Gonville & Caius College
University of Cambridge

Reg 18 Greater Cambridge Local Plan representation

Rectory Farm, Milton

Site Reference: 54906
ID: 115167

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Prepared with

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APPENDIX 1

INDICATIVE MASTERPLAN CONCEPT – Updated for Autumn 2025 busway proposals

1 INTRODUCTION

1.1 This submission to Reg 18 Draft Greater Cambridge Local Plan (GCLP) is made by Gonville & Caius College, University of Cambridge (hereafter "Caius"), in regard to its landholdings at Rectory Farm, to the North-West of Milton (HELAA Site Ref: 54906 and Site ID 115167).

1.2 Rectory Farm has been promoted by Caius through the GCLP call for sites exercises. The HELAA 2021, 2023 and 2025 results are set out on the Reg 18 GCLP "*Sites Dashboard*" and site is given a sole RED score against landscape.

1.3 Caius wish to provide updated information about this site. As requested at the GCLP consultation portal, a site form has been completed, and this report is uploaded to accompany the site form.

1.4 This submission is supported by:

- Allies and Morrison - architects and masterplanners
- KMC - transport consultants
- Graeme Tulley - planning consultant

1.5 This submission:

- Reviews the GCLP evidence base and development strategy;
- Sets out how Caius land at Rectory Farm will help address GCLP needs;
- Sets out HELAA site assessments to date;
- Addresses the landscape issues from the HELAA;
- Comments on transport and highways matters; and
- Sets out the exceptional circumstances for release from the green belt

1.6 This submission concludes by requesting:

- that the HELAA sole RED scoring on landscape is amended to AMBER;
- that Caius Rectory Farm is accepted in the GCLP as being not only "available" and "achievable" but also **"suitable"** for development;

- that there are **exceptional circumstances** for which to release the green belt land;
- Rectory Farm is **allocated for mixed use employment and housing** development in the next round of the GCLP;
- Consideration may be given to allocating Phase 1 for mixed use development in the plan period which can be delivered prior to Waterbeach Cambridge busway going ahead.

2 BACKGROUND

2.1 Rectory Farm is owned freehold by Caius, covers a total area of approximately 95 hectares and is located on land to the north-west of the village of Milton. It is adjacent to the A10 along the south-eastern boundary. Butt Lane, Milton Park & Ride and Milton Recycling Centre abut its southern boundary. Landbeach Road adjoins the east boundary of the site. Rectory Farm currently consists of agricultural land.

2.2 Rectory Farm lies within the Cambridge green belt.

2.3 Caius responded to the Call for Sites (CfS) in 2020 proposing up to 1,500 dwellings and approximately 30,000 square metres of commercial floor space.

Waterbeach to Cambridge Busway

2.4 In October 2024, the Greater Cambridge Partnership (GCP) held consultation on a new proposed alignment for the Waterbeach to Cambridge busway. This will be a dedicated busway, alongside a new walking and cycling route, between Waterbeach New Town and North Cambridge via Landbeach village. The proposals also include a new travel hub on the A10, close to Waterbeach new town.

2.5 The proposed route will start at the existing busway next to Cambridge Regional College. It will then connect with Milton Park & Ride and Landbeach via farmland including Caius land at Rectory Farm, before linking with a new travel hub in Waterbeach.

2.6 In February 2025 Cambridgeshire County Council (CCC- the statutory body) agreed to submit a Transport for Works Act Order (TWAO) for the busway project to go ahead. The GCP, which will deliver the project, has indicated the TWAO application will be submitted to the DfT in 2026.

2.7 The Reg 18 GCLP Infrastructure Delivery Plan 2025 (IDP) describes the Waterbeach to Cambridge busway as… *"critical infrastructure*" …with a phasing… *"by 2035".*

2.8 Caius has agreed with GCP that the required land acquisition to facilitate the busway will be subject of a private treaty agreement between Caius and GCP/CCC, thus quickening the land acquisition process for the busway.

2.9 The private treaty agreement between Caius and the GCP will also contain provision for Caius to build crossing points over the busway to provide access to the land to the north west of the busway.

Busway - impact on Rectory Farm

2.10 Caius masterplanning team - Allies and Morrison – have updated the Rectory Farm proposals in 2025 to take account of the new busway alignment, location of busway crossing points and site accesses into the Rectory Farm land.

2.11 The busway passing through the site represents a significant opportunity to deliver Transport Orientated Development (TOD)[1]. Committed high quality infrastructure which provides access to Cambridge city centre, the northern fringe and other new communities can and should be the focus of new growth areas and Rectory Farm represents this opportunity.

2.12 The masterplan review set out that the capacity of the site for residential remains circa 1,500 new homes but could accommodate more employment space than in the CfS 2020 i.e. circa 50,000 (Min) – 100,000 (Max) sqm of commercial/employment floor space with substantial public open space within the development and with a linear park. The employment space typologies have yet to be agreed but may consist of mid technology uses.

2.13 A copy of the indicative concept plan factoring in the Autumn 2025 busway alignment is attached at Appendix A.

2.14 The timing of the busway does have an impact on the build out, phasing and delivery timescales for the Rectory Farm proposals.

2.15 In this regard, Caius envisage a first phase (Phase 1) of development to the east of the busway alignment and up to the A10, could go ahead before the busway works are complete, gaining site access from existing junctions with the A10 and Landbeach Road.

2.16 This first phase would be expected to consist of 1,000 residential units and 40,000 sqm of commercial floorspace facing the Butt Lane frontage, plus a local centre

[1] Transport-Oriented Development (TOD) is a planning strategy that creates denser, mixed-use, walkable communities centred around high-quality public transit hubs, maximising transit access, reducing car dependency, promoting walking/cycling, and fostering sustainable, compact growth.

consisting of local retail, recreational and leisure facilities. Caius consider this first phase would be built out over years 6 -15.

2.17 In respect of Phase 2 development this would need to wait for busway works to be complete, including new (south western) site access from Butt Lane and installation of a number busway cross over points from Phase 1 to Phase 2.

2.18 Phase 2 would likely consist of another 500 dwellings and a further 40,000 sqm commercial space fronting Butt Lane. In terms of timings, it is expected this could be available and developed out over the 11-16 years +.

2.19 In summary, Caius consider the Rectory Farm proposals are available, achievable and deliverable and would make a significant contribution to the employment and housing needs of the GCLP over the 2024-2045 plan period.

3 GCLP NEEDS AND DEVELOPMENT STRATEGY

3.1 The draft GCLP sets out at Policy S/JH the level of needs for jobs and homes in Greater Cambridge that the plan will meet over the plan period of 2024-2045. Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places for the plan period. Specific site allocations then follow.

GCLP objectively assessed needs

3.2 Policy S/JH: New jobs and homes sets out that the GCLP will meet the objectively assessed needs over the period 2024-2045 for 73,300 additional jobs to support the knowledge intensive sectors and also provide a diverse range of local jobs. The evidence base converts this into employment floorspace needs of almost 1,220,000 sqm over the period 2024-2045.

3.3 With regard to housing, a minimum of 48,195 new homes is set for meeting the needs for the total population, including for affordable housing and specialist accommodation needs. The evidence base projects that by deducting needs from existing supply this results in a residual balance of 10,330 homes to find through new allocations between 2024 and 2045.

3.4 Caius does not comment on the evidence base. However, it does note that other forecasts appear to take a very different view of the growth potential for Greater Cambridge.

3.5 For example, the Ministry of Housing Communities and Local Government (MHCLG) commissioned and published Oxford Economics research on 4 November 2025 which sets out three very different scenarios for Greater Cambridge for the 2031 – 2050 period with much higher employment and housing needs.

3.6 Scenarios are of course dependent on data and assumptions used. However, it is possible that as the GCLP progresses and arrives at Examination there maybe representations that the draft GCLP significantly underestimates needs, that additional sites are required to be allocated, and questions raised as to whether the Plan is …"*prepared positively, in a way that is aspirational but deliverable"* (NPPF Para 16).

Development strategy

3.7 Policy S/DS sets out that… *"The need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge green belt".*

a. Within the Cambridge urban area;

b. On the edge of Cambridge;

c. At an expanded Cambourne;

d. At other new settlements; and

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

3.8 Caius does not comment on the Development Strategy order of preference. However, it is apparent that some flexibility will be needed to meet unexpected events, outcomes or dependencies on infrastructure projects which may or may not be delivered.

3.9 Most notably, in August 2025 the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) creating uncertainty as to whether the councils' vision for North East Cambridge can be taken forward. However, we note the Draft GCLP maintains Policy S/NEC to promote development at North East Cambridge with the draft Plan, building in two scenarios whereby North East Cambridge may or may not proceed in the plan period.

3.10 The consequence would appear to be that the 8,350 new homes (5500 on the WWTP), 320,000 sqm business space, 27,300 sqm of industrial floorspace for mid-tech, light industrial, and creative industries and a new district centre around Cowley Road allocated at Policy S/NEC, are now in doubt with needs to be met elsewhere.

3.11 In this context we note Grange Farm was not progressed in the GCLP First Proposals, and the HELAA 2025 assessment is a RED for "suitability" on landscape grounds.

3.12 Despite this RED suitability score, Grange Farm is now allocated in the Reg 18 for 6000 new homes (Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm) – assuming 2,250 within the Plan period up to 2045. We note the policy requirement (Policy S/GF 13(d)) is to…*" provide a segregated link for the proposed Cambridge South East Transport busway to enable the project to serve the development without being impacted by local congestion"*.

3.13 The Infrastructure Delivery Plan (IDP) sets out the cost of CSET Phase 2 is £161M and the costs of CSET Busway Extension to cross the A11 and A1307 to connect Grange farm is an additional £30M before 2040.

3.14 We appreciate the purpose of plan making is to have a "plan led" system, building in as much certainty as possible as to where development and infrastructure should take place over the plan period. However, as the GCLP has already witnessed unforeseen events along the way can impact on the development strategy, and some key sites are dependent on major infrastructure being funded and implemented.

4 HELAA RESPONSES

4.1 Sites have been assessed using a methodology that incorporates a 'Red, Amber, Green' (RAG) scoring system .The Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) 2021 summary of Site Ref 54906 was:

Criteria	Outcome
Suitable	**Red**
Available	**Green**
Achievable	**Green**

4.2 The GREEN assessment for "availability" reflects the fact Caius is the sole land owner with the land in annual agricultural cropping use.

4.3 The GREEN assessment for "achievable" reflected Strutt and Parkers assessments of the commercial attraction and likely viability of the site for residential and employment uses given the highly sustainable location and its proximity to the north of Cambridge.

4.4 The RED assessment for "suitable" was given against an HELAA assessment on landscape grounds. We note sites were deemed to be 'unsuitable' for the GCLP if they were assessed as 'Red' against any of the criteria used.

4.5 Published alongside the Draft Plan is the GCLP *"Sites Dashboard"* which includes summaries of the HELAA 2021, HELAA 2023 and HELAA 2025, the latter publishing for the first time the assessment of the 2025 call for sites.

4.6 We comment further on this landscape assessment in Section 5 below and request that the RED scoring is amended to AMBER.

5 LANDSCAPE ASSESSMENT

5.1 The HELAA landscape assessments as per the GCLP "sites dashboard" are set out below.

5.2 RED - Landscape summary 2021…."*A large site located to the north west of the village of Milton. I Wide and local views are high due to lack of intervening vegetation and built form. Development upon this site would have a significant adverse impact to the local landscape character. It would be an encroachment into the landscape, isolated, an urbanisation of the rural landscape and permanent. Even with a reduction in residential units with landscape mitigation measures the harm would still be adverse, unacceptable and incongruous with the rural landscape".*

5.3 RED - Landscape summary 2023…."*Additional comments question the previous assessment scoring. In landscape terms, any development of the site would cause harm to the local openness, character and views in this area, which would be unalterable and not possible to mitigate against. Therefore there is no change to the original assessment score".*

5.4 RED - Landscape summary 2025…."*New information has been submitted in relation to the proposed new busway, which roughly dissects the site north to south. The presence of the busway does not alter previous landscape concerns greatly and arguably further degrades the rural character of the site. Previous findings continue to apply, and the development of the site is likely to cause harm to the openness of the landscape character and the purposes of the Green Belt".*

HELAA landscape rating conflicts with its own evidence base

5.5 The MIL01 parcel, within the Milton study area, is included in the Landscape Sensitivity Assessment undertaken by CBA as part of the Local Plan Evidence Base (originally 2021, republished for the Draft Local Plan - Regulation 18 consultation). This assessment evaluates the relative sensitivity of the landscape to residential, commercial, and mixed-use development, based on development scenarios of 2 - 5 storeys for residential and 2- 4 storeys for commercial.

5.6 The Green Belt was subdivided into 'Assessment Units' - discrete parcels assessed individually to determine their contribution to the landscape and potential impacts

of development. While the MIL01 unit is smaller than CNF06 (a larger parcel in the Cambridge North Fringe), it is particularly relevant, as it largely coincides with the site boundary, covering nearly the entire area except the very northern tip, while also incorporating small adjacent parcels to the east and west. This demonstrates that the site has been specifically considered within the landscape assessment.

5.7 Unlike the HELAA, the Landscape Sensitivity Assessment provides a detailed evaluation of the susceptibility of the MIL01 landscape parcel to development, considering natural, cultural, and perceptual or aesthetic factors; the quality and condition of the landscape; views and visual context; overall landscape value; and the potential for mitigation measures.

5.8 The MIL01 parcel is assessed in a balanced manner, identifying an equal number of characteristics that increase and reduce susceptibility to development (13 and 14 respectively in each category). The assessment concludes:

"In summary, this is a relatively commonplace arable landscape within Greater Cambridge. The Mere Way Green Corridor provides structure and has natural, recreational and historic value. Elsewhere, the landscape is open, with scattered woodland and the edges of Histon and Impington and Milton are relatively well integrated into the wider landscape. These features are more susceptible to the development scenario. Features which are less susceptible to the development scenario are the A10, enlarged arable fields and generally limited historic, recreational and natural value away from the Mere Way. Overall. This is assessed as a landscape of ***medium sensitivity*** *to the development scenario."*

5.9 The assessment further identifies opportunities to mitigate potential impacts, highlighting measures such as the…*"management and enhancement of existing hedgerows,"* the *"re-planting [of] hedgerows where these have been lost or become fragmented*," and the "*opportunities to expand and link woodland, hedgerows, and other semi-natural habitats."*

5.10 Based on this, the assessment notes: *"In this context, there may be* ***some opportunities for residential, commercial, and mixed-use development*** *with increased height/scale in parts of the Assessment Unit."*

5.11 With its restrictive RED rating, the HELAA assessments of 2021, 2023, and 2025 reach conclusions that contradict the evidence base, suggesting that the Landscape Sensitivity Assessment has not been fully considered when making the assessment.

5.12 In support of its rating, the HELAA takes a narrow approach, focusing primarily on views and openness of the landscape on the site. By contrast, the Landscape Sensitivity Assessment recognises openness as a characteristic but also considers a

broader range of features that reduce susceptibility to development, taking a more balanced position. The assessment further identifies potential to mitigate impacts on openness through measures such as new tree and hedgerow planting to "manage key views across the rural landscape."

5.13 The HELAA also cites landscape character to justify its rating. On this point, the Landscape Sensitivity Assessment is in direct conflict, characterising the MIL01 landscape as:

- *"A mostly flat, low lying and indistinct landform"*
- *"[A] weak sense of place associated with an enlarged arable field pattern"*
- *"A relatively commonplace landscape within Greater Cambridge that is not distinctive and does not have a strong sense of place"*
- *"[The] quality of the rural landscape is eroded in the east in proximity to the A10"*

5.14 In summary, the HELAA's restrictive RED rating conflicts with its own detailed evidence base for the site, specifically the Landscape Sensitivity Assessment for parcel MIL01, which concludes **medium landscape sensitivity** and that there may be opportunities for residential, commercial and mixed-use development. In light of this evidence, it is not reasonable for the HELAA to conclude that the site is wholly unsuitable. Its conclusions are inadequately reasoned and potentially unsound, leaving them open to challenge.

5.15 We therefore ask the LPA to amend the HELAA scoring for landscape from RED to AMBER, in order to align with the Landscape Sensitivity Assessment. This would recognise, like the evidence base does, that with appropriate mitigation, there are demonstrable opportunities for development within MIL01.

Impact of planned busway

5.16 In our response to the 2025 Call for Sites, we considered the impact of the planned busway on landscape sensitivity and identified this as an additional reason for downgrading the HELAA's RED assessment to AMBER. We consider that the busway will further reduce the susceptibility of the landscape to development for the reasons outlined below. Indeed, the 2025 HELAA assessment makes a similar observation, noting that the busway *"arguably further degrades the rural character of the site."*

1) the agreed alignment of the busway effectively dissects Rectory Farm in two parts. This provides a clear and logical defined boundary on the eastern side of the busway for in-fill development up to the A10.

2) the agreed busway route – which is raised - across Rectory Farm results in a significant new feature within the landscape, which would act to significantly reduce the landscape sensitivity of all the site when viewed from east to west.

3) the new busway route has a significant impact on the contribution the site makes to the Green Belt. The busway will shift the transport corridor further west, meaning that the A10 will no longer serve as an urban containment edge. We address this point in further detail in section 7.

4) Caius College would be happy to commit to the provision of extensive landscape planting towards the west and north boundaries, thus also increasing BNG of the site, in order to minimise the impact of development on the landscape. In this context we note the Final Biodiversity HELAA comment in 2023 scored AMBER and said… *"Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated".*

5.17 Whilst it is acknowledged that any development of this scale would have some landscape impact, this needs to be considered holistically against the benefits that a development in this location could offer.

5.18 As set out in our additional information in the call for sites 2025, we consider the proposed new busway would alter the landscape in a significant way. It will deliver a dedicated busway alongside a new walking and cycling route to provide fast, frequent and reliable and sustainable journeys between Waterbeach New Town and north Cambridge via Landbeach village to make it easier for people to get to work and school.

5.19 It is noted that Landscape Officers were consulted in the HELAA 2025 final landscape, but we find the summary confusing and contradictory.

5.20 The HELAA 2025 assessment accepts there will be a busway and that it *…"roughly dissects the site north to south"…* and then comments …." *The presence of the busway does not alter previous landscape concerns greatly and* ***arguably further degrades the rural character of the site (out italics).***

5.21 We agree with the assessment that the busway will degrade the character of the site. However, we disagree with the subsequent conclusion.

5.22 Surely, having accepted a busway will change the landscape, not least by splitting the site, the HELAA assessment should recognise, as other HELAA assessments do (e.g. biodiversity), that impacts… "*could be reasonably mitigated or compensated*." The assessment should then be changed to AMBER .

5.23 The wording in the 2025 HELAA appears to treat the purpose of the assessment as preserving an already weak landscape character, rather than balancing constraints against development potential, as it should. According to the NPPF, local planning authorities should take a proactive and positive approach when assessing land in a HELAA. The 2025 HELAA, by contrast, does the opposite.

5.24 Considering the above, it is considered that the issue to landscape should be re-categorised as AMBER with the flat landscaping and introduction of the busway limiting existing views with the result that it constitutes a less sensitive landscape.

5.25 In this regard, Caius ask that Rectory Farm HELAA "RED" landscape score is reassessed as AMBER and the site recognised as not only **available**, **achievable** but also a **suitable** site which should be allocated to help meet assessed needs within the overall development strategy.

6 STRATEGIC HIGHWAYS AND TRANSPORT

6.1 Turning to strategic highways the HELAA 2025 assessment is AMBER – stating…"*based on the additional information submitted, the overall assessment score has not changed. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use. A Transport Assessment and a Travel Plan will be required. A vehicle trip budget for this allocation is expected to be required".*

6.2 Rectory Farm occupies a strategic position on the northern edge of Cambridge, within close proximity of the city's most important and fastest-growing employment destinations. The site lies directly on the alignment of planned and emerging strategic transport infrastructure, most notably the Waterbeach to Cambridge Busway and prospective A10 corridor upgrades being pursued by the Cambridgeshire and Peterborough Combined Authority (CPCA). This combination of location and infrastructure provides an exceptionally strong basis for sustainable, well-connected development that aligns with both local and national transport and planning objectives.

Location in Relation to the Cambridge Northern Fringe

6.3 Rectory Farm benefits from exceptional proximity to the northern Cambridge employment cluster, including Cambridge Science Park, Cambridge Business Park, St John's Innovation Centre, Cambridge Regional College, and employment areas within North Cambridge and Milton. Collectively, these destinations accommodate tens of thousands of jobs and are consistently identified in Local Plan evidence as critical drivers of Greater Cambridge's economy.

6.4 Unlike more peripheral new settlements, Rectory Farm is located adjacent to, rather than remote from, these employment concentrations. This places the site in a particularly strong position to support shorter commuting distances and to enable high levels of walking, cycling and public transport use. As a result, development at Rectory Farm would reduce reliance on private car travel for daily journeys, particularly those associated with access to employment, and would align closely with National Planning Policy Framework (NPPF) objectives and Local Plan ambitions to locate growth where it can best support sustainable travel behaviour and economic productivity.

Integration with the Waterbeach to Cambridge Busway

6.5 A defining characteristic of the Rectory Farm site is that it is directly intersected by the Waterbeach to Cambridge Busway. This scheme has secured Outline Business Case approval, entered into the statutory consent process and has been identified by the Greater Cambridge Partnership as a key public transport corridor serving both Waterbeach New Town and North Cambridge.

6.6 The site's relationship with the busway offers several important planning advantages. In particular, it provides the opportunity for a segregated, high-quality public transport connection to Cambridge Science Park, North Cambridge and the city centre, via direct interchange with the existing guided busway. The alignment through the site allows for busway stops to be integrated within the development itself, rather than relying on more distant or peripheral access points, thereby improving accessibility and convenience for future occupants and consistent with the principles of Transport Orientated Development (TOD).

6.7 This level of integration creates strong opportunities for a high bus-based mode share from first occupation, with the potential for further growth as the corridor matures and service frequencies increase. Development at Rectory Farm would therefore help to maximise the value and patronage of the busway, reinforcing the case for the scheme as a whole and ensuring that early trip demand is directly aligned with the delivery of strategic public transport infrastructure.

Relationship with Milton Park & Ride and the Wider Network

6.8 Rectory Farm sits immediately adjacent to Milton Park & Ride, which already functions as a key interchange within the northern transport network. This proximity enables effective multi-modal interchange between car, busway and local bus services, reduces pressure for on-site parking provision, and supports a shift away from peak-hour car commuting into Cambridge.

6.9 The site also benefits from excellent strategic connectivity, including direct adjacency to the A14, which provides regional and sub-regional access, and close proximity to the A10 corridor. The A10 is identified by the CPCA as a focus for future upgrading, including capacity and reliability improvements. Importantly, the presence of this strategic connectivity does not undermine the sustainability credentials of the site. Instead, it ensures that essential car-based trips can be accommodated efficiently, while allowing the majority of Cambridge-bound journeys to be undertaken by non-car modes.

Alignment with Emerging A10 Corridor Improvements

6.10 The A10 corridor between Waterbeach, Milton and Cambridge is subject to ongoing strategic work by the CPCA and partner authorities, including interventions aimed at improving capacity and reliability, introducing public transport priority measures, and implementing demand management across the corridor as a whole. The CPCA have prioritised improvements to the A10 and conversations are ongoing with the DfT over funding.

6.11 Rectory Farm is well placed to benefit from and support these improvements, as it is located at a point where strategic highway access is already established and future interventions can be integrated without passing through sensitive residential areas. Development at the site can therefore contribute positively to corridor-wide solutions, rather than exacerbating existing constraints. This positions Rectory Farm as a supportive component of a coordinated A10 strategy, rather than as an isolated or ad-hoc allocation.

Deliverability and Infrastructure-Led Growth

6.12 Rectory Farm's location means that its deliverability does not depend on speculative or unproven infrastructure. Instead, the site can draw on a combination of existing high-quality transport assets, including Milton Park & Ride, the A14 and established cycling routes, alongside committed strategic schemes such as the Waterbeach to Cambridge Busway and emerging, but also in time the clearly prioritised, A10 corridor improvements.

6.13 As a result, development at Rectory Farm can come forward in a phased and infrastructure-responsive manner, supporting rather than pre-empting the delivery of strategic transport investment. This approach avoids over-reliance on long-distance commuting patterns and supports the creation of a sustainable travel environment from the outset.

6.14 For the above reasons, we consider the strategic highways HELAA 2025 assessment should be re classified from AMBER to GREEN.

7 EXCEPTIONAL CIRCUMSTANCES

7.1 Rectory Farm sits within the Cambridge green belt, with its eastern boundary adjoining the A10 and then Milton which are outside the green belt. Rectory Farm is therefore on the inner edge of the green belt adjoining an existing village (Milton).

NPPF 2024

7.2 NPPF 145 states…*" Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified".*

7.3 NPPF 146 states…*"exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means".*

7.4 NPPF 148 states…. *"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate…"*

7.5 The GCLP development strategy is based on meeting needs without the release of green belt land. We note, however, that it does release green belt in two locations, where the GCLP considers there are exceptional circumstances … *"at Cambridge Biomedical Campus where a limited release is justified to provide an opportunity to meet development needs of the campus and deliver a world leading campus…* and *... Babraham Research Campus to respond to its unique employment characteristics".*

7.6 We have exampled earlier two key Plan allocations - North East Cambridge and Grange Farm – where there are material uncertainties as to them being delivered or capable of being delivered in the Plan period. Such examples could have significant impact on whether the Plan can deliver the sites to meet the needs. If this were to be the case, then as the Plan progresses, some may call into question whether the GCLP is in NPPF terms "sound".

Meeting needs

7.7 Caius makes no comment on whether the Plan is sound or not. We have however observed that other prominent forecasters (e.g. Oxford Economics) suggest the Plan's employment and housing needs have been significantly underestimated.

7.8 Caius will therefore continue to monitor the Plan as it progresses. It notes the 2021 Green Belt Assessment is being updated to respond to the updated national guidance, with an intention to publish a new Green Belt Assessment in 2026. We

would hope this is before Proposed Submission Consultation (Reg 19) Summer/Autumn 2026, to give opportunity for the report to be fully absorbed.

7.9 In this regard, we have confirmed that the Rectory Farm is available, achievable and we would argue suitable.

7.10 Phase 1 of mixed use development phase (to consist of 1,000 residential units and 40,000 sqm of commercial floorspace facing the Butt Lane frontage, plus a local centre consisting of local retail, recreational and leisure facilities) could be delivered before the busway is implemented. Caius consider this first phase would be built out over years 6 -15.

7.11 A Phase 2 development would need to wait for busway works to be complete, including new (southwestern) site access from Butt Lane and installation of a number busway cross over points from Phase 1 to Phase 2. Phase 2 would likely consist of another 500 dwellings and a further 40,000 sqm commercial space fronting Butt Lane. In terms of timings, it is expected this could be available and developed out over the 11-16 years +, i.e. within the Plan period to 2045.

7.12 Rectory Farm could therefore make a significant contribution to meeting employment and housing needs and as set out in NPPF 146 justify exceptional circumstances for release from the green belt.

Sustainable location

7.13 NPPF 148 notes in any release of green belt boundaries…*"the need to promote sustainable patterns of development should determine whether a site's location is appropriate."*

7.14 We have identified in section 6 above, that Rectory Farm occupies a strategic position on the northern edge of Cambridge, within close proximity of the city's most important and fastest-growing employment destinations.

7.15 The site lies immediately adjacent to Milton Park & Ride, which already functions as a key interchange within the northern transport network, which provides for direct and convenient bus access to the city as well cycling and walking to North East Cambridge and Cambridge Science and Business parks.

7.16 It is directly on the alignment of planned and emerging strategic transport infrastructure, most notably the Waterbeach to Cambridge Busway and prospective A10 corridor upgrades being pursued by the Cambridgeshire and Peterborough Combined Authority (CPCA). This combination of location and infrastructure provides an exceptionally strong basis for sustainable, well-connected development that aligns with both local and national transport and planning objectives.

Grey Belt

7.17 In 2024, the Government introduced a formal policy definition of "grey belt" in the National Planning Policy Framework (NPPF). For the purposes of plan-making and decision-making, 'grey belt' is defined in the NPPF as…"*land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development".*

7.18 The NPPG provides guidance as to how the contributions set out in the NPPF Para 143 a), b), d) should be assessed.

a) checking the unrestricted sprawl of large built-up areas

b) preventing neighbouring towns from merging

d) preserving the setting and special character of historic towns

7.19 Local authorities are expected to assess their Green Belt to identify areas of grey belt when reviewing boundaries in local plans or considering planning applications. This involves detailed Green Belt assessments evaluating how strongly land performs against the specified purposes. We would expect Greater Cambridge to update its Green Belt assessment, which currently dates from 2021, to reflect this updated policy and identify potential grey belt areas.

7.20 In 2021, LUC carried out a Strategic Green Belt Assessment, which provided a key piece of evidence to inform the Greater Cambridge Local Plan. The assessment methodology was based on the three Cambridge Green Belt purposes, which align with the Green Belt purposes set out in the NPPF:

- Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.
- Maintain and enhance the quality of its setting.
- Prevent communities in the environs of Cambridge from merging into one another and with the city.

7.21 Parcel ML1 was assessed, corresponding approximately to the site area, although it excludes the northern top of the site while including an area to the south of Butt Lane comprising the Park & Ride (P&R). The assessment evaluated the overall harm of

releasing the parcel in relation to the three Cambridge Green Belt purposes as follows:

"Parcel MI1 makes a relatively significant contribution to preserving Cambridge's compact character, a moderate contribution to maintaining and enhancing the quality of Cambridge's setting, and a moderate contribution to preventing communities in the environs of Cambridge from merging with one another. The additional impact on the adjacent Green Belt of the release of the parcel would be moderate. Therefore, the harm resulting from its release, as an expansion of Milton, would be very high."

7.22 The relatively significant contribution to Cambridge's compact character combined with moderate contributions elsewhere is considered enough to justify a very high overall harm.

7.23 This assessment, however, is predicated on several factors, all of which would be altered and significantly reduced by the introduction of the proposed busway:

- Distinction from the Milton inset area: The assessment notes that the site is currently perceived as separate from Milton… "*which increases the extent to which development would be perceived as diminishing Cambridge's compact character*". However, the introduction of the busway, as a major piece of infrastructure, and one which is raised above the relatively low lying flat landscape, will have an urbanising effect on the site, reducing the contrast between the Milton settlement and the surrounding land. In addition, the busway will create a strong, physical boundary, further mitigating the perceived separation.

- Predominantly open farmland: The assessment states that the land currently has a "*strong rural character."* This differs from the more detailed Landscape Sensitivity Assessment forming part of the evidence base, which describes the site as a *"commonplace landscape"* with a "*weak sense of place."* The introduction of the raised busway will interrupt the site's previously largely uninterrupted rural character, reducing the perceived openness of the site.

- Settlement gaps: The assessment identifies that the site contributes to gaps between Milton and Histon & Impington to the southeast, and between Milton and Landbeach, and that *"development would be perceived as narrowing the gap."* This is acknowledged to some extent (though, of course, the site is only a small part of a wider strategic gap). However, the introduction of the future busway, in combination with the existing A10 corridor, will alter this separation. Due to the low-lying topography, limited natural landscape features, and the presence of the A10 and proposed raised busway, development could occur

without a significant loss of visual separation. Furthermore, development could help mitigate this by introducing a strong landscape edge that preserves separation and reduces the impact of development on these gaps, as also acknowledged in the Landscape Sensitivity Assessment.

7.24 The introduction of the busway, which is raised above the surrounding topography, therefore materially changes the assessment of Parcel ML1. Many of the factors that underpin the original "very high" Green Belt harm are significantly reduced, meaning that the parcel could be considered for development without compromising Cambridge's compact character, visual separation, or strategic settlement gaps.

7.25 Furthermore, there is a strong case for considering the site as grey belt, as it does not make a strong contribution to any of the three core Green Belt purposes. In this context, it is particularly significant that the NPPF deliberately uses the term "strong contribution," which sets a high evidential threshold. The absence of a strong contribution indicates that the site may be considered for development under the grey belt classification without fundamentally undermining the strategic objectives of the Green Belt.

7.26 Lastly in respect of grey belt land, the NPPF requires the exclusion of other protected sites designations as set out at NPPF Footnote 7 (other than green belt). In this context the HELAA 2021 notes that there are no apparent priority habitats or designations within the site.

Exceptional circumstances grounds

7.27 Caius consider there are exceptional circumstances for Rectory Farm's release in this current Plan on the following grounds:

1) Rectory Farm is in the single ownership of Caius and is available, achievable and deliverable with phased development;

2) We identify Rectory Farm HELAA RED assessment for landscape should be re-classified to AMBER and as a result the site as a whole should be considered as "suitable" for allocation in the GCLP;

3) The proposed mix of housing and employment comprising 50,000 – 100,000 sqm of employment space, and up to 1,500 dwellings, would significantly help in meeting GCLP housing and employment needs, particularly if North East Cambridge proposals cannot be delivered or are substantially delayed in or beyond the Plan period;

4) A first phase of mixed use development (40,000 sqm employment and circa 1000 dwellings) is not dependent on the Waterbeach to Cambridge busway being implemented. Caius consider this first phase could be built out over years 6 -15;

5) Rectory Farm is located adjacent to, rather than remote from existing employment concentrations. This places the site in a particularly strong position to support shorter commuting distances and to enable high levels of walking, cycling and public transport;

6) It is in a sustainable location, adjacent to the A10. It is situated within a major growth corridor, with Cambridge North East to the South and Waterbeach New Settlement to the north;

7) It is adjacent to Milton Park & Ride and also benefits from very good cycle access to Cambridge City;

8) Its sustainable location will be enhanced with the new Waterbeach to Cambridge busway (and associated cycling and walking improvements) to further improve public transport and cycling/ walking;

9) The provision for substantial growth at Milton would fully align with the objectives of achieving a cluster of growth along the Cambridge North East- Waterbeach Corridor;

10) The introduction of the Waterbeach- Cambridge busway, which is raised above the surrounding topography, will materially change the landscape and green belt characteristics. The busway's impact needs to be factored into a future green belt assessment, the role of the site in green belt terms and its potential as NPPF grey belt land.

7.28 We note other landowners in the area have proposals for major employment based proposals. Trinity College wish to expand its existing Cambridge Science Park on the north side of the A14 (Cambridge Science Park North) with circa 190,000 sqm proposed, whilst directly to the south of Rectory Farm there are mixed use proposals for 54,000 sqm and 400 dwellings.

7.29 Caius would be happy to explore with other landowners how these proposals could work in a comprehensive and co-ordinated way given their location within the sustainable Cambridge – Waterbeach growth corridor.

8 CONCLUSIONS

8.1 In light of the above, Caius asks that the draft Plan re-assesses the Rectory Farm, Milton proposals and consider the following policy options for the emerging GCLP:

a) The HELAA suitable assessment should be reclassified from an overall RED to AMBER score;

b) given the exceptional circumstances identified above, the land at Rectory Farm, Milton, provides an excellent opportunity for early development, and provides a sound basis for allocation as part of the GCLP;

c) If the GCLP does not allocate the site for a specific quantum of development, then designation as a …"*policy area of major change within the RSC (*Policy S/AMC); and

d) consider potential for allocating a Phase 1 mixed use development, i.e. the land between the A10 and proposed busway in this Plan to be delivered early in the plan period (6-15 years).

8.2 In regard to (c) above, we consider that Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge is a useful precedent.

8.3 Policy S/AMC/WHD *…."supports a masterplan led approach to the comprehensive development of the policy area. This is to create a multimodal travel hub, employment and housing in a highly accessible location*….and…. *Complementary uses including residential and commercial development and appropriate associated infrastructure, services and facilities where they do not prejudice the delivery of the above policy requirements and placemaking outcomes."*

8.4 Caius would be keen to work in partnership with all relevant landowner, bodies and local communities in preparing and adopting a masterplan led approach to the comprehensive phased development of the policy area.

8.5 We consider such a policy led approach would give the GCLP additional flexibility up to an including Examination in Public to include the housing and employment numbers to help demonstrate it was meeting all objectively assed needs.

8.6 It would also offer a partnership approach allowing local communities early stage engagement in the plan making process.

8.7 In regard to (d) above Caius indicative masterplan for Rectory Farm is designed as phased development most particularly in recognition of the Waterbeach to Cambridge busway running effectively north to south through the site. Clearly Phase 2 west of the busway would require the busway to be delivered together with new crossing points and further vehicle access to Butt Lane. As the timing of the busway is yet to be determined, Caius would be prepared to work with GCLP to promote Phase 1 in this current Plan.

Emerging national planning policy

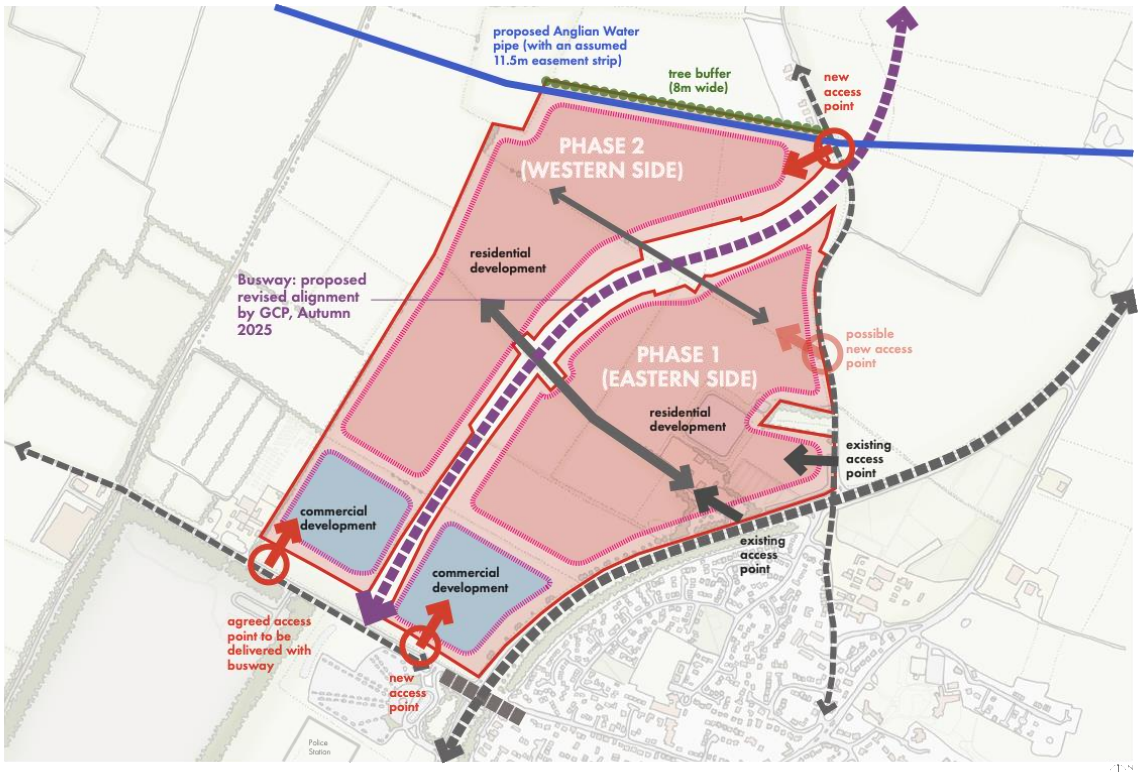
8.8 We recognise the GCLP is being brought forward under existing plan making regulations and the current NPPF 2024.

8.9 However, we are equally conscious the government is consulting on major new proposals within its draft NPPF 2025.

8.10 The consultation NPPF proposals include GB7(1h) which introduces a significant new provision specifying that housing and mixed-use development on Green Belt land is not inappropriate where it is near a well-connected station, of a scale that existing infrastructure can accommodate, does not prejudice long-term development proposals, and complies with the Golden Rules.

8.11 In this regard we note the Waterbeach to Cambridge busway is being progressed under the Traffic and Works Act. Proposals at Rectory Farm may therefore qualify to be also considered under the draft Policy S5, which includes provision for development around railway or tram stations.

APPENDIX 1 – INDICATIVE MASTERPLAN CONCEPT – Updated for Autumn 2025 busway proposals



Masterplan concept layout