Land at Hinxton Grange

Smithson Hill representations to the Greater Cambridge Regulation 19 Local Plan

Smithson Hill

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3.0 Policy S/DS: Development Strategy

3.1 This section responds to Policy S/DS: Development Strategy and to the distribution of housing growth that the policy establishes. SmithsonHill Ltd (SmithsonHill) has interests related to Land at Hinxton (Housing and Employment Land Availability Assessment (HELAA) Site ID 200765) ("the Site"). The Site is located within the Rural Southern Cluster. At its northern extent close to Whittlesford Parkway Station (within an 800m walk) and at its southern extent it abuts the Wellcome Trust extension.

3.2 SmithsonHill maintains its objection to Policy S/DS as set out in their Reg 18 representations which focused on misalignment of this policy with the vision and strategic priorities of the draft GCLP and the missed opportunity of not allocating the Site when it has much better sustainable transport credentials being located by an operational mainline train station, unlike Grange Farm (emerging allocation Policy S/GF). These points are expanded upon below and the Reg 18 representations should be read in conjunction with these Reg 19 representations.

3.3 Ultimately this section concludes that this policy is not positively prepared and is not justified.

Overarching concerns

3.4 The draft GCLP directs the majority of its new housing to locations where sustainability depends on transport infrastructure that is not yet in place, in many cases not yet funded or, in some cases, not yet decided. The policy states need for jobs and homes will be met as far as possible in the following order of preference or hierarchy:

a Within the Cambridge urban area;

b On the edge of Cambridge;

c At an expanded Cambourne;

d At other new settlements; and

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

3.5 The area covered by the 'Rural Southern Cluster' (part e of the hierarchy) does not appear to be defined on the plans Policies Map, however Figure 82 of the draft GCLP shows proposed Policy Areas and Areas of Major Change in the Rural Southern Cluster, and the Site is centrally located within that area. At the same time, and despite its location on Figure 82 of the draft GCLP which we have assumed denotes the area of the Rural Southern Cluster, it directs almost no new growth to the area around Whittlesford Parkway Station. This is the one part of Greater Cambridge that benefits from a mainline railway station beyond Cambridge City Centre, an internationally significant and expanding employment cluster, and adjacencies to the strategic road network.

3.6 It is for the Council to make choices over its spatial strategy, but it must do so within the terms of national planning policy. In this context, the Council's choice is not the outcome of an assessment of reasonable alternatives that is justified by evidence or consistent with the NPPF (December 2024).

3.7 The construction and assessment of alternatives – and thus the spatial strategy that emerges - is infected by a series of failings within the evidence base, or its applications:

1 A settlement hierarchy (Policy S/SH) based on a Settlement Hierarchy Study which uses its mechanistic scoring and thresholds to under-estimate the collective attributes of individual smaller settlements with significant transport infrastructure (such as heavy rail), and proximity to employment campuses within the Rural Southern Cluster.

2 A transport evidence base which identifies the interventions needed to unlock the Rural Southern Cluster, but classifies every one of them as "Additional" rather than as part of the Development Plan – because no development has been allocated there to bring them forward; and

3 A Sustainability Appraisal which has not tested the Rural Southern Cluster as a reasonable alternative at a scale at which it could be sustainable, whose assumptions systematically favour new settlements over connected locations, and whose site-level findings are inconsistent with the strategy actually selected.

Settlement Hierarchy Study Update 2025

3.8 The starting point for this policy should be the vision and seven strategic priorities which the draft GCLP itself seeks to achieve, namely: climate change, biodiversity and green spaces, wellbeing and social inclusion, great places, jobs, homes and connectivity and infrastructure.

3.9 Across these strategic priorities, the plan rightly identifies the importance of locating development so as to reduce the need to travel, providing homes close to jobs and services, supporting Greater Cambridge's internationally important economy and reducing reliance on the private car. Those objectives are consistent with the December 2024 NPPF. Paragraphs 108-110 of the NPPF require transport issues to be considered from the earliest stages of plan-making; opportunities to promote walking, cycling and public transport to be identified and pursued; significant development to be focused on locations which are or can be made sustainable; and patterns of development to minimise the number and length of journeys required for employment and other purposes.

3.10 Those requirements are important in Greater Cambridge because the geography of economic activity is not confined to Cambridge City itself. The Rural Southern Cluster contains a concentration of nationally and internationally significant research and employment activity, including the Wellcome Genome Campus (directly adjacent to the Site), Granta Park and Babraham Research Campus. The draft Plan itself proposes substantial further employment growth within this cluster through some of its proposed allocations. A sound spatial strategy therefore needs to consider not simply the conventional hierarchy of existing settlements, but the functional geography of homes, employment and transport infrastructure.

3.11 SmithsonHill recognises that plans will often seek to develop an understanding of their settlements and the associated hierarchy. For the draft GCLP this is based on the Development Strategy Topic Paper 2026 Appendix 18: Settlement Hierarchy Study Update 2025. It is clearly right that new homes should be directed towards settlements which can offer high levels of amenity. However, the settlement hierarchy is being applied too rigidly if it results in locations being discounted notwithstanding their relationship with major

employment destinations and existing or planned sustainable transport infrastructure. In a rural area containing dispersed but substantial employment campuses, the sustainability of a location cannot sensibly be assessed solely by reference to the services contained within an individual village boundary. The relevant question is also how effectively that location connects residents to employment, services and wider transport networks.

3.12 The plan fails to realise the potential of existing transport hubs in Cambridge's Rural Southern Cluster, particularly where they demonstrate potential for growth in line with national policy. For example, the plan could group villages with campuses and/or travel hubs such as existing train stations and areas which are proposed to benefit from enhanced transport links.

3.13 At present, the land around Whittlesford Parkway, whilst allocated for some development (albeit we have concerns around the achievability of what is proposed, see SmithsonHill's response to Policy S/AMC/WHD), has significant further potential owing to its proximity and connectivity to both the Babraham and Wellcome Genome Campuses, as well as the frequent connections into Cambridge City and London.

3.14 In this context, the Councils' settlement hierarchy methodology does not provide a sufficiently robust basis for determining the relative sustainability of rural settlements or the scale of growth that they should accommodate, particularly given the blunt nature of the scoring mechanism, with wide variations in score within each tier hierarchy and overlaps in scores between tiers. The Settlement Hierarchy Study acknowledges that classification is ultimately a matter of judgement, but does not establish transparent thresholds or criteria explaining when and why that judgement should override the quantitative assessment. The result is a hierarchy which is difficult to reproduce or objectively interrogate, notwithstanding the significant consequences that classification has for the spatial distribution and scale of development.

3.15 This weakness is compounded by the way in which the methodology conceptualises rural sustainability. Most of the available score relates to services, facilities and employment associated with the settlement itself, with relatively little for connectivity (and strategic rail connections in particular that the Government in its NPPF 2026 has said are an inherent starting point for residential development). This is particularly important in the Rural Southern Cluster, where major employment destinations are dispersed between locations such as the Wellcome Genome Campus, Granta Park and Babraham Research Campus and where Whittlesford Parkway provides existing strategic rail connectivity.

3.16 National policy does not require rural settlements to operate as isolated, self-contained units and expressly recognises that development in one village may support services in another (see NPPF para 83). A sound spatial strategy should therefore be based on evidence that assesses how settlements function as part of wider networks of homes, employment, services and sustainable transport, rather than principally according to what happens to fall within an individual settlement.

3.17 There are also inconsistencies in how functional relationships are recognised. The hierarchy expressly allows some settlements, including Great Shelford/Stapleford and Histon/Impington, to be considered together. There is no equivalent transparent methodology for determining when other settlement relationships should be recognised.

3.18 These deficiencies have consequences because the hierarchy feeds directly into the assessment of the spatial strategy and reasonable alternatives. The Sustainability Appraisal records negative accessibility effects for a number of village and Rural Southern Cluster options because they are not close to a centre recognised by the hierarchy, notwithstanding that many of the same locations perform positively in relation to public transport and, in the Rural Southern Cluster, proximity to employment.

3.19 There is therefore a risk of circularity: a well-connected settlement is placed lower in the hierarchy because the methodology gives insufficient weight to its wider functional relationships, and development at that settlement is subsequently assessed less favourably because it is not close to a higher-order centre defined by that same hierarchy.

3.20 This undermines the ability of the evidence base to demonstrate that Policy S/DS represents an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.

3.21 A sound approach would reassess the hierarchy on a more connectivity-led basis, giving consistent and transparent weight to existing and planned sustainable transport, proximity to major employment concentrations and services shared between functionally related settlements.

3.22 This would recognise that some rural locations perform a materially different strategic function because they combine:

- proximity to major existing and expanding employment campuses;
- access to existing rail or other high-quality public transport;
- opportunities for enhanced active-travel connections;
- the ability to support improved public transport between employment destinations; and
- sufficient development potential to provide additional services and facilities as part of planned growth.

3.23 Such locations should not be treated in the same way as otherwise comparable rural settlements which lack those characteristics. This does not necessarily mean abandoning the settlement hierarchy but requires recognition of the functional relationships which the Councils' own economic and transport strategies are seeking to strengthen.

Transport Evidence

3.24 SmithsonHill's Reg 18 comments to the GCLP focussed on the progression of the GCLP without the publication of the Greater Cambridge Transport Strategy (GCTS). This section supersedes SmithsonHill's comments made at the Reg 18 stage as the Draft Interim Greater Cambridge Transport Strategy has now been published.

3.25 The Draft Interim Greater Cambridge Transport Strategy identifies the need for substantial improvements to connectivity across Greater Cambridge and within the Rural Southern Cluster (part e of the hierarchy in this policy). It identifies future mass rapid transit towards Hinxton and improvements associated with Whittlesford Parkway, alongside other strategic interventions. Whittlesford Parkway is therefore not simply a local railway station: it is an existing strategic transport asset located within the part of Greater Cambridge where

substantial employment growth is already occurring and is planned to continue. Making it a focus of additional housing growth would support improvements to accessibility based on an existing asset.

3.26 This is particularly relevant when Policy S/DS is considered alongside Grange Farm, emerging Policy S/GF for a mixed-use new settlement of c.4,500 homes. Table 4.1 of the Transport Strategy profiles each strategic site allocation using the DfT Connectivity Tool, which measures connectivity by walking and wheeling, cycling and public transport, and gives a 2026 baseline score and a 2045 target. The results are striking:

- Land adjacent to A11 and A1307 at Grange Farm: baseline 7–45, target 20–65;
- Land north of Waterbeach: baseline 8–50, target 30–60;
- Wellcome Genome Campus, Hinxton: baseline 11–30, target 35–60;
- Cambourne North: baseline 13–46, target 25–60; and
- Northstowe New Town: baseline 13–53, target 50–70.

3.27 Grange Farm records the lowest baseline connectivity at the bottom of the range of any strategic allocation in Greater Cambridge and the bottom of the range of its target is just 20, lower than the 2026 baseline already recorded at the least connected parts of North East Cambridge (34), Cambridge East (35), the Cambridge Biomedical Campus (39), Babraham Research Campus (32) and Eddington (26). It is lower than the Wellcome Genome Campus at Hinxton (35-60), a location which has further capacity for residential development, in proximity to Whittlesford Parkway.

3.28 Grange Farm's sustainable transport proposition depends upon new infrastructure, including the proposed mass rapid transit/CSET connection. There is significant uncertainty around elements of that infrastructure and its delivery. By contrast, Whittlesford Parkway is operational today and provides direct rail connectivity to Cambridge and beyond.

3.29 The Draft Interim Transport Strategy is explicit that Whittlesford Parkway is a short-term opportunity. Its economic theme records that "*in the short term, the emphasis is on measures that unlock immediate benefits for major campuses, research clusters and business locations: Cambridge South station, Whittlesford Parkway improvements, freight consolidation, travel hubs and active travel links*" (paragraph 4.32), and it lists for 2026–2030 "*Whittlesford Parkway station improvements to station access and interchange with local bus and shuttle services to the wider south corridor for workers and visitors, including to Duxford, local business parks, and research centres*". By contrast, the mass rapid transit extensions on which the longer-term connectivity of Cambourne North and the wider strategy depend are long term (2035–2045) and, on the Transport Strategy's own account, "*no MRT routes have yet been decided and all remain under consideration*".

3.30 The appropriate comparison is therefore not whether Grange Farm can on paper eventually be made sustainable, but whether the overall strategy makes the most appropriate use of existing as well as proposed infrastructure, and whether a greater proportion of growth should be directed towards locations where sustainable connectivity already exists.

3.31 The Plan's choice not to take advantage of existing infrastructure does not address three points:

1 Phasing: poor existing connectivity and infrastructure means its delays the period at which sustainable housing growth comes forward, leading to a backloading of the Plan's trajectory and use of the 'Liverpool' approach for its five year supply;

2 Risk: the 2045 targets for accessibility are contingent on delivery of the interventions in Table 5.1 of the Draft Interim Transport Strategy, and a number are undecided meaning any improvements to accessibility on those bases are inherently uncertain; and

3 Opportunity Cost: the choice is not between Grange Farm and nothing. There was nothing to stop the strategy – which relies on new settlements for the bulk of its growth – from also using locations where the connectivity already exists, such as the Site. The two are not mutually exclusive. That is the very basis on which the NPPF 2026 allows for new development to come forward around rail stations, irrespective of unmet need.

Highways and the A505 corridor

3.32 Highway constraints are relevant to plan making, and development must contribute to reducing reliance on private cars. However, existing highway constraints should not become a reason for avoiding a strategic assessment of the infrastructure required to support the full scale of planned growth.

3.33 The scale of development proposed across the Rural Southern Cluster creates an opportunity—and a need—for a more coordinated approach to the A505 corridor. The draft GCLP evidence base should demonstrate that the cumulative implications of growth for the A505 have been assessed and that there is a coherent strategy for improvements to the corridor, rather than considering individual developments principally through the lens of their immediate trip impacts.

3.34 In this respect, trip budgets are an important demand-management tool but cannot substitute for long-term transport planning. They respond in part to existing constraints on highway capacity and the present limitations of alternative modes. The Transport Strategy should simultaneously identify the longer-term interventions necessary to address the full scope of travel demand, including residual car travel, generated by the cumulative growth proposed across Greater Cambridge.

3.35 Without that wider assessment there is a risk that cumulative highway effects are understated: individual developments may each be required to operate within constrained trip budgets while the strategic evidence does not fully identify the infrastructure necessary to accommodate the aggregate travel demand generated by the Plan. A positively prepared spatial strategy should instead integrate land-use decisions (including bringing residential together with existing and expanded employment) with a long-term programme for sustainable transport and necessary highway interventions.

Sustainability appraisal

3.36 The Sustainability Appraisal (LUC, July 2026) ("the SA") is an important part of the evidence through which the Councils seek to explain and evaluate the likely significant

effects of the proposed spatial strategy and the reasonable alternatives available to it. This latest iteration of the SA for the draft GCLP was published since the GCLP Reg 18 consultation. Read alongside the wider evidence base, it is intended to assist in demonstrating that the submitted strategy is appropriate and based on proportionate evidence. However, SmithsonHill considers that the revised SA raises a number of questions as to whether the range of reasonable alternatives has been fully explored and whether the relative merits of those alternatives have been adequately assessed.

3.37 First, the strategic alternatives tested in 2026 do not appear to examine materially different approaches to growth within the Rural Southern Cluster. Following the withdrawal of funding for the relocation of the Cambridge Waste Water Treatment Plant, the SA identified four further strategic spatial options (9b, 10b, 11ai and 11bi[13]) and records at paragraph 4.20 that, following review of representations to the Reg 18 consultation and updated evidence, no further spatial strategy options were identified. Whilst the options differ in their treatment of matters such as Green Belt release, growth at Cambourne, growth at Royston and the inclusion of a new settlement, each assumes only limited development within the Rural Southern Cluster. None varies the scale or form of development within that location. As a result, the 2026 appraisal does not appear to test whether a greater proportion of growth could be accommodated within a station-connected and employment-focused Rural Southern Cluster location.

3.38 Second, the Rural Southern Cluster has only been appraised in the form of dispersed village growth. In each of the hybrid options, the Rural Southern Cluster component is described as limited development distributed across villages with good public transport accessibility. Consequently, the SA appraises the Rural Southern Cluster as a collection of smaller-scale village extensions rather than as a larger single comprehensively planned community centred on existing infrastructure at Whittlesford Parkway and capable of supporting additional services, facilities and infrastructure. Option 7 ("supporting a high-tech corridor by integrating homes and jobs") was assessed in the dispersed form. The SA therefore does not appear to consider whether a larger-scale, station-led and campus-related community within the Rural Southern Cluster could perform differently against the sustainability objectives.

3.39 Third, the assumptions adopted within the appraisal appear to favour larger new settlements over existing connected locations. Paragraph 4.26 records that developments approaching the scale necessary to function as a new settlement are assumed to provide substantial services and facilities. New settlements are therefore assessed on the basis of both their location and the infrastructure anticipated to arise from their size. By contrast, growth within the Rural Southern Cluster is only tested at a relatively limited scale and is not assessed in a form capable of delivering comparable levels of service provision. Paragraph 6.13, for example, concludes that the smaller-scale growth proposed within the Rural Southern Cluster has comparatively poorer access to healthcare facilities and other services. However, that conclusion reflects, at least in part, the scale of development selected for assessment rather than the characteristics of the location itself. Whilst the SA takes account of existing services, employment opportunities and transport accessibility, it

[13] Spatial option 9b: new settlement and expanding Cambourne. Spatial option 10b: Green Belt,and expanding Cambourne. Spatial option 11ai: expanding Royston and a new settlement. Spatial option 11bi: expanding Royston, and expanding Cambourne.

does not appear to test whether those locational advantages, combined with development at a materially greater scale, could result in a different sustainability outcome.

3.40 Fourth, the assessment of growth in the Rural Southern Cluster appears to remain substantially informed by evidence and assumptions developed when the original strategic spatial options were prepared in 2020 and 2021. Paragraph 4.28 confirms that the appraisal of options 1 to 8, including option 7 (supporting a high-tech corridor by integrating homes and jobs (southern cluster)), drew on evidence prepared during that period. Since then there have been significant changes in transport, economic and policy circumstances, including the opening of Cambridge South station, the continued implementation of the Wellcome Genome Campus expansion, the publication of the Draft Interim Greater Cambridge Transport Strategy and changes in national planning policy (not least, now the NPPF 2026 and its focus on well-connected stations, where development can come forward under Policy S5 and GB8 at well-connected stations, irrespective of the position on unmet need). Given that the sustainability of the Rural Southern Cluster growth is closely related to accessibility and connectivity, it is not clear from the SA how far these changes have been reflected in the assessment of that option.

3.41 Fifth, the SA's own site appraisal identifies the Site (Site 200765: land to the east of the A1301, south of the A505 near Hinxton and west of the A1301, north of the A505 near Whittlesford) as performing strongly against several of the objectives most closely associated with the Plan's strategic objectives. In particular:

- under SA objective 12a (public transport accessibility within the climate change mitigation objective), the Site records a significant positive effect (++), whereas Grange Farm records a significant positive effect subject to uncertainty (++?);
- under SA objective 2b (access to education), both sites record significant positive effects subject to uncertainty (++?);
- under SA objectives 14 and 15 (economy and employment), both sites record significant positive effects (++); and
- under SA objective 2a (access to services and facilities), the Site records a minor negative effect (-), whilst the effect identified for Grange Farm is uncertain. This is an illogical conclusion for the Site given it is located next to the emerging Wellcome Trust expansion which is consented and under construction. Access to services and facilities on the Wellcome expansion site, many of which will be publicly accessible, would in time be much greater for the Site than they are for Grange Farm, now or in the future.

3.42 The SA does indicate Grange Farm performs more favourably against some objectives, including health, heritage and water resources, albeit it is not clear how far that relative assessment is justified, and both locations are identified as having environmental considerations requiring mitigation. Nevertheless, the Site performs particularly strongly against accessibility, employment and public transport-related objectives, and does so by reference to infrastructure and employment concentrations that already exist. Those characteristics distinguish the Site from locations, like Grange Farm, where any positive assessment in the SA depends to a greater extent on future infrastructure provision and delivery assumptions.

3.43 More fundamentally, the SA identifies mixed-use development within the Rural Southern Cluster as a reasonable strategic proposition and identifies Site 200765 as a reasonable site option. The appraisal records a mixture of benefits and constraints, but also identifies potentially strong positive effects associated with access to employment, public transport connectivity and economic performance. The evidence therefore suggests that there are genuine strategic choices available concerning the scale, form and location of growth within the Rural Southern Cluster.

3.44 In that context, the SA does not clearly explain why the Rural Southern Cluster has only been assessed in the form of dispersed village growth, nor why a larger-scale, station-led approach was not considered as part of the strategic alternatives appraisal. Equally, whilst the SA compares the relative performance of individual sites and options, it does not clearly demonstrate why the balance ultimately chosen by the Plan (with all its uncertainties and backloaded housing development) is preferable to an alternative strategy placing greater emphasis on development around existing transport infrastructure and established employment clusters.

3.45 The submitted strategy relies heavily on a relatively small number of large strategic allocations (generally outside of the Green Belt) and associated infrastructure interventions whose delivery will take place over an extended period. An alternative strategy drawing upon a broader range of locations and delivery mechanisms would address this risk. The SA does not provide a sufficiently clear assessment of those alternatives to demonstrate why the submitted strategy should be preferred. As such, it does not provide a robust basis for concluding that Policy S/DS represents an appropriate strategy when considered against the reasonable alternatives.

Formulating a sustainable spatial strategy through Hinxton Grange

3.46 The preceding analysis is not an argument that the Plan should have no new settlements. It is that the spatial option chosen – to rely on new settlements with new infrastructure for which delivery is unproven – was reached without considering the ability to achieve the same goal through places and infrastructure that already exist, notably within the Rural Southern Cluster: homes within reach of new, existing and growing employment centres, a range of services, and a genuine alternative to the car. At Cambourne North and at Grange Farm those conditions must be built from nothing, and the transport on which they depend must be built first. At the Hinxton Grange Site they are already present.

3.47 The Site lies at the centre of the Rural Southern Cluster. It is close to jobs at the Wellcome Genome Campus, Granta Park, Babraham Research Campus and, over the district and county boundary, Great Chesterford. It lies within a reasonable walking/cycling distance of Whittlesford Parkway Station and is physically well related to it by reference to the definitions in the 2026 NPPF, via Ricketts Field. The Plan describes that station at paragraph 3.4.40 as having "*good rail connections to both Cambridge and London" and as being "close to the southern cluster research and employment centres*". The Site is served by the A505 and A1301 and is of a scale capable of delivering services and facilities of its own, alongside those already provided or being constructed at the Wellcome Genome Campus. With the exception of the parcel to the north-east of the McDonald's roundabout,

which is addressed in our representations on Policy S/AMC/WHD, it is not in the Green Belt.

3.48 The comparison with Grange Farm is instructive. The Cambridge South East Transport (CSET) scheme on which Grange Farm depends terminates before the Site, and Policy S/GF requires its extension into the Grange Farm site to be in place to support first occupation unless a temporary alternative can be agreed with the local planning and highway authorities. Policy S/GF requires the Grange Farm developer to contribute towards "improvements to wider walking and cycling infrastructure to Babraham, Babraham Research Campus, the Wellcome Genome Campus, Granta Park, Little and Great Abington, Linton, and Whittlesford Parkway Station", and towards a package of bus services linking, among other destinations, "*Whittlesford Parkway station*". The Plan therefore expects a new settlement several kilometres away to fund connections to a station that the Site adjoins, while declining to allocate the Site itself.

3.49 The answer is in plain sight. Policy S/AMC/WHD demonstrates that the Councils recognise the opportunity at Whittlesford Parkway but presently have no mechanism to realise it. The policy area "*incorporates a range of existing uses including existing employment, homes, Whittlesford Highways Depot and Whittlesford Station Car Park*" (paragraph 3.4.41), and the policy "*provides a context for future proposals if the scheme is developed further"* as part of a future mixed use transport interchange, with further development of plans for the area requiring "*engagement with residents, local businesses and other stakeholders*" (paragraph 3.4.43). Yet the Plan allocates no housing, identifies no capacity and depends on the willingness of existing occupiers to relocate.

3.50 The Site offers what the policy area cannot: deliverable land, within walking distance of the station, available now. Through the Site, including the parcel to the north-west of the McDonald's roundabout on the A505 which is also in SmithsonHill's ownership, SmithsonHill could offer land, infrastructure and/or financial contributions for a range of different measures capable of enhancing eastern access to Whittlesford Parkway Station, delivering active travel connections towards the Wellcome Genome Campus and Duxford, improving capacity and safety at the A505 junction, and providing a travel hub serving the whole of the Rural Southern Cluster rather than a single development. The Site is centrally placed to link the cluster together alongside wider improvements to the A505 corridor, and SmithsonHill will work all parties to achieve that.

3.51 The effect of the strategy is that the growth of the campuses is planned for, but the housing needed for the growth generated is planned somewhere else, from which the campuses are not readily reachable other than by car. That will create less sustainable commuting patterns, as the SA's own findings on climate change mitigation and air quality anticipate. Housing at the Site would meet housing need in the place where it arises, and in a location from which Cambridge and London are reachable by rail.

Delivery

3.52 Not only does the location of the Site lend itself to sustainable travel patterns from day one, it is also promoted by a joint landowner/development who plans on building out at least part of the scheme, meaning it would be able to commence at pace without the need to sell the Site or seek a development partner. Hill could be delivering an initial few phases while other parcels are disposed of, meaning not just a quick start, but continuous delivery from

multiple outlets. Hill has a strong track record of delivery in Cambridge and is committed to future delivery in and around the City. The presence of a developer with an interest in delivering the Site is not typical of all emerging allocations in this plan, including at Grange Farm. This is another characteristic of the emerging Grange Farm allocation that means its delivery will have to come forward later in the plan period, and earlier delivery from additional strategic sites is needed to balance the housing trajectory.

Summary of Position on Draft Policy S/DS

3.53 As demonstrated in our representations to Policy S/JH, it is considered that the draft GCLP needs to allocate more sites for residential development in order to be found sound. This is to bring planned levels of employment growth in line with the housing requirements and support a housing trajectory in which needs are met at the earliest opportunity. Our comments on draft Policy S/DS make clear that the Site is aligned with the spatial strategy of the draft GCLP; is centrally located within the Rural Southern Cluster; and is aligned with a key existing piece of operation sustainable transportation, Whittlesford Parkway Station. It is unclear from the SA and other evidence base documents why the allocation of Grange Farm would come before allocation of the Site, which is aligned with existing rapid sustainable transportation, unlike the proposed CSET extension that is expected to service Grange Farm. Allocation of the Site offers a non-Green Belt option to bolster the housing trajectory on a site which is aligned with the draft GCLP's spatial strategy. It can also come forward in tandem with other large-scale developments, including Grange Farm should that be concluded to be justified.

3.54 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, through limiting the need to travel and offering a genuine choice of transport modes."

3.55 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).

Proposed Modification

3.56 When read alongside SmithsonHill's objections to Policy S/JH and the need to ensure that sustainable patterns of growth are achieved, Policy S/DS should be amended to allocate additional land in the Rural Southern Cluster. We consider that this should include the Site on the basis that it closely aligns with the proposed spatial strategy as it stands, is well related to existing public transport and growth (for example the Wellcome Genome Campus expansion and research park at Great Chesterford), and as demonstrated in our representations on the HELAA in Section 8, does not have any insurmountable technical issues which preclude development.

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