LICHFIELDS

Briefing Note

Date 25 September 2026

Subject Policy S/GB: Green Belt

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

Spatial Strategy and Green Belt release

1.2 In CEG LP's response to the first draft consultation on the GCLP in 2021, the direction of the indicative themes of the plan were supported, recognising that Greater Cambridge needed to balance the support for development through GCLP policies whilst ensuring that sustainability remained at the forefront of decision making. However, given the presence of the Cambridge Green Belt, CEG LP warned that the GCSP Service should not arbitrarily limit themselves by not countenancing Green Belt release. The development of some Green Belt sites on the edge of Cambridge such as South East Cambridge would lead to more sustainable forms of development through shortened commuting distances and prevalence of public transport options than strategic growth options beyond the Green Belt.

1.3 The dGCLP Reg 18 crystallized these concerns and this remains the case in the dGCLP (Reg 19). The dGCLP (Reg 19) continues to propose to release only one area of Green Belt on the edge of Cambridge, to facilitate development needs of the Cambridge Biomedical Campus. CEG LP does not object to the release of this land. It is noted however that lack of Green Belt release more generally is within the context of the dGCLP (Reg 19) which states at para 2.60 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".*

1.4 The dGCLP (Reg 19) (para 2.61) explains that *"The Government attaches great importance to Green Belts in national planning policy*" and adds para 2.62 *"we do not consider that our general development needs provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt in this Local Plan, including grey belt, having regard to the identification of other sources of land supply that can meet needs sustainably without the need for Green Belt release."*

Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116
Registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG

LICHFIELDS

1.5 Whilst the dGCLP (Reg 19) might have a strategy to meet needs which only has minimal Green Belt release, it is not aligned with its strategic priorities for the dGCLP (Reg 19), especially with regard to sustainability. It is also not aligned to delivering the actual housing requirement as set out in CEG LP's objection to Policy S/JH.

1.6 As per CEG LP's objection to Policy S/DS criterion 2 b) additional land on the edge of Cambridge for residential development, such as CEG LP's land interest to the South East of Cambridge, should have been allocated. Whilst the site is located within the Green Belt, it forms a compelling development location to deliver much needed further housing for Cambridge and should be removed from the Green Belt.

Future development management application of policy

1.7 Specifically, it appears that the policy is deliberately seeking to constrain the operation of national grey belt policy in a way that is not consistent with the NPPF. The evidence base for the dGCLP (Reg 19) as it relates to the Green Belt, is entirely predicated on the 'three Cambridge Green Belt purposes'. These are parts 1a) to c) of Policy S/GB. However, there is nothing in the NPPF, nor PPG on Green Belt, which allows for the assessment of grey belt land to be undertaken using anything other than the purposes of Green Belt set out in national policy. Whilst there are similarities with parts a) to c) above with purposes a), b) and d) of the NPPF (2024) para 143, they are not consistent and go beyond what national policy is seeking to achieve.

1.8 On this basis, the policy is unsound because it is not consistent with national policy as required by NPPF paragraph 36d).

1.9 Furthermore, CEG LP is also mindful of the publication of the NPPF (August 2026) and the requirements at Annex A paragraphs 4 and 8 whereby this local plan (being submitted for examination under the 'legacy' plan making system) will be examined under the NPPF (2024). However, the application of the NPPF (2026) will apply for decision-making purposes immediately, and therefore there are some elements of this policy that will ultimately be superseded on adoption.

1.10 NPPF (2026) categorises GB7 as a national decision-making policy, and as such, on adoption, as per NPPF (2026) Annex A(2) development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. This will be the case for Policy S/GB because it states new development in the Green Belt will only be approved in accordance with Green Belt policy in the NPPF **and** having regard to the Cambridge Green Belt purposes. This is materially inconsistent with GB7, especially as it conflicts with purpose b) and further expands on what the NPPF states with regards to purpose d).

Proposed Modification

1.11 Spatially, CEG LP consider that the dGCLP (Reg 19) should be amended to allocate additional land on the edge of Cambridge for residential development to meet the actual housing need established in CEG LP's objections to Policy S/JH. 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.

1.12 In terms of application for future development management purposes, this policy must accurately and completely reflect the NPPF:

"1. ~~A Green Belt will be maintained around Cambridge with the specific purposes to:~~

~~a. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.~~

~~b. Maintain and enhance the quality of its setting; and~~

~~c. Prevent communities in the environs of Cambridge from merging into one another and with the city.~~

The detailed boundaries of the Green Belt in Greater Cambridge are defined on the Policies Map. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework~~, and having regard to the Cambridge Green Belt purposes set out above~~."

Participation at the Examination

1.13 Yes.

1.14 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.