CONSULTATION

RESPONSE

CERES PROPERTY

Greater Cambridge Local Plan

Draft Local Plan

Land South of Lower Cambourne

Site ID 115601

HELAA Site ID 40447

On behalf of Richborough

September 2026

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1. INTRODUCTION

1.1 This representation on the Greater Cambridge Draft Local Plan (Proposed Submission Local Plan Regulation 19 Consultation) ('the DLP') are made on behalf of Richborough in respect of Land South of Lower Cambourne ('the Site').

1.2 In accordance with the requirements of the consultation this representation has been focused on the matters related to soundness of the plan. As required by the consultation an individual response is provided in relation to each policy/part of the plan, with a focus on the tests of soundness as set out in national policy. Responses to each parts of the plan have been provided as part of the online consultation.

1.3 The Site lies immediately south of Cambourne, forming a natural extension to the existing settlement. The Site is being promoted to support the delivery of approximately 1,700 dwellings, along with a local centre, a primary school, and substantial areas of public open space. The Site is approximately 98 hectares in area.

1.4 This representation should be reviewed in conjunction with our Regulation 18 consultation response, which provided detailed technical information to demonstrate that the site is fully deliverable in planning terms, in a way that responds positively to the site's context, opportunities and constraints.

1.5 As part of the Regulation 18 response the following documents were submitted:

- Vision Document, prepared by Richborough;
- Illustrative Development Concept Masterplan, prepared by Richborough;
- Landscape Visual Assessment, prepared by Iceni;
- Heritage Assessment, prepared by RPS; and
- Transport and Access Appraisal, prepared by Hub

Background

1.6 The Site was originally submitted as part of the Call for Sites under HELAA Reference 40447 and 40132. It scored well within the initial HELAA Assessment, which acknowledged that whilst there are some planning policy constraints, these can be overcome through the planning application process.

1.7 The Site is suitable, available and achievable for residential development, and able to contribute towards meeting the districts' housing needs.

1.8 Richborough took on the promotion of the site prior to the Regulation 18 consultation and they are committed to working with the Shared Planning Service to deliver this site. Despite the submission of detailed evidence base information at Regulation 18 stage, the Greater Cambridge Shared Planning Service did not reassess the site, on the basis that in the view of the LPA, the site does not align with the wider Local Plan Strategy. We disagree with this approach.

1.9 For reasons explained within this representation, the Site's omission from the DLP represents a missed opportunity and it is important that assessment of the Site's deliverability and sustainability is revisited. It is considered that the site is well aligned with the Spatial Strategy, which proposes significant growth in Cambourne. The allocation of this site would assist with accelerating the key objectives of the Spatial Strategy to expand Cambourne and could be delivered without resulting in the need to amend the Spatial Strategy.

1.10 As set out within our Regulation 18 response, whilst elements of the DLP are supported, we consider the current DLP does not adequately address the need or demand for residential development in either quantitative or spatial terms. It is also considered that additional sites are required to be allocated for development to ensure choice and competition for market land, to accelerate growth in early years of the plan and to avoid the vast majority of growth being limited to very few sites with deliverability issues.

1.11 The Site represents an opportunity to not only help address soundness issues with the DLP, but to also provide significant social, economic, and environmental improvements for Greater Cambridge.

1.12 Key benefits of the Site include:

- It is the only new Strategic Site in Cambourne that can be developed in the short term and not dependent on the delivery of the East West Rail.
- Allocation of the Site will assist with achieving key strategic vision to focus growth on Cambourne for it to become the third largest settlement in Greater Cambridge.

- The Site is very sustainable with very good pedestrian and cycle connectivity to services in Cambourne.
- The Site is unconstrained in planning terms.
- Ability to deliver housing for all ages from young to old.
- A delivery of a network of green spaces and a new Country Park.
- New Primary School, Local Centre, and Community Centre.
- Richborough are sole promoters of the Site.

1.13 These representations are divided into the following sections:

- **Section 2** overview of the Site
- **Section 3** provides an overview of the proposed development
- **Section 4** provides a planning policy overview
- **Section 5** provides representations on the key policies within the Greater Cambridge Emerging Local Plan
- **Section 6** analyses the Cambourne Growth Strategy
- **Section 7** analyses and provides a response to the HELAA Assessment of the site.
- **Section 8** provides a conclusion

2. THE SITE

2.1 The Site lies immediately south of Cambourne, forming a natural extension to the existing settlement (Figure 1). The Site is approximately 98 hectares in area. The Site is being promoted to support the delivery of approximately 1,700 dwellings, along with a local centre, a primary school, and substantial areas of public open space.



Figure 1: Location Plan

2.2 The Site's northern boundary adjoins the existing neighbourhoods of Lower Cambourne and Greater Cambourne. Lower Cambourne and Greater Cambourne are separated by the Cambourne Nature Reserve, which is adjacent to the northern boundary of the Site. The Site is bounded to the west by the A1198, beyond which lie agricultural fields and the village of Caxton. Its southern edge is Caxton Road and a small cluster of residential properties and smallholdings, including Bourn

Windmill which is a Grade I Listed Building and Scheduled Ancient Monument. To the east, the Site is bordered by Skylark Solar Farm and agricultural land.

2.3 The Site itself is situated partly within the Parish of Caxton and partly within the Parish of Bourn, but principally relates spatially to the town of Cambourne to the north.

2.4 The Site primarily comprises eight arable fields, defined by field margins and interspersed with mature trees and ponds, creating a simple agricultural landscape.

2.5 A bridleway (279/4) runs just to the north of the northern boundary of the Site, which provides a route for cyclist, equestrian, and pedestrian access through Cambourne and Caxton. The bridleway connects into the permissive footpaths in the Nature Reserve providing walking links to bus stops and local services. Additionally, a public footpath (44/15) branches off from the bridleway, crossing the Site centrally in a north south direction, providing a walking route from Cambourne to Caxton Road. Footpath 273/3 is situated to the east boundary of the Site.

2.6 The Site is situated in a very sustainable location and the centre of Cambourne is located approximately 1.5 km from the Site, offering a range of shops, services, and community facilities, including primary and secondary schools and leisure/sports centres, which are within walking and cycling distance of the Site. Further detail on the sustainable location of the site is set out within the Vision Document and within the Access Appraisal, prepared by Hub, which were submitted at Regulation 18 stage.

3. THE PROPOSED DEVELOPMENT

3.1 In accordance with the submissions made at Regulation 18 stage, an Illustrative Development Concept Masterplan (Figure 2) has been prepared to demonstrate initial design response and development capacity. The proposal includes:

- Around 1700 dwellings, comprising varied densities.
- Outstanding new green infrastructure network retaining existing landscape features and providing a robust green buffer to Caxton. Open space will include children's play areas, parks, semi-natural green space, sustainable drainage, and communal food growing.
- Comprehensive, interconnected pedestrian/cycle network, incorporating existing public rights of way.
- Potential to create a self-sustaining development through new on-site energy and heat generation/usage, targeting reduced energy consumption and zero carbon dwellings.



Figure 2: Illustrative Development Concept Masterplan

3.2 Further detail on the proposals is set out within the Vision document.

4. PLANNING POLICY CONTEXT

4.1 This section sets out the key planning policy and material considerations which are relevant to the preparation of the draft Local Plan.

Planning and Compulsory Purchase Act 2004 (As Amended)

4.2 Section 19 of the Planning and Compulsory Purchase Act 2004 (As Amended) sets out specific matters to which the local planning authority must have regard when preparing a local plan.

4.3 Section 39 (2) of the Planning and Compulsory Purchase Act 2004 (As Amended) establishes a legal requirement for Plans to be prepared with the objective of contributing to the achievement of sustainable development.

The Town and Country Planning (Local Planning) (England) Regulations 2012 (As Amended)

4.4 Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while regulation 10 states what additional matters local planning authorities must have regard to when drafting their local plans.

National Planning Policy Framework (NPPF)

4.5 In August 2026, the government published the new version of the NPPF (2026), which replaced the NPPF (2024). As set out within the NPPF, the Greater Cambridge Local Plan is being produced under the legacy plan making system, and therefore its soundness in relation to consistency with national policy will be considered against the NPPF 2024. Accounting for the plan being considered under the 2024 version of the NPPF, unless otherwise stated, where references are made to the NPPF in this document it will be in respect to the 2024 version.

4.6 Nonetheless, as set out in within the NPPF 2026 (Annex A Paragraph 2) Development Plan policies which are materially inconsistent with national decision making policies in the NPPF 2026 should be

given very limited weight. Therefore, whilst the plan is being considered against the NPPF 2024, it is important that due consideration is given to the NPPF 2026.

National Planning Policy Framework (NPPF) (2024)

4.7 The NPPF sets out the Government's planning policies for England and how these should be applied. Paragraph 11 of the NPPF sets out:

> *11. Plans and decisions should apply a presumption in favour of sustainable development.*
>
> *For **plan-making** this means that:*
>
> *a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
>
> *b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
>
> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area; or*
>
> *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
>
> *...*

4.8 Section 3 of the NPPF relates to Plan-making. In relation to examining plans, paragraphs 36 and 37 set out:

> *36. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*
>
> *a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities,*

so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

37. These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

Planning Practice Guidance

4.9 The Planning Practice Guidance (PPG) sits alongside the NPPF and provides further guidance in relation to the planning process.

4.10 Paragraph: 039 Reference ID: 61-039-20190315 explains:

What are the steps in gathering evidence to plan for housing?

Strategic policy-making authorities will need a clear understanding of housing needs in their area. The steps in building up this evidence include:

- *establishing the overall housing need (conducted using the standard methodology unless specific circumstances justify an alternative - see local housing need guidance);*
- *identifying the housing need of specific groups;*
- *working with neighbouring authorities and key stakeholders to establish the housing market area, or geography which is the most appropriate to prepare policies for meeting housing need across local authority boundaries;*

5. REGULATION 19 POLICIES RESPONSE

5.1 This section of the report provides a response to relevant policies within the emerging Local Plan, where they are relevant to land south of Lower Cambourne. This response has been prepared having regard to the tests of soundness as set out within paragraphs 36 and 37 of the NPPF. Each policy is considered in turn:

Vision for Greater Cambridge

5.2 Richborough supports the vision for Greater Cambridge to be a place where a big decrease in our climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities.

5.3 Achieving this vision is contingent upon the adoption of a sound Local Plan which sets ambitious targets for growth and is positively prepared, justified, effective, and consistent with national policy (in accordance with the tests set out in Paragraph 36 of the National Planning Policy Framework 2024 (NPPF). As set out within these representations, in its current form the DLP requires amendments to ensure that the level of growth and housing allocations reflect the Vision for Greater Cambridge as set out in the DLP.

Plan Period

5.4 The Local Development Scheme currently envisages Adoption of the plan in 2028 and the plan period will cover a period until 2045.

5.5 Paragraph 22 of the NPPF states that strategic policies should look ahead to a minimum of 15 years period from adoption to anticipate and respond to long term requirements and opportunities, such as those arising from infrastructure. Where large scale developments such as new settlements or significant extensions to existing villages or towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account of the timescale for delivery.

5.6 The emerging Local Plan proposes a number of new settlements and significant urban extensions, which make up the vast majority of growth in the plan. Table 2 of the emerging Local Plan sets out a housing trajectory for the draft allocated sites. All the larger strategic draft allocations have a growth trajectory that is well in excess of the plan period.

5.7 In October 2025 the Greater Cambridgeshire and Peterborough Combined Authority Board approved the Local Growth Plan which has a core ambition to double the size of the area by 2050. The Local Growth Plan looks ahead to 2050, and the government has also set out a vision for growth in Cambridge between now and 2050.

5.8 Following the publication of the Local Growth Plan, the Greater Cambridgeshire and Peterborough Combined Authority are now in the process of preparing a Spatial Development Strategy for their area which will be built on the Local Growth Plan and will include geographical and land-use designations. The mayor has committed to publication of a draft version of this plan by 2026, with a view to adopting the Spatial Development Strategy in 2028.

5.9 There will be a requirement for the new Local Plan to align with the mayor's spatial strategy, particularly given they are both due for adoption in 2028.

5.10 Therefore, to align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the plan, **it is considered that the plan period should be extended to 2050**. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives. This amendment is required in order for the plan to accord with national policy and for it to be justified.

Proposed Amendment to the Vision in order for the Plan to be Sound

5.11 In order for the plan to be positively prepared, justified and therefore sound and , **the plan needs updating throughout to provide a plan period of 2024-2050**. This would need to include amendments to the Vision and policy S/JH to provide a plan period from 2024-2050.

5.12 The increase in the plan period, will have a resulting impact in the need to plan for additional housing and employment, which will need to be reflected throughout the plan.

Policy S/JH: New Jobs and Homes

5.13 Policy S/JH New Jobs and Homes, sets out that development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for: 73,300 additional jobs and a minimum of 48,069 new homes. The number of new homes has had a minor reduction from 48,195 proposed as part of the Regulation 18 stage.

5.14 As set out in detail within our Regulation 18 response, the level of employment and housing growth proposed over the plan period is underpinned by the Employment and Housing Evidence Update 2025 (EHEU 2025), which forms an evidence based document that has not been updated since the Regulation 18 version of the Local Plan. The two key drivers for the proposed job and housing growth appears to be predicated mainly on how many jobs the government's mandatory minimum housing need calculation would support, and separately the most likely future forecast for jobs for Greater Cambridge and the homes that this would require.

5.15 The Regulation 19 consultation includes an updated Development Strategy Topic Paper (June 2026) to justify the level of growth proposed. This Development Strategy Topic Paper sets out that between 2024-2045, the current supply of sites (either allocated or sites with planning permission) is 38,378, which leaves a residual requirement to allocate 9,691 to meet Greater Cambridge's objectively assessed housing needs during the plan period. The emerging Local Plan allocates 13,654 new dwellings from new allocations, which the Development Strategy Topic Paper and emerging Local Plan states provides an 8.2% supply in headroom in relation to housing need.

5.16 As set out within the June 2026 Development Strategy Topic Paper, the Councils commissioned a review of economic data having regard to representations made at Regulation 18 stage. In this regard Iceni were commissioned to prepare a Review of Economic Data, Context and Representations (June 2026). and concluded that recent data is not considered to provide sufficient basis for reviewing the EHEU (2025) and that in the view of the Council, the proposed housing and employment growth forecast remains robust.

5.17 The earlier version of the Development Strategy Topic Paper (2025) included the below table which sets out the Standard Method, Central and High projected job increases and housing needs (Figure 3). This table has been removed from the June 2026 version, but it is included below as it is considered to provide an important overview of the range of job and growth forecasts considered at earlier stages of the plan making process.

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

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

Source: Iceni analysis

Figure 3: Development Strategy Topic Paper Table 1

5.18 For jobs, the EHEU 2025 identifies a "Central" most likely future jobs forecast. The Central forecast assumes growth of around 4,000 additional jobs per annum or more through to 2045. This is set out as a mixture of continuing the recent period of rapid growth seen in Greater Cambridge's Knowledge Intensive sectors over the last 10 years, but also building in an assumption that there will be slower or contracting periods and unforeseen shocks. The EHEU 2025 also identifies a higher growth forecast, placing greater weight on what is described as *'rapid growth in the recent past'*, particularly in key sectors, and recommended providing flexibility in employment land in case the market delivers more jobs than anticipated.

5.19 For homes, the EHEU 2025 identifies that the outcome of the Government's Standard Method for calculating minimum housing need, which increased significantly in 2024, would support the most likely forecast for future jobs.

5.20 It is argued that as the Standard Method figures broadly correlate with the Central (suggested most likely) job and housing projections and that adoption of these figures is appropriate. However, for reasons explained within this representation, the level of growth proposed does not align with either

the government's, or the Cambridgeshire and Peterborough Combined Authorities aspirations for growth within Greater Cambridge. It also does not provide sufficient flexibility to increase housing numbers, should employment growth continue at the pace it has for the last 10 years. In this regard, there is considered to be a very strong case that employment growth in Cambridge will continue at the pace it has for the last 10 years and that this should be the minimum level of growth planned for.

5.21 The Iceni Review of Economic data, context and representations report (June 2026) seeks to support the Councils position on the basis that maintaining growth rates in line with historic growth rates, means ever increasing year on year actual change, which in the view of Iceni and the Council is difficult to achieve over time. However, this does not account for Cambridge being an international and national focus for job growth and it is considered that clearly Cambridge is an exceptional case when considered against other areas of the United Kingdom.

5.22 Therefore, in accordance with the requirements of the NPPF, this is not considered to be appropriate strategy taking into account reasonable alternatives and other publicly available evidence. As it stands, for reasons explained below, Policy S/JH is not justified and the DLP could not be found sound.

5.23 Paragraph 36 a) of the NPPF is clear that to be positively prepared, the Local Plan should *as a minimum, seek to meet the areas objectively assessed housing needs.'* Therefore, the standard method housing requirement should be a minimum starting point for housing growth. Therefore, it is unclear why the Development Strategy Topic Paper (2025) identifies housing figures that are marginally below the standard method requirements for both housing and job growth as a 'central growth' figure. In reality, this is the absolute minimum level of growth that should be planned for and should be identified as the low growth scenario within the topic paper.

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

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

proposed using the Central level of growth or standard method housing and job figures.

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

Cambridgeshire and Peterborough Independent Economic Review

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

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

5.28 Further to the above, it is explained that:

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

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

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

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

The Case for Cambridge

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

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

5.33 Two illustrative scenarios were put forward:

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

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

5.35 The emerging Local Plan covers a plan period to 2045. Table 3 of the plan sets out that the plan will deliver 52,032 dwellings between 2024 and 2045. If the housing growth in the Local Plan is

continued on a pro rata basis using the 2,289 dwellings per annum for another 5 years, this would still only deliver 63,477 homes by 2050, which is still almost 37,000 dwellings lower than the government's lower of the two Case for Cambridge growth scenarios. Whilst it is acknowledged that the aspiration to deliver 100,000 dwellings by 2050 is optimistic, there is considered to be a strong case to substantially increase the level of housing and employment growth above the standard method figures.

5.36 In this regard, the Mayor for Cambridgeshire and Peterborough Paul Bristow said in June 2026*: 'Our Local Growth Plan is intentionally the most ambitious in the country and delivering it means tackling infrastructure constraints we've put off for too long.'* As set out above, it is considered important for the emerging Local Plan to align with the Local Growth Plan.

5.37 Paragraphs 1.19 to 1.21 of the DLP acknowledge that the government has set up Cambridge Growth Company Development Corporation to accelerate growth, but then conclude that this Local Plan is only based upon the Council's own evidence base for plan making. This is considered to provide a missed opportunity to accelerate growth in Greater Cambridge in the short term, prior to the Development Corporation having planning powers.

Cambridgeshire Local Growth Plan

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

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

5.39 It is also noted that:

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

5.40 Page 155 of the Cambridgeshire Growth Plan is also clear that, to support a doubling of the economy by 2050, this would require a minimum of 214,760 dwellings to be delivered in the County during this timetable. Whilst the Local Growth Plan does not define a District by District breakdown of housing figures, it is clear that Greater Cambridge, as the focus for growth within the County, should be responsible for a substantial proportion of this growth. On a pro-rata basis, if the 214,760 dwellings were delivered equally between the six local authority areas in Cambridgeshire and Peterborough, this would result in Greater Cambridge having a requirement to deliver a minimum of 71,586 dwellings between now and 2050. In reality, accounting for Cambridge being the International Life-Science and employment driver for the region and a cornerstone for the UK's economic strategy. In accordance with the government's Case for Cambridge, the growth within the Cambridge City and South Cambridgeshire administrative areas would be expected to be substantially higher than currently proposed.

5.41 As set out above, as part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will build on the Local Growth Plan and will include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028.

5.42 Paragraph 25 of the NPPF is clear that strategic policy making authorities should collaborate to identify strategic matters, which they need to address in their plans. They should engage with elected Mayors and Combined Authorities. Paragraph 26 of the NPPF then goes on to state that effective and ongoing joint working between strategic plan-making authorities and relevant bodies is integral to the production of a positively prepared and joint strategy.

5.43 In accordance with the requirements of paragraphs 25 and 26 of the NPPF, i**t is critical that the emerging Local Plan is aligned to the Cambridgeshire Local Growth Plan (2025) and the emerging Spatial Development Plan for Cambridgeshire**. As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives of the Cambridgeshire Local Growth Plan.

Conclusion on Policy SJ/H – Homes and Jobs and Amendments Required

5.44 Having regard to the clear growth aspirations set out both by the government and the Cambridgeshire Local Growth Plan, **it is considered that the emerging Local Plan and Policy SJ/H needs to be revisited to provide a higher level of growth**. A higher level of growth

would align with both the governments and Mayors Vision for growth within the area and not providing this assessment is a current flaw of the plan and in turns **results in the current plan not being positively prepared**.

5.45 As set out above, delivery of growth in Greater Cambridge is of national significance. In the past, employment growth rates have been stronger than official figures and have outstripped delivery of housebuilding and infrastructure. The government has confirmed its continued support for high levels of growth in Greater Cambridge. This ambitious level of growth is also supported by the Local Growth Plan and will likely be reflected in the Spatial Development Strategy.

5.46 Based on this evidence, it is considered that **the levels of job and housing growth targeted are not justified** and are not an appropriate strategy taking into account the reasonable alternatives. A far more ambitious level of job and housing growth should be planned for. As it stands, Policy S/JH is unsound and requires amendment.

5.47 It is recommended that in order to be sound that the higher growth scenario as set out in the development strategy topic paper is followed, which is considered to be a more appropriate strategy for growth. This would require part 1 of Policy S/JH to be amended to replace the requirement to deliver 73,000 additional jobs with a requirement to deliver 90,936 jobs over the plan period and to replace the requirement to deliver a minimum of 48,069 dwellings, with a requirement to deliver a minimum of 59,409 dwellings over the plan period. For ease of reference the proposed amendments to the policy are set out below:

Policy S/JH: New Jobs and homes

Development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for:

a. *~~73,300~~ **90,936** additional jobs to support the Greater Cambridge's knowledge intensive sectors, and also provide a diverse range of local jobs; and*

b. *A minimum of ~~48,069~~ **59,409** new homes (reflecting an annual need for ~~2,289~~ **2,829** dwellings) meeting the needs for the total population, including for affordable housing and the specialist accommodation needs of specific groups such as Gypsies, Travellers, Travelling Showpeople, looked after children, older people, students, those with disabilities, and boat dwellers*

5.48 As set out in these representations, sustainable sites which can be delivered early in the plan period, such as Land South of Lower Camborne, would support this ambitious level of growth and should be allocated in the DLP.

Policy S/DS: Development Strategy

5.49 Policy S/DS: Development strategy sets out the proposed strategy for the pattern, scale, and design quality of places created in Greater Cambridge, for the plan period to 2045 and beyond. This is one of the key strategic policies within the plan. The policy is set out in different parts. Part 1 of the policy states the following:

> *Policy S/DS: Development Strategy, sets out that the need for jobs and homes will be met in the following order of preference, having regard to the purposes of the Cambridge Green Belt:*
>
> *a) Within the Cambridge Area*
>
> *b) On the outer edge of Cambridge*
>
> *c) At an expanded Cambourne*
>
> *d) At other new settlements*
>
> *e) In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres*
>
> ...

<u>Part 1 of Policy S/DS</u>

5.50 Part 1 of Policy S/DS is strongly supported. It is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge, accounting for the global importance of Cambridge as the focus for growth.

5.51 The acknowledgement that Cambourne as a highly sustainable location for growth reflects its connectivity and its current range of services and its position as the preferred location for growth after Cambridge is appropriate and is strongly supported. The sustainability of the settlement is such that a strategy of promoting growth here is an entirely logical one and this is why we consider Land South of Cambourne to be an obvious location for new housing. If East West Rail is delivered, then the settlements sustainability credentials will be further enhanced.

5.52 The Emerging Local Plan set out that the significant expansion of Cambourne would leverage its highly connected location within the OxCam Corridor and its integral role in the Greater Cambridge

economy. In this regard, being situated to the west of Cambridge, Cambourne is the only town within the District situated centrally within the OxCam corridor. Cambourne is also located outside the Cambridge Green Belt. It also provides an affordable alternative to Cambridge, where house and rental prices are high. For all these reasons, Part 1 of the Spatial Strategy is strongly supported and the hierarchy for growth is positively prepared, justified and sound in planning terms.

5.53 The allocation of Land South of Lower Cambourne would strongly align with the strategic policy objectives set out within Policy S/DS. Land to the South of Lower Cambourne offers a unique and strategic opportunity to assist with delivering the core objectives of the emerging Greater Cambridge Local Plan. Critically the site is being actively promoted by Richborough and has the ability to be delivered in the short to medium term, without the need for major infrastructure upgrades. In this regard, it is the only site of a strategic scale (1000 units or larger) that can be developed in Cambourne in the shorter term without being reliant on major infrastructure projects, such as East West Rail.

Part 2 of Policy S/DS and Strategic Allocations

5.54 Part 2 of Policy S/DS sets out that the vast majority of growth will be met via the following 3 new allocations, to supplement the existing allocations in the Adopted Local Plans:

- **Cambridge East (Marshalls Airport)** – allocated for approximately 8,000 dwellings (3,950 homes to delivered in the plan period) and 20,000m2 employment space
- **Cambourne North** – allocated for approximately 13,000 dwellings (delivering 2,720 homes within the plan period and 108,00m2 employment space
- **Grange Farm Little Abington** – allocated for approximately 4,500 dwellings (2,550 homes in the plan period) and 35,000m2 of employment space

5.55 This places a very high level reliance on the delivery of growth across only three sites, all of which are 4,500 dwellings or larger in size and all of which are predicated on significant infrastructure improvements. Since the publication of the Regulation 18 consultation, Cambridge North-East allocation has been amended to reduce the number of proposed new dwellings to 580 dwellings. However, rather than replace this allocation with new allocations, which would assist in reducing the reliance on the above 3 sites, the reduction in Cambridge North-East has resulted in a smaller housing buffer being provided. For reasons explained in this section of this report, this approach

results in substantial concerns regarding the likelihood of housing delivery being delayed, which is likely to result in insufficient housing being delivered across the plan period.

5.56 Table 1 of the Local Plan sets out that the current supply is 38,378 dwellings, with a further 9,691 dwellings required between 2024-2045 to meet the required need.

5.57 Table 3 of the DLP sets out that the Council has identified sites to deliver a further 13,654 homes over the plan period. 9,220 of the new dwellings, (which represents the majority of the 13,654 dwellings) will be met via 3 new urban extensions/new settlements at Cambridge East (Marshalls Airport Allocated under Policy S/CE), Cambourne North (Allocated under Policy S/CBN), and Grange Farm, Little Abington (Allocated under policy S/GF). The plan provides for an 8.2% buffer in housing delivery against the standard method. Accounting for the high reliance on the delivery of growth via only 3 sites, all of which have complicated infrastructure constraints it is considered that a buffer nearer to 20% would be preferable and would assist with providing a robust plan.

5.58 Based on the housing trajectory set out in the plan, it is apparent that 2025-2026 had a particularly low level of housing completions. This is concerning, particularly given that the early years of the plan are reliant almost solely on existing allocations to deliver growth. The housing trajectory states that upon adoption of the plan there will be a 5.47 housing land supply. However, this is based on the Liverpool method to assessing housing land supply, which is not the preferred method by government. Paragraph 68-031 of the PPG is clear that the preferred method for assessing land supply is the Sedgefield approach, which requires any backlog to be delivered within the following five years. This is to ensure that any backlog in supply is addressed early and not pushed back to later in the plan period. Using the Sedgefield approach, the housing land supply falls to 5.03 years. The trajectory also sets out that in the year of 2029/2030 annual completions will be almost 4,000 dwellings, which is more than 1,000 units higher than all of the other (20 years) within the plan period. This delivery figure for the year of 2029-2030, appears to be highly optimistic and appears to have been increased with the purpose of ensuring that a 5 year housing land supply can be maintained during the early years of the plan. The housing delivery rates for a number of the strategic sites, including Waterbeach, Northstowe and Bourn Airfield are not considered to be realistic in year 2029-2030.

5.59 Accounting for the reliance of the emerging Local Plan on a limited number new settlements and urban extensions (of 4,500 dwellings and larger in size), there is a good prospect that the 5 year housing land supply will drop below 5 years. Figure 8 of the DLP shows the housing trajectory and it is clear that as a result of the vast majority of new growth being planned for within new

settlements/urban extensions of more than 4,500 dwellings in size, there is very little growth from new allocations within the early years of the plan period.

5.60 This does not align with the NPPF's objectives to significantly boost housing land supply and it has also resulted in the Shared Planning Service advocating the use of the Liverpool approach. This is **not justified**, particularly given that a large quantum of growth in the emerging Local Plan is made up of existing allocations. **This should be addressed by the allocation of additional deliverable sites, such as land to the South of Lower Cambourne**, which can provide a very substantial contribution to housing supply but it can also be delivered in the shorter to medium term without the need to rely on significant infrastructure improvements. As an absolute minimum consideration should be given to provision for reserve sites, which are capable of coming forward quickly at such time that the 5 year housing land supply drops below 5 years. Land South of Lower Cambourne would be a logical site for a reserve site and can be delivered quickly, whilst also contributing a significant number of new dwellings to the housing trajectory.

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

Cambridge East

5.62 Policy S/CE: Cambridge East is a mixed-use development including 8,000 dwellings at Marshalls Airport. The land at Marshalls Airport was released from the Green Belt and safeguarded for development within the Cambridge Area Action Plan, which was adopted back in 2008, as a major new urban extension at Cambridge East. Since the publication of the Area Action Plan, schemes at Marleigh and Land north of Cherry Hinton have obtained consent and are currently being built out. However, some 17 years after the land was removed from the Green Belt, the development of the airport is still predicated on the relocation of Marshalls Airport to a new location.

5.63 Marshall announced in October 2025 that the business will not be moving to Cranfield but that the company is still committed to moving its aerospace business from its Cambridge Airport base by 2030 (with development anticipated to start in 2032). To support this, the site has recently been sold to Homes England and Hill Group, to bring forward development on the airport. Notwithstanding this aspiration, there is still no certainty that the airport will move within these predicted timescales, particularly given that an alternative site to relocate to has not yet been secured. As a result, development at Cambridge East could be significantly delayed which could result in limited or no housing delivery for a number of years, particularly within the first 15 years of

the plan period. In accordance with paragraph 78 of the NPPF, it is considered critical that additional allocations are included in the plan to boost supply within the first 15 years of the plan. This will assist in the Shared Planning Service maintaining a 5 year housing land supply.

Grange Farm, Little Abington

5.64 The delivery of 4,500 dwellings at Grange Farm is predicated to an extent on the delivery of the Cambridge South-East Rapid Busway. The Cambridge South-East Rapid Busway is subject to an up and coming Transport for Works Order Public Inquiry and is also reliant on further funding to secure its delivery. Without the delivery of the busway the sustainability credentials of Grange Farm will be substantially reduced and it is questionable whether this is the most appropriate location for growth when considered against the alternatives.

Cambourne North

5.65 Policy S/CBN: Cambourne North sets out the proposed approach to the further expansion of Cambourne, taking account of the significant planned improvements to public transport in this area. The new settlement would include approximately 13,000 homes, 108,000 square metres of employment floorspace, with a range of supporting services and facilities.

5.66 As set out above, Cambourne is a highly sustainable location for growth and its expansion is strongly supported.

5.67 The delivery of Cambourne North is predicated on the delivery of a new train line and a new train station as part of East-West Rail. The second and third stages of East West Rail, from Oxford through to Bedford and Bedford to Cambridge are still in planning & feasibility stages, and are dependent on final government funding and approval. Stage 1 of East-West Rail is currently under construction and services are due to commence between Oxford and Milton Keynes in 2026. Stage 2 will then extend services to Bedford as part of upgrades to the Marston Vale line by 2030. Accounting for the delays to stage 1 of East-West Rail, completion of the upgrades in stage 2 to Bedford by 2030 is considered to be optimistic and it is likely to be delayed. Stage 3, which is between Bedford and Cambridge, has no set timetable for construction works to commence or to be completed and it will be subject to a Development Consent Order. The Bedford to Cambridge stretch of East West Rail requires provision for a new rail line and is likely to be the most costly and complicated stretch of East West Rail to deliver and the government has yet to commit funding to build the Bedford-Cambridge section. It is considered very unlikely that this stretch of East-West Rail will be delivered

until the late 2030s at the earliest and therefore it is very unlikely that land to the north of Cambourne will be deliverable in the next 15 years at least.

5.68 As set out in the Cambourne Growth-Transport Vision and Principles Evidence Base Document, the residential growth in Cambourne North is situated to the north side of the railway. It is also proposed to build 3 road bridges and 2 active travel bridges across the new railway and A428 to connect to Cambourne. This major infrastructure will be complicated to deliver and it is not feasible for Cambourne North to be delivered until such time as the new rail line and station have been completed. The Cambourne Spatial Framework Strategy, prepared as an evidence based document to support the Local Plan, suggests that the First New Neighbourhood will be delivered between 2035–2040, with East-West Rail Station also opening in the same period. Accounting for the substantial uncertainty and major infrastructure required, it is plausible that delivery of the site could slip into the 2040s and the number of dwellings to be delivered as part of this plan period will be very limited. In this regard, the proposed 2,550 dwellings to be delivered in Cambourne North within this plan period is considered to be optimistic.

5.69 In support of the Regulation 19 consultation, an updated Cambourne North Spatial Framework has been published. This sets out that an Outline application could be submitted in 2028+. 2028 for submission of the Outline application is considered to be unrealistic accounting for the above constraints. It is not considered that an outline application could be submitted, until such time that there is certainty on the exact location and delivery of the rail line, which is not going to be clear for a number of years.

5.70 Conversely, Land to the South of Lower Cambourne can be delivered without the need for any significant infrastructure requirements and it provides a logical and very sustainable extension to the Town that can be delivered in the short to medium term (next 10 years). It would provide for a logical next phase of expansion to Cambourne, to supplement Cambourne West. North Cambourne would then be delivered in the longer term once East-West Rail is delivered.

5.71 The expansion of Cambourne is supported, however, due to the likely significant delays associated with the delivery of the East-West Rail station, additional growth should be allocated at Cambourne. Land to the South of Lower Cambourne would provide a natural extension to the settlement and could be delivered in the short term. As a minimum it should be allocated as a reserve site that could be delivered if the timescales associated with Cambourne North are delayed.

5.72 In order to be justified, positively prepared and in accordance with national policy it is critical that Policy S/DS is amended to include additional allocations. This should include land south of Lower

Cambourne. The following additional wording is proposed to part c of the policy that relates to Cambourne, which is highlighted in bold and italics:

Proposed Additional Allocation

Land south of Lower Cambourne- an allocation for a residential led development, in line with the wider vision for Cambourne, including 1,700 homes (delivering 1,700 homes in the plan period), a local centre, new education facilities and open space

5.73 As a minimum for reasons explained above, the land south of Lower Cambourne should be allocated as a reserve site

Policy S/SH: Settlement Hierarchy

5.74 Policy S/SH set out the Settlement Hierarchy. Cambourne is defined as a town in the settlement hierarchy, along with Waterbeach New Town and Northstowe. The settlement hierarchy is supported and it is considered appropriate for the Towns within Greater Cambridge Area to have their own position in the settlement hierarchy, rather than forming part of Rural Centres, which are less sustainable locations, with less services available.

Policy BG/PO: Protecting Open Spaces

5.75 Policy BG/PO of the emerging Local Plan relates to protecting open spaces. The policy sets out that development proposals will not be permitted where they would harm the character, function, and/or quality of, or lead to the loss of, protected open space of environmental and/or recreational importance as identified on the policies map, unless the existing open space can be satisfactorily replaced to an equivalent or better standard in terms of quality, quantity, or accessibility.

5.76 Richborough have no objection in principle to policy BG/PO, however objection is raised to the proposed designation of land to the south of School Lane, Cambourne as open space, as shown on figure 4 below.



Figure 4: Cambourne Draft Proposal Map - Land to south of School Lane open space designation
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5.77 As set out within the supporting text to policy BG/PO, the proposals maps include some new proposed open spaces within the plan. This includes an area of land between School Lane, the A1198 and to the north of bridleway 44/5 as shown on figure 4 above. This area of land is included within the area being promoted by Richborough and it is included in land put forward for promotion at land to the south of Lower Cambourne. It is not currently designated as open space within the Adopted South Cambridgeshire Local Plan (2018).

5.78 The inclusion of this land as open space was identified following a review of open spaces within the Protected Open Space Review (Updated June 2026), which is an evidence base document to support the emerging Local Plan. The land in question is referenced as POS_2207 with a designation as Informal Open Space at School Lane, Cambourne within the evidenced base document.

5.79 Within the Local Plan, the map key describes the allocated area as *'Historic Park & Gardens/Protected Open Space.'* This is a broad definition and includes a range of open spaces ranging from recreation grounds to informal open spaces. Historic Parks and Gardens and recreation spaces have

significantly higher protection status than Informal Open Space. Therefore, it is considered that the Local Plan map key needs amending to provide a separate category for Informal Open Space. This change is considered necessary in order for the local plan to be justified and therefore sound.

5.80 As set out within the Protected Open Space Review, the designation of sites as Informal Open Space was based on an assessment of sites against the following assessment criteria for the environmental and recreational importance of each site:

1. Contribution to setting, character, structure and environmental quality
2. Positive landscape features and sense of place - features such as streams, trees, hedgerows, meadowland which give it sense of place
3. Important green break from the urban framework
4. For part of a network of open spaces in the local area
5. Historical, cultural or known archaeological interest
6. Enjoyed visually from public places (footpaths, vantage points)
7. Contribute to wildlife value and biodiversity - nature conservation designation/adjacent or link to, contain habitats worthy of designation, wildlife oasis in area of limited wildlife value
8. Important for recreational purposes
9. Part of network and hierarchy of recreational open spaces
10. Part of sports provision which help meet demand
11. Linkage between recreational areas

5.81 Paragraphs 4.5 and 4.6 of the report state that Informal Areas of Open Space are areas of environmental importance, adding to the local setting, structure and environmental quality of places and provide spaces for informal recreation. It is acknowledged that identifying informal areas of open space worthy of protection is open to judgement, which is why the 11 point criteria as set out in paragraph 5.78 has been produced.

5.82 Site reference POS_2207 is referenced as meeting criteria 1, 2, 6, 7 and 8. The evidence base document does not, however, provide any supporting text to clarify how the conclusion on each

scoring criteria has been arrived at. It does also not clarify how many of the criteria a space needs to meet in order to be defined as open space. In this regard, the evidence base is not considered to be robust and the designations of sites has **not been justified** using a sound criteria. This needs to be revisited.

5.83 Notwithstanding the need to provide further clarification on the scoring criteria, it is not considered that Site Reference POS_2207 meets any of the 11 criteria for designating the site as informal open space and therefore the allocation of site POS_2207 and the proposals map for Cambourne should be updated, to remove this land as informal open space. An assessment of the site against criteria 1, 2, 6, 7 and 8 has been undertaken as follows:

	Criteria	Response
1	Contribution to the setting, character, structure and environmental quality	The site is situated at the entrance to Cambourne. However, the environmental quality of the site is limited, other than the frontage of the site, which provides a grass verge frontage to the entrance to Cambourne. The site itself has limited value in terms of contributing to the character and environmental quality of Cambourne. The site is relatively unkempt scrubland that does not provide a positive contribution, other than the landscaping around the site boundary. The landscaping is not of particularly high quality and is a very dense mix species planting.
2	Positive landscape features and sense of place - features such as streams, trees, hedgerows, meadowland, which give it a sense of place	The east and south boundaries of the site are densely vegetated, with further vegetation along the north boundary, but this vegetation has been planted in association with the A1198 and it is not of any significant arboricultural quality. The remainder of the site is low quality scrubland that is overgrown and visually detracts from the entrance to Cambourne.
6	Enjoyed visually from public places (footpaths, vantage points)	To the south of the site is a bridleway 44/5, which connects Caxton and Cambourne. However, the south boundary of the site is vegetated and there are limited views into the site. In any event the site itself is scrubland and does not provide a visually enjoyable view. The more prominent view from the bridleway is to the agricultural land to the south. To the north, the site is partly visible from School Lane, however there is not a pavement on either side of the road at this location and it is not a location that is well used by pedestrians.
7	Contribute to wildlife value and biodiversity - nature conservation designation/ adjacent or link to contain habitats worthy of	The site is scrubland with no significant biodiversity value. The biodiversity value of the site is also likely to be further reduced as a result of its location adjacent to the A1198, which is a busy road. The site is adjacent to Cambourne Country Park, but does not provide a green link between the Country Park and other green

	Criteria	Response
	designation, wildlife oasis in area of limited wildlife value	infrastructure. On the contrary, the Country Park includes a Nature Reserve and this is an area of the District which has high wildlife and ecological value, which reduces the need for further open space designations in this area.
8	Important for recreational purposes	The site is gated and has no public access. Whilst it is appreciated that the assessment of the site is subjective, this appears to be a clear error in the scoring. The land adjacent to the site to the east forms the west boundary of Cambourne Country Park.

5.84 In conclusion it is clear that site reference POS_2227 does not meet the relevant criteria to warrant a designation as informal open space. In order for the plan to be justified and in accordance with national policy, it is important that the proposals map for Cambourne be updated to remove the informal open space designation on the site.

5.85 In the event that the designation is carried forward, as a minimum the map key for Cambourne needs to be amended to be clear that this site is Informal Open Space, rather than being a recreation ground or an Historic Park and Garden. This change is required in order for the plan to be positively prepared and justified.

5.86 It is not considered that this designation impacts on the ability to deliver land to the south of Lower Cambourne. As shown on the Vision Document for the site, it is proposed that this part of the site could provide part of the primary access road onto the roundabout with the A1198/School Lane junction. As shown within the Vision Document submitted at Regulation 18 stage, the development would have the ability to provide significant alternative areas of open space elsewhere in the site, that would be of significantly better quality than the informal open space.

6. CAMBOURNE GROWTH STRATEGY

6.1 To support the current Preferred Options Consultation, the Greater Cambridge Shared Planning Service have published a number of updated technical evidence base documents to support the allocation of Cambourne North. One of the documents that has not been updated is the Cambourne Growth Strategy (by Arup dated September 2025). Accounting for this document not being updated since Regulation 18 stage, Richborough have reiterated their comments raised at Regulation 18, which are considered to be important having regard to the soundness of the plan.

6.2 The Cambourne Growth Strategy and Spatial Framework Strategy set out a bold vision for Cambourne's transformation into a sustainable, well-connected town of regional significance by 2060, creating a population of approximately 50,000 people.

6.3 The Cambourne Growth Strategy document sets out that, anchored by the proposed East West Rail (EWR) station and the Cambourne to Cambridge Busway (C2C), it will become one of the best-connected locations in Cambridgeshire, enabling fast links to Cambridge and across the Oxford–Cambridge Arc. This sets out a clear Vision for Cambourne to become the third largest settlement in Cambridgeshire, after Cambridge and Peterborough. As set out above the principle of substantial expansion of Cambourne is strongly supported.

6.4 Evidence based documents prepared to support the Growth Strategy include the Cambourne Spatial Framework Strategy, which was updated in June 2026. The original Spatial Framework Strategy (June 2025) included a Spatial Options Report (June 2025), which was undertaken to consider the most suitable way to expand Cambourne. A long list of appraisal options considered whether Cambourne should be expanded to the North, East, West, South, or combinations thereof. North was chosen as the preferred option.

6.5 Each option was subject to a high-level qualitative review against the following key drivers:

1. *Alignment with transport connectivity*
2. *Capacity to accommodate scale of development in the long term*
3. *Deliverability*

6.6 Growth to the south of Cambourne included both land within the land south of Lower Cambourne and land adjacent to the east. The option of developing to the south of Cambourne was discounted

on two fronts. Firstly, its transport connectivity and secondly that only a limited proportion of growth can be delivered in Cambourne South.

6.7 In this regard, it is acknowledged that South of Cambourne cannot deliver 13,000 dwellings and 108,000 square metre of employment land proposed for allocation in the DLP alone. This is not considered to be a suitable reason to discount the option, which can make a valuable contribution to growth in Cambourne, when combined with other options. It is considered that the Spatial Options Paper places insufficient weight on the deliverability of land to the south of Cambourne and, unlike the other options, it can be delivered in the shorter to medium term, without the need for major infrastructure upgrades. In addition, it does not take into account wider spatial concerns raised in paragraphs 5.54 to 5.71of this statement that the DLP is reliant on a very limited number of new settlements/urban extensions, many of which have deliverability constraints.

6.8 The option of delivering growth to both the north and the south of Cambourne was discounted on the basis that growth to the north performs better against the criteria than growth to the south. This conclusion is not considered to be sound and it is considered that the assessment of the suitability of delivering growth to both the north and south needs to be reassessed as the most suitable option for growth in Cambourne. Following our comments at Regulation 18 stage, this further assessment has not been undertaken and therefore our original comments and concerns are still applicable.

6.9 In respect of the growth option to the north, there is no acknowledgement within the Spatial Options Report assessment regarding the deliverability scoring for Cambourne North, that its implementation relies on the implementation of East-West Rail and substantial infrastructure upgrades associated with the delivery of 5 new bridges between Cambourne North and Cambourne. This is a clear and fundamental constraint to the delivery of housing and employment to the north of Cambourne, particularly given that the route and funding for East-West Rail (including delivery timetable) is not yet secured. The May-July East West Rail Consultation (2026) has not changed this position. In this regard, the benefits of delivering growth to Cambourne North, particularly in relation to its deliverability, are clearly overstated within the document.

6.10 Accounting for the deliverability issues associated with Cambourne North it is considered that there is a clear and compelling case for some dispersal of growth to multiple options. This will reduce the reliance on all the growth being delivered via Cambourne North and substantially increase the prospects of Cambourne growing in the short to medium term (next 10-15 years), which will assist in meeting the aspirations of the Cambourne Growth Strategy.

6.11 In deliverability terms, the Spatial Options report appears to discount growth the south of Cambourne on the basis that it concludes there are infrastructure constraints in relation to transport

connectivity and flooding need to be overcome. It also references that there is potentially higher heritage sensitivity, and that only a limited amount of growth is supported. It does acknowledge that there is a good opportunity to extend the guided busway into the growth area to the south. In this regard the flood risk constraints relate to land to the east of Land to the South of Lower Cambourne. The site subject to this representation is unconstrained in flood risk terms, and is situated solely within a flood zone 1. In heritage terms, this representation has been supported by a heritage assessment prepared by Iceni, and a Vision Document that demonstrate that the development can be delivered whilst protecting heritage assets, including Bourn Windmill to the south of the site. The Vision Document also demonstrates that suitable separation will be maintained between development in land to the south of Lower Cambourne and Bourn and Caxton.

6.12 The Spatial Options Report does not reference that growth to the south of Cambourne can be delivered in the short to medium term without the need for East-West Rail or major infrastructure improvements. This is a substantial benefit of Cambourne South that has not been adequately acknowledged in the deliverability section of Spatial Options Report. Therefore, in order to be sound, it is imperative that the respective deliverability merits of Cambourne North and Cambourne South are reassessed to provide a sound evidence base and a justified conclusion.

6.13 In addition, the conclusion of Cambourne South in respect of transport connectivity also needs to be reassessed. It appears that the fundamental reason for discounting Cambourne south is that in the longer term EWR will be likely to be located to the north of the A428. Whilst it is acknowledged that EWR is an important factor, it should not be only determinant for further growth in Cambourne particularly as it is not yet a fully committed scheme. Aside from the deliverability issues set out above, provision for 13,000 dwellings to the north of Cambourne is going to be slow to deliver and multiple allocations around the town will have significant benefits in providing choice and competition for market land and boosting housing supply.

6.14 The report concludes that the expansion to the south of Cambourne has '*poor alignment with sustainable transport connectivity.*' This conclusion is considered to be flawed and it is inconsistent with the remainder of the document, which acknowledges that growth to the south would still have moderate connectivity to EWR and good connectivity to the guided busway.

6.15 The report also sets out that there would be a good opportunity to extend the guided busway into the south Cambourne growth area, which would further enhance the sustainability credentials of directing growth to the south of Cambourne.

6.16 When considering the merits of dispersing growth, it is also important to recognise that the train station and guided busway will provide connectivity to different locations and areas of Cambridge.

New homes to the south of Cambourne would have easier connections to the guided busway than homes in North Cambourne and this could provide more sustainable links for those wanting to access the substantial employment opportunities within West Cambridge Employment Hub and Life-Sciences Campus. The guided busway will provide six trains an hour to Cambridge City and Cambridge West Employment Site, which is a significant benefit in transport connectivity terms. The guided busway will also likely be in place well in advance of any new EWR station. As a result, development to the south of Cambourne is a highly sustainable option.

6.17 As set out within the Access Appraisal, prepared by Hub, and the Vision Document that support this representation, the development will have the ability to provide both bus services and cycle routes from the site to Cambourne Town Centre and EWR.

Conclusion on Cambourne Spatial Options Paper

6.18 For the reasons set out above, expansion to the south of Cambourne should be planned for, either as a stand-alone extension to the settlement, or in combination with development in another direction. As detailed in the submitted documents and plans, Land South of Lower Cambourne is unconstrained and could provide a highly sustainable extension to Cambourne. As acknowledged in the Spatial Options Report:

> *'delivery across two separate areas could create benefits by spreading impacts of phasing and construction if planned correctly and in a coordinated fashion'.*

6.19 The benefit of developing multiple areas is considered to be underestimated in the document, particularly in the deliverability section and this is considered to clearly be the preferred option for growth. This needs to be reassessed and it is considered that provision of new development both to the north and south of Cambourne, would have substantial benefits in sustainability terms and boosting housing supply in the short term, and that it is clearly the most suitable option when considered against the alternatives. As an absolute minimum this document should be updated to address and it does not provide a sound basis for distributing growth in Cambourne.

6.20 As set out above, as a minimum land south of Lower Cambourne should be allocated as a reserved site within the emerging Local Plan. This is considered to be particularly appropriate in respect to Cambourne, given the infrastructure constraints associated with Cambourne North. Land south of Lower Cambourne would be capable of being delivered in the short to medium term as a reserved site, in the likely event that land north of Cambourne is substantially delayed.

7. HELAA RESPONSE

7.1 To support the emerging Local Plan, the Greater Cambridge Shared Planning Service have prepared a Housing and Economic Land Availability Assessment (HELAA). In accordance with the Planning Practice Guidance, the HELAA provides an assessment of the suitability, availability, and achievability of each individual site submitted as part of the Call for Sites. The HELAA was originally undertaken in 2021, and then updated in 2025 to reflect any change in planning circumstances since the original site submission. Further updates and reassessment of a number of sites was completed in May 2026. In respect to land south of Lower Cambourne, despite the submission of extensive technical information at Regulation 18 stage, the site was not reassessed on the basis that it the allocation of the site does not align with the spatial strategy. It is considered that the site allocation aligns well with the Spatial Strategy and allocation of the site would assist in meeting the strategic objectives of policy S/DS in respect to the key strategic policy of expanding Cambourne. Allocation of the site would assist with meeting this objective in the short term, given that Cambourne North is not deliverable until the late 2030s at the earliest.

7.2 To demonstrate the suitability of the site, the Regulation 18 submission was supported by the preparation of a Vision Document for the site. Technical work has also been undertaken on the following disciplines and formed part of the submission to the Shared Planning Service:

- Landscape and Visual Appraisal, prepared by Iceni
- Heritage Assessment, prepared by RPS
- Access Appraisal, prepared by Hub

7.3 This technical work undertaken demonstrates that the site is a suitable and deliverable site for development. Informed by the technical work undertaken at Regulation 18 stage, an updated analysis and response to the HELAA Assessment for land to the South of Lower Cambourne (HELAA Reference 40447) has been undertaken. Accounting for the site, not being reassessed, as set out in table 1 below the assessment has been resubmitted to allow reassessment of the site.

7.4 The site was previously concluded as red impact, solely on the basis of the landscape impact of the scheme. However, as demonstrated in the Landscape and Visual Technical Note, the site is of medium landscape sensitivity and development on the site can be readily accommodated. It is therefore considered that the site should be re-scored as Amber/Green for development. A full assessment is set out below:

	HELAA Assessment	Applicants Response and Assessment
Site information		
Site ID	115601	
HELAA Site ID	40447	
Suitable Site Area (ha)	98.2897952694159	
Suitability		
Adopted Development Plan Policies RAG 2025	Amber	Amber
Adopted Development Plan Policies Comment 2025	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.	This conclusion is agreed. The site has scored Amber only because it is situated outside of the development boundary.
Flood Risk RAG Assessment 2025	Amber	Green
Flood Risk Officer Comment 2025	Flood Zone: Wholly in Flood Zone 1. Surface Water Flooding: 3% lies in a 1 in 30 year event. 1% lies in a 1 in 100 year event. 3% lies in a 1 in 1000 year event	As identified by the flood risk officer the site is wholly within a flood zone 1. There are a few minor areas within the site, that are within surface water flood risk areas. No development is proposed within these areas (please refer to the Vision Document). The site therefore should be assessed as Green.
Landscape RAG Assessment 2021	Red	Amber
Landscape Comment 2021	Development of a new settlement would have a significant adverse impact upon the landscape as a resource, Local Green Space and views. Visibility is high from both wider and local views both within and out of the site. It would have a permanent effect and an encroachment into the countryside. Even with a significant reduction of residential dwellings the harm would still be adverse upon the settlement of Caxton and the rural countryside.	The regulation 18 submission was supported by a Landscape and Visual Appraisal, prepared by Iceni. This LVA demonstrates that the site is assessed of being medium landscape sensitivity and development of the site can be readily accommodated. To minimise harm to the landscape, the recommendations of the LVA have been fully incorporated into the Vision Statement. This includes: 1. Retention of landscaping and clear view corridor to Bourn Windmill. 2. Retention of woodland and vegetation between the development site and the A1198 to ensure clear separation between the site and Caxton 3. Retention of an area of open land to the south-east of the site to provide clear separation with Bourn 4. Provision of a green corridor to the north of the site to ensure integration with the nature reserve and green space to the north.

	HELAA Assessment	Applicants Response and Assessment
Biodiversity and Geodiversity RAG Assessment 2021	Amber	Amber/Green
Biodiversity and Geodiversity Officer Comments 2021	All residential developments will require assessment of recreational pressure on nearby SSSI. Any development is likely to require consultation with Natural England. Habitats including hedgerows, trees, wetlands, wooded copses and watercourses may qualify as Habitats of Principal Importance/be of high ecological value and support protected or notable species. Arable habitats may be of low ecological value and may support farmland bird populations. Ponds within the site may support great crested newt (if suitable). Grass snake recorded in area.	A full assessment will be undertaken at planning application stage. However, the site is not in close proximity to SSSI or protected sites. The closest SSSI is approximately 2.5km from the site at Elsworth Wood, With Caldecote Meadows, just over 2.5km to the east of the site. The site is agricultural land generally of low ecological value.
Policy RAG Rating 2021	Green	Green
Policy Officer Comments 2021	Site is not on a protected open space designation, however there are some protected open space designations on periphery of the site including a Local Green Space designation. Development of the site may have a detrimental impact on the peripheral open space designation, but the impact could be reasonably mitigated or compensated.	This assessment is agreed.
Historic Environment RAG Assessment 2021	Amber	Amber/Green

	HELAA Assessment	Applicants Response and Assessment
Historic Environment Comments 2021	The southern site boundary is adjacent to the site of Bourn Mill, a Grade I listed building and Scheduled monument. It is therefore a highly sensitive location and there is potential for significant impact to setting. To mitigate it may be necessary to exclude some of the existing site boundary to create a buffer and height and key views will need to be carefully considered.	This assessment is agreed. This submission has been subject to a detailed heritage assessment of the site. The proposed Concept Masterplan has sought to sensitively plan the development to protect and enhance the setting of Bourn Windmill. This includes providing open space adjacent to the Windmill to enhance the experience of public views to the Windmill and providing a viewing corridor to the north, to frame the views to and from the Windmill.
Archaeology RAG Assessment 2021	Amber	Amber
Archaeology Officer Comment 2021	Located in a landscape of extensive Iron Age and Roman activity. Cropmarks of Iron Age and Roman date are recorded in the site.	This assessment and conclusion is agreed.
Accessibility RAG Assessment 2025 - Automated	Amber	Green
Accessibility Comment 2025	Adequate accessibility to key local services, transport, and employment opportunities.	As demonstrated within the Vision Document and Access Appraisal, prepared by Hub, the site is within a very sustainable location with access to key services and facilities within Cambourne, the vast majority of which are less than 2km from the site. The site access also has the ability to provide direct connectivity onto the cycleway/pedestrian footpath on School Lane on Lower Cambourne, with further opportunities to link directly into Cambourne via the Nature Reserve.
Transport and Roads RAG Assessment 2021	Amber	Green
Transport and Roads Guideline Comments 2021	Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	This assessment is agreed. The Access Appraisal undertaken by Hub, further supports this position and demonstrates that the development can be accommodated and mitigated on the road network.

	HELAA Assessment	Applicants Response and Assessment
Noise, Vibration, Odour and Light Pollution RAG Assessment 2021	Amber	Green
Noise, Vibration, Odour and Light Pollution Guideline Comments 2021	The proposed site will be affected by road traffic noise from nearby main roads, but is acceptable in principle, subject to appropriate detailed design considerations and mitigation.	This conclusion is agreed. Suitable setback can be provided from the A1198 to ensure no impact on residential amenity.
AQMA RAG Assessment 2021	Amber	Green
Air Quality Officer Comment 2021	Large site and lots of residential units - potential for AQMA traffic impact without mitigation	The assessment is agreed and the site is unconstrained in air quality terms. It is therefore considered that the assessment should be amended to Green.
Contaminated Land RAG Assessment 2021	Amber	Green
Contaminated Land Officer Comments 2021	Previous agricultural land use. Potential for historic contamination, conditions required.	The site is agricultural land and potential for historic contamination that would impact on deliverability of the site is considered to be very low.
Overall Suitability Score	Red	Green
Further Constraints		
Agricultural Land Classification Grade 2	100	Noted
Source Protection Zone	75.21	This is noted, but is not considered to be a constraint on the deliverability of the development.
Highways England Zones	A428	
Available		
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The site was submitted by the landowner and/or site promoter who has confirmed that the site is available for development in the timescales indicated.	Richborough are now responsible for promotion of the site and they are fully committed to early delivery of the site.

	HELAA Assessment	Applicants Response and Assessment
Are there known legal or ownership impediments to development?	No	Agreed - There are no legal or ownership constraints.
Is there planning permission to develop the site?	No relevant recent planning history	
When will the site be available for development?	6-10 Years	6-10 years is agreed.
Available RAG	Green	Green
Achievable		
Is there a reasonable prospect that the site will be developed?	The land has been promoted by the landowner and or developer and is known to be available for development. The site has a low existing use value and residential development is likely to be economically viable at an appropriate density.	This assessment is agreed.
Achievable RAG	Green	Green
Capacity		
Prevailing Density (weighted) (dwellings per ha)	30	
Residential capacity at prevailing density	1474	Based on work undertaken as part of the Vision Document the site is considered to have capacity for 1700 dwellings.
Estimated start date	6-10 Years	Agreed
Estimated annual build-out rate (pa)	145	Agreed
Development completion timescales (years)	11-15 Years	Agreed

8. CONCLUSION

8.1 This representation has been prepared by Ceres Property on behalf of Richborough and demonstrates that land to the south of Lower Cambourne would be a very sustainable and logical allocation for growth as part of the emerging Greater Cambridge Local Plan. There is a compelling case for the allocation of the site.

8.2 Elements of the emerging Local Plan is supported. In particular, part 1 of the Development Strategy (Policy reference S/DS) is strongly supported. The hierarchy of growth options, which seek to prioritise growth in Cambridge and Cambourne is strongly supported and they are both correctly identified as the most sustainable settlements for growth as part of the emerging Local Plan. Cambourne is the only town within the Greater Cambridge Area that is situated within the Oxford–Cambridge Arc. It is highly connected and provides an affordable alternative to growth in Cambridge.

8.3 In order to be considered as sound, the following changes are required to the plan:

- The level of housing and employment growth as set out in policy S/JH seeks to only meet the minimum levels of housing and employment as required under the standard method. It is not considered that this is the most reasonable approach when considered against the alternatives. Higher housing and employment growth would align with the Cambridgeshire Growth Local Plan and the government's Case for Cambridge. It is also imperative that housing supply is boosted to address the very acute housing affordability crisis in the area and to readdress the imbalance with job and employment growth within Greater Cambridge.
- The Local Plan period should be increased to 2050 as a minimum in order to align with the Cambridgeshire Growth Local Plan (2025) and to align with paragraph 22 of the NPPF. This is considered to be particularly appropriate given the number of new settlements/urban extensions proposed.
- There is a clear need to increase the number of new allocated sites both to increase housing delivery and to ensure a suitable supply of sites, particularly within the early years of the plan. The current housing buffer of 8% is considered inadequate, particularly given that the vast majority of new allocated growth is limited to 3 new sites, all of which have substantial and complicated infrastructure requirements in order to be delivered.
- It is imperative that additional sites are allocated that can be delivered within the first 10-15 years of the plan period, and should include the allocation of land south of Cambourne. This would significantly boost housing land supply and provide choice and competition for market

land. It will also ensure that a 5 year housing land supply can be maintained. As a minimum land south of Lower Cambourne should be allocated as a reserved site.

- The proposals map for Cambourne requires amending to remove the proposed allocation as open space on land to the south of School Road, Cambourne. For reasons set out in this response, the land in question is low quality scrubland that does not have any public access and is not readily visible from public views. In addition, in order to be justified policy BG/PO and the corresponding proposals maps require amending to provide a clear distinction between the different types of open space.

8.4 In respect of Cambourne, the Spatial Options Report for Cambourne needs to be revisited. The provision for delivery of 13,000 dwellings along with 108,000m2 of employment space solely on land to the north of Cambourne is not considered to be the most appropriate strategy when considered against the alternatives. It is considered that there are substantial benefits with dispersing growth to both north and south of Cambourne.

8.5 Cambourne North is predicated on the delivery of East-West Rail, which has not as yet been subject to a DCO, and it does not currently benefit from funding from the government. It is also predicated on the delivery of five new bridges over the new railway line and the A428. It is very unlikely that Cambourne North will be developed prior to 2040 at the earliest. To maintain the vision for significant growth in Cambourne, only development to the south has the ability to be delivered in the short to medium term, without the need for major infrastructure upgrades. Growth to the south of Cambourne would be a logical next phase of Cambourne after Cambourne West, and it will assist meeting the strategic expansion of Cambourne as set out within the emerging Local Plan and the Cambridgeshire Growth Plan.

8.6 Land to the south of Lower Cambourne benefits from being unconstrained in planning terms and it benefits from very good connectivity to Cambourne Town Centre and the existing schools and services in Cambourne. The site has the ability to deliver 1,700 dwellings, a local centre, and a primary school. The Vision Document and Concept Masterplan for the site has been carefully prepared and respects the landscape character and the setting of Bourn Windmill to the south of the site. As demonstrated by the technical work undertaken the site is fully deliverable in planning terms and the HELAA should be reassessed in respect to the site in line with our assessment set out in section 7. As a minimum, land to the south of Lower Cambourne should be allocated as a reserve site, which could come forward in the event that the Shared Planning Service is not able to demonstrate a 5 year housing land supply or if the development at Cambourne North is delayed.

8.7 The amendments set out in this representation are required in order for the plan to be positively prepared, justified, effective and in accordance with national policy. Richborough would like the opportunity to attend the Examination in Public hearing sessions to clearly set out the amendments required in order for the plan to be sound.

8.8 Richborough is actively promoting the site and is committed to working constructively with the relevant landowners and the Shared Planning Service to bring it forward.