

Greater Cambridge Local Plan 2024–2045

**Regulation 18 Consultation December 2025 –
January 2026**

Land to the south–east of Cambridge Road, Foxton

Representations on behalf of R2 Developments Ltd.

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1. Introduction

- 1.1. Our client, R2 Developments Ltd., supports the aims of the emerging Local Plan to minimise carbon emissions and reliance on the private car by creating thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure needed for Greater Cambridge. However, the Councils' strategy for economic growth needs to allow for greater flexibility and a recognition of the role that employment sites physically well related to railway stations can play. The proposed changes to the National Planning Policy Framework (NPPF) seek to promote development near to well-connected railway stations. Should these changes be adopted unchanged, then the decision making policies would be material considerations in the determinations of applications for development. Accordingly, the purpose of these representations is primarily to respond to the emerging Vision; Development Strategy; and Draft Allocations proposed by Greater Cambridge Local Plan (GCLP) Regulation 18 consultation. And to highlight the need for the emerging Local Plan to take account of the proposed changes to national planning policy.
- 1.2. Our client has been promoting their site 'Land to the south-east of Cambridge Road, Foxton' (HELAA Site ID 40408 –Site ID 115890) through previous call for sites as a logical and deliverable site to be allocated for 12,500 square metres of employment floorspace. The site was first assessed by the Councils in 2021. And then again in 2025. In the time that has passed our client has continued to progress technical and design work and is now in a position to update their Call for Sites submission. This latest submission also seeks to reaffirm the deliverability of the site and highlight the need for a revision to the green belt to support a site-specific policy that allocates the site for employment development in the emerging Local Plan. An alternative mixed use scheme is also proposed in light of proposed changes to the NPPF with regard to new homes being delivered near well-connected rail stations.
- 1.3. The allocation of the site would result in the following benefits:
 - Up to 12,500 square metres of employment floorspace in a sustainable location within walking distance of a well-connected rail station and within the A10 corridor, which has been identified as accommodating employment growth

or

 - Up to 800 square metres of employment floorspace and 70 dwellings in a sustainable location within walking distance of a well-connected rail station and within the A10 corridor, which has been identified as accommodating employment growth
 - Provision of small scale, low-rise buildings within a landscape led layout that would result in opportunities for start-up companies by giving them space to scale-up either within the site or by moving to larger premises within the same geographical area
 - A flexible site that can be designed to promote walking and cycling as the most appropriate means for staff and visitors to travel to the site by using sustainable transport infrastructure including Foxton rail station and the Melbourn Greenway



- A flexible site that can be designed with SUDs integrated to ensure that no new or existing properties would be at risk of flooding
- The ability to deliver significant landscape buffers on the eastern and southern edges of the site to provide a better defined and more defensible edge to the green belt
- Environmental enhancements that would deliver significant gains in biodiversity through the creation of new habitats on site

1.4. The following sections respond to the previous HELAA assessments of the site in the context of the changes to national planning policy that have been implemented and those that are proposed in the recent consultation.

2. A Sustainable Location

- 2.1. Paragraph 88 of the NPPF states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings. Paragraph 89 acknowledges that to meet employment needs in rural areas sites may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In the case of our client's site, which is adjacent to Foxton, it is in a highly sustainable location within walking distance of a well-connected rail station and on the route of the Melbourn Greenway. Both these existing pieces of infrastructure would offer staff employed on the site greater opportunities to travel by sustainable modes.
- 2.2. Moreover, the A10 corridor has been identified as an area for future employment growth through the emerging Local Plan. To the northeast of the site, the land adjacent to Cambridge Road (A10) and Mill Lane, Hauxton is proposed to be allocated for 2,000 square metres of office (Class E(g)(i)), research and development (Class E(g)(ii)), and light industrial (Class E(g)(iii)) floorspace through draft Policy S/RRA/CRH. Draft Policy S/RRA/CR also proposes approximately 8,000 square metres of floorspace for employment uses at land to the west of Cambridge Road, Melbourn. Through the allocation of our client's site, there is the opportunity to locate further employment opportunities at Foxton to create a network of sites connected by the A10 and the Melbourn Greenway alongside it.
- 2.3. In addition to supporting the Councils' growth strategy for the southwest of the district, the proposed changes to the NPPF include draft Policy S5, which would establish 'in principle' support – a "default yes" – for suitable proposals that develop land around rail stations within existing settlements, and around 'well-connected' train stations outside settlements, including on green belt land. Draft Policy L3 would require minimum densities of 40 dwellings per hectare around all stations, with an increase to 50 dwellings per hectare around 'well-connected' stations. Given the frequency of trains from Foxton station to London and Cambridge, it is likely to meet the definition of 'well-connected'.
- 2.4. Moreover, our client has been promoting 'Land to the north and east of Barrington Road, Foxton' (HELAA Site ID (2023) 40412 –Site ID 115891) for 60–90 dwellings. The adoption of draft Policy S5 would mean weight being attached to it as a decision making policy during the determination of any application for our client's other site. There are other sites in close proximity to Foxton station that may also come forward as speculative applications in accordance with Policy S5. Especially on sites that are being promoted through the call for

sites process. However, to meet the government's aim of creating sustainable clusters around railway stations, there is a need to deliver employment opportunities alongside these new homes. The arguments made in the parallel update report for our client's other site with regards to housing delivery are relevant to this site if it were to come forward as a mixed use site.

- 2.5. There is a high level of probability that the draft NPPF will result in policies S5 and L3 becoming part of the national planning policy. Therefore, it is essential that the emerging Local Plan acknowledges that sites like our client's are likely to come forward as planning applications. And that it takes the opportunity to positively plan for them by allocating them through the Local Plan process. This would ensure that the location of new employment sites maximise the opportunities for new and existing residents to walk, cycle and take public transport to access their places of work.
- 2.6. By designating Foxton as a Group Village it has been identified as one of the more sustainable rural settlements in the District. Unlike other Group Villages, Foxton benefits from excellent public transport connectivity with London and Cambridge. The Melbourn Greenway also provides cycle connectivity with employment sites at Melbourn to the southwest and employment sites at Hauxton and Cambridge to the northeast. Which include the biomedical campus at Addenbrookes. The Councils' strategy for accommodating new homes on the edges of Cambridge and new settlements to the north and west of the district means that there are very few new homes proposed for the rest of the rural area, including the A10 corridor. A more holistic approach needs to be taken to the distribution of both homes and employment sites across the district, especially along existing travel corridors.
- 2.7. Notwithstanding the proposed changes to the NPPF, further employment opportunities being delivered along the A10 corridor would support the aims of the established hierarchy of settlements. By focusing limited growth on Foxton, one of the most sustainable Group Villages in the district, new homes and jobs could be delivered around the railway station. Successive Local Plans have recognised the need for new homes and jobs to be accommodated near to existing public transport infrastructure. The proposed changes to the NPPF take this further with the likelihood of a default yes for sites such as our client's, that are well related to rail stations.
- 2.8. In preparing the emerging Local Plan the Councils instructed IcenI to carry out analysis of employment needs. The IcenI Report on the life sciences sector¹ identifies a need for start-up spaces for smaller companies and scale-ups opportunities as these companies grow. Our client's site could accommodate flexible units with space for companies to grow. Being located on the A10 corridor, there is the opportunity for companies to benefit from the site's proximity to larger employment areas at Melbourn and Hauxton, as well as Foxton station providing connectivity with London and Cambridge.
- 2.9. Draft Policy J/NE of the emerging Local Plan recognises that sites for employment can be acceptable on the edges of South Cambridgeshire's towns and villages. In terms of the specific criteria of draft Policy J/NE, our client's site is close to the defined extent of Foxton and logically related to the built form to the northeast of the village. Given the likelihood for

¹ Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs – September 2024



future development around the railway station, the scale and form of development on the site would be in keeping with the category and scale of the village as it grows. There are other benefits of the site being allocated for development in terms of landscape impact.

3. Landscape and Green Belt Matters

- 3.1. The Councils' 2021 assessment of the landscape impact concluded that the development of the site would have a significant impact and would urbanise the rural edge of the village. This assessment takes no account of the village edge as it is presently. An edge that is defined by views of commercial buildings and the former petrol filling station from the eastern approach along the A10 and the railway. Through the allocation of our client's site, there is the opportunity to deliver a more appropriate edge treatment to the village. One that would provide more appropriate boundaries with the land to the east and south that would remain as green belt.
- 3.2. The benefit of a more holistic approach to the wider land parcel to the south-east of Cambridge Road is that the existing edge can be screened and therefore enhanced. This benefit can only be achieved through the allocation of our client's site. Moreover, the weight attached to the impacts of development in the green belt has changed significantly since the 2021 assessment. Specifically, due to the 2024 changes to the NPPF and the introduction of 'grey belt' land as a concept for permitting development in sustainable locations on low-quality land within green belts.
- 3.3. Grey belt is defined in the NPPF 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 policies relating the areas or assets in footnote 7 would provide a strong reason for refusal.
- 3.4. Our client has undertaken an initial assessment of the site. The development of the site would not check the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging into one another or preserve the setting and special character of historic towns. Based on this assessment, there is a strong argument that the site meets the definition of 'grey belt' with regards to the contribution it makes towards the purposes of the green belt.
- 3.5. Following a more detailed assessment, our client is confident that they can demonstrate that the site does not contribute strongly to any of purposes of green belt set out in the NPPF. As such, there is a high degree of probability that a successful argument could be made that the site comprises grey belt land.
- 3.6. At the application stage further evidence would include a LVIA, to demonstrate that a low-rise development on the site together with a landscaped buffer would not result in any significant adverse impact upon landscape character. In the context of existing views of the commercial units on the edge of the village, new landscaping, that would be integral to any development proposals, would deliver a more defined and therefore defensible edge to the village and green belt.
- 3.7. Prior to preparing a layout plan for the site our client has been carrying out further investigations. These are primarily focused on identifying whether there are any archaeological assets of significance that may require preservation in situ. Whilst these

could potentially constrain development on part of the site, it is likely that there would still be opportunities for development of the site as proposed.

4. Flood Risk

- 4.1. The most recent Flood Risk Officer's comments confirm that the site is wholly in Flood Zone 1. Limited areas of the site are identified as being at risk of surface water flooding. The limited impact of surface water flooding across parts of the site is a known constraint that would inform the layout of the site. Given the landscape led approach to any development of the site there is the opportunity to deliver an integrated approach to water management with surface water drainage being managed close to its source. A SUDs network could be integrated into any layout in a way that would create amenity benefits, enhance biodiversity, and contribute to a network of high-quality green and blue spaces for the benefit of users of the units and visitors to the site. Development would inevitably be sequentially located within the site to avoid any buildings or road infrastructure being located in areas of flood risk.

5. Ecology

- 5.1. The 2021 RAG Assessment of 'amber' for Biodiversity and Geodiversity appears to be based on the potential for increased pressure on a nearby SSSI from new residents. As the site would not accommodate any residential properties, this concern is unfounded.
- 5.2. Given that the majority of the site comprises intensively farmed agricultural land, there should be no reason why through an enhancement of existing landscape features a significant increase in biodiversity could not be achieved through the provision of landscaped buffers to the east and south. Whilst our client has concerns about the implications of the proposed blanket requirement of 20% BNG across all major developments as proposed by draft Policy BG/BG, in the case of their site, it is likely that the Councils' aspiration for 20% BNG could be achieved and even exceeded.
- 5.3. Throughout the Councils' assessment of the site the Policy Officer has confirmed that the site is not part of a protected open space designation and that any impact of the proposed development could be reasonably mitigated or compensated. That remains the case.
- 5.4. In allocating the site for development there is the opportunity to secure the beneficial use of a site that is likely to be identified as grey belt land. The allocation could also secure environmental enhancements that would create a more defined, stronger eastern and southern boundaries to this part of the village that would not cause harm to the openness of the adjacent land that would remain as green belt.

6. Access

- 6.1. The Site Access Officer confirms that the proposed site access is likely to be acceptable in principle subject to detailed design. Accordingly, there is no reason to believe that the creation of an acceptable access onto Cambridge Road would represent a constraint to the development of the site. Indeed, with the proximity to the Greenway and Foxton station, the opportunities for sustainable travel to the site should reduce the impact of a new access.

- 6.2. All other technical matters related to ground contamination, air quality, noise, etc. are either identified as 'green' or 'amber' in previous assessments. There is no reason to believe that any of these matters would represent a constraint to the development of the site.

7. Summary

- 7.1. The development of our client's site would help support the vitality of Foxton through new jobs being created in a location with access to a well-connected rail station and services and facilities at the heart of the village. Importantly, the smaller employment units could be delivered early on in the plan period so that less reliance was needed on the delivery of larger employment sites and the infrastructure needed to support them. The employment opportunities along the A10 corridor are set to increase with the proposed allocations in the emerging Local Plan. This strengthens the argument that Foxton is a sustainable location to focus future employment growth as part of a more holistic approach to the A10 corridor. Especially on a site where there is every indication that new low-rise employment buildings could be accommodated without significant harm to the character of the village or the green belt.
- 7.2. In this case, there is a strong argument that the allocation of our client's site offers an opportunity to deliver a sustainable development of the land around Foxton station. Given the proposed changes to the NPPF and the potential for a default 'yes' for sites well-related to rail stations, it is inevitable that the site around the station will be developed in the future. Through taking a holistic approach to growth in this part of the village, and the development of our client's site in particular, the Councils have the opportunity to enhance the area through the creation new landscaped boundaries to the east and south. Which would create a continuous landscaped edge to the village, and a defensible boundary to the green belt, that limited views of any new buildings on the site.
- 7.3. Once further assessments have been carried out, it is likely that our client will be able to demonstrate that their site performs poorly against the purposes of green belt as set out in the NPPF. Since the site was originally promoted, in the early stages of the Local Plan process, the concept of grey belt has become part of national planning policy and is one of the means by which the government seeks to promote development in sustainable locations. This significant shift in the national policy to permit more development on sites like our client's means that the development strategy for the Greater Cambridge must be reassessed. With the proposed changes to the NPPF, a further shift in national policy is likely to take place with sites well-related to rail stations effectively benefitting from a presumption in favour of development.
- 7.4. These changes warrant a further review and assessment of the acceptability of our client's site and the important role it can play in delivering new jobs needed for the economic growth aspirations of Greater Cambridge to be realised.

8. Deliverability

- 8.1. In terms of delivery, an estimated 48-month completion period, following allocation in an adopted Local Plan and the subsequent approval of all necessary planning applications, is realistic. This means that the new jobs could be delivered in the early years of the new Local Plan.

9. Specific policies

Housing Need: Policy S/JH: New jobs and homes

- 9.1. The growth figures in the emerging Local Plan are based on the conclusion of the Employment and Housing Needs Update. This is that the preferred employment scenario would result in the delivery of 73,248 jobs over the plan period. Whilst this may be the most likely scenario, the higher growth scenario and the sites needed to support it, should not be dismissed. Especially as the higher scenario could be achieved if sufficient investment comes forward.
- 9.2. The government's growth aspirations for Greater Cambridge are well documented with the Cambridge Growth Company (CGC) being set up to promote and accelerate growth in the area. The CGC is yet to publish any plans for how it will deliver the government's growth aspirations and what levels of growth it is seeking to promote. It is clear that in order to deliver growth in Greater Cambridge a balance is needed to ensure that the delivery of sites do not stall due to delays in their planning or build out phases. Should there be greater investment in Greater Cambridge than predicted, then the development plan should have the flexibility so that its policies are not a barrier to growth
- 9.3. A more robust approach would be to allocate more smaller sites for homes and jobs so there is less reliance on the larger, strategic sites. Given the government's aspirations for Greater Cambridge there is a strong justification for adopting a higher growth scenario than envisioned in the emerging Local Plan. And ensuring that the delivery of sufficient employment sites is not a barrier to more ambitious growth targets. This would also have an implication for the number of new homes proposed to support this growth in locations where new jobs would be created. Such as along the A10 corridor.
- 9.4. Whilst the proposed allocations would deliver employment growth and housing to meet the identified needs of Greater Cambridge, there should be aspiration for more ambitious targets. This can be achieved through the allocation of further sites on locations where changes to the NPPF make it inevitable that development would otherwise come forward as speculative applications.

Policy S/DE: Defined development extents

- 9.5. Focusing development only within the defined development extents of settlements is inconsistent with the proposed changes to the NPPF by way of draft Policy S5. These changes propose a more flexible approach to the location of development with weight given to sites that are well-related to existing settlements and well-connected rail stations. If the Councils were to adopt a more flexible approach to the development of sites well related to existing settlements and well-connected rail stations, it would result in more opportunities for new jobs to come forward as windfall sites where they can demonstrate that there are no technical reasons why they should not be developed.
- 9.6. Defined development extents do not necessarily guard against incremental growth in unsustainable locations. Indeed, new homes and jobs in demonstrably sustainable locations could be restricted from coming forward due to locations being just outside defined development extents of highly sustainable settlements. Or where they are within reasonable walking distances of established public transport routes. Such as Foxton rail

station. Where any harm to the countryside can be mitigated through landscaping and design, such sites should not be restricted in coming forward if they can demonstrate sustainable development. The Councils' approach is not consistent with the proposed changes to the NPPF, which takes a more pragmatic approach to allowing appropriate development where it is well located to existing settlements and public transport infrastructure. This is clearly the direction of travel that the government is taking to promote sustainable development.

Recommended change: part 1 of Policy S/DE needs to be amended to read *“Development and redevelopment of unallocated land and buildings within defined development extents, and on land well-related to the defined development extents and within reasonable walking distance of well-connected rail stations, (as shown on the Policies Map) will be permitted provided that:”*

Policy S/GB: The Cambridge Green Belt

- 9.7. The government's initial reforms of the NPPF in December 2024 included a modernisation of the way the green belt works. This included the consideration of development being permitted on low-quality green belt land that is identified as 'grey belt'. An initial assessment of our client's site at Foxton indicates that it is likely to be classed as grey belt, as it performs poorly against the purposes of green belt in the NPPF.
- 9.8. Given the importance of grey belt land in the government achieving its aim of significantly boosting the supply of new homes and jobs, greater flexibility is needed for a range of sites to come forward on sites that are well related to well-connected rail stations. Our client's site meets these criteria, as well as having excellent cycle connectivity with existing and proposed employment sites along the A10 corridor and at Cambridge.
- 9.9. In light of the significant changes to national policy with regards to development within the green belt, there is the need for the Councils to undertake a thorough green belt review as part of the Local Plan process. This is essential to ensure that the development strategy for Greater Cambridge is sound and will deliver the growth aspirations for the area in the short, medium and long term. It is inconceivable that the development strategy for an area so tightly constrained by green belt is not supported by an up to date review of the green belt, and the contributions that land parcels within it make to its purposes.
- 9.10. Whilst Policy S/GB follows the themes of the NPPF there is one clear area of divergence. That is in criterion c), which seeks to *“prevent communities in the environs of Cambridge from merging into one another and with the city”*. Criterion b) of paragraph 143 of the NPPF relates to preventing neighbouring 'towns' merging into one another. As the environs surrounding Cambridge are villages, draft Policy S/GB needs to be consistent with the NPPF.

Recommended change: criterion c), of Policy S/GB needs to be amended to read *“prevent communities in the environs of Cambridge from merging with the city.”*

Further recommendation: That a comprehensive review of the green belt be carried out to identify further sites for development in sustainable locations that can be delivered without harm to the purposes of land being designated as green belt.



Town & Country Planning Act 1990 (as amended)
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