LICHFIELDS

Briefing Note

Date 25 September 2026

Subject Policy S/DS: Development Strategy

1.1 These representations to the regulation 19 draft Greater Cambridge Local Plan (dGCLP) have been prepared by Lichfields for CEG Land Promotions Limited (CEG LP) on behalf of the landowners Peterhouse College and Guys & St. Thomas' Foundation in the context of their interests in Southeast Cambridge, namely the foreseen:

- Southern extension to Peterhouse College (A southern expansion to previously released Green Belt sites GB3/GB4);
- Southern extension to Employment site E/3; and
- Easterly expansion to the previously released Green Belt site GB1.

Representation

1.2 As set out at length in CEG LP's objections to Policy S/JH, Greater Cambridge is vital to the economic aspirations of the UK, both now and in the future. However, to ensure that continues, the dGCLP (Reg 19) needs to respond positively to the concerns raised by a range of stakeholders which would threaten the delivery of sustainable growth in the area which include:

1 The delivery of a quantum of housing that will enable the job growth expected across the wider Greater Cambridge region, including a wide range of sizes and tenures, to ensure that businesses can draw upon the necessary labour pool.

2 The location of houses in areas which are accessible to and well supported by public transport links and can take advantage of the significant investment that is going into improving local infrastructure such as the delivery of Cambridge South station, East-West rail and new guided busways.

1.3 There is an emphasis on the location of development having regard to the presence of sustainable transport options, and in that perspective the approach that Policy S/DS Part 1) takes is considered appropriate. The supporting text to Policy S/DS (para 2.60) acknowledges that *"Our evidence shows that the edge of Cambridge could be a sustainable location for homes and jobs, being accessible to existing jobs and services."*

1 At face value, CEG LP is in agreement with the Greater Cambridge Shared Planning Service (GCSP) that Policy S/DS Part 1) includes a reasonable order of preference, with sites centrally located and on the edge of Cambridge given a high priority in delivering the jobs and homes that are demanded in such a high growth area. However, it is noted that this order of preference is considered within the context of the Cambridge Green Belt.

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Registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG

1.4 Whilst acknowledging that the GCSP Service has to give consideration to the Green Belt and also Grey Belt, CEG LP considers that the approach to discounting sites based on Green Belt constraints has significantly hindered the plan's ability to take advantage of the most sustainable development opportunities. These sustainable locations are those which could do the most to help ease transport congestion and their associated environmental pressures by placing growth where there is a very viable alternative to the private car. This runs contrary to the dGCLP (Reg 19) strategic priorities related to climate change, wellbeing, great places and connectivity.

1.5 Whilst accepting it is open for the GCSP Service to choose a strategy which seeks to not release Green Belt on the edge of Cambridge (aside from Cambridge Biomedical Campus), it would still be necessary for that strategy to be deliverable and meet the other policy tests in the NPPF (2024), including the tests of soundness. In the circumstances of Greater Cambridge, and taking account of the pressures of housing need, avoiding the Green Belt is not a sustainable solution for growth.

1 It creates unsustainable commuting patterns and undermines community vitality. This could make it increasingly difficult for local businesses and services to recruit and retain workers, undermining economic growth potential and the resilience of local businesses.

2 CEG LP is mindful that the GCSP Service's own evidence does not necessarily dispute these points. The 'Development Strategy Topic Paper Appendix 1: Strategic Growth and Spatial Options Review' (para 1.2) *"explains the Councils' approach to strategic options testing for the draft plan and Proposed Submission stages, providing context for strategic options testing work completed to inform the Proposed Submission strategy."* As summarised in the Topic Paper (page 6 – Appendix 1B) sustainability benefits of the 'Focus on edge of Cambridge – Green Belt' were identified at earlier stages of the plan's progress:

- *"Depending on location, potentially good access to established employment hubs, existing services, facilities and public transport links, and provision of new employment, services and facilities if developments are of sufficient scale, resulting in positive effects for the economy and employment, accessibility, equalities, health, climate change mitigation and air quality.*
- *Can be designed around walking and cycling."*

1.6 Despite these sustainability benefits, the 'Development Strategy Topic Paper Appendix 4: Revised Greater Cambridge Local Plan Green Belt considerations review' (para 4.1) summarises the following approach has been taken in the dGCLP (Reg 19):

"Drawing on the assessment, it is considered that on the basis of the Calverton tests, our objectively assessed needs for homes and jobs would not justify a strategic exceptional circumstances case for releasing land in the Cambridge Green Belt for development. On this basis, the preferred option development strategy meets our identified need for development such that NPPF paragraph 146 is not relevant to the emerging plan. As there are no strategic exceptional circumstances for Green Belt release, the Councils have not

considered grey belt land although we have carried out an assessment to identify land that could provisionally be considered grey belt, in line with NPPF requirements."

1.7 The following explains why CEG LP considers the Development Strategy to the 'Edge of Cambridge' in the dGCLP (Reg 19) is **not sound**.

Economic Potential

1.8 The approach to Green Belt release represents a frustrating lack of ambition by Greater Cambridge, which, whilst recognising that all of this development is helpful for the continued growth of the Biomedical Campus, has not resulted in opening up the area to the expansion and development of other technology parks such as Peterhouse and Fulbourn Technology Parks on the edge of Cambridge.

1.9 CEG LP supports the expansion of the Biomedical Campus. Cambridge cluster companies successfully pitched for $2bn funding in 2025, which was across both the tech sector ($1.19bn) and life sciences ($896m), highlighting that both sectors are highly important to keeping Cambridge as a vibrant tech city. It is therefore indicative that Greater Cambridge has both a booming life sciences and tech sector. As an example, following the removal of Fulbourn Technology Park from the Green Belt in the South Cambridgeshire Local Plan 2018 it has flourished, as has TusPark at the Cambridge Science Park.

1.10 CEG LP emphasises that the dGCLP (Reg 19) offers a significant opportunity to release Green Belt in a highly sustainable location (such as their Site on Land to the Southeast of Cambridge) which can deliver significant economic growth to those campuses. Restricting the release of the Green Belt to just enabling the expansion of one existing life sciences operator is restrictive, and a highly limiting option in facilitating and realising the undoubted economic growth which has been demonstrated to exist in Greater Cambridge.

Sustainable Transport

1.11 The approach of the dGCLP (Reg 19) to strictly limit Green Belt release has the potential effect of constraining the economic stimulus that could be achieved through the delivery of new infrastructure developments that are currently taking place on the edge of Cambridge. Significant investment has been provided by the Government to bring forward Cambridge South station, which in addition to serving the Cambridge Biomedical Campus, will provide a direct connection to East West Rail and connect to the West Anglia Main Line serving routes directly between Cambridge and London. It should be noted that CEG LP has a land interest on opposite side of the road from the Biomedical Campus expansion which is being proposed for release from the Green Belt.

1.12 In addition to improved rail links, the delivery of the new Cambridge South East Transport (CSET) busway is progressing which will see a new guided busway linking the Biomedical Campus to a new travel hub off the A11 adjacent to the Babraham campus. This will also see the delivery of a path for pedestrians and cyclists which will run alongside the busway.

1.13 The delivery of such extensive public transport infrastructure, and the existing infrastructure including the park and ride facility, provides a significant opportunity to

deliver additional housing and employment hubs in these terminus areas, most notably in active travel cycling proximity of Cambridge South station.

Active Travel

1.14 The delivery of the above public transport infrastructure, in addition to what exists, will also help to encourage active travel which is a key component of ensuring that Greater Cambridge hit their net zero carbon target by 2045. A report produced by Network Rail indicated that it was expected that 95% of onward travel from Cambridge South station would be by public transport, walking or cycling[1] with trips being made to the Biomedical Campus comprising 74% walking and cycling.

1.15 The prevalence of such strong public transport links being delivered on the edge of Cambridge makes it particularly surprising that the release of more Green Belt land in this location has not at least been explored. The delivery of both housing and employment allocations would seem logical in such a highly sustainable location, reducing the demand for private transport use across the area, inherent in several of the strategic priorities of the dGCLP (Reg 19).

1.16 CEG LP has considered the travel patterns of people who live in or on the edge of Cambridge compared to those who live outside the edge of Cambridge, i.e. in the rural part of South Cambridgeshire[2]. This has utilised Census 2011 data due to the unreliability of the 2021 Census data in respect of Travel To Work Areas. It is acknowledged that the Census 2011 is dated and travel patterns may well have changed over the past 15 years or so in and around Cambridge because of the investments made to place greater emphasis on walking, cycling and public transport to make it easier for residents and employees to choose active and sustainable modes of travel over the private car.

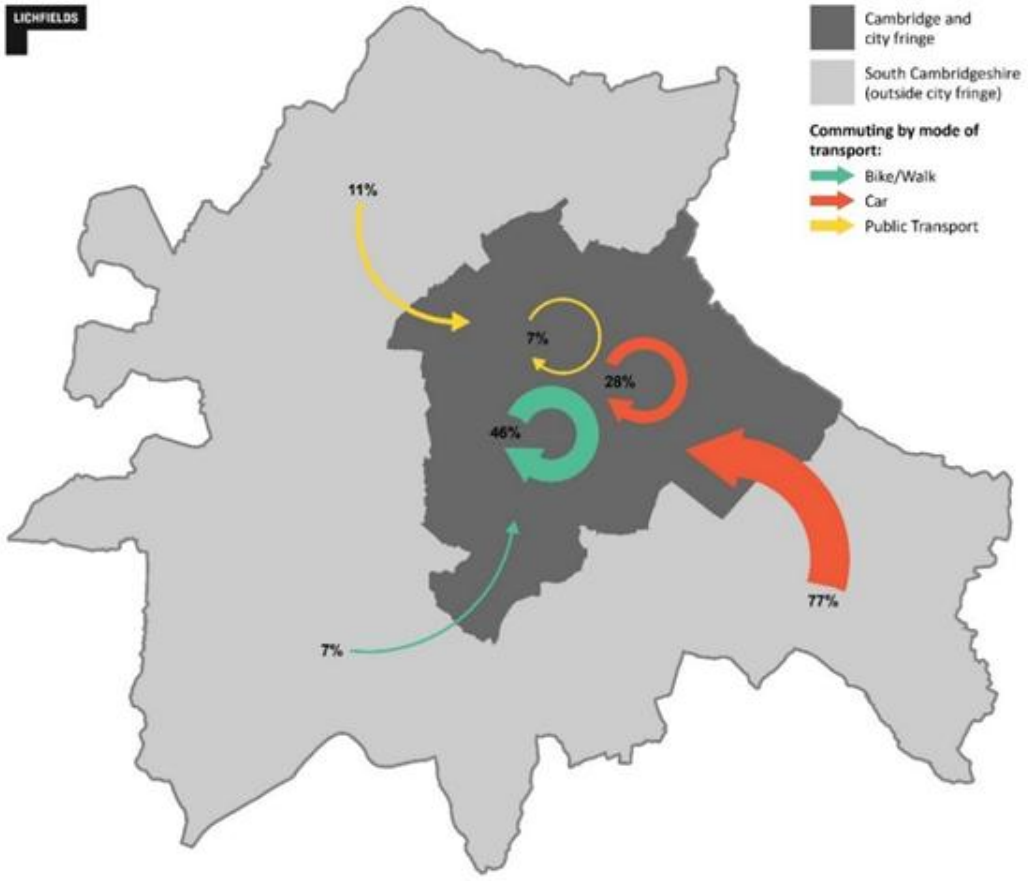
1.17 A total of just over 18,000 people travel to work from South Cambridgeshire (beyond the city fringe) into the city and fringe for work. As shown, 77% of people commute by car, with only 11% travelling by public transport and only 7% travelling by bike or walking.

1.18 A total of almost 61,000 people live in the city and fringe, and either travel to a fixed location from work or work from home. Of these people almost half (46%) cycle or walk to work – amounting to just over 28,000 people. The proportion driving is much lower than those travelling in from elsewhere in South Cambridgeshire, at 28% (17,300 people). 7% travel by public transport (4,200 people). A further 16% of people living/working in the city and fringe work from home (amounting to 9,500 people).

[1] https://assets.publishing.service.gov.uk/media/63a2ff8dd3bf7f375f7c438d/cambridge-south-inspectors-report.pdf

[2] This encompasses Cambridge and the Middle Super Output Areas (MSOAs) which directly adjoin the city boundary.

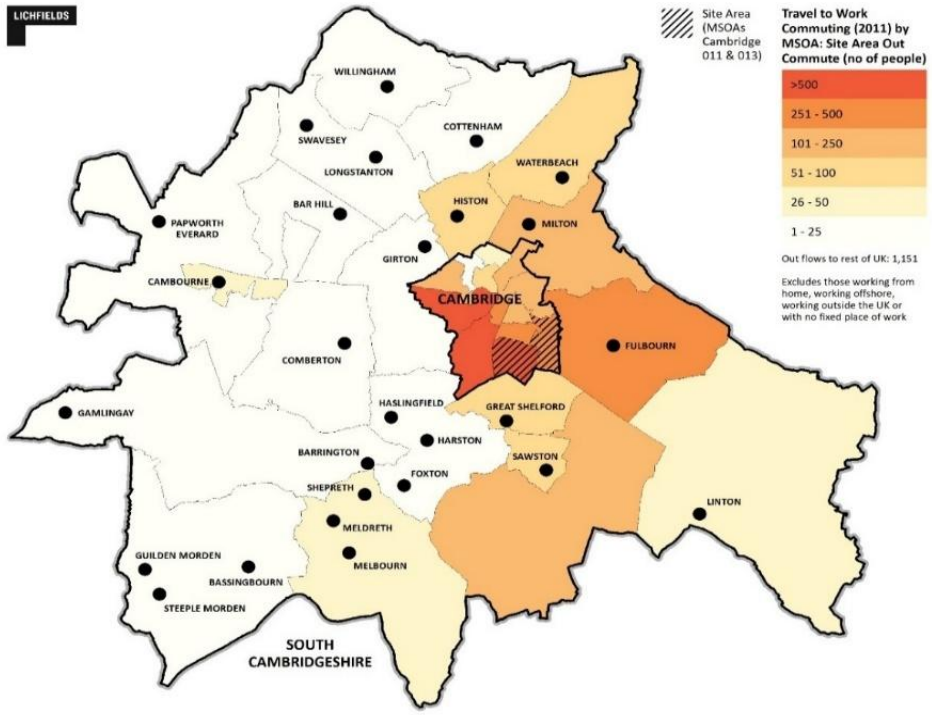
Figure **Error! No text of specified style in document.**.1 Commuting into Cambridge/city fringe by mode of transport – living within Cambridge/city fringe and from those living in South Cambridge



Source: Census 2011. Analysis refers to those who travel to a fixed place of work or work from home. It excludes those with no fixed place of work or who work offshore/outside the UK. *Car refers to those travelling as a driver of a car, van or motorcycle and those who travel by taxi. People travelling as passengers in cars (3%) and those working from home or commuting by another method of transport (16%) are not included in the above diagram

1.19 Looking specifically at the commuting patterns in the area around the site (south east Cambridge), most people who commute travel within the local area (i.e. work in the same Middle Super Output Area in which they live), commute into Cambridge City or into adjacent parts of South Cambridgeshire to the east and south (e.g. Fulbourn and Duxford).

Figure **Error! No text of specified style in document.**.2 Commuting Flows out of site area (MSOAs)



Source: Census 2011. Excludes people who work from home, have no fixed place of work or work offshore/outside the UK.

1.20 Of the 6,500 people living in the area around the site at the time of the 2011 Census who travelled to work somewhere within Greater Cambridge, almost half – 3,100 people – either cycled or walked to work. Most of these travelled to the city centre or worked locally (i.e. within the same MSOA), as shown in Figure 3.2.

1.21 Travelling by car (or motorbike, as a driver, or by taxi) was the second most common method for those living in the local area, with 2,400 people (37%) travelling to work this way. However, this was mostly those who worked outside of Cambridge, in areas such as Fulbourn and Duxford. Some residents do drive to work in the city, particularly the west of the city where the University is mostly located (with 282 residents of the site's local area commuting to this MSOA), but this is much fewer than the number cycling, walking or taking public transport (totalling 834). Public transport as a method of travel to work for those living in the site's local area is modest at 11.5%.

1.22 It would be reasonable to assume that if housing and employment were co-located at South East Cambridge, the proportion who live and work in that local area who cycle or walk to work would be high because work would be within easy walking or cycling distance. At the time of the Census, of the 2,100 people who lived in the local area around the site and travelled to work in the same area, 68% either cycled or walked to work. A further 9% travelled by public transport suggesting reasonable bus links exist in/around the area which is likely to see further growth upon the completion of the CSET guided busway. Any new

housing development would also likely boost this figure through the delivery of S106 contributions towards infrastructure to encourage sustainable travel in and around the local area.

1.23 It is evident that most sustainable methods of travel to work arise when people are close enough to walk/cycle, leading to the conclusion that housing and employment development is best suited to those areas a short distance from places of work/home i.e. in edge of centre locations. It is logical that the co-location of housing and employment will lead to the most sustainable outcomes and the empirical evidence supports this. Placing more housing and employment in edge of centre locations is most likely to produce the most sustainable live-work patterns and by conduit, help Greater Cambridge achieve a higher rate of active travel and achieve net zero targets.

1.24 CEG LP's specific objections on how Greater Cambridge has failed to adequately consider its Green Belt policy in the above context are further addressed in our response to Policy S/GB: Green Belt.

Soundness

1.25 The NPPF paragraph 110 states:

"110) The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, <u>through limiting the need to travel</u> and offering a genuine choice of transport modes."

1.26 Furthermore, as per the test of soundness at NPPF paragraph 36:

a The plan is not positively prepared because its strategy does not seek to meet the area's objectively assessed needs (see our commentary on the inadequacies of the Annex D housing trajectory.

b The plan is also not justified because it is not pursuing an appropriate strategy. The non-Green Belt release strategy is not maximising the edge of Cambridge location as the second preference for locational development in this policy.

Proposed Modification

1.27 When read alongside CEG LP objections to Policy S/JH and the need to ensure that sustainable patterns of growth are achieved, Policy S/DS criterion 2 b) should be amended to allocate additional land on the edge of Cambridge for residential and employment development. Although omission sites are acknowledged not to be a matter for the examination, to demonstrate that there is suitable and available land available to accommodate growth, CEG LP's land interest to the South East of Cambridge forms a compelling highly sustainable development location to deliver much needed further housing for Cambridge.

Participation at the Examination

1.28 Yes.

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1.29 CEG LP is committed to working productively with the GCSP Service to deliver on its strategic priorities through this Local Plan. Drawing on its interests and experience delivering in the area, CEG LP hopes to play a significant role in meeting Greater Cambridge's housing and employment needs. Therefore, it is essential that policies within the Local Plan create a deliverable environment informed by CEG LP's experience. CEG LP would be able to make a positive contribution during the examination's hearing sessions to expand on the points made above and provide further detail to inform the Inspectors' considerations.