a balanced tenure mix designed to meet local demand, supporting both first-time buyers and families seeking long-term stability. This Community-focused development is tailored to local need, creating new options and improving supply.

*Local demand meets long-term housing stability.*



## **Redheughs, Edinburgh**

### *Scotland*

Located in West Edinburgh, Redheughs is set to deliver over 1,300 homes through a placemaking vision that balances accessibility, affordability, and sustainable design. This mixed-tenure development brings new homes, green infrastructure, and Community space into a growing area, with strong transport links and integrated services supporting a connected urban lifestyle.

*This is about transforming opportunity into a lasting, sustainable Community.*

## Camden Film Quarter, London

*Greater London*

In partnership with Yoo Capital, this bold regeneration aims to be an innovative and sustainable mixed-use campus. Combining homes, cultural space, creative studios and retail and infrastructure to support the Community, the project will bring a first of its kind creative neighbourhood to life and deliver 50% affordable homes, creativity, and inclusive growth in one of London's most iconic districts.

*A new chapter for Camden: Creative. Connected. Inclusive.*



## East Wick and Sweetwater, Queen Elizabeth Olympic Park

*Greater London*

Part of the Olympic legacy, East Wick and Sweetwater is delivering over 1,800 mixed tenure new homes in East London. The development blends modern architecture with green spaces and canal-side living, creating a walkable, family-friendly neighbourhood with shops, schools, and creative workspaces at its heart.

*Creating a resilient and vibrant new chapter for East London.*



## Port Loop, Birmingham

*Central and North*

Set on an island in Birmingham's canal network, Port Loop is rethinking urban living. This award-winning regeneration mixes contemporary homes with communal gardens, bike lanes, and a waterside park. It's a case study in People-first placemaking — social, sustainable and brilliantly connected.

*City living made greener, healthier, and more connected.*



## Poundbury, Dorset

*South West*

A pioneering urban extension of Dorchester, Poundbury showcases principles of walkability, mixed-use living and timeless design. With over 2,500 homes, local shops, schools, and green spaces, it's a living example of how visionary masterplanning can create truly self-sufficient Communities.

*Timeless placemaking grounded in People and purpose.*



## Lower Herne, Kent

*Greater London*

In partnership with Countryside (part of Vistry Group), we are delivering the full vision for Lower Herne Village — a bold, place-led regeneration project that will bring 800 high-quality, mixed-tenure homes to Kent. Set within a well-connected, semi-rural landscape near Herne Bay, the development includes vital infrastructure such as a new relief road, generous green spaces, and access to local amenities and transport links.

Designed with affordability, sustainability and Community at its core, this new village supports first-time buyers, growing families, and long-term regeneration.

*Delivering rural regeneration through homes, infrastructure, and a strong sense of place.*



## **Creswick, Ascot's Green**

### *South East*

Ascot's Green is a thoughtfully planned urban extension to the south of Welwyn Garden City, located on land owned by the historic Hatfield Park Estate.

Delivered in partnership with the Estate, this development will provide 340 much-needed new homes, blending traditionally inspired architecture with modern design standards to suit today's lifestyles.

Set within green open spaces and directly connected to the surrounding countryside, Ascot's Green champions biodiversity, sustainability and Community wellbeing — creating a nature-rich, family-friendly neighbourhood rooted in the heritage of the garden city movement.

*Honouring heritage. Growing a modern garden city.*

## Engine Yard, Edinburgh

### Scotland

Located on a historic tram depot site, Engine Yard combines industrial heritage with modern city living. This vibrant, urban Community includes homes, commercial space and public realm upgrades — creating a bold and characterful place with strong local identity and lasting value.

*Character, creativity, and industrial heritage in every brick.*



## Shottendane Road, Margate

### South East

With 450 new homes planned, Shottendane Road brings much-needed housing to the Kent coast. The mix of apartments and family homes will support a thriving, inclusive local Community — designed with sustainability, green space and modern lifestyles in mind.

*This is about housing that builds stability and opportunity.*



## → Chloe and Louis’s journey to homeownership

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Chloe and Louis Rice, a young couple from Milton Keynes, embarked on their homeownership journey with Places for People’s Shared Ownership scheme at Laconia Place. Expecting their first child, they sought a spacious, modern home close to family. Their new two-bedroom house, complete with a garden and ample storage, provided the perfect setting for their growing family.

The ability to personalise their kitchen, bathroom, and flooring made the experience even more special. Chloe noted the process was straightforward, allowing them to secure their ideal home without compromise. With Chloe’s brother also residing nearby, Laconia Place has become a true family affair.

***“It already felt like home before we received the keys!”***

→ Winner of the Gold Award for Customer Satisfaction – three years in a row.

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→ [Click here to read the full story.](#)

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## → A first home and first step to independence

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At just 19, Cian was ready to take the next step in life — not through renting or staying with family, but by buying his own home. With support from Places for People, he made that goal a reality through the Shared Equity scheme at Chapelton.

After a chance conversation led him to Chapelton, Cian connected with Sales Executive Karen, who helped guide him through the process. With personalised support and access to an independent financial advisor, he quickly realised he could afford his dream home. Now settled into his new Community, Cian feels proud, independent and secure.

***“I absolutely love it — the neighbours, the Community, and everything’s on my doorstep. The houses are stunning and I knew instantly this was the place for me.”***





→ [Click here to read the full story.](#)

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Let's create thriving Communities together.

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