Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.
Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.
Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.
By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.
Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Alison Stanley	
Organisation (where relevant)	Gonville & Caius College, University of Cambridge	
Job Title (where relevant)	Endowment Property Manager	
Address, including Post Code	Trinity St, Cambridge CB2 1TA	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Rectory Farm, Milton Site Reference: 54906 ID: 115167
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Rectory Farm is owned by Gonville & Caius. It covers a total area of approximately 95 hectares and is located on land to the north-west of the village of Milton. It currently consists of agricultural land and lies within the green belt. Caius has confirmed Rectory Farm is available, achievable and we would consider suitable.

The Waterbeach to Cambridge busway agreed route passes through the site effectively dividing it in two. Caius supports the busway and has agreed a private treaty sale for the land required. A Transport and Works Act Order (TWAO) is to be submitted.

Caius has responded to "call for sites" exercises (Site Reference: 54906 ID: 115167) and previous consultations on the GCLP. An updated masterplan (2025 – see attached supporting Reg 18 submission) was prepared taking account the busway route, giving capacity for circa 1,500 new homes and circa 50,000 (Min) – 100,000 (Max) sqm of commercial and employment floor space with substantial public open space/linear park.

The busway will be raised above the surrounding low lying topography and will materially change the landscape and green belt characteristics. It will divide the site in two and have an urbanising effect, reducing the contrast between the Milton settlement and the surrounding land with the busway creating a strong, physical boundary between itself and the A10.

This will provide a clear and logical defined boundary on the eastern side of the busway for in-fill development up to the A10. The HELAA 2025 comments that the busway would …"*arguably further degrade the rural character of the site".*

The councils Green Belt assessment (2021 and 2025 update) of this land parcel (MI1) does not consider the introduction of the busway, which as noted above is raised above the surrounding topography, and would in our view materially change the assessment of Parcel MI1.

An eastern Phase 1(within the A10 and busway route) would consist of circa 1,000 residential units and 40,000 sqm of commercial floorspace, plus a local centre consisting of retail, recreational and leisure facilities. This could be delivered before the busway is implemented and be built out over years 6 -15.

A western Phase 2 development would need to wait for busway works to be complete but would consist of a further 500 dwellings and a further 40,000 sqm commercial space, built out over years 11-16 + within the Plan period to 2045.

NPPF 2024 introduces grey belt land and Annex 2 defines it 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".* We consider there is also a strong case (increased by the busway) for considering the site as grey belt, as it does not make a strong contribution to the three core Green Belt purposes.

With the Anglian Water waste facility at Hartree not now relocating this has raised significant questions for the Reg19 Plan given North East Cambridge was to deliver 234,500 sqm of workspace and 8500 new homes. To maintain needs targets and headroom, Reg 19 has upped housing capacity in existing major designations as well as a new Grange Farm allocation. To meet employment needs existing clusters and hubs and Cambridge East are being accelerated along with densification at Cambridge Science and Business parks. We note there is also new impetus for development north of A14 with the Chivers/Trinity College and Ely Diocese proposals.

Rectory Farm has not been allocated in the Reg 19 Plan. However, Caius is of the view that Rectory Farm could form part of major mixed use expansion north of the A14 and that there are exceptional circumstances for its release from the green belt and allocation in the plan on the following grounds:

1. NPPF 2024 (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"* ***(our bold italics).***
2. For reasons set out above (and in attached supporting Reg 18 submission) we consider the busway as raised above the surrounding low lying topography will materially change the landscape and green belt characteristics and create a new boundary.
3. NPPF 148 states…. "*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…".* In terms of sustainability*:*
    - 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;
    - It is in a sustainable location, adjacent to the A10. It is situated within a major growth corridor, with North East Cambridge and Science Park to the South and Waterbeach New Settlement to the north;
    - It is adjacent to Milton Park & Ride and also benefits from very good cycle access to Cambridge City;
    - 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; and
    - 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.
4. Reg 19 Policy S/JH: New jobs and homes is to meet objectively assessed needs in Greater Cambridge over the period 2024-2045. Caius proposals would help meet those needs within the plan period on what it considers is a suitable, available and deliverable site. It would help build in additional flexibility and headroom to the councils employment/housing need figures which may be needed, particularly given the rapid growth seen in Greater Cambridge, the rise of

new typologies such as mid-tech, the reduced potential at North East Cambridge (where Rectory Farm could help compliment and meet those needs locally in what is a major north/south growth corridor), and where UK government is promoting further growth and productivity gains.

5. In this context a first phase of mixed use development (circa 40,000 sqm employment and circa 1000 dwellings) i.e. that which would lie between the busway and A10 corridor, could proceed before Waterbeach to Cambridge busway is completed, early in the plan period.
6. Policy S/DS: Development Strategy considers in meeting general needs there is no requirement to release green belt land, but it does find exceptional circumstances for specialist needs. In context of NPPF 146, we consider the above factors represent exceptional circumstances for the release or part release of Rectory Farm from the green belt .
7. There is in any event a strong case for considering the site as grey belt, as it does not make a strong contribution to the relevant NPPF Para 143 a), b), d) core Green Belt purposes, with the contribution further diminished by the introduction of the busway and the presence of the adjacent park and ride.
8. Caius therefore considers that by not releasing Rectory Farm from the green belt and allocating the site, the Reg 19 Plan is unsound in that:
    - It has not been **positively prepared** as it fails to allocate the site which would assist in meeting the objectively assessed needs and is suitable, available and deliverable.
    - is **not justified** as it fails to acknowledge that the introduction of the Waterbeach - Cambridge busway, which will materially change the landscape and green belt characteristics of the site, is an exceptional circumstance which justifies inclusion of this site within its site selection assessments.
    - It is **not consistent with national planning policy** as it fails to allocate land in a sustainable location close to existing and proposed transport hubs and does not recognise the exceptional circumstances that justify the proposed allocation of this site.

Please provide a 100 word summary of your representation.

Caius considers Rectory Farm should be released from the Green Belt and allocated for development in the GCLP. The proposed Waterbeach to Cambridge raised busway will bisect the land, urbanising the landscape forming a distinct new boundary line. An updated masterplan proposes 1,500 homes and up to 100,000 sqm of commercial space. Phase 1 between the A10 and raised busway route could deliver 1,000 homes 40,000 sqm of commercial floorspace before the busway is implemented in years 6 -15. Caius consider there are "exceptional circumstances" for Green Belt release. The site is in a highly sustainable location, given North East Cambridge has been paired back it would help meet local employment and housing needs in what is a major north south growth corridor, the busway creates both a new boundary line and will materially change the landscape and green belt characteristics of the site, and the site could in any event be considered "grey belt" land.

Section 4: Supporting Documents
If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

YES
Reg 18 Greater Cambridge Local Plan representation
Rectory Farm, Milton
Site Reference: 54906
ID: 115167

Section 5: Proposed Modifications
Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.
You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

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.

This could be promoted as a masterplan led “Area of Major Change” where the College would be keen to work with all relevant partners.

Additionally given the importance of the Waterbeach to Cambridge busway proposal and its impacts on landscape and green belt, the Plan should consider allocating a Phase 1 mixed use development, i.e. the land between the A10 and proposed busway to be delivered early in the plan period (6-15 years), with Phase 2 to follow at a later stage.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	YES

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Caius is a significant landowner thought Greater Cambridge. Its core educational estate is complimented by extensive agricultural, residential, and commercial land and property much of which has development potential. Caius wishes to directly express its views to the Inspector.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	YES
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	YES
Informed of adoption of the Local Plan	YES