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Places for People

CONSULTATION RESPONSE

Greater Cambridge Local Plan

Draft Local Plan (Regulation 19 Consultation)

Land to the north and west of Wilbraham Road, Fulbourn

On behalf of Places for People Developments Ltd

September 2026

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EXECUTIVE SUMMARY

1. These representations are submitted on behalf of Places for People Developments Limited ("PfP") in response to the Greater Cambridge Local Plan Proposed Submission Regulation 19 consultation. They concern Land north and west of Wilbraham Road, Fulbourn ("the Site"), promoted as a strategic residential-led mixed-use development capable of delivering more than 2,500 homes within a comprehensive, landscape-led framework.

2. PfP is one of the UK's leading placemaking and development organisations, with experience of delivering and managing strategic development and sustainable mixed-use communities. Its approach combines mixed-tenure and affordable housing with community facilities, supporting infrastructure, environmental enhancement and long-term stewardship.

3. The Site comprises two separately assessed HELAA parcels: Site 52761, the larger northern parcel and principal strategic development opportunity; and Site 40293, the smaller western parcel with a distinct relationship to Fulbourn village. The parcels form one comprehensive strategic opportunity, but their individual characteristics, potential functions and assessment findings should not be conflated.

4. PfP is also in advanced discussions with the owners of additional land adjoining the western and north-western parts of the Site regarding its inclusion within the wider promotion. This land could form a logical and beneficial extension to the wider strategic opportunity and provides further flexibility for landscape and green infrastructure, access and movement, east-west connectivity and the definition of a comprehensive long-term development boundary. Its precise role and development potential will be established through further technical assessment.

5. The proposals envisage a connected new community comprising more than 2,500 homes, mixed-tenure and affordable housing, employment, education, healthcare and community facilities, sustainable transport improvements and substantial green and blue infrastructure. Development would be structured around existing landscape and ecological features, active travel, high-quality placemaking and long-term stewardship. The framework does not assume that the whole Site would accommodate built development.

6. The detailed Site-specific vision and flexible masterplan framework are contained in the January 2026 Land north and west of Wilbraham Road, Fulbourn Vision Document, which was submitted as part of the Regulation 18 consultation. For completeness, the Vision Document has been attached unchanged

from Regulation 18 as Appendix A. PfP's development experience, delivery model and approach to creating and managing communities are described in Places for People: Creating Thriving Communities, attached unchanged as Appendix B.

7. PfP supports the preparation of a joint Local Plan for Cambridge and South Cambridgeshire and the Plan's objectives for sustainable economic and housing growth. The Site is capable of making an integrated contribution to the Plan's seven themes of climate change, biodiversity and green spaces, wellbeing and social inclusion, great places, jobs, homes and infrastructure. These are the seven organising themes of the Proposed Submission Plan.

8. As set out within our Regulation 18 response, the comprehensive framework provides opportunities to deliver a broad mix of homes; create distinctive neighbourhoods responding to the fen-edge and village-edge contexts; reinforce green infrastructure and ecological connections; support health, wellbeing and community life; improve sustainable access to major employment locations; and coordinate housing with education, healthcare, community and transport infrastructure.

9. This alignment does not, by itself, establish that the Site should be allocated or remove the need to address its acknowledged constraints. It is nevertheless relevant to whether the Site's omission and the selected portfolio of development locations represent an appropriate and effective strategy.

10. These representations retain the core strategic and Site-specific case submitted at Regulation 18 where they remain relevant. They have been updated to address the Proposed Submission Plan and Policies Map and updated evidence base work, the current HELAA, Development Strategy Topic Paper, Site Allocations Topic Paper, Sustainability Appraisal, the Councils' responses to the Regulation 18 representations, the August 2026 National Planning Policy Framework and subsequent engagement with East West Rail.

11. At Regulation 19, the issue is not simply whether the Site is capable of development. It is whether the Plan is legally compliant and sound, whether the chosen development strategy has been informed by reasonable alternatives and proportionate evidence and whether the Site's omission has been adequately justified.

12. PfP's principal concern is that the Plan has not demonstrated that concentrating a substantial proportion of growth in a limited number of large, complex and infrastructure-dependent locations represents the most appropriate and effective strategy. The detailed representations also address whether the housing strategy adequately supports Greater Cambridge's economic ambitions, whether the strategy provides sufficient flexibility and resilience to boost housing supply and whether the Plan

should respond more fully to the Government's objective of accelerating growth in and around Cambridge. In particular it is considered that there is a clear need to increase the choice and competition for market land, to boost housing land supply, particularly within the first 10 years of the plan period.

13. The HELAA identifies Site 52761 as available and achievable but unsuitable overall because of landscape and townscape and archaeology considerations. PfP considers that these matters should inform the allocation boundary, distribution of development, further assessment, mitigation and site-specific requirements rather than preclude consideration of the strategic opportunity. The assessment should also be consistent with the treatment and scoring of comparable constraints affecting the strategic sites allocated in the Plan.

14. The HELAA capacity entry of 2,500-3,000 dwellings and 3,000- 7,000 square metres of employment floorspace relates specifically to Site 52761. This accords with the Vision Document for the site and is supported. No separate capacity is attributed to Site 40293 pending verification of its final proforma.

15. PfP does not suggest that the Site is unconstrained. Green Belt, landscape, ecology, flood risk, heritage, archaeology, access and infrastructure must inform the development response. The Site's scale and flexible masterplan framework provide scope to address these matters through the allocation boundary, development distribution, land retained for environmental and infrastructure functions and appropriate policy requirements.

16. The updated HELAA records all four transport criteria as Amber, and there is no longer an in-principle transport or access reason preventing allocation. The scale and mixed-use nature of the development provide opportunities to internalise day-to-day trips through education, local centre, employment and community facilities, supported by a network-based access strategy and direct, frequent and high-quality public transport connections to Cambridge and major employment areas. A future Fulbourn station would provide a significant additional sustainability benefit and is being actively progressed, but Policy I/ST is outcome-led and does not prescribe rail as the only acceptable public transport mode. The Site can therefore be allocated on the basis of a deliverable multimodal transport strategy while safeguarding and progressing the station opportunity. A meeting has been held with Network Rail and GBR Anglia to progress a feasibility study, and PfP has confirmed that it can resource that work.

17. The Site therefore provides a relevant reasonable alternative against which the appropriateness and effectiveness of the submitted strategy can be tested. Its strategic scale, the availability and achievability of Site 52761, the distinct but complementary role of Site 40293, alignment with the Plan's seven themes and ability to coordinate housing with infrastructure establish a clear basis for its consideration.

18. The principal modification sought is the allocation of Land north and west of Wilbraham Road as a strategic residential-led mixed-use development. This would require a bespoke site-allocation policy and consequential amendments to Policy S/DS, the schedule of strategic development locations, Development Strategy Key Diagram, housing trajectory, Proposed Submission Policies Map, Cambridge Green Belt boundary and, where necessary, the defined development extent.

19. The site-allocation policy should establish requirements for landscape, ecology, heritage, archaeology, access, flood risk, infrastructure delivery, phasing and long-term stewardship. It should also secure a coordinated safeguarding and "no prejudice" approach to potential railway, crossing, access, bus and active-travel infrastructure.

20. These modifications would broaden the portfolio of strategic development locations, improve flexibility and delivery resilience and provide a coordinated framework for addressing the Site's constraints, opportunities and infrastructure requirements. If immediate allocation is not accepted, the Site should be identified as a reserve or safeguarded strategic growth location through a defined mechanism and timetable for reassessment. This remains a secondary remedy and it would assist with boosting supply, in the event that the housing land supply position falls.

21. PfP remains committed to working constructively with Greater Cambridge Shared Planning, the Councils, statutory bodies, infrastructure providers and local stakeholders. PfP also requests the opportunity to participate in the relevant Examination hearing sessions concerning the development strategy, reasonable alternatives, treatment of the Site and modifications required to make the Plan sound.

1. INTRODUCTION

Background

1.1 These representations are submitted on behalf of Places for People Developments Limited ("PfP") in response to the Greater Cambridge Local Plan Proposed Submission Regulation 19 consultation being undertaken by Greater Cambridge Shared Planning ("GCSP") on behalf of Cambridge City Council and South Cambridgeshire District Council.

1.2 PfP is promoting Land north and west of Wilbraham Road, Fulbourn ("the Site") as a strategic residential-led mixed-use development capable of delivering more than 2,500 homes within a comprehensive, landscape-led framework.

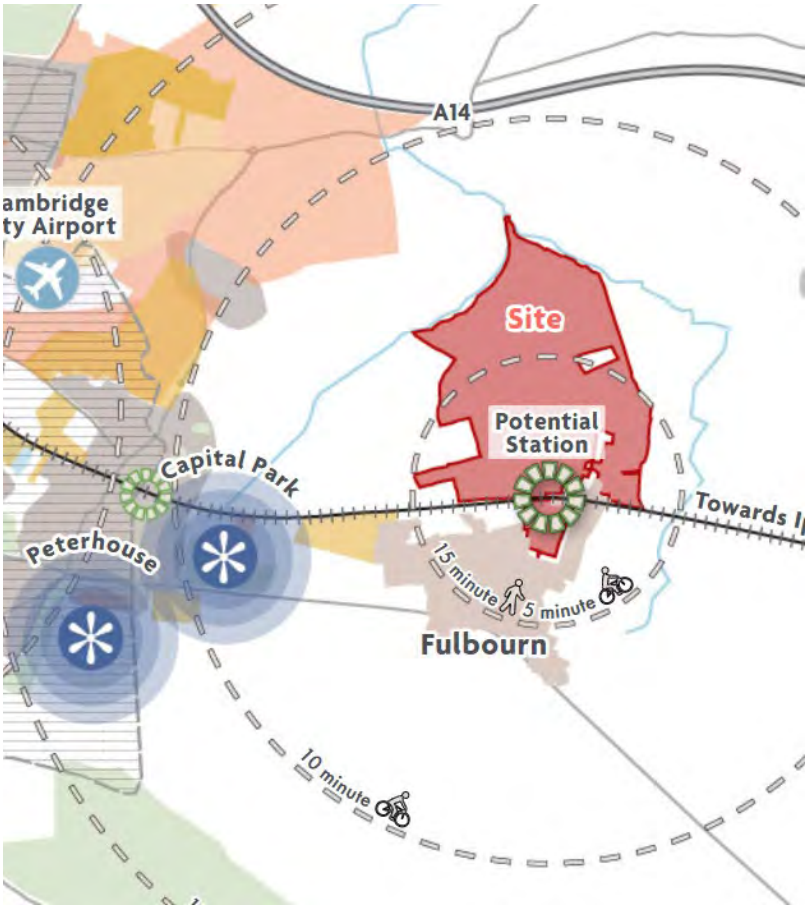


Figure 1: Site Location Plan © JTP

1.3 The Site comprises two parcels assessed separately through the Greater Cambridge Housing and Economic Land Availability Assessment ("HELAA"): Site 52761, Land north of Wilbraham Road, Fulbourn, CB21 5GT; and Site 40293, Land west of Station Road, Fulbourn, CB21 5AB.

1.4 The two parcels form part of one comprehensive strategic opportunity but have different physical, environmental and functional characteristics. Site 52761 provides the principal strategic development opportunity. Site 40293 has a distinct and locally responsive role reflecting its closer relationship with the existing village and its landscape, heritage, archaeological, access and infrastructure context.

1.5 The parcels should therefore be considered together within the comprehensive development framework while retaining a separate assessment of their individual characteristics, constraints, opportunities and potential functions.

1.6 PfP is also in advanced discussions with the owners of additional land adjoining the western and north-western parts of the established Site regarding its inclusion within the wider promotion. The additional land is identified on Figure 2 and provides an opportunity to strengthen the comprehensive nature, flexibility and long-term planning of the wider strategic opportunity.

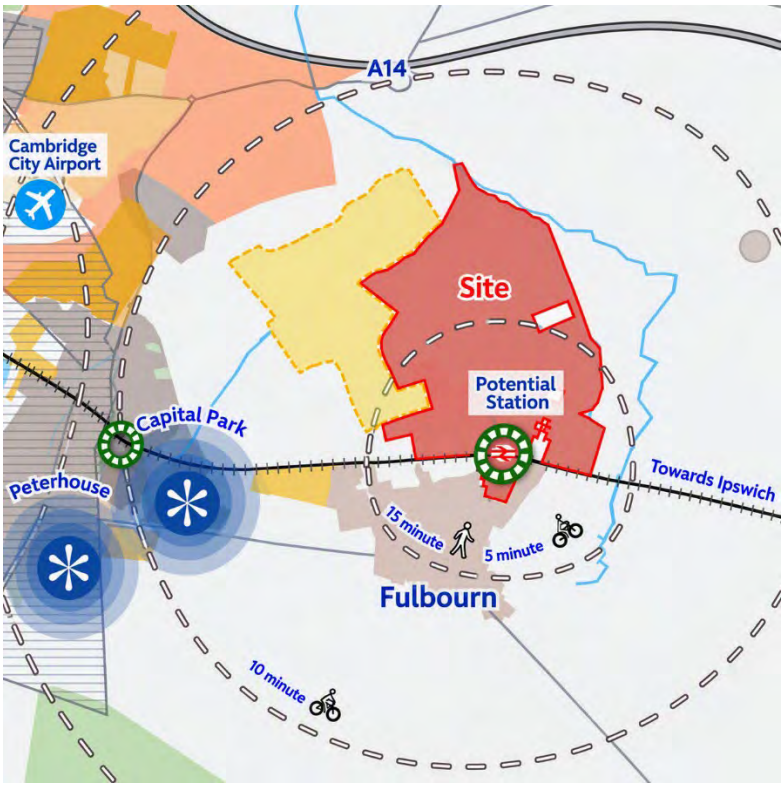


Figure 2: Established Promoted Site and Additional Adjoining Land Interests

Purpose of the Representations

1.7 PfP submitted representations concerning the Site in response to the Greater Cambridge Local Plan Regulation 18 consultation in January 2026. Those representations promoted the Site as a sustainable strategic development opportunity and were supported by a Vision Document setting out an initial landscape-led masterplan framework.

1.8 The current representations retain the core strategic and Site-specific case submitted at Regulation 18 where it remains relevant. They have been updated and reframed to address the Greater Cambridge Local Plan Proposed Submission, its supporting evidence and to response to the updated HELAA Assessment of the site.

1.9 The purpose of these representations is to consider whether the Proposed Submission Plan is legally compliant and sound, identify the provisions and evidence documents to which PfP's objections relate and explain the modifications considered necessary. In this regard as explained within this representation, whilst the plan is considered to be legally compliant a number of amendments are required in order for the plan to be considered sound.

1.10 The representations do not rely solely upon demonstrating that the Site is capable of development. They consider whether the Councils have demonstrated that their chosen development strategy is positive, appropriate, effective and consistent with national policy when assessed against reasonable alternatives and proportionate evidence.

1.11 The Site is relied upon as evidence against which the appropriateness and effectiveness of the submitted strategy and site selection process can be tested. Its allocation is advanced as the principal modification required to remedy the shortcomings identified in these representations.

1.12 The detailed representations are structured in accordance with Part B of the Councils' Regulation 19 response form. They identify the relevant document and provision, the applicable soundness tests, the substance of each objection, the evidence relied upon and the modification sought.

Places for People

1.13 PfP is one of the UK's leading placemaking and development organisations, delivering major strategic sites and sustainable communities nationwide. The Group is committed to:

- High-quality design and long-term stewardship;

- Low-carbon development and climate-resilient construction;
- Biodiversity enhancement and nature-positive placemaking;
- Social value, community infrastructure and inclusive growth; and
- Delivering homes across a range of tenures, including affordable housing

1.14 These commitments align closely with the emerging Greater Cambridge Local Plan's emphasis on housing, climate action, biodiversity, sustainable transport, inclusive growth and high-quality placemaking.

1.15 Further information about PfP's development experience, mixed-tenure model, environmental and social priorities and approach to creating and managing communities is contained in Places for People: Creating Thriving Communities, attached unchanged as Appendix B.

Supporting Vision and Delivery Documents

1.16 These representations are supported by two documents prepared or submitted as part of PfP's Regulation 18 case:

- The January 2026 Land north and west of Wilbraham Road, Fulbourn Vision Document, attached unchanged as Appendix A; and
- Places for People: Creating Thriving Communities, attached unchanged as Appendix B.

1.17 Appendix A provides the detailed Site-specific development vision, initial masterplan framework, design principles, landscape and visual analysis, green and blue infrastructure strategy, ecological opportunities, movement and connectivity framework and supporting plans and diagrams.

1.18 Appendix B provides supporting information about PfP's development experience, delivery capabilities, mixed-tenure model, environmental and social priorities, regional reach and approach to creating and managing communities over the long term.

1.19 These first two appendices perform complementary roles. Appendix A addresses the Site and its potential development framework. Appendix B explains the experience and delivery model which PfP would bring to the promotion, development and long-term stewardship of the Site. The main statement summarises the material relevant to these Regulation 19 representations but does not reproduce either supporting document in full.

1.20 Neither supporting document has been revised for Regulation 19. Where evidence, policy or circumstances have changed since January 2026, the updated position is stated in the main Regulation 19 representations. Since Regulation 18, an updated Transportation Representation has been prepared by Mayer Brown and is included at Appendix C. The Transportation Representation provides updated evidence on the Site's accessibility, access opportunities and multimodal transport strategy. It explains why there is no longer an in-principle transport or access reason preventing allocation, while identifying the further junction feasibility, road-safety, modelling, mode-share and trip-budget work that would appropriately accompany masterplanning and a future planning application.

1.21 The additional adjoining land shown on Figure 2 was not included within the January 2026 Vision Document. The Vision Document nevertheless establishes relevant principles for considering that land, including landscape-led development, connected green infrastructure, east-west permeability, active travel, coordinated access and movement and the creation of a clear and defensible long-term Green Belt boundary. The precise application of those principles to the additional land will require further assessment.

Changes Since Regulation 18

1.22 Since the Regulation 18 representations were submitted, the Councils have published the Proposed Submission Local Plan, the accompanying Policies Map and an updated evidence base. This includes the current HELAA material, Development Strategy Topic Paper, Site Allocations Topic Paper, Sustainability Appraisal and the Councils' responses to the Regulation 18 representations. In respect to the site, part of the site is now included on the Fulbourn proposals map as a safeguarded corridor for the delivery of East-West Rail under policy I/SI.

1.23 The national policy context has also changed following publication of the August 2026 National Planning Policy Framework. The revised Framework introduces a restructured system of plan-making and national decision-making policies and establishes the current tests against which the soundness of the Proposed Submission Plan should be assessed. Under the transitional arrangements, as set out within the new NPPF, the Greater Cambridge emerging Local Plan is being considered under the old plan making system and therefore the 2024 version of the NPPF is the relevant version of the NPPF.

1.24 PfP has also continued its discussions with the owners of additional adjoining land, which have now reached an advanced stage. The opportunity provides scope to consider a more comprehensive

long-term allocation and development framework, subject to the promotion arrangements being formalised and the necessary technical assessment being undertaken.

Report Structure

1.25 The remainder of this statement is structured as follows:

- Section 2 sets out the planning policy context
- Section 3 describes the Site, HELAA and relevant environmental, planning and rail matters;
- Section 4 Provides a Regulation 19 policies response, with suggested amendments needed in order for the plan to be sound
- Appendix A contains the unchanged January 2026 Land north and west of Wilbraham Road, Fulbourn Vision Document; and
- Appendix B contains the unchanged Places for People: Creating Thriving Communities brochure.
- Appendix C contains the Mayer Brown Transportation Representation

1.26 PfP remains committed to working constructively with GCSP, the Councils, statutory bodies, infrastructure providers and local stakeholders to refine the allocation, masterplan and delivery strategy for the Site.

2. PLANNING POLICY CONTEXT

National Planning Policy

2.1 In August 2026, the government published the new version of the NPPF (2026), which replaced the NPPF (2024). In accordance with the transitional arrangements in 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.

2.2 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.

2.3 The NPPF confirms that the purpose of the planning system is to contribute to sustainable development by managing the use and development of land in the long-term public interest. The economic, social and environmental objectives of sustainable development should be pursued in mutually supportive ways through the preparation and implementation of development plans.

2.4 The NPPF is supported by national Planning Practice Guidance, including guidance on plan-making, housing and economic land availability assessment, Green Belt and Local Plan Examination. The Guidance provides further detail on the implementation of national policy but does not displace the policies within the NPPF.

Regulation 19 and Examination

2.5 The Greater Cambridge Local Plan has reached the Proposed Submission stage under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the final formal stage for making representations before the Councils consider submitting the Plan for independent Examination.

2.6 The purpose of the Regulation 19 consultation is materially different from that of the preceding Regulation 18 consultation. Regulation 18 provided an opportunity to comment more generally on the emerging strategy, policies and development options. At Regulation 19, representations must address whether the Proposed Submission Plan is legally compliant and sound and identify any modification considered necessary.

2.7 In accordance with paragraphs 36 and 37 of the NPPF this representation has been prepared having regards to the tests of soundness as follows:

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

The Development Plan

2.8 The current development plan of relevance to the site comprises:

- The South Cambridgeshire Local Plan (2018);
- The Cambridge Local Plan (2018); and
- The Fulbourn Neighbourhood Plan (2023)

2.9 Although the site is situated within South Cambridgeshire, the Cambridge Local Plan remains relevant to the wider strategic context, including the relationship between the Site and Cambridge's employment areas, transport networks and development on the eastern side of the city.

The Greater Cambridge Local Plan Proposed Submission

2.10 Cambridge City Council and South Cambridgeshire District Council are preparing the Greater Cambridge Local Plan as a joint Local Plan for both administrative areas. The Proposed Submission Plan covers the period 2024 to 2045.

2.11 The principal development strategy policies are Policy S/JH: New Jobs and Homes; Policy S/DS: Development Strategy; Policy S/SH: Settlement Hierarchy; Policy S/DE: Defined Development Extents; Policy S/GB: The Cambridge Green Belt; and Policy S/MO: Monitoring.

2.12 The Site is not identified as an allocation in the Proposed Submission Plan or shown as an allocated site on the accompanying Policies Map. These representations therefore consider the soundness of the development strategy and the evidence supporting the Site's omission.

2.13 The evidence relevant to that assessment includes the updated HELAA and individual site proformas, Development Strategy Topic Paper, Site Allocations Topic Paper, Sustainability Appraisal, Policies Map, infrastructure and transport evidence and the Councils' responses to the Regulation 18 representations.

2.14 The following sections apply the current national and local planning policy framework to the Site and to the specific policies, evidence documents and map provisions addressed by PfP's representations.

3. LAND TO THE NORTH AND WEST OF WILBRAHAM ROAD, FULBOURN

Vision and Masterplan Framework

3.1 The Land north and west of Wilbraham Road, Fulbourn Vision Document, attached as Appendix A, provides the detailed vision and initial masterplan framework for a sustainable, landscape-led new community at Fulbourn. This Vision Document was submitted as part of the Regulation 18 consultation response and remains unchanged since the Regulation 18 submission.

3.2 Places for People: Creating Thriving Communities, attached unchanged as Appendix B, provides supporting information about PfP's development experience, delivery capabilities, mixed-tenure approach, environmental and social priorities and long-term stewardship model.

3.3 The two documents perform complementary roles. Appendix A addresses the Site and its potential development framework. Appendix B explains the experience and delivery model which PfP would bring to the promotion, development and long-term management of the Site.

3.4 The supporting documents remain the principal sources for that material and are not reproduced in full in this section. The main statement provides a concise, standalone account of the Site case and records the updated Regulation 19 position where relevant.

3.5 The comprehensive promotion is for a strategic residential-led mixed-use development capable of delivering more than 2,500 homes, including mixed-tenure and affordable housing, together with employment, education, healthcare and community facilities, sustainable transport improvements and substantial green and blue infrastructure.

3.6 The masterplan is an initial and flexible expression of the Site's potential rather than a fixed scheme. It does not assume that the whole promoted area would accommodate built development. The extent and distribution of development would be refined through further assessment and engagement, with substantial areas performing landscape, biodiversity, open-space and infrastructure functions.

Site Description and Context

3.7 The Site lies on the eastern and north-eastern side of Fulbourn and comprises two parcels assessed separately through the HELAA: Site 52761, Land north of Wilbraham Road, and Site 40293, Land west of Station Road.

3.8 The parcels form one comprehensive strategic opportunity but have different physical, environmental and functional characteristics. Site 52761 provides the principal strategic development opportunity. Site 40293 has a distinct and locally responsive role associated with its closer relationship to Fulbourn village.

3.9 Site 52761 is the substantially larger northern parcel and extends principally north of the Cambridge to Newmarket railway line. It is predominantly arable land with established hedgerows, drainage ditches, woodland and tree groups, watercourses and a pond. Its northern boundary adjoins the Wilbraham Fens Site of Special Scientific Interest.

3.10 Site 40293 is the smaller western parcel between the railway and the existing village. Residential development lies to its west, south and east. It has closer access to village services but a more sensitive relationship with the Fulbourn Conservation Area, nearby listed buildings and the Scheduled Monument affecting part of its south-western edge.

3.11 The two parcels should therefore be planned together within a single landscape and infrastructure framework while retaining separate assessment of their individual constraints, opportunities and potential functions.

Additional Adjoining Land Opportunity

3.12 PfP has been in discussion with the owners of additional land adjoining the western and north-western parts of the Site regarding its inclusion within the wider promotion. Those discussions are now well advanced, and the parties expect shortly to formalise arrangements under which PfP would promote the additional land on the landowners' behalf. PfP has consistently recognised that the land could form a logical and beneficial extension to the comprehensive strategic opportunity. The relevant land interests are identified on Figure 2.

3.13 The additional land has the potential to strengthen the overall planning and masterplanning framework by providing greater flexibility in the distribution of development, landscape and green infrastructure; improving opportunities for east-west connectivity towards Teversham and Cambridge; increasing the scope to coordinate access and movement, including potential

connections towards Teversham Road and the wider highway network; and enabling a more comprehensive and durable treatment of the western edge of the development. These opportunities are consistent with the wider principles established in the Vision Document, including landscape-led development, connected green infrastructure, active-travel links, permeability and the creation of a clear and defensible long-term Green Belt boundary.

3.14 The additional land was not included within HELAA Sites 52761 and 40293 or the January 2026 Vision Document, and its precise role, capacity, and development potential will therefore require further technical assessment. Its inclusion does not presently alter the stated capacity of more than 2,500 homes, or the conclusions reached for the established Site. Nevertheless, PfP considers that the additional land forms part of the wider strategic opportunity and should be taken into account in refining the allocation boundary, landscape and green-infrastructure framework, access and movement strategy and site-specific policy requirements through the plan-making process.

3.15 The established case for allocation remains supported by the evidence relating to HELAA Sites 52761 and 40293. The additional adjoining land would complement and strengthen that case by allowing Greater Cambridge Shared Planning, PfP and the landowners to consider the most comprehensive and effective long-term allocation boundary and development framework. Its inclusion would also provide greater flexibility to respond positively to the environmental, movement and infrastructure considerations identified through subsequent technical assessment.

Access and Connectivity

3.16 The established Site and additional adjoining land are related to existing roads and routes connecting Fulbourn with Cambridge, Teversham, the Wilbrahams, Newmarket and the strategic highway network. The additional land provides further opportunity to examine connections towards Teversham Road and the wider highway network as part of a comprehensive access and movement strategy, subject to further technical assessment.

3.17 The movement framework identifies more than one potential access opportunity from Wilbraham Road and Station Road and supports a network-based access strategy rather than reliance upon a single junction. It also provides for an internal street and bus network and improved walking, wheeling and cycling connections. Detailed junction feasibility, road-safety assessment, strategic and local highway modelling, mode-share assumptions and trip-budget work would follow through the masterplanning and planning-application processes. These are appropriate matters for detailed assessment and do not provide an in-principle reason to prevent allocation.

3.18 Fulbourn is served by buses connecting the village with Cambridge, Newmarket and surrounding settlements. The scale and mixed-use nature of the development provide opportunities to internalise day-to-day trips through education, local centre, employment and community facilities. The transport strategy would also secure a direct, frequent and high-quality public transport connection to Cambridge and major employment areas, supported by active-travel and demand-management measures.

3.19 The Site is close to major employment locations, including Capital Park, Peterhouse Technology Park and the Cambridge Biomedical Campus. Existing and potential active-travel routes provide opportunities to strengthen connections with Fulbourn, Cambridge, Teversham, the Wilbrahams and the surrounding countryside.

3.20 Appendix A also identifies the opportunity to safeguard and investigate a potential future Fulbourn station and alternative railway crossing arrangements. In addition, the Regulation 19 plan for Fulbourn now identifies the southern part of the site as a safeguarded as important infrastructure under Policy I/SI of the Local Plan. A response has been made to this policy in respect to Fulbourn within this representation.

Environmental and Planning Context

3.21 The promoted land remains within the Cambridge Green Belt and is not identified as an allocation or included within the defined development extent on the Proposed Submission Policies Map.

3.22 Site 52761 adjoins the Wilbraham Fens SSSI. The relationship with the wider fenland network requires careful consideration of hydrology, recreational effects, habitat connectivity, ecological buffers and long-term management.

3.23 Site 40293 adjoins the Fulbourn Conservation Area and has a relationship with listed buildings in the historic village. Part of Scheduled Monument List Entry 1465057 extends into its south-western part. These assets must inform development distribution, design and landscape treatment.

3.24 Public Rights of Way and recreational routes around Site 52761 provide opportunities to create a more connected walking, wheeling and cycling network. Watercourses and drainage features are also defining elements of the northern parcel and its wider landscape.

3.25 The Regulation 18 statement described the Site as unaffected by material fluvial flood risk. That position requires qualification because the updated HELAA identifies parts of Site 52761 within Flood Zones 2 and 3. Flood risk must therefore inform the distribution of development through further assessment and the sequential approach.

3.26 These designations and constraints do not affect all parts of the Site equally. They provide parameters for deciding where development, green infrastructure, ecological protection, open space and infrastructure should be located within a comprehensive framework.

Site Opportunities and Alignment with the Proposed Submission Plan

3.27 The Site's scale, relationship with Fulbourn and Cambridge, fen-edge landscape, watercourses and transport infrastructure provide the basis for a comprehensive development rather than piecemeal growth. The Site aligns closely with the strategic objectives and thematic policy direction of the Proposed Submission Plan.

3.28 Its potential contribution extends beyond housing capacity and encompasses the Plan's seven themes:

- Climate change: the opportunity for a low-carbon development in a location with access to employment, buses and potential active-travel and public-transport improvements.
- Biodiversity and green spaces: a landscape-led framework retaining and reinforcing existing features, providing ecological buffers, creating habitats and strengthening links across the fenland network.
- Wellbeing and social inclusion: mixed-tenure and affordable housing, accessible open space, community facilities, active travel and long-term stewardship of community assets.
- Great places: distinctive neighbourhoods responding to the northern fen-edge and southern village-edge contexts, with landscape, movement, open space and built form planned together.
- Jobs: improved access to Capital Park, Peterhouse Technology Park, the Cambridge Biomedical Campus and the wider Greater Cambridge economy.
- Homes: more than 2,500 homes through a broad mix of types and tenures, including affordable housing.
- Infrastructure: coordinated provision of education, healthcare, community facilities, green infrastructure and transport improvements, with feasible railway, crossing and active-travel options safeguarded.

3.29 The strategic scale of the Site allows these benefits to be planned and delivered in an integrated manner. Appendix A provides the Site-specific framework for coordinating development, landscape, movement and infrastructure, while Appendix B explains the development experience and long-term stewardship approach which PfP would bring to its delivery. This alignment does not remove

the need to address the Site's constraints, but it is relevant to whether its omission represents an appropriate and effective development strategy.

HELAA Assessment

3.30 The HELAA assesses Sites 52761 and 40293 separately. Their individual findings should not be conflated, notwithstanding their complementary roles within the comprehensive promotion. The HELAA Assessment for Site 52761 has been updated in June 2026, following the submission of updated technical information by PfP at Regulation 18 stage.

3.31 Site 52761 is recorded as Available Green, Achievable Green and Suitable Red. The Red suitability criteria are landscape and townscape and archaeology; the historic environment and access and transportation criterion is Amber.

3.32 The HELAA records a capacity of between 2,500-3,000 dwellings and 3,000-7,000 square metres of employment floorspace for Site 52761. This has been updated from Regulation 18 stage and accords with PfP's own assessment of the site.

3.33 The Green availability and achievability findings confirm that the principal disagreement concerns suitability. Under the HELAA methodology, a Red finding against an individual suitability criterion produces an overall Red outcome, so the reasons for the individual ratings require consideration rather than reliance on the overall classification alone.

3.34 PfP's case is that landscape, archaeology and access should inform the allocation boundary, development distribution, further assessment, mitigation and site-specific policy requirements rather than preclude consideration of the strategic opportunity.

3.35 Site 40293 requires separate consideration because of its closer relationship with the village and its landscape and heritage context. No current rating or capacity is attributed to that parcel pending verification against the final proforma. The assessment should also consider whether the criteria and scoring applied to Sites 52761 and 40293 are consistent with those applied to the strategic sites allocated in the Proposed Submission Plan, particularly where comparable landscape, archaeological, ecological, access or infrastructure considerations arise.

3.36 The additional adjoining land shown on Figure 2 falls outside HELAA Sites 52761 and 40293 and has not been attributed availability, achievability, suitability or capacity findings in these representations. Its inclusion within the wider promotion does not alter the recorded HELAA findings for the established Site. Its appropriate role should instead be established through proportionate assessment as the allocation boundary and Site-specific policy are refined.

Landscape and Townscape

3.37 Landscape and townscape are identified as a Red criterion for Site 52761. The parcel has an open agricultural and fen-edge character, with an open core framed by mature vegetation, the New Cut, Little Wilbraham River, Caudle Ditch and Fen Drove Way.

3.38 Appendix A provides a basis for distinguishing the open core and more sensitive areas from land with greater potential to accommodate development. Existing vegetation and watercourses can structure a substantial green-infrastructure framework and sensitive settlement edges. Whilst clearly the site will have landscape and townscape impact, through sensitive design it is considered that the site can be suitable integrated into the fen landscape.

3.39 Site 40293 has a different village-edge relationship, influenced by neighbouring residential development and mature vegetation. Further landscape and visual assessment would be required for both parcels.

3.40 The allocation-stage question is whether landscape effects can be avoided, reduced and managed through the boundary, distribution and form of development and appropriate policy requirements.

3.41 The additional adjoining land also provides an opportunity to consider the western landscape edge, development distribution, structural planting, green infrastructure and relationships with Teversham through a more comprehensive framework. Its detailed landscape role and sensitivity will require assessment, but the wider ownership provides additional flexibility in defining development areas and durable landscape boundaries.

Green Belt and Grey Belt

3.42 The promoted land lies within the Cambridge Green Belt. The August 2026 NPPF provides the current framework for assessing Green Belt purposes, identifying grey belt and considering boundary changes.

3.43 Fulbourn is a village rather than a large built-up area or town. That status is relevant to the purposes concerning unrestricted sprawl, merger of neighbouring towns and the setting of historic towns. The rural setting of the Conservation Area nevertheless remains a material heritage consideration.

3.44 Safeguarding the countryside from encroachment is also relevant, and different parts of the Site may make different contributions to that purpose. The representations do not assume that the whole Site is grey belt.

3.45 The appropriate assessment is whether individual areas meet the national definition, whether all the promoted land needs to be kept permanently open and whether durable boundaries can be formed using the railway, watercourses, mature vegetation and land retained for ecological and flood-management functions.

3.46 Any Green Belt release would need to comply with the applicable national policy requirements, including the Golden Rules where relevant, and be reflected in a site-specific allocation policy.

3.47 The additional adjoining land may also assist in establishing a more comprehensive and durable long-term Green Belt boundary. The precise contribution made by that land to the Green Belt purposes, and the appropriate extent of any release, will require separate assessment and should be considered as part of the refinement of the allocation boundary.

Biodiversity and Green Infrastructure

3.48 Biodiversity is an important influence on the Site but is not identified as a Red suitability criterion for Site 52761. The proximity of designated sites requires assessment of hydrology, recreation, disturbance, habitat connectivity and the relationship between development, watercourses and the fenland environment.

3.49 The development framework would protect designated sites through appropriate buffers, development distribution, ecological assessment and long-term management. It also provides opportunities for habitat creation, connected green corridors and stronger links between Wilbraham Fen and Fulbourn Fen.

3.50 The assessment should therefore address both potential effects and the scope for avoidance, mitigation, enhancement and long-term landscape-scale management.

Built Heritage and Archaeology

3.51 The HELAA records the historic environment criterion for Site 52761 as Amber. The principal designated heritage considerations are associated with Site 40293 and the adjoining village, including the Conservation Area, listed buildings and Scheduled Monument.

3.52 These assets should be treated as masterplanning parameters. Development distribution, density, height, massing, views, open space, planting and boundary treatment would need to respond to their significance and setting, supported by further heritage assessment.

3.53 Archaeology is a Red criterion for Site 52761, and the wider area is of known archaeological interest. The Scheduled Monument affecting part of Site 40293 should be protected as a fixed parameter.

3.54 The existence of archaeological potential is not disputed. The relevant issue is whether it prevents strategic development or can be addressed through proportionate desk-based assessment, field evaluation, development distribution, preservation and mitigation.

3.55 The Red archaeology rating should therefore be supported by proportionate evidence explaining why investigation, avoidance, preservation and mitigation would not provide an acceptable allocation-level response.

Transport Strategy including Rail Strategy

3.56 The updated 2026 HELAA records all four transport-related criteria, comprising accessibility, site access, transport and roads, and strategic transport, as Amber. It also recognises that access is acceptable in principle following consideration of the additional technical work undertaken by Mayer Brown at Regulation 18. These findings establish that there is no longer an in-principle transport or access reason preventing allocation. They do not remove the need for proportionate detailed assessment as the masterplan progresses.

3.57 The scale and mixed-use nature of the development provide opportunities to internalise day-to-day trips through education, local centre, employment and community facilities. The Transport Strategy identifies more than one potential access opportunity and supports a network-based access approach rather than reliance upon a single junction. Detailed junction feasibility, road-safety assessment, strategic and local modelling, mode-share assumptions and trip-budget work would follow at masterplan and planning-application stage. These are properly matters for detailed assessment rather than reasons to prevent allocation.

3.58 The development would provide a direct, frequent and high-quality public transport connection to Cambridge and major employment areas, supported by active-travel and demand-management measures. A future Fulbourn station would represent a significant additional sustainability benefit, but Policy I/ST is outcome-led and does not prescribe rail as the sole means of achieving sustainable accessibility. Allocation should therefore not be made wholly dependent upon the prior delivery of the station.

3.59 A deliverable multimodal strategy can be developed through high-quality bus provision, active-travel connections, demand management and the internalisation of trips, including connections to

employment locations and the proposed Cambridge East station. The station opportunity should nevertheless continue to be safeguarded and actively progressed.

3.60 Since Regulation 18, engagement led by Mayer Brown with East West Rail and Network Rail has progressed the station opportunity. The position agreed on 30 April 2026 recorded that initial discussions with the rail industry had identified no issue of principle with the potential future delivery of a station, subject to funding, an appropriate consenting route, operational and capacity matters and compatibility with local aspirations for improved services to Newmarket and beyond.

3.61 The position has since advanced further. A meeting has been held with Network Rail and GBR Anglia for the purpose of progressing a feasibility study, and PfP has confirmed that it can resource that work. The outcome of the feasibility process will inform the detailed station option, railway interfaces, safeguarding requirements and consenting route.

3.62 The 2026 East West Rail consultation identified Fulbourn as a potential location for a Cambridge Eastern Train Care Centre. Its relationship with the station, railway crossings, development access, active travel and the wider masterplan requires coordinated consideration. PfP has no objection in principle to a Train Care Centre at Fulbourn, provided that its location and design do not prejudice the future development of Land north and west of Wilbraham Road.

3.63 The extent of land ultimately required for East West Rail and any Train Care Centre should remain sufficiently flexible while the proposals continue to evolve. The appropriate safeguarding extent should be confirmed through the Proposed Submission Policies Map and the emerging Development Consent Order process. The Plan should therefore secure a coordinated "no prejudice" approach rather than assume that either the present safeguarding boundary or any particular infrastructure layout is final.

Summary

3.64 Land north and west of Wilbraham Road represents a strategic residential-led mixed-use opportunity capable of delivering more than 2,500 homes within a comprehensive landscape-led framework.

3.65 Sites 52761 and 40293 form one comprehensive opportunity but require separate assessment. Site 52761 is the principal strategic development component; Site 40293 has a distinct and locally responsive role.

3.66 The additional adjoining land identified on Figure 2 forms a logical and beneficial extension to the wider promotion. Although its precise role, capacity, and development potential require further

assessment, it provides additional flexibility for the distribution of development, landscape and green infrastructure, east-west connectivity, access and movement and the establishment of a comprehensive long-term allocation boundary.

3.67 The Site aligns with the Proposed Submission Plan's seven themes and offers an integrated opportunity to deliver homes, employment access, community facilities, environmental enhancement, sustainable transport and infrastructure.

3.68 The HELAA records Site 52761 as available and achievable. Its overall Red suitability conclusion is driven by landscape and townscape and archaeology, while historic environment and access and transport criteria are Amber. These matters should be assessed as potential masterplanning and allocation requirements rather than treated only through the overall Red classification.

3.69 The Site is subject to acknowledged Green Belt, landscape, ecological, flood-risk, heritage, archaeological, access and infrastructure considerations. Appendix A provides a flexible Site-specific framework for responding to those matters, while Appendix B explains the development experience and long-term stewardship approach which PfP would bring to their coordinated delivery. Both documents remain subject to the updated qualifications in this statement.

3.70 The updated HELAA and Mayer Brown evidence confirm that there is no longer an in-principle transport or access reason preventing allocation. The Site can be supported by a deliverable multimodal strategy, while the potential Fulbourn station is actively progressed and feasible railway and Train Care Centre options are safeguarded through a coordinated "no prejudice" approach.

3.71 Taken together, the Site's strategic scale, the availability and achievability of Site 52761, the complementary role of Site 40293, the seven-theme alignment and the opportunity to coordinate housing with infrastructure establish its relevance as a reasonable strategic alternative. The soundness implications and modifications sought are addressed in Section 4.

3.72 Taken together, the strategic scale of HELAA Sites 52761 and 40293, the additional flexibility provided by the adjoining land identified on Figure 2, the availability and achievability of Site 52761, the complementary role of Site 40293, the seven-theme alignment and the opportunity to coordinate housing with infrastructure establish the wider promotion's relevance as a reasonable strategic alternative. The soundness implications and modifications sought are addressed in Section 4.

4. REGULATION 19 POLICIES RESPONSE

4.1 This section of the report provides a response to relevant policies within the emerging Local Plan, where they are relevant to land to the north and west of Wilbraham Road, Fulbourn. This response has been prepared having regard to the tests of soundness as set out within paragraphs 36 and 37 of the NPPF. This section considers the Greater Cambridge Local Plan Proposed Submission and the evidence supporting its development strategy. It identifies the principal respects in which PfP considers that the Plan requires modification and provides the basis for the separate representations submitted through Part B of the Councils' Regulation 19 response form.

4.2 The section should be read alongside the planning policy context in Section 2 and the Site-specific evidence in Section 3. It does not repeat the description of the Site, its constraints and opportunities, the Site-specific vision and masterplan material contained in Appendix A or the supporting delivery and stewardship information contained in Appendix B

4.3 Each detailed representation identifies the relevant document and provision, applicable soundness tests, substance of the objection, supporting documents and modification sought.

Broad Areas of Support

4.4 PfP supports the preparation of a joint Local Plan for Cambridge and South Cambridgeshire.

4.5 PfP also supports the Plan's broad objectives of enabling sustainable economic and housing growth, responding to climate change, enhancing biodiversity, improving sustainable transport, coordinating infrastructure and creating healthy and high-quality places.

4.6 The principles of delivering mixed and affordable housing, strategic green infrastructure, nature recovery, active travel, public transport and long-term stewardship are consistent with the approach to the Site.

4.7 This support is qualified. Agreement with the broad objectives does not demonstrate that the development strategy, site selection process, individual allocations or treatment of reasonable alternatives are sound.

4.8 PfP considers that there remain several important areas where the draft Plan requires further refinement to ensure it can progress confidently to Regulation 19 and ultimately meet the tests of soundness set out in the NPPF. These comments are therefore offered in a constructive and collaborative spirit, with the intention of helping guide the Plan through this next vital stage.

- The need for an extended plan period to align with the governments vision for Cambridge and to align with the Cambridgeshire Local Growth Plan (2025).
- Insufficient allocation of deliverable sites to meet identified development needs, particularly housing, over the full plan period.
- A shortfall in supply flexibility, with too few sites capable of early delivery or responding to changing economic and demographic pressures., which appears to have resulted in the Liverpool rather than Sedgefield approach being selected.
- An over-reliance on complex or infrastructure-dependent locations, which may not deliver at the scale or pace required.
- A need for clearer evidence of deliverability, including realistic trajectories and robust assumptions on lead-in times.
- Further work required to demonstrate the Plan is "positively prepared", ensuring it fully meets objectively assessed needs.
- Strengthening the case for "effectiveness", including a more resilient spatial strategy and a broader portfolio of sites.
- Ensuring the Plan is "justified", with a transparent comparison of reasonable alternatives and clearer rationale for site choices.
- Reinforcing "consistency with national policy", particularly around housing delivery, sustainable transport, and climate-responsive growth.
- Ensuring that the sustainability credentials of well-located and sustainable settlements such as Fulbourn is recognised in the plan.

4.9 A detailed assessment of each policy, relevant to PfP land interests, is considered in turn:

Vision for Greater Cambridge

4.10 PfP 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.

4.11 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.

4.12 PfP supports a vision focused on:

- A net-zero future through low-carbon, climate-responsive development.
- Nature-rich places delivering strong biodiversity gains.
- Compact, well-connected communities focused on sustainable travel.
- Healthy, high-quality neighbourhoods with excellent design and green space.
- A balanced housing mix meeting diverse local needs.
- A thriving innovation economy supported by homes and infrastructure.
- Resilient water systems addressing scarcity and integrating SuDS.
- Protected landscapes and heritage shaping high-quality growth.
- Infrastructure aligned with growth, including transport and community facilities.
- Vibrant villages and centres strengthened by improved services and access.

4.13 The vision is aligned with PfP own prioritises as set out within the Thriving Communities document (Appendix B) and the site aligns with these objectives and can deliver a development that reflects the distinctive character of Fulbourn while contributing to the wider needs of Greater Cambridge.

Plan Period

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

4.15 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.

4.16 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.

4.17 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.

4.18 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.

4.19 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.

4.20 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

4.21 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.

4.22 The increase in the length of 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

4.23 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.

4.24 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.

4.25 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.

4.26 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.

4.27 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

4.28 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 'r***apid 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.

4.29 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.

4.30 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.

4.31 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.

4.32 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.

4.33 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.

4.34 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.

4.35 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.

4.36 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

4.37 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'.*

4.38 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'.*

4.39 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.

4.40 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.

4.41 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

4.42 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'.*

4.43 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.*

4.44 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.

4.45 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.

4.46 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. Further detail on the Local Growth plan is set out below.

4.47 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

4.48 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*

4.49 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'.*

4.50 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 County, 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.

4.51 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.

4.52 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.

4.53 In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it 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

4.54 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.

4.55 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.

4.56 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.

4.57 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*

4.58 As set out in these representations, sustainable sites which can be delivered early in the plan period, such as Land to the north and west of Wilbraham Road, Fulbourn, would support this ambitious level of growth and should be allocated in the DLP.

Policy S/DS: Development Strategy and Policy S/SH Settlement Hierarchy

4.59 Policy S/DS and Policy S/SH need to be considered in conjunction in that Policy S/SH sets out the proposed settlement hierarchy for the plan, which then informs the locations for growth as set out in Policy S/DS.

4.60 Draft Policy S/SH identifies Fulbourn as a Minor Rural Centre, along with the settlements of Bar Hill, Bassingbourn, Comberton, Cottenham, Gamlingay, Girton, Linton, Melbourn, Milton, Papworth Everard, Swavesey, Waterbeach and Willingham.

4.61 Minor Rural Centres are described as follows:

> *'Minor rural service centres have a lower level of services and facilities and employment than rural centres, but a greater level than most other settlements in Greater Cambridge and often perform a role in terms of providing services and facilities for a small rural hinterland'*

4.62 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

...

Part 1 of Policy S/DS and Policy S/SH

4.63 No objection is raised to the five suggested locations for growth in the District as set out in Policy S/DS. However, it is not considered necessary to put them in an order of preference, given that different development in different locations will all contribute to meet the housing and development needs for the area. For example, growth in Cambourne and within Rural Centres and Minor Rural Centres will be particularly important to ensure choice and competition for market land and it will provide in many instances more affordable private housing for those unable to afford to live in Cambridge City or those that would prefer a village location. In this regard, it is considered important for sustainable and well-connected villages such as Fulbourn to accommodate a suitable proportion of growth.

4.64 In terms of the size, the proposed minor rural service centres are logical, however this is considered to provide an over-simplistic approach and does not take into account the location of each settlement, which have contrasting sustainability and connectivity credentials. For example, Fulbourn benefits from being situated in very close proximity to Cambridge City and it is accessible both by cycle and a short bus journey to the city and to the major employment opportunities at Capital Park and Peterhouse Technology Park and Cambridge Bio-Medical Campus.

4.65 Land to the north and west of Wilbraham Road, Fulbourn also provides a unique opportunity to facilitate the reopening of Fulbourn Train Station, which would have substantial benefits in terms of reducing car trips into Cambridge both for existing and new residents in the area and it will ensure a coordinated approach between housing and infrastructure delivery. It would also align with the objectives of East West Rail and the Cambridgeshire Local Growth Plan (2025), which refers to the proposal to increase capacity along the line to the east of Cambridge (between Cambridge and Newmarket), which will include a new station at Cambridge East. This could include also include the provision for the introduction of the Snailwell Loop around Newmarket, which would increase the capacity and frequency of train provision.

4.66 The settlements of Gamlingay and Papworth Everard are situated in relatively remote locations with relatively poor transport connectivity and they are clearly not as a sustainable option for growth when compared to settlements such as Fulbourn.

4.67 It is therefore considered that the settlement hierarchy and development strategy needs to be reassessed and additional sub-category should be added to include 'Well Connected Minor Rural Centres. Settlements such as Fulbourn, Milton, Melbourn and Waterbeach would be appropriate settlements for this category and they should clearly be preferable to the less sustainable minor rural centres, such as Gamlingay, and Papworth Everard. As part of this re- assessment the reference to schemes of up to 30 dwellings being delivered in Minor Rural Service Centres, should also be removed from the policy.

Suggested Amendments to Policy S/DS and Policy S/SH

4.68 The following re-wording of Policy S/DS is suggested, with amendments highlighted in bold:

> *Policy S/DS: Development Strategy, sets out that the vast majority of jobs and homes will be met in the following locations:*
>
> *a) Within the Cambridge Area*
>
> *b) On the outer edge of Cambridge*
>
> *c) At an expanded Cambourne*
>
> *d) At other new settlements*
>
> *e) In Rural Centres and Well Connected Minor Rural Centres*
>
> *More limited level of growth will be facilitated in other Minor Rural Centres and in the southern rural cluster*

4.69 Policy S/SH should be amended to **identify Fulbourn, Milton, Melbourn and Waterbeach as well connected Minor Rural Centres.**

4.70 These amendments are required to ensure that the plan adequately responds to the sustainability credentials of well-connected minor rural services and would provide the most appropriate strategy when considered against the alternatives. This approach would be sound and in accordance with national policy.

Part 2 of Policy S/DS and Strategic Allocations

4.71 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

4.72 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.

4.73 PfP does not object to strategic-scale development or the allocation of larger sites. The concern is the degree of reliance placed upon a small number of strategic locations whose delivery is contingent upon major infrastructure interventions before substantial housing can come forward. By contrast, Land north and west of Wilbraham Road is capable of contributing to housing delivery during the early years of the Plan period and is not dependent upon the prior delivery of a new railway station or other major infrastructure. Whilst additional infrastructure, including a future station, would provide significant long-term benefits and support the Site's full strategic potential, early phases of development are capable of coming forward in advance of such interventions. The allocation would therefore broaden the portfolio of strategic opportunities, increase choice and competition for market land and improve the flexibility and resilience of the overall strategy.

4.74 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.

4.75 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.

4.76 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 a 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.

4.77 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.

4.78 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 north and west of Wilbraham Road, Fulbourn, which can provide a very substantial contribution to housing supply but it can also provide choice and competition for market land, in a location that is not currently allocated for growth. 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 to the north and west of Wilbraham Road, Fulbourn would be a logical site for a reserve site.

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

Cambridge East

4.80 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.

4.81 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

4.82 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

4.83 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.

4.84 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. 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.

4.85 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

4.86 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.

4.87 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.

4.88 The lack of certainty regarding the delivery of Cambourne North, further strengthens arguments as set out above that additional strategic sites such as land to the north and west of Wilbraham Road, Fulbourn should be allocated to boost housing supply and safeguard against the delay to delivery of the proposed allocated sites.

4.89 Overall, it is clear that allocation of land to the north and west of Wilbraham Road, Fulbourn will provide a number of benefits in terms of boosting housing supply, providing additional choice and competition of allocated sites to safeguard against slow delivery and to ensure that development is directed to the most sustainable locations. Its allocation is required in order for the plan to be positively prepared, justified, and effective having regard to the tests of soundness as set out within the NPPF.

4.90 The additional adjoining land shown on Figure 2 further strengthens the case for a comprehensive strategic allocation. It provides greater flexibility in refining the allocation boundary, distributing development and green infrastructure, coordinating access and movement and establishing a durable western edge. Its precise role should be established through proportionate technical assessment and the preparation of the Site-specific allocation policy.

Proposed Amendment to Policy S/DS

4.91 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 to the north and west of Wilbraham Road, Fulbourn. 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 to the north and west of Wilbraham Road, Fulbourn - an allocation for a residential led mixed use development, including more than 2,500 homes (delivering 2,500 homes in the plan period, employment provision, a local centre, new education facilities and open space.***

4.92 As a minimum for reasons explained above, the land north and west of Wilbraham Road, Fulbourn should be allocated as a reserve site.

Policy I/SI - Safeguarding Important Infrastructure

4.93 Policy I/SI relates to Safeguarding Important Infrastructure. Part 1 of the policy states that land subject to safeguarding directions, as identified on the Policies Map, will be subject to consultation by the local planning authority with the relevant body. It states that planning permission will not be granted for development that would prejudice the construction or effective operation of the following transport schemes:

a) Proposals in the A428 Black Cat to Caxton Gibbet Improvement Scheme safeguarded area, which will require consultation with National Highways;

b) Proposals in the East West Rail scheme safeguarded area, which will require consultation with the East West Rail Company

4.94 Since the Regulation 18 stage, the proposals map for Fulbourn has been updated to identify part of the land under the control of PfP as a Safeguarded Area for important infrastructure. This relates to the area immediately to the north of the railway line, which is a safeguarded corridor for East- West Rail. In the consultation held in May- June 2026, East- West Rail identified land on the north side of the rail line at Fulbourn as a potential location for a train care centre.

4.95 PfP has no objection in principle to the proposed Train Care Centre, provided that its location and design do not prejudice the future development of Land north and west of Wilbraham Road,

Fulbourn. As the East West Rail proposals continue to evolve, it would be premature to conclude that the safeguarding area presently shown is definitive or sufficient. The extent of land required should remain under review and be confirmed through the Proposed Submission Policies Map and the emerging East West Rail Development Consent Order process. Any subsequent change should be reflected in the Policies Map and coordinated with the Site allocation, station opportunity, railway crossings, access and active-travel requirements.

Modifications Sought

4.96 The principal modification sought is the allocation of Land north and west of Wilbraham Road, Fulbourn, comprising HELAA Sites 52761 and 40293, together with the additional adjoining land identified on Figure 2, as a comprehensive strategic residential-led mixed-use development capable of delivering more than 2,500 homes within a landscape-led framework.

4.97 The allocation should be supported by a bespoke site-allocation policy; amendments to Policy S/DS, the strategic-site schedule, Key Diagram, housing trajectory, Policies Map and Green Belt boundary; any necessary defined development extent change; environmental, access and flood-risk requirements; railway and transport safeguarding; infrastructure, delivery and phasing requirements; and long-term stewardship.

4.98 These modifications would broaden the portfolio of strategic development locations, improve flexibility and resilience and provide a coordinated framework for the Site's constraints, opportunities and infrastructure requirements.

4.99 The detailed allocation boundary and Site-specific policy should be developed with GCSP, the relevant landowners and statutory and infrastructure bodies. That process should distinguish the established roles of HELAA Sites 52761 and 40293 and establish, through proportionate technical assessment, the appropriate role and extent of the additional adjoining land shown on Figure 2. The resulting framework should secure a comprehensive approach to development distribution, landscape and green infrastructure, access and movement, environmental mitigation, infrastructure and phasing.

4.100 If immediate allocation is not accepted, the Site should be identified as a reserve or safeguarded strategic growth location with a defined mechanism and timetable for reassessment. This is a secondary remedy.

4.101 PfP remains committed to constructive engagement with the Councils, infrastructure providers and other relevant bodies.

APPENDIX A - Land north and west of Wilbraham Road, Fulbourn Vision Document, January 2026

Land north and west of Wilbraham Road

Fulbourn

Vision Document

January 2026

Places for People

As the UK's leading Social Enterprise, we believe that it's more than just homes that make a Community.

CERES PROPERTY

DPV Consult

jtp

fabrik

Executive Summary

The Proposed Vision

The vision for the land north and west of Wilbraham Road is to create a cohesive, landscape-led and sustainably connected new neighbourhood for Fulbourn, shaped directly by the opportunities and influences identified through the baseline studies.

The combined landholding offers a rare opportunity to deliver a well-planned, ecologically rich and highly accessible extension to the village, structured around green infrastructure, sustainable movement, and a strong sense of place. The masterplan responds to the distinct characteristics of the northern and southern parcels, while ensuring they function as a single, integrated community that complements and strengthens Fulbourn.

The land north and west of Wilbraham Road, Fulbourn represents a sustainable and deliverable opportunity to contribute positively to the Greater Cambridge Local Plan.

The Site:

- Aligns with the emerging spatial strategy.
- Supports climate and biodiversity objectives.
- Enhances sustainable transport and active travel.
- Integrates with the existing settlement.
- Can deliver over 2,500 homes within a landscape-led framework with 50% affordable housing.
- Is available, suitable and achievable within the plan period.

The proposal is brought forward by Places for People (PfP).

- The UK's largest social enterprise.
- A partner trusted by Local Authorities nationally.
- A key delivery partner of Homes England, and one of a select group of Strategic Partners with a proven track record of exceeding targets and securing additional funding.
- Unlike a traditional housebuilder, PfP takes a long-term view and is ideally placed to build and manage new communities in perpetuity.
- A commitment to invest in and around Fulbourn and Cambridge, helping to drive and support the region's growth objectives.



The site is uniquely capable of early delivery.

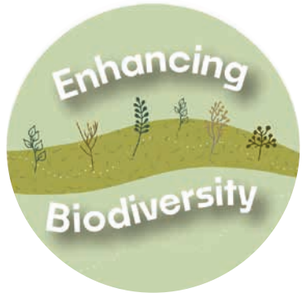
Both land parcels are in single, committed ownership with no third-party dependencies, ransom strips or legal impediments, and Places for People — as a social-enterprise Registered Provider with substantial in-house delivery capacity — is able to mobilise quickly. The land is available now, unconstrained by flood risk, contamination or infrastructure capacity issues, and benefits from clear access options and a straightforward development platform. With a proven track record of delivering large, complex schemes at pace, PfP can bring forward early phases within the plan period, supporting the urgent need for new homes in Greater Cambridge and demonstrating immediate momentum behind the emerging spatial strategy.



Rail Connectivity
SUSTAINABLE RAIL ACCESS
Opportunity to safeguard and support the potential reopening of Fulbourn Station



Stewardship
SOCIAL INFRASTRUCTURE
The developments we create endure as high quality communities managed by PfP



Biodiversity
GIVING BACK THE FENS
Habitat corridors, green infrastructure, ecological enhancements



Transport
ACTIVE TRAVEL
New pedestrian and cycle links to Fulbourn and Cambridge



Community
SOCIAL VALUE
Support for local services, community facilities and open space



Climate Action
LOW-CARBON DEVELOPMENT
Energy-efficient homes, tree-lined streets, integrated SuDS



Housing Delivery
AND A SUSTAINABLE PLACE
Capacity for over 2,500 homes including affordable housing



Economy
EMPLOYMENT ACCESS
Proximity to Cambridge Biomedical Campus and ARM HQ



Deliverability
EARLY DELIVERY
Site is available now and can deliver within the plan period, adding certainty for the Local Authority

Who are we?

Places for People will be the delivery partner for the proposed development in Fulbourn, drawing on over 50 years of experience as one of the UK's leading placemaking and affordable housing organisations and the UK's largest social enterprise. Building over 2,000 homes each year across both open-market and affordable tenures, and managing a national portfolio of more than 250,000 homes - including a significant presence in Cambridgeshire - Places for People has the scale, expertise, and integrated structure to deliver large, complex developments efficiently and to a high standard.

The Places For People approach translates our purpose into practice. It ensures that design excellence, sustainability and social value are embedded in every stage of a project's life – from planning and procurement to long-term management.

Three Core Pillars

Partnership

We collaborate with public and private partners to unlock shared value and deliver at scale.

Integration

We bring together homes, open space, community facilities and infrastructure as a cohesive whole.

Stewardship

We retain a long-term relationship with the places we create, ensuring they remain safe, well-managed and vibrant.

How Our Approach Works

We plan for people and place together, shaping design around local need.

We create mixed and inclusive communities, offering diverse homes and tenures.

We invest in the long term management of our homes and wider estates, maintaining high standards throughout each asset's life.

We embed Environmental, Social and Governance principles, reducing carbon and supporting wellbeing.

We adopt Modern Methods of Construction, digital tools and data-driven asset care.

Our Five Placemaking Principles

Inclusive & Mixed Communities
Diversity of age, income, ability and culture.

Access to Social & Commercial Amenities
Local hubs that connect people to opportunity.

Green Infrastructure & Biodiversity
Networks of well-managed, multifunctional open space.

Healthy, Safe & Connected Communities
Walkable, active neighbourhoods.

Well-Designed & Sustainable Places
Long-life, low-carbon, adaptable homes.

We Are Committed To:

- Creating mixed communities that are diverse in age, income, ability and cultural background.
- Designing lifetime communities where homes and neighbourhoods evolve to meet people's changing needs.
- Providing a diverse mix of homes offering varied types, sizes and tenures that respond to local demographics, including opportunities for later living, build-to-rent and supported housing on suitable sites.
- Not leaving the vulnerable behind, ensuring access to supported and extra-care housing within inclusive neighbourhoods.
- Ensuring tenure-neutral design, where every home, regardless of tenure, receives the same attention to quality, layout and materials.
- Designing with local character in mind, ensuring each development reflects its setting through thoughtful architecture, appropriate materials, colour palettes and landscaping that enhance a sense of place and belonging.



As a consistently top-performing strategic partner of Homes England, Places for People is committed to delivering high-quality, mixed-tenure housing, including a commitment to 50% affordable homes. The Group also brings proven capability in delivering supporting infrastructure, community assets, and Extra Care accommodation tailored to the needs of older residents.

Long-term stewardship is embedded within its approach, supported by in house property management expertise responsible for over 110,000 homes across the UK - ensuring the delivery of well-managed, sustainable communities.

Who Are We?

Places for People

Places for People is advancing some of the UK's most ambitious large-scale community developments, bringing forward new homes, social infrastructure, and high-quality public realm across a range of strategic sites.

The projects on this spread demonstrate the organisation's long-term, master-developer approach, delivering not only extensive housing provision but also schools, employment spaces, green infrastructure, and the vital amenities required to support sustainable, thriving neighbourhoods.

Gilston Park, Harlow

Gilston Park will deliver seven distinct new villages to the north of Harlow, totalling 10,000 new homes. Places for People is the masterplan developer for 8,500 of those homes, with the remaining 1,500 to be delivered by Taylor Wimpey. Planning Permission for the entire scheme was granted in January 2025.

The villages will include:

- six primary schools,
- two secondary schools,
- healthcare facilities, and
- 29,000 sqm of employment space, all framed by a comprehensive green and community infrastructure network.





Brooklands, Milton Keynes

Brooklands is a major urban extension to the east of Milton Keynes, led by Places for People as master developer. Due to complete in 2026, the development will provide 2,650 mixed-tenure new homes.

The site includes:

- three new schools,
- a hotel,
- commercial spaces, and
- over 100 acres of parkland.

Since outline permission was granted in 2007, Places for People has led the delivery of strategic infrastructure and early phases, including open spaces, play areas, high-quality public realm, and active travel routes.







Land north and west of Wilbraham Road Fulbourn - Vision Document

Why here?

Location

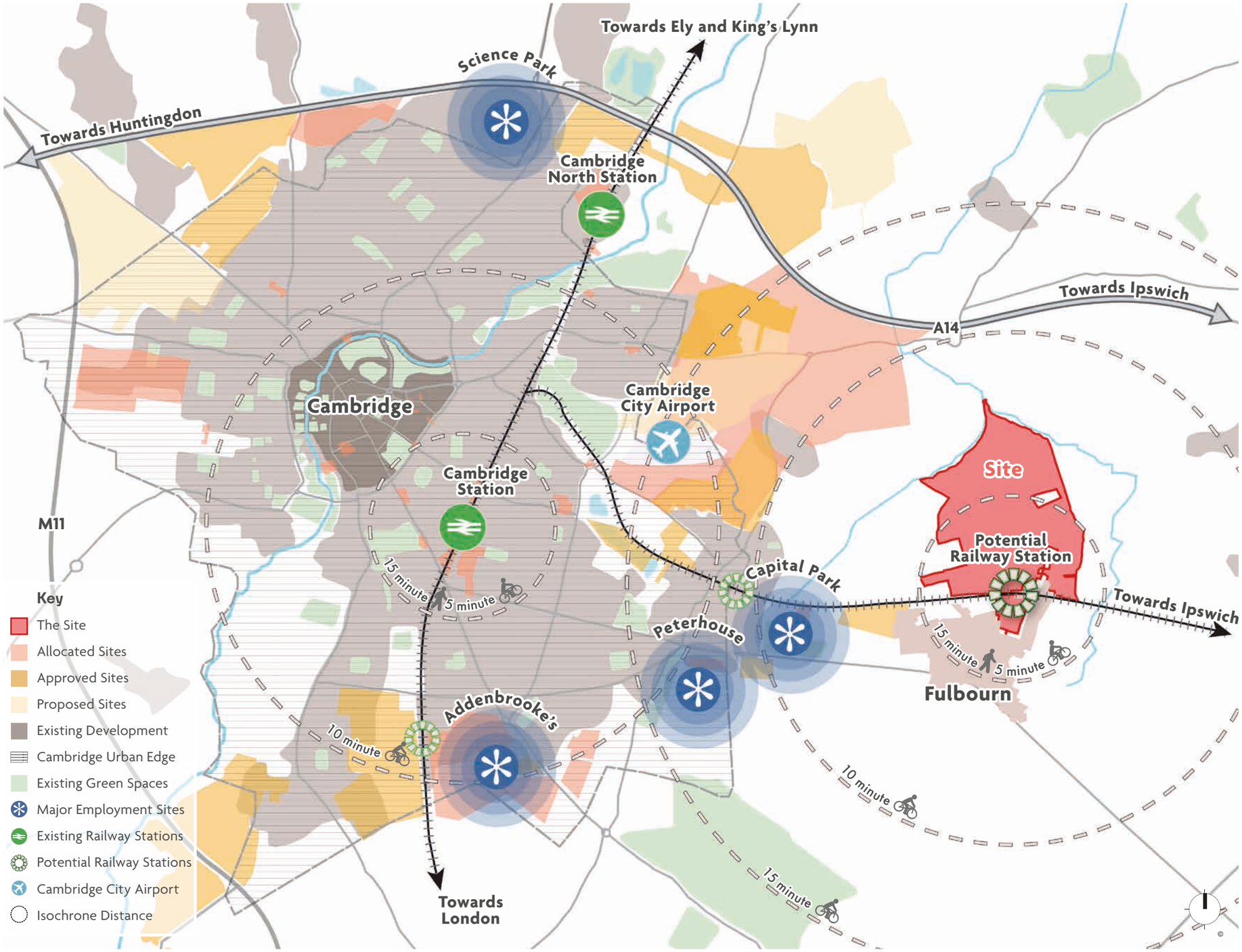
The Site sits in a highly logical and policy-aligned location for future growth, positioned directly alongside both existing commitments and proposed allocations identified in the emerging Greater Cambridge Local Plan. Its relationship to the Cambridge urban edge, the Fulbourn village centre, and the established employment clusters to the west places it firmly within the GCLP's preferred growth corridors, which prioritise sustainable, well-connected locations with strong access to services, jobs, and active-travel networks. In spatial terms, the Site represents a natural extension to areas already identified for development, reinforcing the plan-led strategy of focusing growth in locations that can support high-quality, infrastructure-efficient, and sustainable communities. This alignment with the GCLP growth location strategy strengthens the case for considering the Site as part of a coherent, master-planned approach to meeting identified needs.

Employment

The area has good employment access to Capital Park and Peterhouse Technology Campus (host to Arm's Global Headquarters), together with numerous other science parks and the Cambridge Biomedical Campus.

Need for Housing

Cambridge faces some of the highest affordability pressures in the country, with house prices far outstripping local earnings and limiting access to homes for key workers and younger households. The Fulbourn site offers a real opportunity to help address this by delivering a significant number of new homes — including a high proportion of affordable housing — in a sustainable, well-connected location. With Places for People, a social-enterprise Registered Provider, leading delivery, affordable homes are secured, well-designed and retained for the long term, directly supporting Greater Cambridge's need for inclusive, mixed communities.



Wider Location Plan

Why Here?

Understanding the Place

The site presents a significant opportunity to create a sustainable community that supports Cambridge and connects with the Fens.

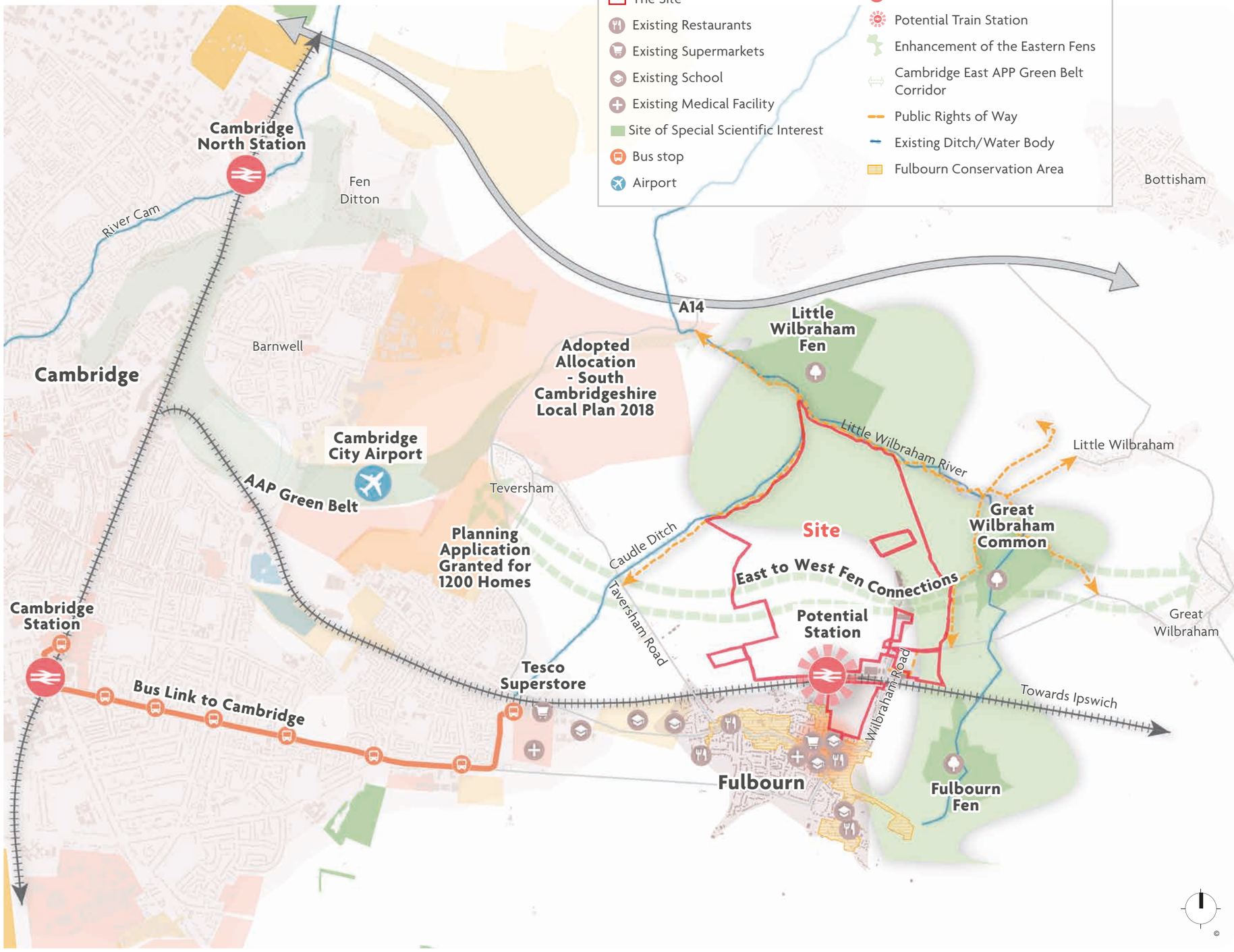
Fulbourn has been identified as a potential location for a new railway station on the Cambridge–Newmarket line, which would enhance sustainable travel options into Central Cambridge and Newmarket, as well as provide improved onward connections to London and other destinations.

The site also offers the opportunity to link Wilbraham Fen, a 62.5-hectare SSSI, with Fulbourn Fen, a 31-hectare Wildlife Trust nature reserve. This would establish north–south connections linking Fulbourn to the Fens, along with the potential for new east–west connections between Cambridge and the Fens.

Safeguarding the Potential for Reopening of Fulbourn Station

Strengthening Landscape & Ecological Opportunities Across the Fenland

Utilising strong access to services, jobs, and active-travel networks



The Site and Local Amenities

Why Here?

Unlocking Access

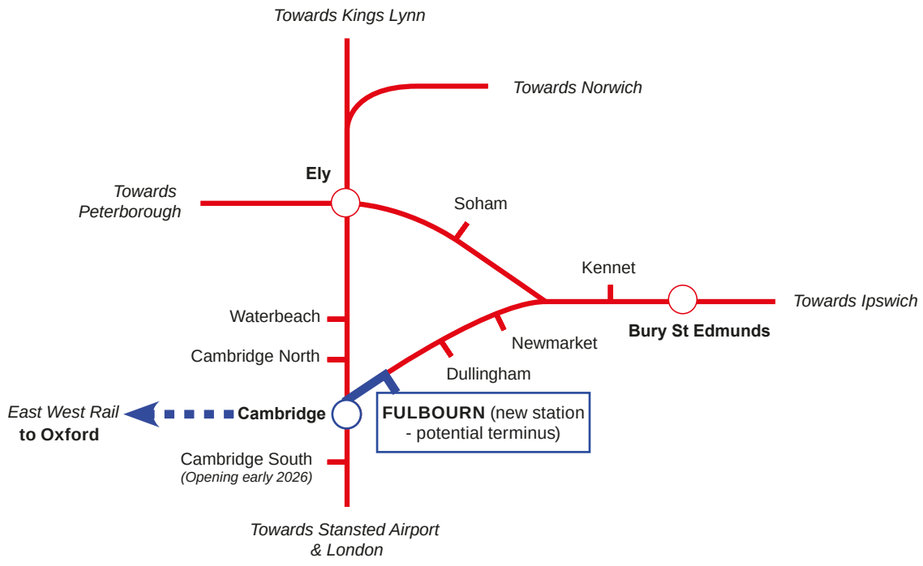
Rail Strategy

The site's exceptional connectivity, linking directly to the Fulbourn Greenway, the wider cycle network, local bus services and Cambridge's major employment hubs, sets the foundation for a truly low-carbon place.

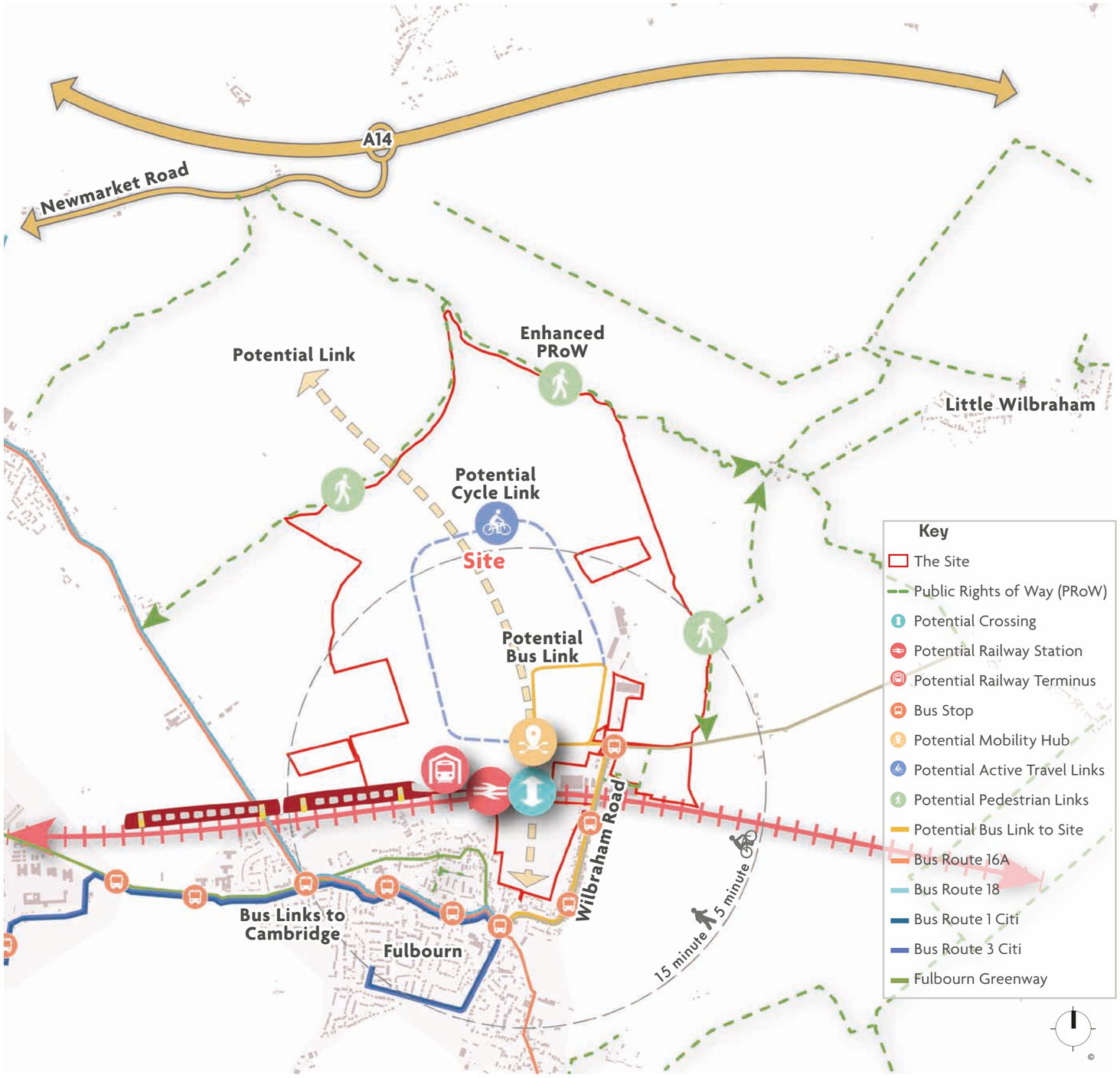
The emerging opportunity to reinstate Fulbourn Station, supported by early positive engagement with Network Rail and Greater Anglia, represents a step-change in sustainable accessibility, enabling rail-based commuting and significantly reducing reliance on the private car.

The following statement of intent has been agreed between PfP and Network Rail:

In terms of the Transport Strategy for the site, initial discussions with the Rail Industry indicate that there are no issues of principle in relation to the potential future delivery of a station on the proposed allocation. However, this would be subject to funding, identification of an appropriate consenting route and the exact details including the requirements for safeguarding the performance and capacity of the line. A new station would also need to be compatible with the aspirations of local stakeholders, notably for half-hourly services to Newmarket and beyond. This will be developed pursuant to initial feasibility studies to be undertaken with Network Rail and the East West Rail team.



Cambridge Area - Possible Future Train Map



Site Wide Transport Strategy

Why Here?

Unlocking Access

Bus Strategy

The proposed bus strategy considers the following key elements:

Provision of high-quality bus services connecting the site to Cambridge City Centre, integrating with the wider Cambridge bus network. These services would be delivered in line with best practice, with measures aimed at incentivising a high level of bus mode share.

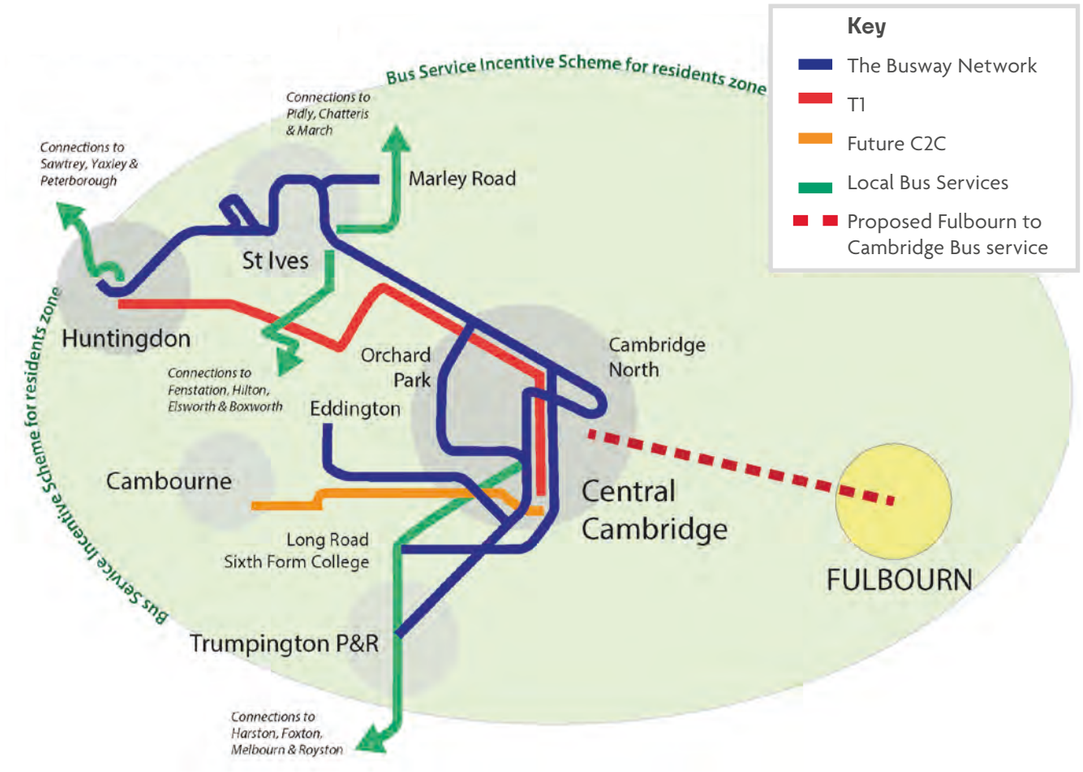
Active Travel Links

The development will incorporate active travel connections:

a) linking the site with the local community, enabling residents to benefit from the proposed station and associated facilities within the allocation; and

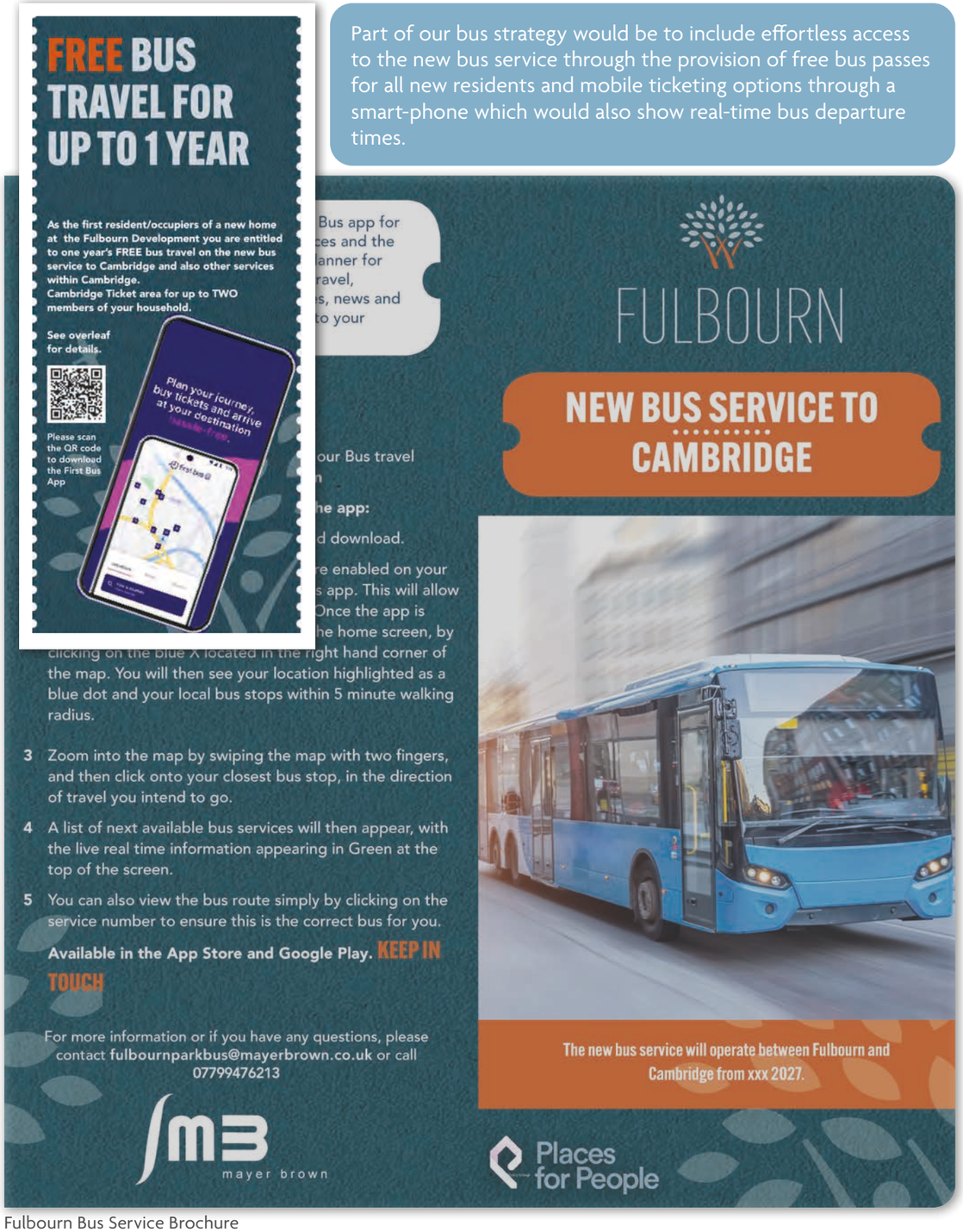
b) connecting into strategic active travel routes associated with the emerging Cambridge East proposal and onward to Cambridge City Centre.

A link is proposed from the site to the Newmarket Road, with priority within the site for bus movements, but with the objective of relieving traffic pressures within Fulbourn and maximising the ability to use roadspace for active travel uses.



Bus Strategy Diagram

Part of our bus strategy would be to include effortless access to the new bus service through the provision of free bus passes for all new residents and mobile ticketing options through a smart-phone which would also show real-time bus departure times.



Fulbourn Bus Service Brochure

Why Here?

A Connected Fenland

Landscape Character

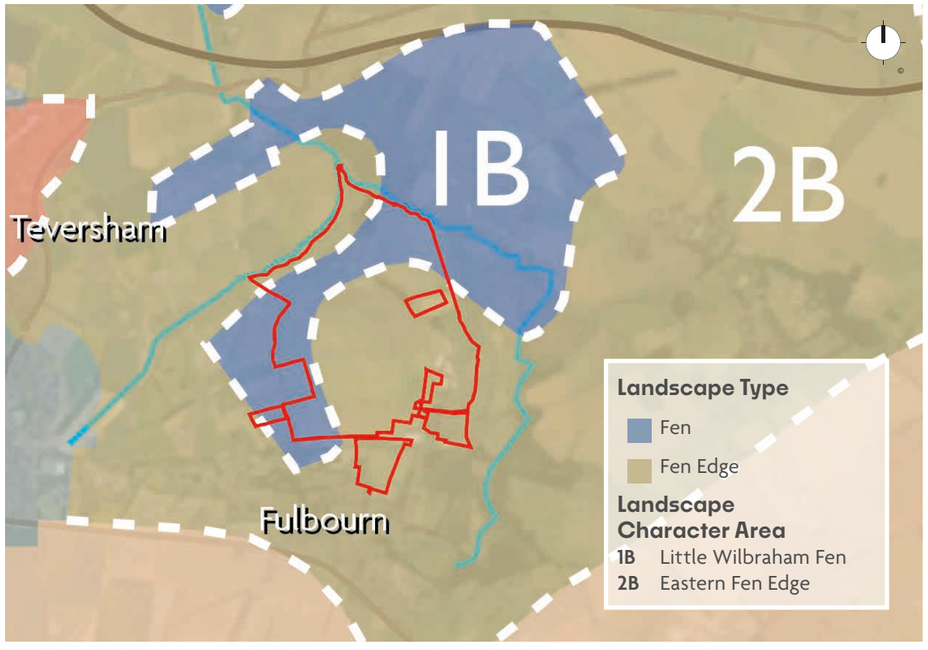
The site is located within the wider Cambridgeshire fenland landscape. It falls within Landscape Character Area 1E: Fulbourn Fen and Landscape Character Area 6C: Fulbourn Fen Edge Chalklands, as defined in the Greater Cambridge Landscape Character Assessment. This reflects the site's position at the transition between the open fenland landscape and the settled fen-edge character of Fulbourn.

2B. Eastern Fen Edge

The Eastern Fen Edge is a transitional landscape between the low-lying Fenlands and the higher Chalklands. Its character is defined by the intermingling of fen, chalk and river terrace influences, creating a gradual change in landform, soils and landscape character rather than a distinct boundary.

1B. Little Wilbraham Fen

Little Wilbraham Fen is a small, low-lying fen pocket within the Eastern Fen Edge, generally lying at around 5–10 metres AOD. It is characterised by peat and river terrace deposits, with chalk geology becoming more apparent toward the edges, reflecting its position within the fen-to-chalk transition zone.



Landscape Character Area (Cambridge Green Belt Study, Chapter 4, 2002; LDA)



Site Wide Landscape Strategy

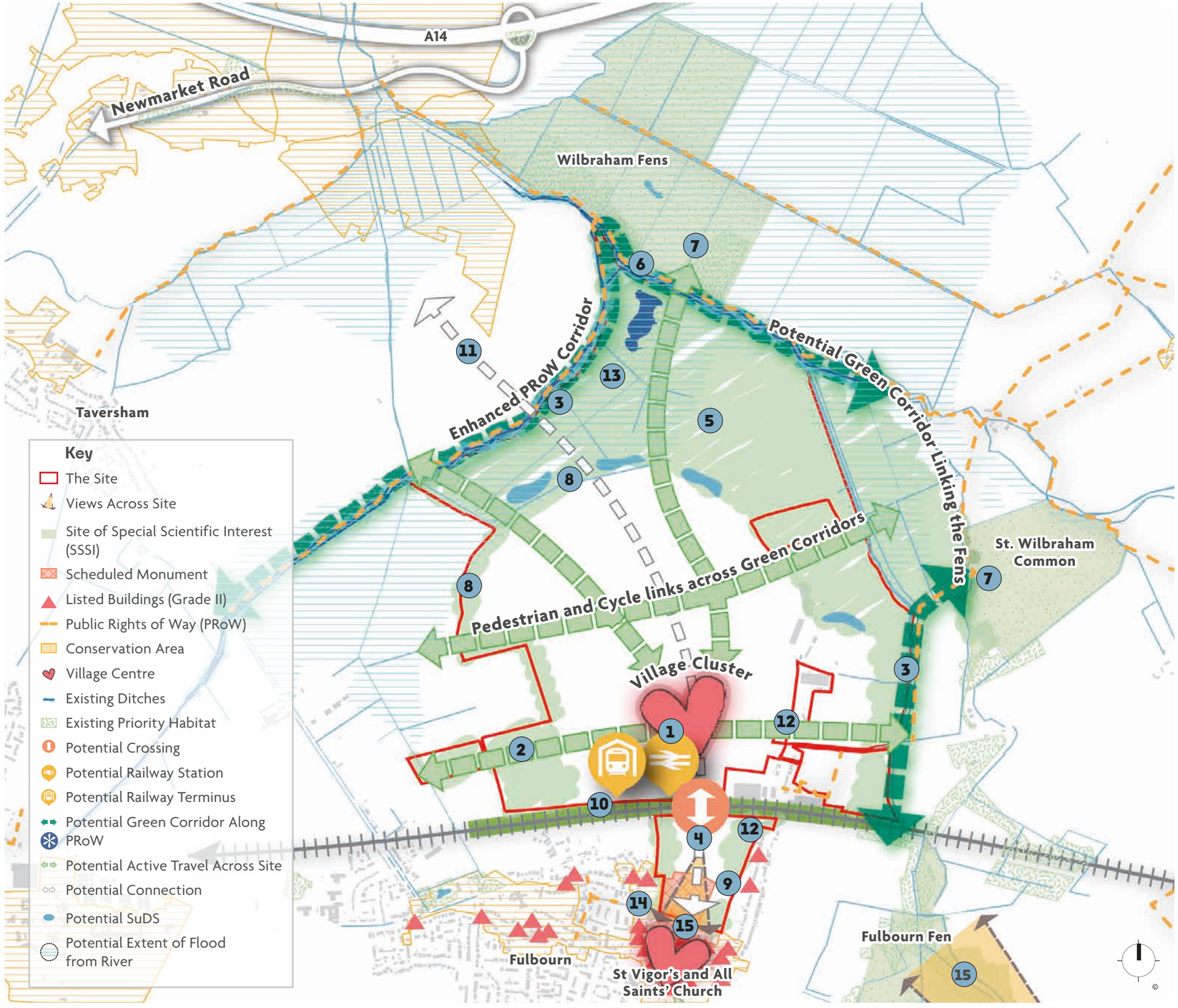
Land north and west of Wilbraham Road Fulbourn - Vision Document

Why Here?

Site Considerations

Baseline studies were undertaken to understand the Site's physical, environmental and contextual qualities and to inform the key considerations outlined below.

1. Opportunity to deliver a sustainable transport hub, including potential re-opening of Fulbourn Station.
2. Potential to provide strong active travel routes linking to Cambridge.
3. Potential to enhance existing public rights of way and create new active travel corridors across the site.
4. Potential to strengthen links to the village centre, community facilities and employment areas.
5. Opportunity to create a strong, landscape-led and defensible Green Belt edge.
6. Potential to sensitively edge Wilbraham Fens SSSI through buffers, habitat enhancement and careful hydrological management.
7. Opportunity to improve existing fens, creating a wider green corridor and delivering biodiversity net gain.
8. Potential to retain and enhance hedgerows and drainage features to form a strong wet green corridor.
9. Potential to create effective green buffers and setbacks to the south, supporting a sensitive village edge.
10. Opportunity for green buffers and noise mitigation along rail corridors.
11. Opportunity to provide new primary connections with Newmarket Road, extending to the A14.
12. Potential to provide access from Wilbraham Road and Station Road, supported by updated transport assessments.
13. Low fluvial flood risk across both parcels, enabling flexible SuDS-led drainage design.
14. Opportunity to respond sensitively to Fulbourn Conservation Area, nearby listed buildings and Scheduled Monument which lies partly within the south-western edge of the southern parcel.
15. Potential to address views towards St Vigor's and All Saints' Church, and views of the site from Mutlow Hill.



Site Considerations Plan

The Vision

Design Principles

The following design principles guide a landscape-led approach, strengthening sustainable movement, ecological networks, and the site's relationship with its wider fenland context.

1. Railway Station

- Potential railway station and Terminus.
- Potential bridge over railway line.
- Great sustainable links for the site and wider Fulbourn area.



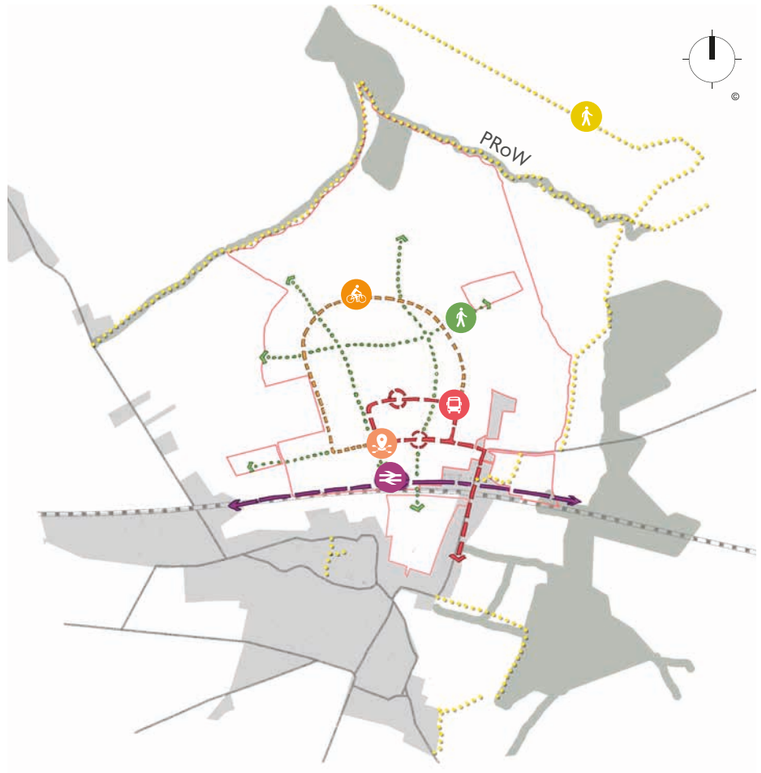
2. Permeability

- East-west permeability between Cambridge and the Fens.
- North-south permeability between Fulbourn and the Fens.
- Green corridors for ecology, slow movement and recreation.



3. Fast to Slow Movement

- Hierarchy of fast, medium and slow movement.
- Promoting modal shift to sustainable modes of transport.
- New Mobility Hub and potential for rail links.
- Bus circuit through the central hub.
- Cycle loop around the site.
- Slow movement pedestrian and cycle routes along the green corridors.
- Links with existing PRoW network surrounding the site.



The Vision

Design Principles

4. Hubs

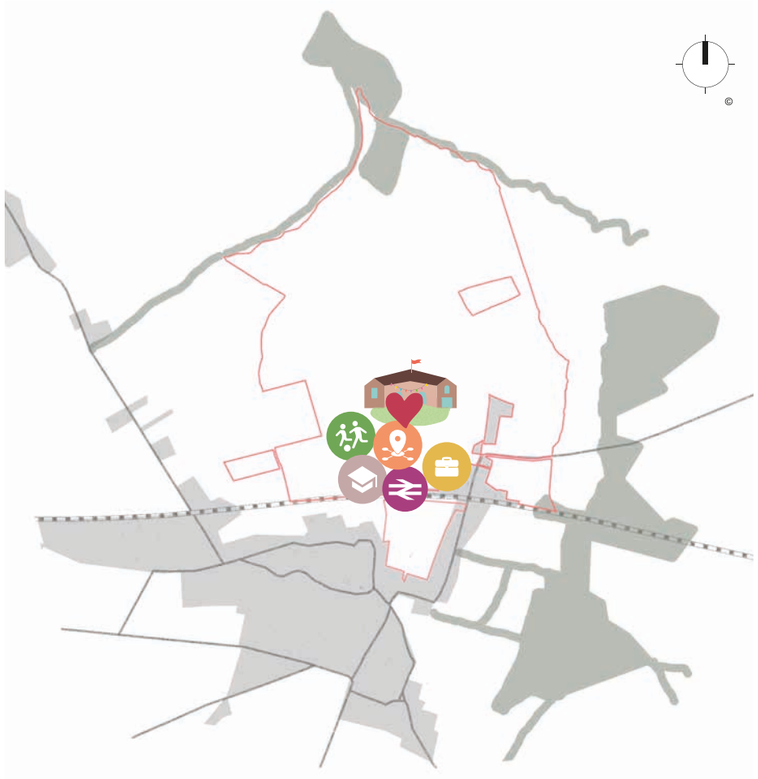
- Local centre and village green at potential railway station hub.
- School sites to the west with playing fields and allotments.
- Business uses to the east around existing industry.
- Mobility Hub to aid connections and environmentally friendly travel.

5. Bolster & Buffer

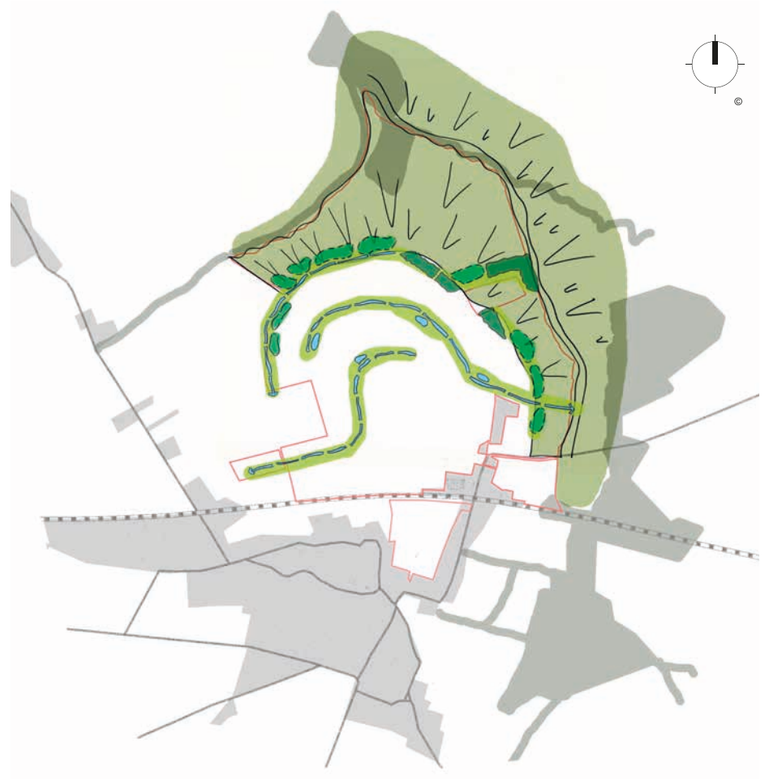
- Extend blue connections through the site.
- Sustainable drainage along green buffers.
- Bolster the ring of woodland and landscape around the core of the site.
- Integrate river and associated ditches into a coherent water management and landscape framework.
- Use drainage corridors to reinforce movement routes and habitat connectivity.

6. Protect & Enhance

- Protect and enhance the existing fen landscape with ecological value.
- Establish a fen-inspired landscape along the northern and eastern edges of the site.
- Use wet meadows, reedbeds, and seasonally wet grassland to reflect the historic fenland setting.
- Reinforce the ecological and landscape setting of Wilbraham Common SSSI.







Masterplan Framework

The Vision

At the heart of the vision is a comprehensive green infrastructure framework that defines the structure, character and identity of the new neighbourhood. The open fen-edge landscape to the north, the proximity to Wilbraham Fens SSSI, and the network of hedgerows, ditches and woodland blocks provide the foundation for a connected system of green corridors, habitat areas, recreational routes and multifunctional open spaces. This landscape-led approach ensures that development is sensitively located, visually contained, and ecologically integrated, while delivering significant biodiversity net gain and long-term environmental stewardship.

PfP is uniquely able to offer individuals and families the ability to move through a range of tenures all on one scheme. Progressing from social rent to shared ownership and outright sale (including student, key worker and retirement housing) allows for the community to build up over time and allows people to remain in it regardless of their tenure needs.

***DELIVERABLE** and **VIABLE** over the plan period. Participation from the new and existing community will drive the vision.*



The Vision

Key Messages

Potential for the Site to Accommodate a New Station

Land can be reserved along the site's southern boundary with the railway line, allowing for the future delivery of a new railway station for Fulbourn.

Mixed Use Village Centre

Opportunity to provide a new mixed-use centre to support the new village with a unique offer that would complement, and not detract from, Fulbourn's existing village centre. The site offers a unique opportunity to address the relative absence of publicly accessible green space within the north-western part of Fulbourn.

Mobility Hub

Mobility hub to support sustainable travel, and deliveries and collections that support day-to-day lifestyle requirements [active travel], together with car clubs, EV charging, and other transport connectivity benefits.

Employment Areas

Opportunity to bolster the local economy with new businesses and employment offers around the existing industry adjacent to the site. Generation of local jobs offers residents the opportunity to work close to home, reducing the need to travel, and broadening options to commute by active means, such as cycling.











The Vision

Key Messages

2500+ Well Managed Homes with Strong Links to Nature, Health and Wellbeing

Opportunity to create a new Garden Village community in its own right to the north of the railway line. A place that is connected to nature and enables preservation of areas of ecologically rich landscape.

Wide Variety of Homes and Tenures

Opportunity to provide a broad mix of new home typologies and tenures to respond to local housing need and demands for affordable provision.

Education

Opportunity to create a new Garden Village with the critical mass to deliver new schools and other educational uses. Strong connections to nature could foster a unique education offer.















The Vision

Key Messages

Large Areas of Amazing Landscape

Large, connected areas of high-quality green space enhance the existing riparian corridor and fenland landscape, delivering ecological enhancement, accessible amenity, and a strong green setting for new homes.

Ecological Improvements

Development provides opportunity to support the preservation and enhancement of areas of ecologically rich landscape and the provision of new corridors.

Community Park - Linking the Fens

Opportunity to link Wilbraham Fen, a 62.5 hectare SSSI, to Fulbourn Fen, a 31 hectare Wildlife Trusts Nature Reserve. Establishing an ecological country park to link the two fens and improve ecological connections.

Connections

Opportunity for new east-west connections, linking Cambridge to the Fens, and north-south connections, linking Fulbourn to the Fens.











The Vision

Landscape-led Design

The Vision responds directly to the sensitivity of Fulbourn's rural approaches and settlement edges, using landscape, water and open space to create a clear, legible, and softened transition between village and fenland.

Development will be landscape-led from the outset, using the site's fenland setting as the primary structuring element. Existing watercourses, ditches, and low-lying land will be strengthened and extended to form a continuous blue-green framework, creating wet meadows, fenland planting, and naturalised river corridors that enhance biodiversity, manage water sensitively, and provide attractive, accessible spaces for everyday life.

The fenland landscape will be most strongly expressed along the periphery of the site, particularly to the north and east, where enhanced fen habitats and open green spaces will reinforce the setting of nearby designated landscapes and create a soft transition between new development and the wider countryside. These areas will function as both ecological assets and shared community spaces, allowing residents to experience the openness and seasonal change characteristic of the fenland environment.

Closer to the village, development will respond to the settled fen-edge character, with homes arranged around green spaces, tree-lined streets, and retained landscape features that reflect the existing pattern of Fulbourn.

Throughout the site, landscape, water, and movement will be integrated to create a coherent and legible place, where walking routes follow green corridors, views are framed by vegetation and water, and development is experienced as part of a continuous landscape rather than as a hard urban edge.

Overall, the Vision is to deliver a fenland-inspired neighbourhood that enhances the landscape setting of Fulbourn, strengthens ecological networks, and provides a generous, distinctive environment for new homes - ensuring that development adds long-term value to both the village and its surrounding landscape.











Vision Objectives

Overall, the proposed vision is for a **sustainable, well-connected, deliverable and landscape-led new neighbourhood** that respects its setting, enhances local character, delivers meaningful environmental benefits, and provides a long-term proven management regime through **Places for People**, strategic contribution to meeting Greater Cambridge's housing and infrastructure needs.

It is a vision rooted in evidence, shaped by the Site's opportunities and influences, and aligned with the principles of good placemaking and sustainable growth.

The vision has fully responded to site opportunities and constraints including with reference to previous assessment of the sites credentials carried out by the authorities.



Rail Connectivity SUSTAINABLE RAIL ACCESS		Support long-term sustainable transport choices, including safeguarding the opportunity for the potential reopening of **FULBOURN STATION** and integrating public transport into the heart of the masterplan through our Mobility Hub.
Stewardship SOCIAL INFRASTRUCTURE		Deliver and provide certainty with regard to **MANAGEMENT by PfP** of the open spaces, communal areas and facilities through PfP's commitment to our customers.
Biodiversity GIVING BACK THE FENS		Deliver a **LANDSCAPE-LED NEIGHBOURHOOD** that responds to the fen-edge setting, reinforces existing landscape structure, and creates a coherent green infrastructure network. **PROTECT AND ENHANCE** ecological value, including sensitive buffering to Wilbraham Fens SSSI, habitat creation, biodiversity net gain and integrated blue-green infrastructure.
Transport ACTIVE TRAVEL		Create a highly walkable, **SUSTAINABLE MOVEMENT** framework that prioritises active travel, connects seamlessly to the proposed new Mobility Hub and Fulbourn Greenway, and strengthens links to the village centre and wider Cambridge network.
Community SOCIAL VALUE		**A NEW NEIGHBOURHOOD** with the critical mass to deliver new schools and other educational uses. Strong connections to nature could foster a unique education offer. Embed **HEALTH, WELLBEING** and active lifestyles, with generous open spaces, play areas, walking and cycling routes, and opportunities for recreation and community interaction.
Climate Action LOW-CARBON DEVELOPMENT		Integrate a **ROBUST AND RESILIENT** drainage strategy, using SuDS, wetlands and naturalised water features to manage surface water and enhance landscape quality. Ambition to deliver **LOW-CARBON HOMES** that prioritise energy efficiency, long-term resilience, and exceptional living comfort.
Housing Delivery AND A SUSTAINABLE PLACE		Form a series of **DISTINCTIVE, CHARACTERFUL** neighbourhoods. Create a cohesive, **FUTURE-READY** neighbourhood, capable of adapting to changing mobility patterns and community needs over time. Provide a balanced **MIX OF HOMES AND TENURES**, supporting a diverse and inclusive community with later-living housing, Build to Rent, Affordable housing and For-sale housing.
Economy EMPLOYMENT ACCESS		Strengthen **FULBOURN'S RELATIONSHIP** with nearby employment areas, enabling sustainable access to Capital Park, Peterhouse Technology Park and the wider Cambridge employment cluster.
Deliverability EARLY DELIVERY		Respect and respond to **HERITAGE SENSITIVITIES**, particularly the setting of the Fulbourn Conservation Area and nearby listed buildings, ensuring new development **ENHANCES LOCAL CHARACTER.**

Appendix

Landscape Character

The site lies within the broader Cambridgeshire fenland landscape. Specifically, it is situated within Character Area 1E: Fulbourn Fen and Character Area 6C: Fulbourn Fen Edge Chalklands, as identified in the Greater Cambridge Landscape Character Assessment, reflecting its position at the transition between open fenland and the settled village-edge landscape. As a whole, the site is influenced by a landscape of broad agricultural openness structured by sinuous, tree-lined watercourses and fenland habitats, alongside a more enclosed and settled character closer to Fulbourn, where small-scale field patterns, scattered woodland and parkland features, historic settlement form, and pockets of ecological value contribute to a softer, village-influenced setting. This combination of openness, enclosure, water, vegetation, and settlement creates a distinctive fen-edge landscape that underpins a landscape-led approach to future development.

Within this context, the site extends across land to the north of Fulbourn and comprises two distinct but related landscape character areas, separated by the east–west railway corridor: a contained village-edge landscape to the south and an agricultural landscape to the north.

The southern part of the site lies immediately adjacent to the northern edge of the village and is identified within the Fulbourn Neighbourhood Plan as forming part of an Important Countryside Frontage (ICF). This area of the site comprises arable and pastoral fields each separated by hedgerow and intermittent hedgerow trees **(Photograph 1)**. In views from the settlement edge, the open foreground land contributes to the appreciation of the village edge and its transition to the historic core. Despite this, however, this parcel is also experienced within a predominantly residential context, enclosed by existing development and mature vegetation.

Residential properties along Lanthorn Stile directly front the southern boundary **(Photograph 2)**, with further housing adjoining the site to the east and west. A dense belt of mature trees along the railway corridor forms a strong northern boundary, providing visual separation from the wider landscape beyond **(Photograph 3)**. As a result, the southern part of the site has a contained and inward-looking character, with landscape features comprising garden planting, hedgerows, and mature trees that reflect the established village-edge setting.



Photograph 1



Photograph 2



Photograph 3



Photograph 4

Appendix

Landscape and Visual

The northern part of the site forms part of the wider fenland agricultural landscape and is significantly larger in extent. The core of this northern parcel is expansive and open in character, defined by large arable fields and a gently crowned topography, rising to approximately 15.0m AOD near the centre of the site and falling gradually to around 10.0m AOD at the outer edges **(Photograph 5)**.

While the interior of this area is open and largely devoid of internal landscape features, it is notably contained by a belt / outer ring of mature trees **(Photograph 6)**. This woodland framework provides a degree of enclosure, creating a sense of spatial definition and visual containment within the core of the site.

In contrast, the peripherial areas of the site, particularly along the northern and eastern edges, exhibits a more subdivided and intricate landscape structure. Here, the land is broken into smaller field parcels defined by a combination of hedgerows, tree lines, ditches, and greened routes **(Photograph 7)**. These peripheral areas are more closely associated with the surrounding fenland, reflecting the traditional pattern of drainage-led field divisions and linear landscape features typical of the fen edge.

The northern area of the site is framed by a series of well-defined landscape features that reinforce its fenland character:

- New Cut watercourse along the eastern boundary
- The Little Wilbraham River along the northern boundary
- Caudle Ditch and its associated greenway to the north-west
- Fen Drove Way forming a clear western boundary

These elements create a strongly legible network of blue and green infrastructure, providing both physical and visual structure to the landscape and reinforcing the relationship between landform, water management, and agricultural use.

Additional features include a fishing pond with associated mature vegetation in the north-west corner, isolated tree groups within the fields, and the presence of Queens Farm, together with light industrial units, agricultural sheds, and areas of hardstanding and car parking (Photograph 8). These introduce a working fenland character, reflecting ongoing agricultural and rural enterprise uses rather than an untouched landscape.



Photograph 5



Photograph 6



Photograph 7



Photograph 8

Land north and west of Wilbraham Road Fulbourn - Vision Document

Appendix

Landscape and Visual

Visual Appraisal

The southern part of the site lies at the built village edge and is identified as an Important Countryside Frontage (ICF) within the Fulbourn Neighbourhood Plan. It is visually contained by surrounding residential development and mature vegetation, with properties fronting or backing onto the site along Lanthorn Stile, Station Road, and adjacent streets. A dense belt of planting along the railway corridor further restricts views northwards.

Views into and across the southern parcel are largely limited to local residential receptors. There are no expansive outward views to the wider countryside. A key exception is the intervisibility with Church Lane **(Photograph 4 on previous page)**, which is identified in the Fulbourn Neighbourhood Plan as a key view. Intervisibility between the site and the church contribute to the appreciation of the village's historic core and Conservation Area. Overall, the southern parcel is experienced as a contained green space within the village edge, rather than as part of the open countryside.

While the northern parcel forms part of a visually open rural setting on the southern edge of Fulbourn, its visual influence is moderated by a combination of landform, peripheral woodland, watercourses and surrounding development, resulting in a restricted visual envelope despite its scale. The site is not publicly accessible and contains no Public Rights of Way or permissive paths, meaning there are no internal public viewpoints.

The site is surrounded by waterways, including Caudle Ditch, New Cut, and the Little Wilbraham River, along which Public Rights of Way are located. Mature belts of planting between these routes and the site provide substantial screening, limiting views largely to intermittent and filtered glimpses **(Viewpoint 1**).

Partial views of the site are available from Teversham Road to the west, where it is perceived as a secondary background element beyond intervening arable land **(Viewpoint 2)**. Longer-distance views are possible from elevated locations to the south-east, including from Mutlow Hill **(Viewpoint 3)**. From these viewpoints, the site is experienced within a wider developed context, including industrial areas of Fulbourn and large-scale development at the edge of Cambridge, and does not form a visually dominant feature.



Land north and west of Wilbraham Road Fulbourn - Vision Document

Appendix

Landscape and Visual



Viewpoint 1 - Views towards the site from the surrounding PRoW network are screened by tree belts along the waterways.



Viewpoint 2 - The site's open arable fields are partially visible in the background of the view from Teversham Road.



Viewpoint 3 - In views from Mutlow Hill and other potential long distance receptors, the site forms a very minor element and is not readily discernible.

Land north and west of Wilbraham Road Fulbourn - Vision Document



jtp

Places for People

CERES PROPERTY

DPV Consult

fabrik

APPENDIX B - Places for People: Creating Thriving Communities, 2025

Places for People

Creating Thriving Communities


BABBOE



East Wick and Sweetwater, Queen Elizabeth Olympic Park, London

Contents

04 We are Places for People
06 Introducing our developments
08 Our regional reach
10 Our environmental and social priorities
12 Our successes in 2024/25
14 Featured projects
24 Customer testimonial
28 Get in touch

→ We are Places for People

We change lives by creating, managing, and supporting thriving Communities.

As the UK's leading Social Enterprises, we operate through a Group of over 20 specialist companies to deliver homes, services, and opportunities that enable Customers and Communities to flourish.

We own or manage more than 245,000 properties, support over half a million Customers, and operate over 100 leisure centres that promote health and wellbeing.

Our strength lies in our scale, our People and our purpose. With over 13,000 Colleagues and a deep commitment to social impact, we are uniquely placed to act as a catalyst for positive change.



1 2 3

1 Attractive green spaces at Brooklands, Milton Keynes.

2 Chapelton, Aberdeenshire, Community charity Bike Ride.

3 Popular on-site Hillhead Cafe at Tornagrain, Inverness.

Our People Promises

→ We are Community

This is what we stand for and this is how we roll. When you're in our Community, this is what you sign up to.

Do The Right Thing. Always.

Fired Up, Ready To Grow.

One Community.

Be Respectful, Earn Respect.

Enjoy Work.







→ Introducing our developments

Our end-to-end development business unlocks land, shapes Communities, and delivers sustainable housing at scale.

We work across both the public and private sectors, delivering strategic land promotion, large-scale regeneration, consented developments, joint ventures, and bespoke schemes. Our unique model ensures every project is designed for long-term value, with Community at its core.

We build a wide range of homes — in varying sizes and tenures — to meet the needs of diverse local populations. These homes are set within high-quality, well-designed Communities, supported by the social and physical infrastructure needed to foster healthy, inclusive, and thriving places.

We're not just building homes — we're creating places where People can live, work, and flourish.

With legacy partnerships and flexible delivery models, we bring the experience, agility, and capability that make us the partner of choice.



Port Loop, Birmingham


Strategic land promotion
Package deals
Subject-to-planning acquisitions
Key delivery routes include:
Joint ventures and bespoke deals
Consented land acquisitions
Regeneration

→ Our regional reach

Our reach spans the UK — from city centres to rural villages, new towns to regeneration projects. We work in close partnership with landowners, local authorities and developers to unlock opportunities that others can't.

Our approach is scalable and responsive. Operating across five regions, and supported by a national strategic land division, our teams bring national capability and local insight, allowing us to deliver developments that are innovative, inclusive and commercially sound.

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1 *Transforming an architectural icon into a thriving, modern Community — Park Hill, Sheffield.*



2 *Poundbury, a pioneering urban extension of Dorchester.*



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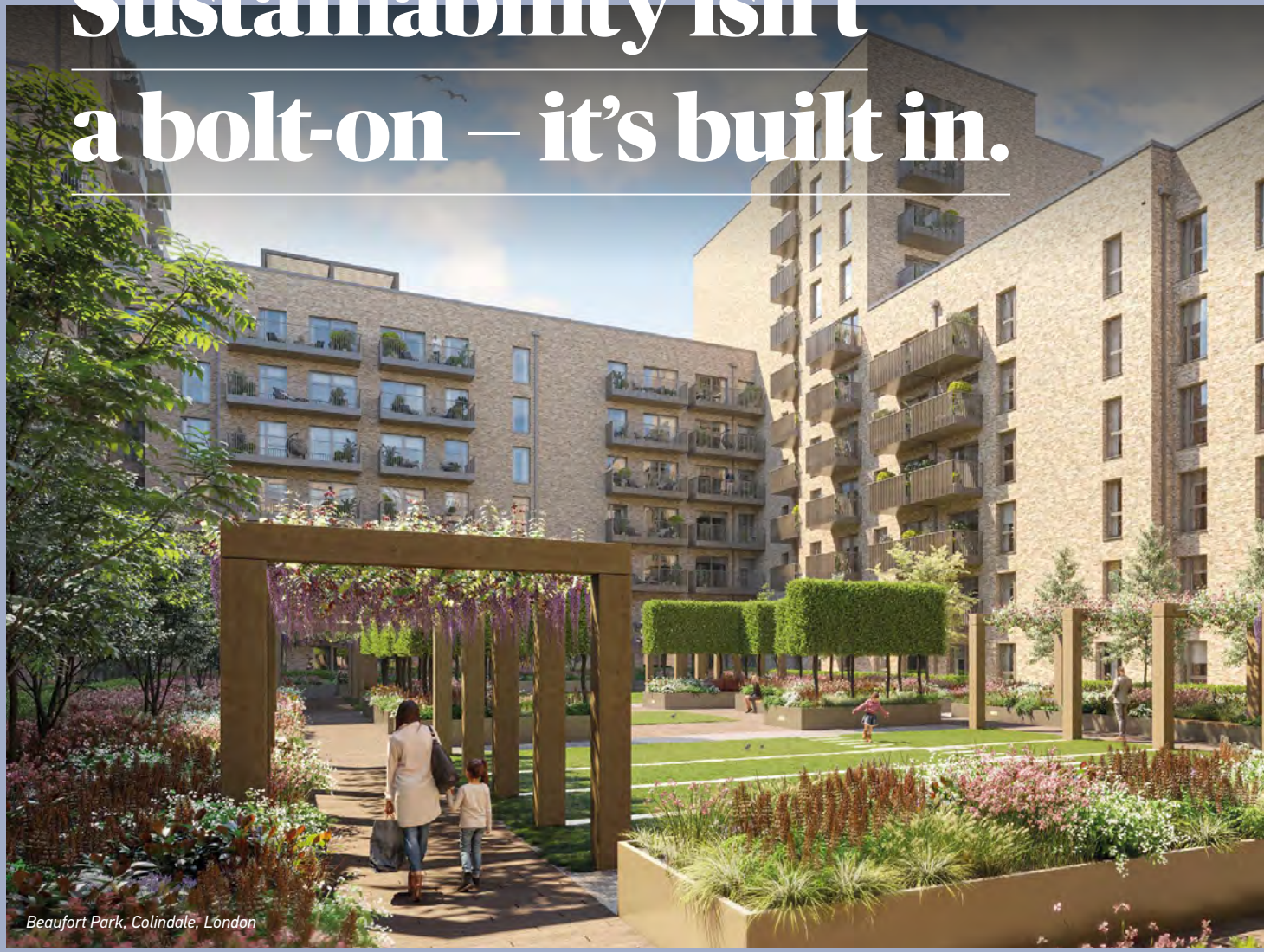
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Sustainability isn't a bolt-on – it's built in.



Beaufort Park, Colindale, London



Building a greener future

- We're on the path to net zero by 2050.
- 90%+ of our homes achieve EPC B or better.
- 20%+ use Modern Methods of Construction (MMC).
- Whole-life carbon assessments to be carried out on all new homes by 2026.
- All new homes to run on renewable energy tariffs by 2027.

Efficiency in every detail

- Homes designed for water use of just 105L per person / day.
- 95% of site waste diverted from landfill by 2030.
- Sustainable choices made standard.

Nature at the heart

- Delivering Biodiversity Net Gain in our new Communities.
- Creating spaces that support both People and wildlife.

Social value, built in

- Homes designed for life, inclusion and wellbeing.
- Places designed to support thriving Communities.
- Supporting social mobility creating training, jobs, and apprenticeships on site and through our supply chain.
- Collaboration with local charities, businesses and residents to deliver lasting impact.

Our sustainable, mixed tenure model

- A balance of tenures including affordable rent, private rent, market and shared ownership.
- 100% of profits reinvested back into social value.
- It's a model that builds more than homes — it builds futures.

→ We don't just develop places — we shape thriving Communities.

→ Our successes in 2024/25





2,000+

new family homes delivered

1,764

affordable homes ha





4

nded over

94.5%

Customer recommend score

→ Creating thriving Communities — from concept to Community

Across the UK, Places for People is delivering outstanding, place-led developments that reflect local context, sustainability ambitions and long-term value.

Here are just a few examples of how we're building thriving Communities through meaningful partnerships and innovation.





Port Loop, Birmingham

Gilston, Hertfordshire

Greater London

Located in the Harlow and Gilston Garden Town, this development is a bold, long-term vision for sustainable growth. With outline permission for up to 8,500 homes, this Garden Village is designed around six walkable neighbourhoods. It will deliver new schools, health services, and over 600 hectares of green space and parkland — creating a truly connected and future-ready Community.

This is about more than just homes — it's about lasting infrastructure, nature, and identity.





Tornagrain, Inverness

Scotland

Developed in partnership with the Earl of Moray, Tornagrain is Scotland's newest town. Set in the Highlands, the masterplan includes 5,000 homes with retail, schools, green space, and jobs within walking distance. The town is inspired by traditional urban design and builds on a vision of sustainable, Community-first living.

This is a model for placemaking in rural growth — attractive, inclusive and resilient.



Brooklands, Milton Keynes

South East

Brooklands is a highly successful, mixed-tenure Community that exemplifies our partnership approach. The development includes homes of all sizes and tenures, surrounded by green boulevards, parks, schools, and sustainable travel options. Residents enjoy an inclusive and well-managed neighbourhood.

Designed with People in mind, Brooklands is proof that thoughtful infrastructure and design leads to better everyday living.

Park Hill, Sheffield

Central and North

An iconic example of Brutalist architecture, Park Hill is being reimagined through a multi-phase regeneration led by Places for People and Urban Splash. Phase 4 will deliver 125 new homes, 20% affordable, and new commercial space, all designed by Stirling Prize-winning architects Mikhail Riches. The scheme blends heritage with sustainable living, including EV charging, bike storage and green public spaces.

Transforming an icon into a thriving, modern Community.





Watchhouse, Doncaster

Central and North

A growing collection of 91 affordable homes including Shared Ownership opportunities, Watchhouse is helping more People in South Yorkshire access quality, secure housing. Offering a balanced tenure mix designed to meet local demand, supporting both first-time buyers and families seeking long-term stability. This Community-focused development is tailored to local need, creating new options and improving supply.

Local demand meets long-term housing stability.



Redheughs, Edinburgh

Scotland

Located in West Edinburgh, Redheughs is set to deliver over 1,300 homes through a placemaking vision that balances accessibility, affordability, and sustainable design. This mixed-tenure development brings new homes, green infrastructure, and Community space into a growing area, with strong transport links and integrated services supporting a connected urban lifestyle.

This is about transforming opportunity into a lasting, sustainable Community.

Camden Film Quarter, London

Greater London

In partnership with Yoo Capital, this bold regeneration aims to be an innovative and sustainable mixed-use campus. Combining homes, cultural space, creative studios and retail and infrastructure to support the Community, the project will bring a first of its kind creative neighbourhood to life and deliver 50% affordable homes, creativity, and inclusive growth in one of London's most iconic districts.

A new chapter for Camden: Creative. Connected. Inclusive.





East Wick and Sweetwater, Queen Elizabeth Olympic Park

Greater London

Part of the Olympic legacy, East Wick and Sweetwater is delivering over 1,800 mixed tenure new homes in East London. The development blends modern architecture with green spaces and canal-side living, creating a walkable, family-friendly neighbourhood with shops, schools, and creative workspaces at its heart.

Creating a resilient and vibrant new chapter for East London.

Port Loop, Birmingham

Central and North

Set on an island in Birmingham's canal network, Port Loop is rethinking urban living. This award-winning regeneration mixes contemporary homes with communal gardens, bike lanes, and a waterside park. It's a case study in People-first placemaking — social, sustainable and brilliantly connected.

City living made greener, healthier, and more connected.





Poundbury, Dorset

South West

A pioneering urban extension of Dorchester, Poundbury showcases principles of walkability, mixed-use living and timeless design. With over 2,500 homes, local shops, schools, and green spaces, it's a living example of how visionary masterplanning can create truly self-sufficient Communities.

Timeless placemaking grounded in People and purpose.



Lower Herne, Kent

Greater London

In partnership with Countryside (part of Vistry Group), we are delivering the full vision for Lower Herne Village — a bold, place-led regeneration project that will bring 800 high-quality, mixed-tenure homes to Kent. Set within a well-connected, semi-rural landscape near Herne Bay, the development includes vital infrastructure such as a new relief road, generous green spaces, and access to local amenities and transport links.

Designed with affordability, sustainability and Community at its core, this new village supports first-time buyers, growing families, and long-term regeneration.

Delivering rural regeneration through homes, infrastructure, and a strong sense of place.



Creswick, Ascot's Green

South East

Ascot's Green is a thoughtfully planned urban extension to the south of Welwyn Garden City, located on land owned by the historic Hatfield Park Estate.

Delivered in partnership with the Estate, this development will provide 340 much-needed new homes, blending traditionally inspired architecture with modern design standards to suit today's lifestyles.

Set within green open spaces and directly connected to the surrounding countryside, Ascot's Green champions biodiversity, sustainability and Community wellbeing — creating a nature-rich, family-friendly neighbourhood rooted in the heritage of the garden city movement.

Honouring heritage. Growing a modern garden city.

Engine Yard, Edinburgh

Scotland

Located on a historic tram depot site, Engine Yard combines industrial heritage with modern city living. This vibrant, urban Community includes homes, commercial space and public realm upgrades — creating a bold and characterful place with strong local identity and lasting value.

Character, creativity, and industrial heritage in every brick.



Shottendane Road, Margate

South East

With 450 new homes planned, Shottendane Road brings much-needed housing to the Kent coast. The mix of apartments and family homes will support a thriving, inclusive local Community — designed with sustainability, green space and modern lifestyles in mind.

This is about housing that builds stability and opportunity.



→ Chloe and Louis's journey to homeownership

Chloe and Louis Rice, a young couple from Milton Keynes, embarked on their homeownership journey with Places for People's Shared Ownership scheme at Laconia Place. Expecting their first child, they sought a spacious, modern home close to family. Their new two-bedroom house, complete with a garden and ample storage, provided the perfect setting for their growing family.

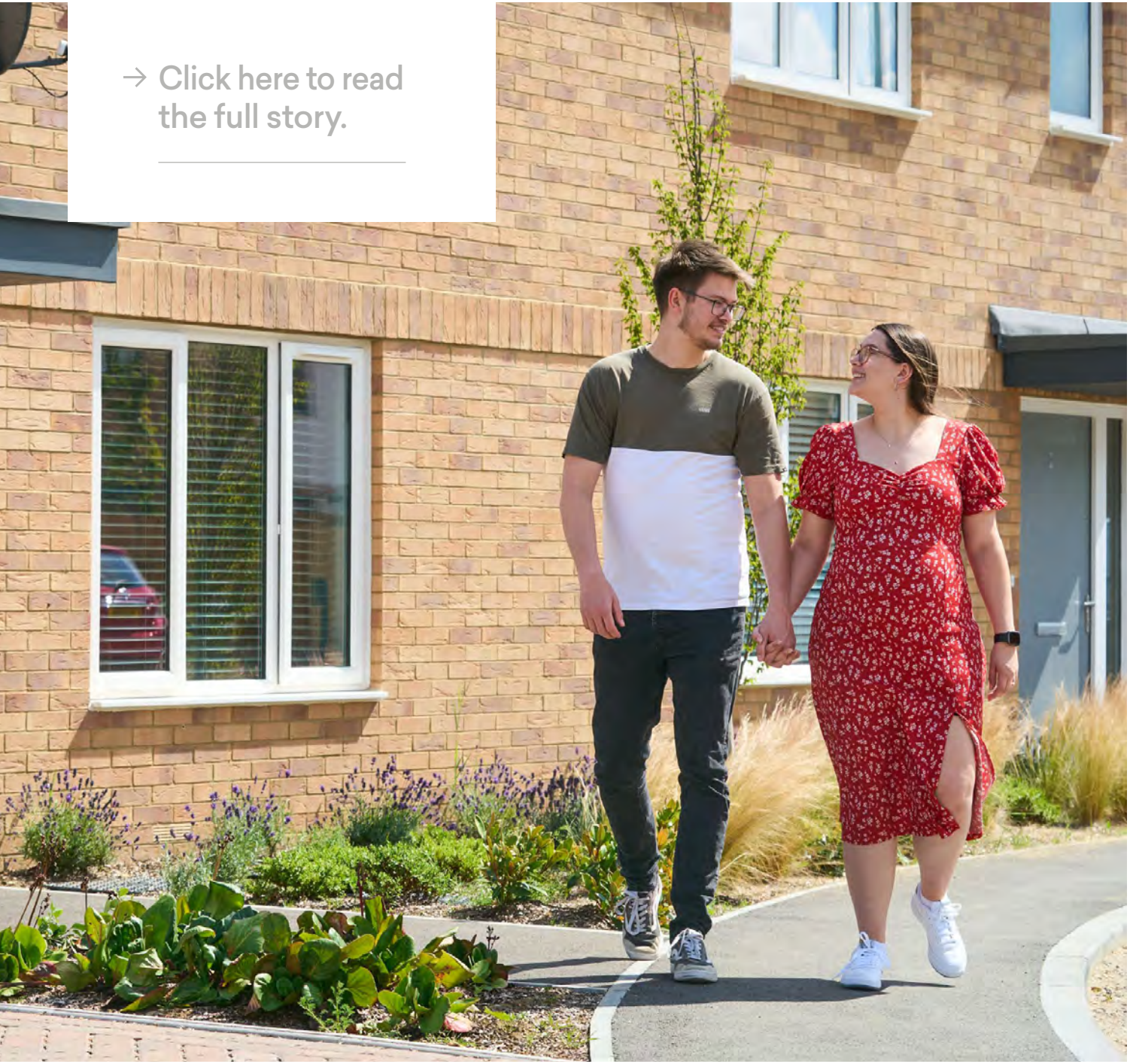
The ability to personalise their kitchen, bathroom, and flooring made the experience even more special. Chloe noted the process was straightforward, allowing them to secure their ideal home without compromise. With Chloe's brother also residing nearby, Laconia Place has become a true family affair.

"It already felt like home before we received the keys!"



→ Winner of the Gold Award for Customer Satisfaction — three years in a row.

→ Click here to read the full story.

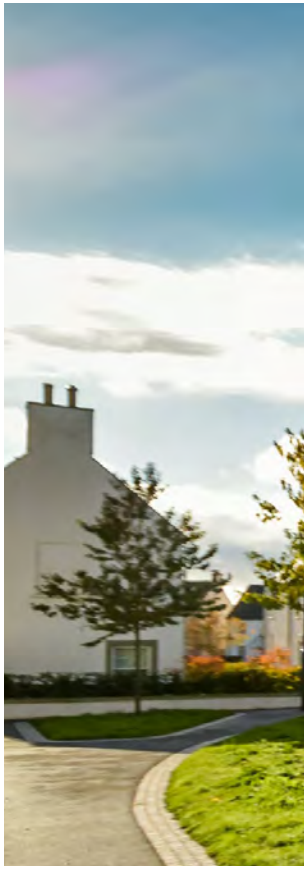


→ A first home and first step to independence

At just 19, Cian was ready to take the next step in life — not through renting or staying with family, but by buying his own home. With support from Places for People, he made that goal a reality through the Shared Equity scheme at Chapelton.

After a chance conversation led him to Chapelton, Cian connected with Sales Executive Karen, who helped guide him through the process. With personalised support and access to an independent financial advisor, he quickly realised he could afford his dream home. Now settled into his new Community, Cian feels proud, independent and secure.

"I absolutely love it — the neighbours, the Community, and everything's on my doorstep. The houses are stunning and I knew instantly this was the place for me."





→ Click here to read the full story.



Places for People

Let's create thriving Communities together.

placesforpeople.co.uk/ctc

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APPENDIX C - Mayer Brown Transportation Representation

Transport Representation

Land north of Wilbraham Road, Fulbourn

Local Plan representations: response to the 2026 HELAA transport assessment and Fulbourn station position

Purpose and promoter position

1.1 This Transport representation provides an updated transport position for Land north of Wilbraham Road, Fulbourn, having regard to the Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) 2026, the emerging Greater Cambridge Local Plan transport policies, the East West Rail (EWR) 2026 proposals and the current work being undertaken by the Promoter with Network Rail/GBR Anglia on a potential passenger station at Fulbourn.

HELAA transport assessment

1.2 The 2026 HELAA assesses a 231.59 ha suitable site area for a mixed-use proposal of approximately 2,500 to 3,000 homes and 3,000 to 7,000 sq m of employment floorspace. The HELAA transport position is shown in **Table 1**.

HELAA topic	Score	HELAA position
Accessibility	Amber	Adequate accessibility, subject to on-site provision including a primary school, local centre/employment and community facilities.
Site access	Amber	Access is acceptable in principle, subject to detailed design and engagement with the County Council on network capacity and walking, cycling and public transport infrastructure.
Transport and roads	Amber	Cycle links are required to Fulbourn, Cherry Hinton and Cambridge. Comprehensive mitigation is required to reduce car use and address potential highway impacts.
Strategic dependency	Amber	The HELAA states that the site could only come forward with a railway station at Fulbourn and a bus link to Cambridge City.

Table 1: 2026 HELAA transport findings

1.3 The 2026 HELAA represents a material improvement from the 2021 assessment. All four transport topics are assessed Amber, with site access now expressly acceptable in principle. The remaining matters concern the form, evidence and delivery of a sustainable transport package. The promoter supports continued work on a potential Fulbourn station, but considers that the HELAA wording that the site could only come forward with a railway station is not supported as an absolute allocation requirement by Policy I/ST, national transport policy or the present status of the rail proposal.

1.4 The change in the site-access rating from Red in 2021 to Amber in 2026 is significant. It confirms that there is no longer an in-principle transport access objection. The four HELAA matters are addressed below in the same order as Table 1, distinguishing between matters that could be secured through an allocation and matters that require detailed testing at masterplan and planning application stage.

1. Accessibility

1.5 The HELAA concludes that accessibility is adequate, subject to on-site provision including a primary school, local centre/employment and community facilities. The development is of sufficient scale to create a mixed-use neighbourhood in which a meaningful proportion of day-to-day trips can be internalised. The allocation would therefore establish the principle and expected range of on-site facilities, with the masterplan and subsequent applications demonstrating their location, phasing and links to Fulbourn and the wider area. This is an Amber delivery matter, not a reason to withhold allocation.

2. Site access

1.6 The HELAA now states that access is acceptable in principle, subject to detailed design and engagement with Cambridgeshire County Council on network capacity and walking, cycling and public transport infrastructure. The Transport Strategy identifies more than one access opportunity and a new internal route through the site, enabling access to be considered as a network rather than a single point of dependency. Detailed junction feasibility, safety review, trip-budget work and strategic/local modelling would be undertaken with the County Council as part of a future planning application. This reflects the NPPF test that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Applying that test here, the relevant question that is considered to be satisfied is whether safe and suitable access can be achieved and significant network effects can be mitigated to an acceptable degree through a vision-led approach.

3. Transport and roads

1.7 The HELAA requires cycle connections to Fulbourn, Cherry Hinton and Cambridge, together with comprehensive mitigation to reduce car use and address highway impacts. The emerging Transport Strategy responds directly to this through continuous active-travel routes, connections towards the Fulbourn Greenway and Cambridge East, a direct high-quality bus proposition to Cambridge and major employment areas, and a street hierarchy designed around walking, cycling and public transport. The next stage would quantify mode-share targets and a vehicular trip budget, test cumulative highway effects and define proportionate mitigation and monitoring. These are conventional matters for a strategic allocation and do not depend on a passenger station being operational.

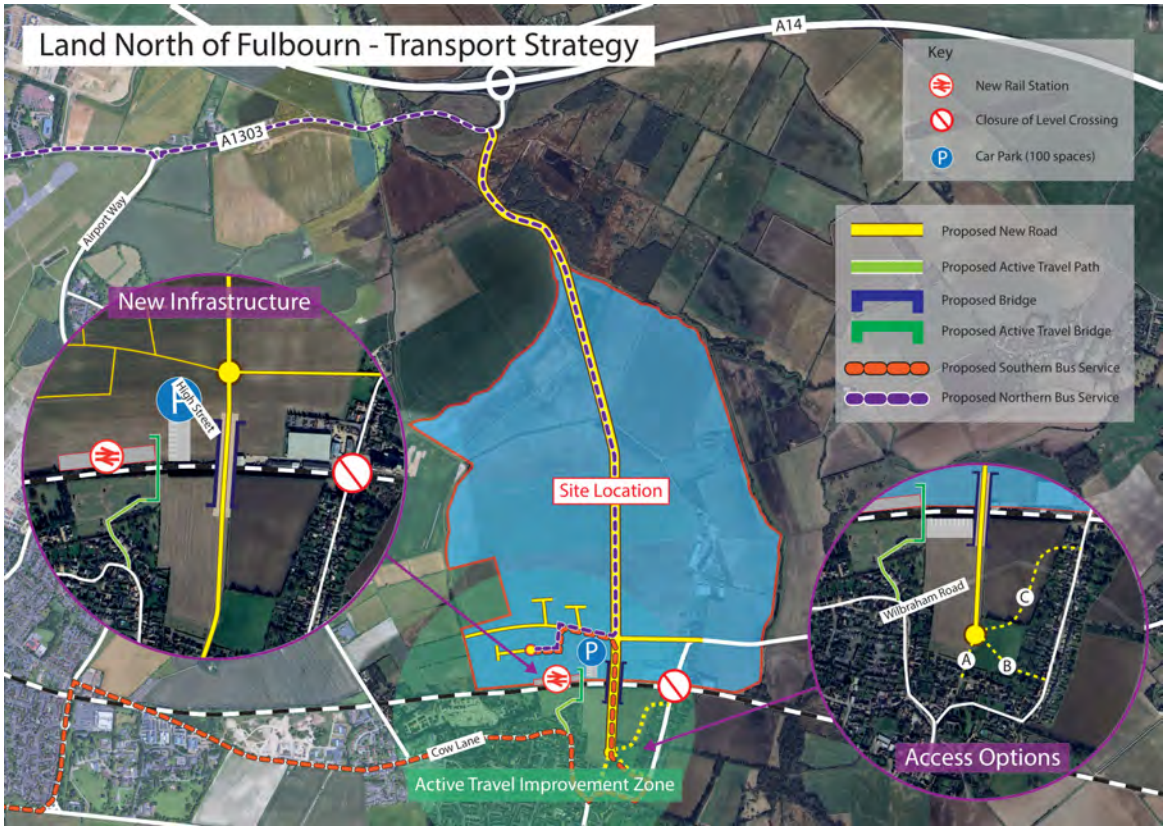


Figure 1: Land North of Fulbourn - Illustrative Transport Strategy (including proposed Fulbourn Greenway connections)

4. Strategic dependency

1.8 The HELAA states that the site could only come forward with a railway station at Fulbourn and a bus link to Cambridge City. The promoter accepts the requirement for a direct, frequent and attractive public transport connection to Cambridge, and proposes that this is secured as part of the allocation and infrastructure delivery strategy. The railway station is supported by the rail industry in principle and would be safeguarded and is being actively progressed. However, it should not be made an absolute precondition of allocation where the Local Plan policy test can be met by a deliverable multimodal package including high-quality bus, active travel, demand management and highway mitigation.

Current rail position: East West Rail and Fulbourn station

1.9 The promoter is actively progressing the Fulbourn station proposition separately from the HELAA and EWR processes. A working meeting has been held with Network Rail/GBR Anglia meeting on 04/09/2026, to discuss and agree the brief for further testing of the proposed Station in order to check the Operation and likely Station cost. Places for People have confirmed to Network Rail/GBR Anglia its ability to resource the study, to focus on timetable and operational feasibility of the station, together with its costs. Separate dialogue is taking place with EWR (East West Rail), regarding safeguarding the requirement for a Train care Centre as part of the allocation, if that forms part of the DCO.

1.10 This is consistent with the position agreed between Places for People's advisers and the Rail Industry/East West Rail team on 30 April 2026, in the context of the promotion of the site through the Greater Cambridgeshire Local Plan:

1.11 *"In terms of the Transport Strategy for the site, initial discussions with the Rail Industry indicate that there are no issues of principle in relation to the potential future delivery of a station on the proposed allocation. However, this would be subject to funding, identification of an appropriate consenting route and the exact details including the requirements for safeguarding the performance and capacity of the line. A new station would also need to be compatible with the aspirations of local stakeholders, notably for half-hourly services to Newmarket and beyond. This will be developed pursuant to initial feasibility studies to be undertaken with Network Rail and the East West Rail team."*

Why a Fulbourn station should not be an allocation requirement

1.12 Policy I/ST is outcome-focused. It requires development to reduce reliance on the car and to have, or attain, sufficient integration and accessibility by walking, wheeling, cycling or public and community transport. For major development it requires high-quality public transport linking to Cambridge city centre and major employment centres. A railway station

is identified as one possible measure within a sustainable movement network, alongside bus stops and mobility hubs, rather than as a mandatory form of infrastructure. The policy therefore supports securing transport outcomes and a package of measures, not prescribing a Fulbourn station as the only means of achieving them. Please see Appendix A.

1.13 The same approach is consistent with national policy. The NPPF requires significant development to be focused on locations which are, or can be made, sustainable and requires sustainable modes to be prioritised, safe and suitable access to be achieved and significant transport impacts to be mitigated. It does not require a particular site to be served by rail. The appropriate test for the allocation is therefore whether the site can be made sustainable and whether a credible, deliverable transport package can achieve acceptable accessibility, safety and network outcomes.

1.14 Making allocation dependent on that third-party infrastructure would introduce an unnecessary delivery risk. A more robust policy approach is to require safeguarding and active progression of the station, while also requiring the development to demonstrate an acceptable non-station transport scenario based on high-quality bus connectivity, active travel and demand management.

Promoter response to the HELAA

1.15 The promoter's response and proposed work programme are set out in **Table 2.**

HELAA matter	Promoter response
Accessibility	Adequate accessibility can be achieved through a mixed-use neighbourhood with on-site education, local centre/employment and community facilities, connected to Fulbourn and wider destinations.
Site access	The 2026 Amber rating confirms access is acceptable in principle. The Transport Strategy identifies a network-based access approach rather than reliance on a single junction.
Transport and roads	A comprehensive low-car strategy can combine direct bus services, active travel, internal trip capture, demand management and proportionate highway mitigation.
Strategic dependency	A direct high-quality bus link to Cambridge would be secured. A Fulbourn station would be safeguarded and progressed but not treated as an absolute allocation prerequisite while feasibility, funding and rail approvals are being progressed.
Current station workstream	Network Rail/GBR Anglia engagement is active, considering the timetable/operational feasibility.
Phasing and delivery	Development phasing would be tied to measurable transport outcomes.

Table 2: Promoter response to the HELAA matters

Conclusion

1.16 The promoter's representations make the following focused transport points:

- the change from the 2021 Red access finding to a 2026 Amber finding confirms that site access is acceptable in principle and should now be addressed through detailed design and assessment;
- all four 2026 HELAA transport findings are Amber and identify matters for evidence, mitigation and delivery rather than an in-principle transport reason to reject the site;
- Policy I/ST requires sustainable accessibility and high-quality public transport but does not require a railway station. A frequent, direct bus service, active travel network, mobility hub and demand-management package can therefore be tested as a policy-compliant transport solution;
- a Fulbourn station remains a significant opportunity and is now being actively progressed with Network Rail/GBR Anglia, but and should not be an absolute allocation prerequisite; and
- the allocation would safeguard the station opportunity and require continued rail engagement, while retaining flexibility for the development to come forward where a robust non-station package demonstrates acceptable accessibility, mode-share and network outcomes.

1.17 From a transport perspective, the 2026 HELAA provides a credible basis for the site to proceed to allocation and more detailed assessment. Accessibility is judged adequate subject to on-site facilities; site access is accepted in principle; and the transport/roads matters can be addressed through a vision-led package of bus, active travel, demand management and proportionate highway mitigation.

1.18 The only material qualification is the HELAA's absolute station wording. That wording goes beyond the outcome-based approach in Policy I/ST and would make the allocation dependent on rail infrastructure which is now entering feasibility work with Network Rail/GBR Anglia. The station should be treated as an important safeguarded opportunity and potential enhancement, rather than the sole means by which the site can be considered sustainable.

1.19 The proposed allocation would have a dual-track evidence programme: progress the Network Rail station study and EWR interface work, while in parallel testing a deliverable non-station scenario comprising a direct high-quality bus connection to Cambridge, comprehensive walking and cycling links, a mobility hub, demand management, a defined vehicular trip budget and proportionate highway mitigation. This provides a resilient basis for allocation and future delivery irrespective of the timing of third-party rail infrastructure.

Appendix A: Check against detailed Transport Policies

Policy	Promoter response	Delivery evidence
I/ST(1): vision-led approach and road-user hierarchy	The masterplan would be structured around walking, wheeling, cycling and public transport from first occupation. A mix of homes, employment, education and local facilities would internalise trips and reduce the need to travel.	Prepare a vision-led movement strategy with mode-share targets, a vehicular trip budget and a clear hierarchy of streets and routes.
I/ST(2)(a-c): walkable neighbourhoods and active travel	A permeable network would provide direct links within the site and to Fulbourn, Cherry Hinton, Cambridge, the Fulbourn Greenway and the wider Rights of Way network. Existing routes would be protected and improved.	Prepare an active travel network plan and walking and cycling audits. Design to LTN 1/20 and relevant Cambridgeshire standards, including inclusive crossings, lighting, surfacing and wayfinding.
I/ST(2)(d-e): mobility hubs and high-quality public transport	A central mobility hub and direct bus corridor would connect the site with Cambridge East, major employment areas and Cambridge city centre. A potential Fulbourn station would be safeguarded as an additional long-term opportunity, not relied upon as the sole public transport solution.	Develop the bus service, priority and funding strategy. Demonstrate convenient access to public transport. Safeguard a potential rail/mobility-hub location and progress separate station feasibility work.
I/ST(2)(f-h): safe access, active-mode priority and future flexibility	Access is accepted in principle by the HELAA. Detailed access and street design would provide safe movement for all users, priority crossings, filtered permeability where appropriate and access for buses, servicing and emergency vehicles.	Prepare access feasibility designs, road-safety review, junction analysis and street typologies. Safeguard flexibility for future public transport, shared mobility and technology.
I/ST(3-4): safety, cumulative impacts, mitigation and assessment	The promoter accepts the need to demonstrate that residual effects are not unacceptable and to address cumulative Local Plan, EWR and committed-development impacts. Measures would be phased to influence travel behaviour from the outset.	Agree a vision-led Transport Assessment and Framework Travel Plan scope with the highway authority. Undertake strategic and local modelling, including relevant A11 and A14 East interfaces, and prepare a monitor-and-manage mitigation plan.
I/MH: mobility hub facilities	A site mobility hub would enable interchange between bus, active travel and shared mobility from the outset, with rail added if and when a Fulbourn station is demonstrated feasible and deliverable.	Define hub location, catchment, facilities, pick-up and drop-off, secure cycle parking, wayfinding, management, maintenance and phased delivery.
I/CV: cycle and vehicle parking	Parking would be design-led and related to accessibility, land-use mix and mode-share targets. Cycle parking would meet the policy standards, including one space per residential bedroom and provision for non-standard cycles. Car clubs, pooled parking and reduced parking would be introduced as public transport matures.	Prepare a Parking Strategy, site-wide electric-vehicle charging strategy and parking monitoring plan, including measures to avoid displacement into Fulbourn and surrounding roads.

I/SD: servicing and last-mile deliveries	Servicing would be integrated without obstructing active travel routes, bus stops or general traffic. Consolidation, delivery lockers, cargo cycles and low-emission vehicles would reduce movements and conflicts.	Prepare a Delivery and Servicing Plan covering routing, timing, vehicle types, turning, school interfaces and management from first occupation.
I/SI: EWR safeguarding	The masterplan would not prejudice the construction or operation of EWR. The promoter would work with EWR Co and Network Rail on the Newmarket Line, train care centre, level-crossing interfaces, safeguarding and the separately promoted station option.	Confirm the extent of safeguarding through the Policies Map and emerging DCO documents. Consult EWR Co and Network Rail and incorporate agreed land, access, construction and operational requirements.