



Quod

Draft Greater Cambridge Local Plan – Regulation 18 Consultation

Representations on
behalf of LIH and
Pigeon

28 JANUARY 2026

Q230805

Contents

Executive summary	1
1 Introduction	2
2 Review of previous submissions	5
3 Review of dGCLP site assessment	8
4 Exceptional circumstances and grey belt assessment	15
5 Vision and policies	20
6 Conclusion	28
Figure 1 - Cambridge South Indicative Masterplan	3
Table 1 - HELAA (2025 Update) Site Assessment	8
Table 2 - Quod Site Suitability Assessment	11

Executive summary

As currently drafted, the plan does not achieve the government’s clearly set ambitions for Greater Cambridge, in which the Greater Cambridge area is foremost in plans for national economic growth. It also misses the specific national policy to support the expansion of the Cambridge Biomedical Campus with associated housing delivery. The Local Plan as currently drafted does not align with the ambitions set out in the Local Growth Plan which aims for a 15% increase in housing by 2035, increasing to a 54% increase by 2050. Government guidance on Local Growth Plans (July 2025) states that they should be the “guiding star” that provides direction for other relevant plans and strategies which should “align” with the Local Growth Plan.

The overarching spatial strategy is flawed as it renounces the sustainable and economic benefits of growth at and adjacent to Cambridge based on an out of date understanding of Green Belt policy – and without undertaking a Green Belt appraisal.

Cambridge South represents a unique opportunity to deliver housing to meet a broad range of needs but specifically those of the Biomedical Campus in line with national policy. It is eminently deliverable; unencumbered by existing uses or landownership complications. Its clearly defined physical boundaries mean it is a clear grey belt site, which can be planned as a sustainable extension of the city. Sites on the edge of Cambridge have a track record of delivering high quality development. Cambridge South would be the next success story and there are demonstrable exceptional circumstances to justify its release from the Green Belt.

1 Introduction

These representations have been prepared by Quod on behalf of Land Improvement Holdings ('LIH') and Pigeon Land ('Pigeon') in response to the Regulation 18 consultation on the Draft Greater Cambridge Local Plan 2024-2045 ('the dGCLP').

- 1.1 LIH and Pigeon are jointly promoting land known as Cambridge South that is bound to the north by Addenbrooke's Road, to the west by the M11, to the east Cambridge Road, and to the south by the river Cam and the Cambridge railway line ('the Site'). A redline boundary plan of the Site is provided at **Annex 1**.
- 1.2 By comparison with other sites on the edge of Cambridge which may be promoted for development, the Site has many qualities but, most notably:
 - the Site is clearly defined by strong physical boundaries, such that its development would not represent unplanned sprawl – rather, the Site's containment means that it can be planned as an integral part of the City and is a clear grey belt opportunity;
 - the Site is highly accessible generally, but specifically it lies within the immediate vicinity of Cambridge Biomedical Campus and of Cambridge South station. There is a pressing need for residential development to serve the existing and expanding Campus and the Site is the outstanding opportunity to meet that need in a location which can access the Campus by active travel and sustainable means.
- 1.3 LIH and Pigeon's proposals for Cambridge South are to deliver a new, mixed-use, residential-led quarter of Cambridge capable of accommodating circa 4,500 new homes across a range of tenures and typologies. The Site would provide supporting non-residential and commercial uses to ensure a sustainable and lively settlement close to existing jobs and infrastructure. The Cambridge South housing proposals are designed to provide the volume and type of homes that are ideally suited to meeting the housing needs of the Cambridge Biomedical Campus ('CBC') in a location that would allow people to travel between their home and their job without the need for a car. An indicative masterplan of the Site showing the development proposals is provided at **Figure 1**.

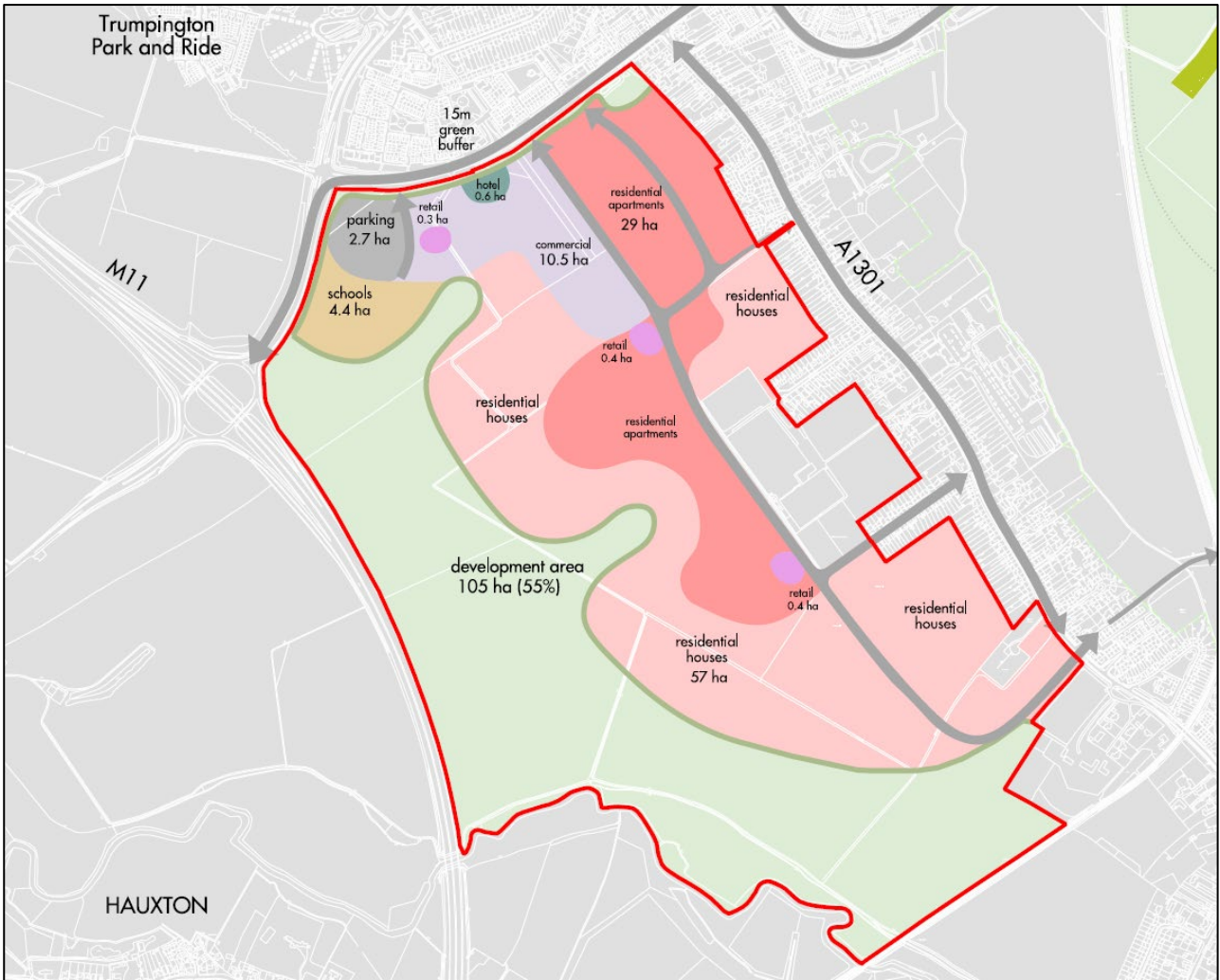


Figure 1 - Cambridge South Indicative Masterplan

1.4 We are conscious that the dGCLP will be examined against the December 2024 version of the National Planning Policy Framework ('NPPF' or 'the Framework'). Paragraph 16 of the NPPF sets out the expectations for local plans, which are as follows:

“Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

Paragraph 36 makes clear that for the dGCLP to be considered sound it needs to be **positively prepared, justified, effective and consistent with national policy**:

- 1.5 The representations set out in this letter are intended to ensure that the dGCLP can be found sound when examined by the Planning Inspectorate on behalf of the Secretary of State by providing recommendations for modifications to its vision, strategy and policies.
- 1.6 The remainder of these representations are set out as follows:
 - An overview of previous submissions made by LIH and Pigeon regarding the Site;
 - A review of the 2025 site assessment in the HELAA;
 - An assessment of exceptional circumstances and whether the Site should qualify as grey belt;
 - Comments on the draft vision and policies; and
 - A summary of the above.
- 1.7 The following annexures are provided in support of these representations:
 - Annex 1 – Site Location Plan;
 - Annex 2 – 2025 Cal for Sites submission;
 - Annex 3 – Cambridge South Heritage Appraisal; and
 - Annex 4 – Cambridge South Green Belt Appraisal.

2 Review of previous submissions

- 2.1 The Site has been promoted for development for well over a decade, having been submitted as a suitable and sustainable urban extension since 2011.
- 2.2 The opportunity the Site provides has more recently been promoted at each stage of consultation on the emerging dGCLP. On behalf of landowners, Quod made a submission to the 2019 Call for Sites undertaken by the Greater Cambridge Shared Planning Service ('GCSP').
- 2.3 Representations were then made by Quod on behalf of landowners to the Regulation 18 consultation held in April 2021 on the GCSP Local Plan Issues and Options paper. Those representations put Cambridge South forward as part of a broader plan for the expansion and regeneration of the CBC, providing a combination of housing and research and development floorspace that would see the delivery of a true Innovation District in southern Cambridge.
- 2.4 In November 2021 the GCLP First Proposals document was published for consultation and contained a draft Policy S/CBC, which had the effect (in draft) of removing part of the land from the Green Belt for the expansion of CBC into what is known as Phase 4. Despite the clear need for housing to support the growth and success of the Biomedical Campus, the remainder of the site being promoted at Cambridge South was not allocated in the draft Plan.
- 2.5 The expansion of CBC and the development of Cambridge South have since been promoted as separate proposals, albeit the underlying synergy between the growth of CBC and the role that Cambridge South can play in supporting that remains and should be recognised.
- 2.6 Most recently, LIH and Pigeon responded to the Call for Sites consultation held by GCSP in March 2025. A copy of that submission is included at **Annex 2**. It sets out the key reasons why the Cambridge South opportunity should be grasped. In summary:
 - Successive governments have made supporting the growth of Cambridge a national priority. The then-government published The Case for Cambridge in March 2024, which was subsequently endorsed by the current minister for housing and planning in his written ministerial statement dated 23rd August 2024.¹ The very publication of that document marks Cambridge out as exceptional, let alone its contents. It sets out in clear terms how addressing the city's challenges and constraints can help unlock growth and realise the city's full potential. Housing delivery is placed at the top as the most pressing of those constraints and challenges that need to be addressed.
 - CBC has been consistently recognised as a globally significant centre of life science research, development and application. Its coordinated growth and regeneration is strongly supported by both GCSP and government. CBC Ltd have however been clear that without associated housing growth targeted at meeting the needs of the Campus' workforce, existing constraints that are hampering the Campus will persist, and in fact inevitably become more aggravated. Those are constraints that worsen affordability for

¹ Letter from Matthew Pennycook MP, 23rd August 2024. Available [here](#).

everyone (not just Campus workers) and increase journey to work times, putting greater pressure on transport infrastructure, worsening congestion and the associated disbenefits of noise and air pollution, lower quality of life and loss of productivity that come with that. The constraints deter investment in the Campus, directly contrary to government policy.

- In May 2024 the then-Secretary of State issued a written ministerial statement in relation to Cambridge. That statement represents up to date, site specific government policy ('the May 2024 WMS').² It addressed the establishment of the Cambridge Delivery Group (now Cambridge Growth Company) but was particularly notable in specifically identifying the Cambridge Biomedical Campus as being the "*foremost UK life sciences cluster*" and the Greater Cambridge life sciences as being of "*national importance.*" It invited the "*immediate collaboration between key stakeholders... to address the coherent enhancement, intensification and expansion of [the CBC]*". The WMS also specifically recognised the need to "*address any barriers to the early expansion and coherent enhancement of the campus, including through the accelerated delivery of any associated housing development and the provision of appropriate levels of affordable housing to meet the housing needs of those working at the campus.*" [emphasis added]
- Cambridge South is unique in being of the right size and location to address both the government's broader aims to realise the full potential of the city and the more specific housing needs of the Biomedical Campus. It can do so by providing a quantum of housing that can make a meaningful difference, whilst also providing up to 50% of all homes as affordable.

2.7 A more detailed description of the proposals for Cambridge South, including a break down of the housing offer, is set out in Section 7 of the 2025 Call for Sites submission. Those proposals have not changed and so are not repeated here. To date, however, there is no evidence to show that GCSP has even considered the case made there.

2.8 The submission also included a Transport Approach and Strategy document prepared on behalf of LIH and Pigeon by KMC Transport which sets out a strategic approach to accessibility focused on promotion of local, low-car living; then enhancing existing infrastructure; and finally leveraging and supporting planned infrastructure. The report also puts forward a 'Monitor & Manage' approach to delivering development, whereby delivery of the right infrastructure at the right time is ensured through establishing a peak-hour Vehicular Trip Budget ('VTB') to control development quantum, monitoring performance as the development is built out, and managing travel demand against the VTB through introduction of appropriate mitigation packages.

2.9 The 2025 Call for Sites submission also considered whether the Site should qualify as 'grey belt' in accordance with the then-very recent guidance on the matter. That consideration is revisited in greater detail in **Section 4** of these representations and with the benefit of specialist

² Cambridge Delivery Group Update. Statement made on 8th May 2024 by Michael Gove, [Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations. Statement UIN HCWS447.](#)

heritage and landscape input, as well as with reference to appeal decisions that have emerged since the guidance was published.

- 2.10 The remainder of these representations focus on why the Councils should reconsider their decision to not allocate Cambridge South and why in doing so the dGCLP would stand a much stronger chance of being found sound at examination.

3 Review of dGCLP site assessment

- 3.1 Cambridge South has been considered by GCSP as part of an update to the Housing and Economic Land Availability Assessment ('HELAA') following the Call for Sites consultation 2025.
- 3.2 The Site ID is 115146 and the HELAA Site ID is OS214. The Site is considered against a number of suitability criteria on a Red Amber Green ('RAG') basis. Importantly, much of the assessment dates from when the Site was considered as part of a larger proposal coordinated with the expansion of CBC. The HELAA scoring is summarised in **Table 1** below.

Table 1 - HELAA (2025 Update) Site Assessment

Criteria	HELAA 2025 Suitability (RAG)	Summary of comment (year of comment)
Adopted Development plan policies		Development of the site has some potential policy constraints, but these could be overcome through the planning application process. (2025)
Flood Risk		The site contains areas at high, or medium risk from surface water flooding and/or the site contains some land in Flood Zones 2 and/or 3 but there is sufficient land in Flood Zone 1 to accommodate at least 5 additional dwellings or an increase of 500 square metres of employment floorspace. (2021)
Landscape		The visibility from elevated views to the east and south make this area particularly sensitive both visually and in regard to the setting of the city. Development would push the urban edge of the city to Hinxtton Road and thereby radically altering and weakening the strong divide between urban and rural landscape and creating significant harm to the landscape character and the setting of the City. It would also threaten to interrupt the Hobson's Brook Green Corridor that links the City to the countryside. However, if development were considered appropriate in this area, it should be limited to the area south of Nine Wells residential development, southwest of Babraham Road, northwest of Granham's Road and northeast of PROW 39/8 (Granham's Road to Nine Wells LNR). Any limited development would need to have regard of the effect of encroaching further into the countryside and be sympathetic to the rural character and the setting of the city. (2021)
Biodiversity and Geodiversity	(no RAG rating given)	All residential developments will require an assessment of recreational impacts on nearby SSSIs. Any residential development of more than 50 units or industrial development over 1000m2 would require consultation with Natural England. River Cam and Cambridge Commons could be impacted by recreation. Arable habitats are likely to be of low ecological value, although may

		support farmland bird populations. Ponds, watercourses, hedgerows, woodland, wetland and grassland may qualify as Habitats of Principal Importance/be of high ecological value and support protected or notable species. Water vole, reptiles, bat species, nesting birds all previously recorded on site. All applications should achieve minimum 10% net biodiversity gain to meet the NPPF, Local Plan Policy NH/4 and emerging local and UK Government Policy; off-site compensation will be required if this cannot be achieved on site. (2021)
Historic Environment		There is a Grade II listed structure at Nine Wells nature reserve. Development in this area would have an impact on this and potentially its watercourse which is the source of the Hobson Conduit which runs above ground along Trumpington Street as a Grade II listed structure. If the area were to be redefined, taking into consideration the heritage assets as stated, it may be possible to mitigate the impact. (2021)
Archaeology		Extensive evidence for prehistoric, Roman and medieval settlement and associated activity is located within and in the vicinity of the site. (2021)
Accessibility		Good accessibility to key local services, transport, and employment opportunities. Proposed development would require accompanying primary school, secondary school, local centre/employment provision, community centre and health centre. (2025)
Site Access		The proposed site is acceptable in principle subject to detailed design. (2021)
Transport and Roads		Having considered the updated information, the overall assessment score has not changed. There are very limited existing passenger transport and sustainable transport links around the site. The developer will need to look into links to Shelford train station and possibly at new extensions to passenger transport links. Impact on A1301 can be mitigated as there are cycle lanes nearby. (2025)
Noise, Vibration, Odour and Light Pollution		The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation. (2021)
AQMA		Large site and lots of residential units - potential for AQMA traffic impact without mitigation. (2021)
Contaminated Land		Agricultural fields, contamination likely to be negligible. (2021)
Overall suitability score		
Available		
Achievable		

- 3.3 As can be seen, despite only one of the twelve criteria receiving a 'red' score, the Site is nonetheless overall judged to have a 'red' suitability score.
- 3.4 It is clear when comparing the comments made to the score given that there are inconsistencies and that the scoring is unjustifiably conservative. For instance, the comments for Noise, Vibration, Odour and Light Pollution recognise that mitigation and high quality design will be needed to achieve a satisfactory internal and external environment for the Site's residents and (rightly) gives a green scoring. Contrast this with the comments on contaminated land, which acknowledge that there is a 'negligible' chance of contamination, and yet gives this an amber score. The same applies for site access, where the comment makes clear that the Site is acceptable in principle and yet still only gives an amber rating. Critically, both the commentary and the scoring fail to recognise the Site's proximity to CBC (whose housing needs it would be meeting) and also to Cambridge South station. Any recognition of either of those material factors would be bound to improve the scoring.
- 3.5 The one assessment topic that has a 'red' score is landscape. It is significant therefore that those comments have not been updated since 2021 when Cambridge South was being considered as part of a joint promotion for the Site and CBC. The landscape comments almost entirely pertain to the proposed expansion of CBC and are largely quiet on the proposals for the Site itself.³
- 3.6 The landscape scoring is further undermined by comparing it to the Greater Cambridge Landscape Sensitivity Assessment (November 2021). That study divided the Cambridge Southern Fringe area into eleven parcels. The Site is contained in parcel CSF07, which is given a scoring of 'medium' landscape sensitivity. Only one other parcel in the Southern Fringe area has that scoring, all nine others all having a scoring of 'medium to high' or 'high'. It is therefore one of the least sensitive land parcels in this area.
- 3.7 The detailed assessment of the parcel CSF07 is contained in paragraph 2.4.14 and reads:

*“Overall, this is a landscape comprising many features that are less susceptible to the development scenario, including its generally flat, low lying landform, simple landcover pattern of arable fields, the influence of the highway and rail networks, recent prominent development on the edge of Cambridge and limited natural value. Characteristics which are more susceptible to the development scenario include the contribution the landscape makes to the rural context of Cambridge, valued views from the edge of Cambridge and Great Shelford into the countryside, and the soft western edge of Great Shelford which contributes to the defining character of Cambridge. On balance, this landscape is judged to be of **medium to low** sensitivity to the development scenario.”⁴*

³ The reference to Hinxton Road is assumed to be an error and should read Hinton Way, which is south of CBC but not of Cambridge South; the development of the Site would not in any case stretch further south than the Cambridge Line; Hobson's Brook is located between Cambridge Road (A1301) and the railway line, and the associated green corridor would be unaffected by the development of Cambridge South. The reference to the limited area where development may be acceptable is only made in relation to the CBC expansion land.

⁴ The 'development scenario' that the quote refers to is defined in paragraph 2.1.2 as being development of between 2-5 storeys for residential development and between 2-4 storeys for commercial development.

- 3.8 The sensitivity assessment is to be read alongside The Greater Cambridge Landscape Character Assessment (February 2021). That assessment shows the Site as falling within landscape character type 3: Lowland Farmlands, which is considered to have a moderate landscape condition and a moderate strength of character.⁵
- 3.9 Given that the more detailed, independently prepared landscape assessment of the Site does not place either its sensitivity or character as anything higher than ‘moderate’, it is difficult to understand how a ‘red’ suitability score has been arrived at and maintained unedited in the HELAA. This should be revisited.
- 3.10 The Site’s availability and achievability are then considered. Despite the Site being recognised as being in the control of a willing developer, without legal or ownership impediments and that the Site would be available in years 0-5 of the plan period, the availability is given an amber scoring. The achievability is rightly given a green scoring given that the Site is largely unconstrained greenfield land with existing accesses. The inconsistency in how the scoring is applied is evident here and needs to be reconsidered.
- 3.11 It is recognised that there is an important element of judgement involved in these types of assessments. However, it is difficult to reconcile the judgement of the Site with the scoring given, which appears inconsistent and often unsound.
- 3.12 A more sound and justified assessment of the Site against the HELAA criteria is suggested in **Table 2** below.

Table 2 - Quod Site Suitability Assessment

Criteria	Quod Suitability rating (RAG)	Reasoning
Adopted Development plan policies	Green	As noted in the HELAA, there are some potential policy constraints but these fall to be reconsidered in this local plan. There is no reason to believe that these cannot be overcome through a suitably worded site allocation and through the determination of a planning application made pursuant to it.
Flood Risk	Green	There are some areas of Flood Zone 2 and/or 3 within the Site but the high level proposals make clear that no built development is proposed in these areas, and therefore there is no conflict with national or local policy on the matter. There are pockets of surface water flood risk and built development may be proposed on those areas. However, a site specific policy can require the submission of a flood risk assessment that demonstrates mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the

⁵ Greater Cambridge Landscape Character Assessment (February 2021). Chris Blandford Associates. Table 4.2.

		development. The potential for an improvement to surface water flows can be realised through the incorporation of SUDS and other surface water management infrastructure.
Landscape		Development of the Site would lead to change in the landscape character and would result in the partial loss of what is currently open countryside that separates Cambridge from Great Shelford. However, this is to be balanced against the quality character of the landscape, which is assessed as moderate, and the sensitivity of the landscape to development, which is also assessed as being moderate.
Biodiversity and Geodiversity		<p>The Site is generally of low biodiversity value, and there is therefore good opportunity to deliver an on-site net gain in biodiversity in accordance with and possibly exceeding the statutory requirement.</p> <p>Desktop studies confirm that, whilst the Site has the potential to support notable species, the use of standard ecological mitigation measures and good design, coupled with the scale of the site and of the green infrastructure planned, would mean that there is no biodiversity constraint to its development.</p>
Historic Environment		The Site comprises two Scheduled Monuments which are designated heritage asset of the highest level of significance. The historical interest of these assets is derived very largely from their archaeological interest, with the setting of each making a lesser contribution to their overall significance. The high level masterplan (Annex 3) ensures that both Scheduled Monuments would be outside of the developed area and within public open space, allowing for the archaeological remains to be left in situ. A site specific policy can ensure that there is no physical impact to either Scheduled Monument arising from the development of the Site and that appropriate set backs are respected. Similar controls can be ensured through effective development management and consideration of a planning application.
Archaeology		As per HELAA comments and those above. In addition, however, the scheduled monuments are currently subject to potentially damaging ploughing. Ceasing the agricultural use and incorporating the scheduled monuments into public open space provides the opportunity to not only avoid harm to those assets but to provide a heritage benefit to them by protecting and increasing the public's appreciation of them.
Accessibility		As per HELAA comments.
Site Access		As per HELAA comments, though the need for detailed design should not preclude the site access from scoring green. As above, the Site is ideally located close to one of the City's most significant employment hubs, whose housing needs it would be directly meeting and from which it would be easily accessible by sustainable modes. The Site is also close to both Cambridge South Station and Shelford Station, making it highly connected to the wider area

		including multiple trains per hour to London and, in time, to Oxford via East West Rail.
Transport and Roads		<p>As detailed in the Transport Approach and Strategy prepared by KMC and submitted as part of the 2025 Call for Sites submission, the Site benefits from a strong network of existing transport infrastructure. Cambridge South station, Trumpington Park and Ride and Shelford train station are all a reasonable walk or cycle ride from the Site, and there is an existing bus corridor along Cambridge Road. There are existing active travel routes accessible from the Site that offer local links: Addenbrooke’s Road; the DNA Path; and the Cambridgeshire Guided Busway. There are further planned transport infrastructure in the form of CSET and the South West Travel Hub. This sets a very positive foundation for the delivery of a transport strategy with active and sustainable modes of transport at their core.</p> <p>Additionally and uniquely, the Site and the proposals are of a scale and nature that would locate people close to their place of work (CBC), would allow a mix of uses to be delivered that reduces the need to travel, and that would provide meaningful investment in new, planned and existing transport infrastructure.</p> <p>Combined, and as set out in the Transport Approach and Strategy, these factors provide for the ideal conditions to foster a sustainable, low-car transport strategy delivered and maintained through a monitor and manage approach.</p>
Noise, Vibration, Odour and Light Pollution		As per comments in the HELAA.
AQMA		The Cambridge AQMA was revoked in January 2025.
Contaminated Land		As per HELAA comments, contamination is likely to be negligible.
Overall suitability score		Based on the information above it is clear that the Site is demonstrably suitable and provides a unique opportunity to deliver a highly sustainable new quarter of the City, locating people close to their places of work and making best and most effective use of existing and planned infrastructure. Whilst there will be landscape impacts, these have been assessed by the Council as being moderate. The two Scheduled Monuments are a constraint that needs to be thoughtfully accommodated, but early masterplanning has already shown this could be achieved.
Available		As per the HELAA comments, the Site is available and has been promoted as such for well over a decade. There are no incumbent businesses on the Site that would prevent an early start on site.

Achievable		The Site benefits from existing accesses and is broadly unconstrained from a deliverability perspective. As per the HELAA comments, the development should be viable, and is able to offer a level of affordable housing greater than the emerging policy requirement. The Site is unconstrained by existing uses or infrastructure that would require relocation or extinguishment prior to a start on site, and the proposals could contribute towards housing delivery in the first five years of the plan period.
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3.13 As is made plain from the above, when up to date information and evidence is properly taken into consideration, and the Council's own judgement of that information more fairly applied, the Site performs very well and should be considered a suitable site for meeting development needs.

4 Exceptional circumstances and grey belt assessment

- 4.1 Not considered as part of the HELAA is the Site's location within the Green Belt. This is the right approach given that the HELAA focuses on physical constraints and suitability rather than policy constraints. Nonetheless the Site's location in the Green Belt is an important matter for consideration, as is the government's introduction of the 'grey belt' in late 2024.
- 4.2 The NPPF attaches great importance to the Green Belt, and at paragraph 143 sets out its five purposes, which are:
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 4.3 Nevertheless, paragraph 146 of the NPPF (quote below) makes clear that Green Belt boundaries should be reviewed where it is necessary to meet identified development needs.
- 4.4 This section of the report considers whether exceptional circumstances exist to justify revising the boundaries of the Cambridge Green Belt. It then assesses whether the Site should qualify as grey belt in accordance with government's guidance on the matter. .

Exceptional circumstances

- 4.5 The NPPF makes clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Paragraph 146 sets out an example of where exceptional circumstances may apply:
- “Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”*
- 4.6 It is recognised that the dGCLP is currently able to meet its minimum identified need for homes on land that is either outside of the Green Belt and/or is on previously developed land. This is on the basis that the 'identified need' is the objectively assessed need for Greater Cambridge as derived through the standard method. It is on this basis, and with reference to the *Calverton*

tests,⁶ that the Councils consider that there is no exceptional circumstances case for releasing land in the Green Belt for development.⁷

- 4.7 The Councils have stated in the Strategy Topic Paper that they have concluded that their “*general development needs alone do not provide the ‘exceptional circumstances’ required in national policy to justify removing land from the Green Belt on the edge of Cambridge in this Local Plan.*”⁸
- 4.8 However, this conclusion is reached with reference only to the *Calverton* tests. As the Strategy Topic Paper (rightly) acknowledges with reference to the more recent *Keep Bourne End Green* case law example,⁹ whilst the *Calverton* tests provide an ideal structure it should not be confused with being the only acceptable approach and that a more “*open textured*” approach can be lawfully taken.¹⁰
- 4.9 Deliberately or not, the Councils’ conclusion misses the point that successive governments have been making for some time; that only meeting Cambridge’s minimum needs would fail to grasp the exceptional opportunity for economic growth and development that the City can offer, which can have benefits of a national scale.¹¹ Any more “*open textured*” approach to considering the case for exceptional circumstances would be bound to recognise this and plan for it accordingly and would be a lawful and sound approach. Such an approach would also be consistent with the NPPF, which specifically recognises that a higher housing requirement can be justified where it reflects higher growth ambitions linked to economic development.¹² Ignoring these factors risks the plan being found unsound because it would essentially be at odds with national policy (NPPF paragraph 36(d)), which has clearly and repeatedly called for the ambitious growth of Cambridge and its economy to support the wider national wellbeing. The existence of the Cambridge Growth Company does not change any of this.
- 4.10 Beyond the more generalised case for exceptionality, there are exceptional circumstances that relate to Cambridge South specifically. These are primarily related to the Site’s close proximity to the Cambridge Biomedical Campus, supporting the expansion of which the Councils have rightly seen as sufficiently exceptional to propose releasing Green Belt land. The intrinsic relationship between the Campus’ ability to grow sustainably and the need for housing to support this is set out in detail in Section 6 of the 2025 Call for Sites Submission (**Annex 2**). That detail is not repeated here other than to restate that the Campus itself is clear on the challenges it is already facing due to lack of affordable and available housing, and that these will only worsen as the Campus regenerates and expands. The housing offer has been tailored in response to the CBC Housing Report and informed by meetings between LIH, Pigeon and CBC Ltd. That process of refinement will continue, as will the ongoing collaboration with CBC Ltd to make sure the housing offer is targeted for maximum effect.

⁶ *Calverton Parish Council v Nottingham City Council & Ors* [2015] EWHC 1078 (Admin).

⁷ Draft Greater Cambridge Local Plan: Strategy Topic Paper (2025), Appendix 4, paragraph 2.18.

⁸ Draft Greater Cambridge Local Plan: Strategy Topic Paper (2025), paragraph 5.79.

⁹ *Keep Bourne End Green v Buckinghamshire Council & Anor* [2020] EWHC 1984 (Admin) (23 July 2020).

¹⁰ Draft Greater Cambridge Local Plan: Strategy Topic Paper (2025), Appendix 4, paragraph 1.14.

¹¹ A summary of the clear directions that government has given for Cambridge’s potential to be properly grasped is in Section 2 of these representations and in the Call for Sites submission made by LIH and Pigeon in March 2025.

¹² NPPF 2024, paragraph 69.

4.11 Importantly for the soundness of the dGCLP, it is national policy to address and accelerate the delivery of housing to meet the needs of the Campus.¹³ Cambridge South is the only site available that can offer the quantum and type of housing in a location that can offer highly sustainable access to the Campus and make a meaningful difference in that way. It is unencumbered by existing uses or land ownership complications and can deliver swiftly. It is truly exceptional.

Grey belt assessment

4.12 Paragraph 148 of the NPPF states:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations..”

4.13 Grey belt is defined in Annex 2 of the NPPF as:

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

4.14 Those ‘areas or assets in footnote 7’ are habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest (‘SSSI’); Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

4.15 Footnote 7 is not engaged by this Site and the proposals for its development.

4.16 The Site does not comprise any designated habitats sites (irreplaceable or otherwise) nor SSSIs, and there is no reason to believe that the development of the Site would lead to unacceptable impacts to any such sites or harm their integrity. The Site is not Local Green Space, and it is not in a National Landscape, National Park or defined as Heritage Coast.

4.17 There are some parts of the southwestern area of the Site that are at risk from flooding. These follow the River Cam. As the indicative masterplan shows, no development is proposed in those areas. The remainder of the Site is in Flood Zone 1. There is no reason to suggest that the application of policies relating to flood risk management would provide a reason for refusing development, let alone a strong reason.

¹³ As per the May 2024 WMS.

- 4.18 There are two scheduled monuments within the Site (as noted in the site assessment in Section 3 of this report) and numerous heritage assets in the wider vicinity of the Site. The likely impact on all relevant heritage assets is addressed below.
- 4.19 The Planning Practice Guidance provides advice on how it should be considered whether or not a Site makes a 'strong contribution' to purposes (a), (b), or (d).¹⁴
- 4.20 Landscape and heritage reports have been prepared on behalf of LIH and Pigeon to consider these matters in detail and with the benefit of specialist expertise.
- 4.21 A **Green Belt Appraisal** has been prepared by David Jarvis Associates on behalf of LIH and Pigeon. A copy of that report is provided at **Annex 4**. It finds in summary that:
- **The Site makes a moderate contribution to purpose (a).** This is with reference to defining 'sprawl' as the incongruous or untidy expansion of a built-up area. This would not be the case here, with the expansion of Cambridge into Trumpington establishing a pattern of development that development of the Site would be congruent with, a pattern already established by the residential development along Cambridge Road. The PPG states that sites that make a 'moderate' (i.e., not strong) contribution to purpose (a) are those that have "*physical feature(s) in reasonable proximity that could restrict and contain development.*" Not only are such physical features immovable, clear and definite (the M11, the River Cam, the Cambridge railway line – all of which are immovable), they form the physical boundaries of the Site that are clearly capable of restricting and containing development.
 - **The Site makes no contribution to purpose (b).** The PPG is clear that this purpose relates to towns, not villages. Great Shelford is classified as a village. Hence, whilst the effect would be of extending Cambridge closer to Great Shelford, the Site does not contribute to this purpose.
- 4.22 A **Heritage Appraisal** has then been prepared by Pegasus Group on behalf of LIH and Pigeon (**Annex 3**). It considers in detail both whether the Site makes a strong contribution to purpose (d) and whether the footnote 7 considerations would suggest there is a strong reason for refusing or restricting development.
- 4.23 Starting with the former, the Heritage Appraisal finds that **the Site makes at most a moderate contribution to purpose (d)**. Whilst the Site borders the modern day boundary of Cambridge, it is some kilometres distant of its historic core and not of significant visual importance to its historic aspects and to the elements of the city's setting that contribute most to its appreciation. In coming to this conclusion, the Heritage Appraisal refers to the Greater Cambridge Green Belt Assessment prepared by LUC on behalf of GCSP in 2021, noting that the findings of that independent assessment affirm the conclusions reached in the Heritage Appraisal; which is that the relevant parcels make a moderate contribution to Cambridge Purpose 2, which aligns with NPPF purpose (d).¹⁵

¹⁴ Planning Practice Guidance: Green Belt. Published 22nd July 2019, last updated 27th February 2025. Paragraph: 005 Reference ID: 64-005-20250225.

¹⁵ It should be recognised as well that 'moderate' in the LUC Green Belt Study is the second lowest category that is used, it falling between a contribution that is considered to be relatively limited (lowest), relatively

- 4.24 The Appraisal then deals with the footnote 7 matters. It tabulates the heritage assets that may be affected by the development of Cambridge South (including the two scheduled monuments that are within the Site), describes their significance and the contribution their setting makes to it. It comes to a view on the likely effect of the proposed development of the Site to the significance of those heritage assets. It finds in all cases that the potential for impacts to the significance of heritage assets would not amount to a strong reason for refusing or restricting the development. In the case of the two scheduled monuments within the Site, it finds that the proposals would in fact be likely to deliver heritage benefits.
- 4.25 In summary, the Site does not contribute strongly to Green Belt purposes (a), (b), or (d) and nor would any of the footnote 7 areas or assets suggest there is a strong reason to refuse or restrict development. The Site should therefore be considered to be grey belt for the purposes of plan-making.

significant, and significant (highest). Refer to Figure 4.2 of the LUC Green Belt Study (2021) for a summary of this.

5 Vision and policies

- 5.1 This section sets out representations in relation to specific aspects of the vision and the draft development management policies contained in the dGCLP.

Vision

- 5.2 The vision as stated is overall commendable but does not reflect the government's ambition for Greater Cambridge. This is particularly in relation to housing, where the plan's approach contrasts starkly against its much more aspirational and positive vision for jobs in Greater Cambridge. The Housing Needs of Specific Groups in Cambridge and South Cambridgeshire report is reluctant to draw a clear relationship between affordable housing needs and overall housing supply, but makes clear that there is a net need for 1,636 affordable homes per annum (of which the majority is derived from Cambridge).¹⁶ Clearly if the vision is to deliver 'significant quantities of housing that is affordable to rent and buy' then a similarly significant (if not more significant) quantity of market rate housing will be needed to make this possible. Meeting the minimum standard method will help but does not go far enough in targeting a meaningful change to the availability and affordability of housing in the Greater Cambridge area. More commentary on this is provided under Policy S/DS below.
- 5.3 Wording for the vision that would more accurately reflect the government's ambition is suggested below:

Homes: *Plan for a step-change in housing delivery of all kinds, including significant quantities of housing that is affordable to rent and buy, and different kinds of homes to suit our communities. Homes are delivered where they are needed the most to foster sustainable neighbourhoods and create a world-class Greater Cambridge.*

- 5.4 The other components of the vision are on the whole supported but risk being undermined if they are not supported by sufficient levels of new housing in the right places.

Policy S/JH: New jobs and homes

- 5.5 The housing target that is arrived at by the Councils is an employment-led housing target that is needed to meet the Central Scenario of 73,248 new jobs across the plan period. The latest Employment and Housing Evidence Update 2025 ('EHEU 2025') calculates that this requires 2,292 dwellings per annum ('dpa'), almost identical to the standard method need of 2,295 dpa. That assessment in turn relies on assumptions around commuting patterns. Paragraph 4.31 of the EHEU 2025 explains this:

"The standard method housing need is higher (2,295 vs 1,769 previously). In both studies a consistent approach to commuting assumptions has been used, with Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this. As Greater Cambridge's commuting ratio is below 1, more

¹⁶ Greater Cambridge Housing Needs of Specific Groups, Icen Projects, August 2025. Table 7.17.

in-commuting is therefore assumed in the updated results than in the 2023 EHEU. This means a lower local population (and so fewer dwellings) is required relative to the number of local jobs.”

- 5.6 The ratio of jobs to homes has notably changed over the past five years. Starting from 1 job per 0.75 homes in 2020, that ratio increased to 1:0.77 in 2023 but then reduced significantly to 1:0.65 in the 2025 study.
- 5.7 There are at least two interrelated issues that this approach risks aggravating. The first is that, in planning for sufficient housing to meet a targeted growth in jobs, the existing issues facing workers and their employers risk going unresolved. These issues are well known and plainly set out in the housing studies produced by the Cambridge Biomedical Campus Ltd¹⁷ and by the Cambridge University Hospitals NHS Trust.¹⁸
- 5.8 A more positive housing target should be adopted that aims to avoid worsening commuter patterns compared to the current situation. A more sensible (although not transformational) ratio for these purposes should be to mirror the current commuting patterns as measured in the 2011 Census.¹⁹ Such an approach would bring the housing delivery target to 59,331 across the plan period or 2,825 dpa. This is very close to the ‘High’ scenario considered in the EHEU 2025 (2,829 dpa). Such an approach would be sound and more closely in accordance with paragraph 69 of the NPPF.
- 5.9 It is recognised that the Central scenario is preferred as it is deemed more achievable, but that relates to the level of job growth. It should not be confused with the achievability or desirability of delivering an increased number of homes, which would be of a very significant benefit even if the full level of jobs growth was not fully realised.
- 5.10 It is notable that even this target would fall short of the government’s policy objectives but it would at least represent a more positively planned scenario that does more than to meet the minimum standard method needs and that would go some way to addressing profound issues related to under supply of housing in Greater Cambridge.

Policy S/DS: Delivery Strategy

- 5.11 The overarching approach to meeting the identified needs is set out in this policy as:

“a. Within the Cambridge urban area;

b. On the edge of Cambridge;

c. At an expanded Cambourne;

d. At other new settlements; and

e. In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.”

¹⁷ Cambridge Biomedical Campus Housing Study: Establishing the housing needs of the CBC workforce. Cambridge Biomedical Campus Ltd (April 2024).

¹⁸ Deliver Affordable Housing for our Hospital Workers: The Case for Change. Cambridge University Hospitals NHS Foundation Trust.

¹⁹ Greater Cambridge Housing Needs of Specific Groups, Icenis Projects, August 2025. Table 4.3.

- 5.12 This overall approach is sound but has been misapplied and without appropriate evidence to inform its implementation.
- 5.13 The Strategy Topic Paper recognises that Edge of Cambridge – Green Belt sites “give the best chance to improve walking, cycling and public transport potential. A high level of active mode travel (walking and cycling) and low car mode share is likely to be seen in this option.”²⁰ This in turn provides the best chance for meeting the Councils’ aspirations to transition to net zero carbon by 2050 by locating homes in an area where a shift away from private car use will be more easily achieved. The Sustainability Appraisal (‘SA’) prepared by LUC affirms this stating: “development at [locations around Cambridge within the Green Belt] is likely to have good access to existing services, facilities and employment within Cambridge, therefore minimising the need to travel, as well as good access to sustainable transport links. This will help to minimise the increase in carbon emissions arising from new development.”²¹
- 5.14 The Councils are planning to publish an updated Green Belt Study that will consider the impact of grey belt designations for plan-making and decision-making. This will be a key part of the evidence base that should have informed this iteration of the dGCLP and the draft allocations. Instead, its conclusions – which may well be significant – will need to be backfilled to the draft plan. Any such study must recognise the government’s clear signal that Green Belt boundaries should be re-examined in response to a clear need for development, particularly where the release of land would enable sustainable patterns of development (e.g., locating development adjacent to built up areas and close to well connected train stations) is a valid consideration for those purposes.
- 5.15 Rather than waiting for this study to inform the site allocations, the Councils have proceeded with an approach that is both insufficiently justified and fails to take account of their own currently available evidence regarding the sustainability of edge of Cambridge sites and which is at odds with national policy on supporting Cambridge’s growth. This will need to be revisited in the next iteration of the local plan and the implementation of the spatial strategy reconsidered. Without this, the plan is at risk of not being justified (NPPF paragraph 36(c)) and undermining the clear vision of supporting the transition to a net zero future.
- 5.16 The judgement made in the SA as to the deliverability of edge of Cambridge Green Belt sites is also questionable and does not reflect government policy. Paragraph 4.27 of the SA reads:
- In terms of Options 9a and 11b, any delay to the phasing of East-West Rail and the new railway station at Cambourne could delay completions. For Option 10a, lead in times for Edge of Cambridge Green Belt sites may be extended as applications cannot be ‘twin-tracked’ alongside plan making due to the need to demonstrate very special circumstances for Green Belt release.*
- 5.17 Whether a site is in the Green Belt or not, there is nothing in practice to prevent a planning application from being twin tracked alongside the plan making process. Indeed, this is quite normal. The councils’ position fails to recognise both adopted and draft national policy on the matter. In adopted policy, grey belt sites not only do not need to demonstrate very special circumstances, but can benefit from a presumption in favour assuming the Golden Rules are

²⁰ Strategy Topic Paper, Appendix 1B, paragraph 3.9.

²¹ Draft Greater Cambridge Local Plan: Sustainability Appraisal (2025). LUC. Paragraph 4.100.

met and there is a demonstrable unmet need. The draft NPPF expands those circumstances to include grey belt sites that are close to well-connected train stations (Cambridge South is readily accessible). Not recognising this in the SA is a flaw that risks undermining the soundness of the delivery strategy.

Policy S/GB: Cambridge Green Belt

- 5.18 Policy S/GB states that new development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework.
- 5.19 The government are at the time of writing is consulting on draft changes to the NPPF. As soon as that version is adopted, which is anticipated for early summer 2026, it is clear that planning applications will be considered against its decision making policies.
- 5.20 The draft NPPF contains important changes to the way that certain proposals for development of land in the Green Belt should be considered. Draft Decision Making Policy GB7 sets out a series of instances where development should not be regarded as inappropriate in the Green Belt and therefore not have to demonstrate very special circumstances. Part (g) of the policy deals with grey belt, which is already a feature of the current NPPF. Part (h) is new and states:
- h. Development for housing and mixed-use development which would:*
- i. be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment;*
 - ii. be physically well-related to a railway station or a settlement within which the station is located;*
 - iii. be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;*
 - iv. not prejudice any proposals for long-term comprehensive development in the same location;*
 - v. in the case of major development, comply with policy GB8.*
- 5.21 It is considered that Cambridge South complies with these criteria and would (under the draft NPPF) therefore not represent inappropriate development in the Green Belt.²²
- 5.22 Whilst it is against the 2024 version of the NPPF that the dGCLP is being prepared, the draft is already a consideration and will become even more material when it is adopted. Any spatial strategy that involves the consideration of Green Belt land would be remiss not to consider the implications of grey belt and of the draft NPPF's definition of what would not be inappropriate development in the Green Belt and the more near-term impact on development management this will have.

²² Policy GB8 of the draft NPPF deals with The Golden Rules, which are already a feature of the current NPPF. The 2025 Call for Sites submission makes clear that The Golden Rules would be met by the proposed development of Cambridge South.

Policy C/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

- 5.23 Strong support is given to this policy. Cambridge Biomedical Campus is a globally significant hub of research and innovation that has led to tangible improvements to human health and wellbeing. Its expansion and regeneration deserves full support.
- 5.24 The potential for Cambridge South to complement and support the expansion of CBC has long been evident, with housing delivered on Cambridge South intended to support the evolution of the Campus and to meet the needs of its diverse workforce. Whilst the two sites are now being promoted separately, that intrinsic relationship between the two sites remains obvious.
- 5.25 As already referred to in these representations and in the 2025 Call for Sites submission, CBC Ltd have made clear that housing pressures affect the quality of life of staff working on the Campus and affect the ability of employers to recruit and retain their staff. Those are existing issues that will only be aggravated by expanding the Campus without a commensurate increase in housing delivery to support it.
- 5.26 The Cambridge Biomedical Campus: Housing Study 2024 produced by CBC Ltd sets out a need for 14,000-16,000 new affordable homes to meet the Campus' current and future needs.²³ These needs will not be met through the delivery of the current site allocations alone and therefore the deliverability of Policy C/CBC is imperilled. The need to accelerate the delivery of housing associated with the Campus was made clear in the May 2024 WMS which should be regarded as national policy for these purposes.
- 5.27 Additional sites are needed to meet this need and Cambridge South is unique in its location and ability to offer a quantum of and diversity of housing products aimed at meeting these needs.

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

- 5.28 This draft policy allocates land in the southern rural cluster for 6,000 new homes. Its allocation is said to be justified by its proximity to the Babraham Research Campus, Granta Park, the Wellcome Genome Campus and Chesterford Research Park. Clearly, however, the allocation is located to benefit from the Cambridge South East Transport ('CSET') Travel Hub that is to be located on the far side of the A11, which will provide a high quality connection between the Site and CBC, and onwards to Cambridge.
- 5.29 The GCLP Infrastructure Delivery Plan (Reg 18) sets out that an extension of the CSET Guided Busway to Grange Farm is expected to cost circa £30m. The IDP does not clearly indicate how this is to be funded, but it is assumed that the entirety of that cost will fall on the Grange Farm allocation.
- 5.30 This is in addition to the £161m cost identified for the delivery of CSET Phase 2 itself, which will link the A11 Travel Hub to the Cambridge Biomedical Campus. Again, no indication is given of how the cost of that will be recouped through developer contributions (or indeed if at

²³ CBC Ltd, Cambridge Biomedical Campus Housing Study: Establishing the housing needs of the CBC workforce. CBC Ltd (April 2024). Page 42.

all). However, it is clear that the allocation is dependent at least in part on the delivery of CSET for its location to be acceptable in planning terms and to help reduce car dependency in that location (without CSET the allocation site is arguably poorly served by public transport infrastructure). In accordance with draft Policy I/ID, the allocation should be expected to make a fair and reasonable contribution towards the delivery of CSET Phase 2 itself, not just to its extension into the Site. This should be set out in the next iteration of the Infrastructure Delivery Plan to make clear the expectations of the development and to help its promoters understand the viability of delivery on those expectations. This will in turn help ensure the deliverability of CSET Phase 2 and therefore the sustainable transport infrastructure that the allocation relies on to be acceptable.

Policy S/CBN: Cambourne North

- 5.31 This draft policy allocates land to the north of Cambourne to deliver approximately 13,000 homes and 108,000sqm of employment floorspace. It therefore represents a very significant allocation within the dGCLP. Its deliverability is therefore going to be important for the overall soundness of the plan at examination but also for avoiding the plan becoming out of date over its lifetime due to lack of supply.
- 5.32 Paragraph 3.3.4 of the dGCLP makes clear that the allocation is in place to take advantage of “*significant planning improvements to public transport in this area.*” These are principally the introduction of an East West Rail station to Cambourne and the delivery of the Cambourne to Cambridge Guided Busway. The former is very early in its programme; the Development Consent Order application is not anticipated until 2027 and completion of the scheme is targeted for 2035. The latter has gone through a Transport and Works Act Order examination but must now be in doubt as it has been faced with severe criticism, including from Mayor Bristow.
- 5.33 There is therefore significant uncertainty over the sustainability of the proposed location. Compared with an allocation adjacent to Cambridge, the proposed allocation risks being more reliant on private car journeys. Without sustainable transport infrastructure in place from an early stage, those risks will certainly be realised, missing the opportunity to cultivate a truly sustainable new settlement and hindering rather than helping the Councils achieve their Vision for Greater Cambridge.

Policy H/AH: Affordable Housing

- 5.34 Part 2 of the policy sets out very tightly defined expectations for the provision of affordable housing tenures. The unit mix for Cambridge South is not yet set but the current indication is that the proposals would diverge from the affordable housing tenure mix shown in the dGCLP. Given that the government is placing ever greater emphasis on the need to increase the delivery of social rent housing, it would be perverse for the dGCLP to prevent this.
- 5.35 It is recognised that NPPF paragraph 64 states that planning policy should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required). This however needs to be read alongside paragraph 71 of the NPPF which recognises the benefits of mixed tenure sites.

5.36 In general, therefore, greater flexibility is needed within the policy to allow for more bespoke proposals to be favourably considered. This could simply be achieved by amending the wording of part 2 of Policy H/AH to the following:

Within the affordable housing secured on major developments for housing (except for within Build to Rent and Co-living developments), the proportions of each affordable housing tenure should be provided as set out in Table 00, other than in specific circumstances where an alternative tenure mix can be justified.

5.37 This would bring the policy closer in line with the objectives of the NPPF and the policy sound.

Policy H/BR: Build to Rent homes

5.38 The inclusion of this policy is supported subject to the comments below.

5.39 Part (c) of this policy requires that a proposed development offers rental tenancies of at least 3 years to all tenants. It is recommended that this component of the policy is removed.

5.40 There is little evidence to suggest that this is necessary or desirable. The Homes Topic Paper recognises that the demand for this typology is “*expected to come from students, academics and young professionals.*” Those are groups that are largely transient and predominantly have short-term tenancy requirements who would not want to sign up to a 3 year tenancy. Setting a minimum of 3 years for all tenants could therefore risk making the housing product undesirable for the exact group whose needs it is aiming to meet.

5.41 Part (d) then requires that the development is professionally managed by a single management operator and have an agreed Management Plan. Again, this component of the policy is suggested to be removed.

5.42 For large-scale schemes, it may be impractical and/or undesirable to require a single management operator for all build to rent units. This should instead be considered on a case-by-case basis through development management.

Policy GP/HD: Housing Density

5.43 It is essential the density of new development is optimised to make the best and most effective use of the land that is available. Policy GP/HD acknowledges this and the design-led approach is overall supported but it is unduly constrained to densities “*that reflect local character and context...*” This is not the approach that the NPPF takes, which acknowledges that densities should “*take into account... the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change.*”²⁴ (emphasis added).

²⁴ NPPF 2024, paragraph 129(d).

5.44 The remainder of the policy then goes on to acknowledge that higher densities can be achieved in certain circumstances. This is potentially at odds with the first component of the policy, and so this should be amended to read:

“Development proposals must make efficient use of land through optimising development densities to have regard to local character and context through a design-led approach and to the desirability of making the best use of available land.”

5.45 Part (c) of the policy should be removed. It is essentially repeating the heritage tests that are already put in place by draft Policy GP/HE and through the balancing exercises set out in Chapter 16 of the NPPF. Those balancing exercises in turn recognise that there may be some impact to heritage assets arising from new development to heritage assets and their settings, but that nonetheless those harms can be found to be acceptable if sufficiently outweighed by the public benefits the development would deliver. That is a more nuanced exercise than set out in Policy GP/HD, which does therefore not need to repeat the point in a more constricted way.

6 Conclusion

- 6.1 These representations have been prepared on behalf of LIH and Pigeon who are jointly promoting land known as Cambridge South bound by Cambridge Road, the M11 and the River Cam for the development of circa 4,500 new homes. This submission follows multiple other submissions made to GCSP, which most recently include those made to the Call for Sites consultation held in 2025.
- 6.2 These representations should be read alongside those earlier submissions and have been prepared to help inform the next stage of plan-making and ensure that the plan can be found sound when it does reach examination.
- 6.3 Supporting the sustainable growth of Cambridge and its economy is a national priority. Successive governments have made clear their ambition to realise the city's potential, and the Councils' Local Plan must be an essential component of this. This is a responsibility that the Councils must take seriously. It is recognised that there are other layers of planning that may supplement or build upon the foundations set by the GCLP. However, the timeframes and scopes for those additional layers are not fully clear, and there is therefore a real risk that opportunities for addressing issues that Greater Cambridge is currently facing are missed or severely delayed. These issues are closely related to the affordability and availability of housing, which is having a real and considerable impact now on people's ability to find a home in a location of their choosing and/or to access the housing market at all. This in turn impacts on the ability of employers and institutions to attract and retain staff. This applies as much to world-leading academics working for Cambridge University as it does to hospital support staff and other key workers.
- 6.4 Without a greater supply of deliverable housing land it is possible that the GCLP will not be found sound at examination due to not being sufficiently positively prepared.
- 6.5 Cambridge South offers an opportunity to reduce this risk by allocating land that can deliver a substantial number of new homes and, critically, in a location that can benefit from access to existing and planned infrastructure and close to one of the city's major employment hubs. The housing offer has been tailored to make the most of this opportunity by providing a mix that directly addresses the needs of those working on Cambridge Biomedical Campus. It can do so whilst also meeting the 'Golden Rules' set out in the NPPF. There are numerous examples of edge of Cambridge sites delivering high quality development, integrated with the city.
- 6.6 The draft NPPF that government is currently consulting on sets out a clear indication that proposals on grey belt (as the Site is considered to qualify as), that are able to benefit from good connectivity to existing infrastructure and is able to meet these Golden Rules should be considered favourably. The next iteration of the dGCLP should do the same, and plan for sustainable patterns of growth that reflect the government's ambitions for a step-change in economic and housing delivery.