Representations on behalf of LIH and Pigeon

Draft Greater Cambridge Local Plan – Regulation 19 Consultation

24th September 2026

Q230805

Report

Contents

1 Introduction 3
2 Cambridge South 5
3 Review of the dGCLP 8
4 Vision and policies 12
5 Summary 14

1 Introduction

These representations have been prepared by Quod on behalf of Land Improvement Holdings ('LIH') and Pigeon Land ('Pigeon') in response to the Regulation 19 consultation on the Draft Greater Cambridge Local Plan 2024-2045 ('the dGCLP'). They relate to development proposals known as Cambridge South.

1.1 LIH and Pigeon (collectively referred to as 'LIH/P') are jointly promoting land known as Cambridge South that is bound to the north by Addenbrooke's Road, to the west by the M11, to the east Cambridge Road, and to the south by the river Cam and the Cambridge railway line ('the Site'). A redline boundary plan of the Site is provided at **Annex 1**.

1.2 LIH/P have responded to the Call for Sites and Regulation 18 consultations previously held to highlight the opportunity that the development of Cambridge South represents in meeting the acute need for housing in Cambridge, and specifically to support the ongoing success of Cambridge Biomedical Campus as a nationally significant centre for healthcare innovation.

1.3 Government remains steadfast in its commitment to unlocking the full potential of Cambridge. Since the Regulation 18 consultation was carried out, government has held and responded to a consultation on establishing a centrally-led Greater Cambridge Development Corporation ('GCDC') to help achieve this. The GCDC was subsequently established on 23rd July 2026. Its remit is to achieve transformational economic growth by supporting infrastructure-led development to address the issues caused by a historic mismatch between employment growth and housing supply, as well as dealing with the underlying constraints to delivering strategic-scale development in Greater Cambridge.

1.4 The exceptional circumstances justifying the Site's release from the Green Belt have been made clear in previous submissions. Despite this and without reasonable justification, the Site remains unallocated in this version of the dGCLP. LIH/P's commitment to realising the Site's benefits remains undiminished, however, and engagement has started with GCDC in advance of a planning application being made to them next year once they are expected to receive their planning powers, with a view to delivering the type of nationally significant growth that government is targeting.

1.5 It is recognised that having a settled GCLP would be a helpful baseline from which a further spatial plan can be prepared, planning the greater and accelerated growth which is government policy. However, LIH/P recognise the difficulties which GCSP face in seeking to promote a plan which meets only business as usual minimum development requirements at a time when government has made clear that greater levels of growth are necessary.

1.6 In this context, LIH/P recognise that

- this is not the plan which will respond to the government's greater growth objectives for Cambridge;
- that plan will be developed by the Mayor of the Combined Authority and/or the GCDC working jointly and its publication is not expected until after the adoption of the GCLP;

- nevertheless, the appointment of the GCDC and the publication of clear national policy statements makes clear that this situation is not intended to slow growth or prevent the development of strategic sites;

- for that reason the government is expected to grant development management responsibility and powers to the GCDC to enable the determination of strategic applications on sites which are “beyond the local plan”, such as Cambridge South.

1.7 These representations are framed in this context. We recognise that GCSP has deliberately decided to plan without meeting the government's growth objectives and, for example, to commit this plan to oppose any further Green Belt release.

1.8 That represents a challenge for the Local Plan Inspectors and it will be a matter for those Inspectors to determine how they wish to address the plan.

1.9 In these circumstances, LIH/P will pursue the development of the site principally through a planning application to the GCDC rather than through representations to this plan. Nevertheless, LIH/P wish GCSP and the Local Plan Inspectors to be fully aware of the Cambridge South proposals in case either party determine that this plan should in fact seek to meet government’s objectives.

1.10 For the reasons summarised in these and previous submissions, the development of Cambridge South has very substantial planning merit. In particular, development of scale, sustainably located and tailored to meet the pressing housing needs of the Cambridge Biomedical Campus (including Addenbrookes and other hospitals at the Campus) is urgently needed in the national interest.

1.11 If it is determined that this Local Plan should plan to meet these needs and other national growth objectives, Cambridge South should be allocated for that purpose.

1.12 If submitted for examination, it is against the December 2024 version of the NPPF that the dGCLP will be examined. All references in these representations to the NPPF are therefore to the December 2024 version, unless clearly stated otherwise.

2 Cambridge South

2.1 The Site has a long promotion history in which the proposals for Cambridge South and the very considerable planning merits of the Site have been set out in detail. That most recently includes responding to the Call for Sites exercise held in March 2025 and then to the Regulation 18 consultation that finished in January 2026.

2.2 The detail and content of those representations are therefore not repeated other than in summary form below.

The Cambridge success story

2.3 Cambridge is rightly regarded around the world as a premier hub for innovation and life sciences. It attracts researchers, academics, companies and professional talent from around the world to create a city-wide innovation district that has birthed dozens of unicorn companies and is now Europe's largest technology cluster.

2.4 This success is of national significance and importance. Greater Cambridge is one just a few places that are net contributors to the state. Growing Cambridge's economy therefore means growing the UK's economy.

2.5 The Cambridge Biomedical Campus ('CBC') embodies the Cambridge Phenomenon. It brings together internationally renowned research laboratories and regional healthcare institutions and combines them with the headquarters of footloose life-science and pharmaceutical companies such as Abcam and AstraZeneca. It is the most significant employment hub in the city, home to 22,000 workers and attracting tens of thousands more visitors each day.

2.6 Its success is embodied in its dozens of Nobel Prize winners and the healthcare advancements that it has fostered which include genomic modelling and rare disease diagnosis, heart and lung transplant techniques and targeted cancer therapies.

2.7 In economic terms the Campus's success and contribution is dazzling: as a global leader in healthcare R&D, in 2021 alone CBC supported an aggregate economic footprint of £2.2 billion worth of Gross Value Added to the UK economy and a collaborative operating income of £1.9 billion, as well as contributing £291million to the Exchequer through tax revenues.

2.8 The current day success of CBC is rightly supported by the dGCLP, which allocates land for the comprehensive expansion and regeneration of CBC, delivering over 1,000,000sqm of new healthcare and commercial R&D floorspace and increasing the number of daily employees to over 40,000 within the plan period. That is in addition to land already allocated for that purpose, which is in the process of being built out and which has attracted GSK to move their UK headquarters to the Campus.

The complication

2.9 Cambridge's success in achieving economic growth and innovation has not been matched by its housing supply – something the dGCLP perpetuates. The result is a severely pressurised housing market in which inadequate supply reduces choice, drives up prices and forces people to either stretch their budgets or to live further from the places where they grew up or work.

2.10 This diminishes Cambridge's ability to continue attracting the world's top talent and compete on the world stage with places like Boston, Silicon Valley, Seoul and Beijing. More immediately and tangibly, however, it impacts local people's finances, affects their quality of life and harms the environment through stretched commuting patterns.

2.11 This is perhaps most evident at CBC. The Housing Study prepared by CBC Ltd summarises the issues facing the Campus:

> *"The Campus itself provides little in the way of housing or accommodation, with that provision limited to several hundred rooms and flats provided by Sanctuary Housing as key-worker accommodation for NHS employees and student accommodation for those studying/practicing at the Campus. Yet housing is a big issue for CBC and the scale of workforce creates a significant interaction with the wider housing market that the Campus sits within. Anecdotally, housing and its availability and affordability in Cambridge is creating issues for CBC occupiers, with CBC's Vision 2050, identifying: "CBC is a major employment site, with key workers, scientists, and business people commuting every day. Many travel long distances and are squeezed out of the city by high housing costs. These pressures can have detrimental effects on the institutions, who struggle to retain key staff, and communities: pushing up house prices, creating congestion and generally impacting the quality of life of local people.""*[1]

2.12 That 'anecdotal' evidence is borne out in evidence produced by Cambridge University Hospitals, which details that 50% of their staff earn less than £30,000 and over 80% earn less than £50k per year. The cost of housing in Greater Cambridge then creates an affordability gap, with over 50% of survey respondents considering that they are either stretched or very stretched financially.[2] This is further aggravated by the fact that staff have to search for housing far from the Campus, often in less sustainably accessed locations wherefrom the only practical transport mode is the private car. Well over a third of Campus staff travel more than hour on their commute, with nearly 70% of that contingent being either moderately or very dissatisfied with their commute. It also puts a strain on the highway network, with key junctions currently operating at or near capacity.

2.13 That is the current situation. The dGCLP has the effect of planning to significantly expand the CBC such that the Campus's current workforce of 22,000 is expected to grow to over 40,000 within the plan period.

2.14 On the basis of this planned growth, the CBC Ltd Housing Study identifies a need for 14,000-16,000 new affordable homes to support the current and future needs of the Campus's workforce.[3] However, the dGCLP does not plan for anything approaching the type or scale of housing to support the target jobs growth. Rather, the draft policy for CBC's expansion allows it to deliver only 1,000 homes. CBC Ltd is clear: *"this would leave on off-site need for affordable housing of 14,900 units required in the 25 years up to 2050… It is accepted that even with an expansion in accommodation, the plans for accommodation on campus will be insufficient to address the full extent of affordable housing needs for staff at CUH and across the campus."*[4]

---

[1] CBC Ltd, Cambridge Biomedical Campus: Housing Study 2024. Page 21.
[2] Cambridge University Hospitals NHS Foundation Trust, Delivery Affordable Housing for Hospital Workers: The Case for Change.
[3] Housing Report published by CBC Ltd in 2024
[4] Cambridge Biomedical Campus On Site Housing paper. CBC Ltd (April 2025). Paragraphs 6.2 and 6.5.

2.15 Government is alert to the need both to support the expansion of the Biomedical Campus and to achieve a scale of housing delivery that is commensurate to those expansion plans:

> *"In addition, the Government is satisfied that the national importance of the Greater Cambridge life sciences sector is sufficient to prompt, in principle, the early expansion and coherent delivery of this foremost UK life sciences cluster. In particular, the Government is satisfied that the imperative to support this key sector provides sufficient justification for immediate collaboration between key stakeholders on development proposals coming forward ahead of the emerging Local Plan, to address the coherent enhancement, intensification and expansion of the Cambridge Biomedical Campus adjacent to Addenbrooke's Hospital.*
>
> *One of the first priorities of the new Growth Company will be to support immediate collaboration between key stakeholders at the Cambridge Biomedical Campus.* ***The Growth Company will also help to address any barriers to the early expansion and coherent enhancement of the campus, including through the accelerated delivery of any associated housing development and the provision of appropriate levels of affordable housing to meet the housing needs of those working at the campus."***[5]

The solution: Cambridge South

2.16 Cambridge South has the potential to deliver up to 4,000 new homes on the doorstep of the Biomedical Campus, supporting the growth of this nationally significant asset and improving the wellbeing of its workforce. It is the premier site for achieving cross cutting benefits by delivering housing in a location where commuting trips can be made sustainably and that can be targeted directly at meeting the needs of the Campus's workforce.

2.17 There are already thousands of daily trips associated with the Biomedical Campus and more are coming. Vehicular commuting journeys that would otherwise end up on the transport network and be dispersed afar can instead be removed from the network and be made from Cambridge South by active travel and sustainable means instead.

2.18 The housing – 50% of which would be affordable - would be set within a landscape-led masterplan that creates a new sustainable community, supported by high quality social, transport, and green and blue infrastructure. A range of sizes, typologies and tenures would be provided to ensure that the diverse needs of the Campus's workforce are catered for. It would open up what is currently private land as publicly accessible green space, as well as providing further benefits in improving links between the city and its rural edge, redefining the edge of the city into a high quality gateway, delivering a net gain in biodiversity and providing community and leisure facilities that can be enjoyed by all.

2.19 The case for Cambridge South is clear and yet the dGCLP overlooks the opportunity to allocate the Site and deliver on the plan's stated vision of delivering homes where they can support jobs growth, reduce reliance on new transport infrastructure, and in doing so achieve sustainable development that is gentle on the environment.

2.20 The primary (indeed only) reason put forward by GCSP for not allocating the Site is its location in the Green Belt. For the reasons set out in the next section, that conclusion has been reached in a manner that is not consistent with national policy.

[5] Michael Gove MP written ministerial statement: Cambridge Delivery Group Update. 8th May 2024.

3 Review of the dGCLP

3.1 Government has clearly and repeatedly stated that it considers supporting the growth of Cambridge and its economy to be a national priority. Such statements have come in the form of written ministerial statements, publications and considerable funding for infrastructure aimed at unlocking development. Mayor Bristow's Local Growth Plan matches this ambition, seeking to double the size of the Combined Authority's economy with a stretch target to triple it.

3.2 Perhaps the clearest and most consequential action that government has taken is the establishment of the Greater Cambridge Development Corporation.

3.3 As the consultation document states:

> *"The proposed Development Corporation would have a clear remit to deliver lasting benefits for both existing and future communities. It would do so by accelerating economic growth; coordinating enabling infrastructure; leveraging public and private investment; delivering environmentally sustainable outcomes; and reducing inequality through affordable housing and skills development. Building upon the exceptional quality of place seen across much of Greater Cambridge, the objective of the Development Corporation would be to deliver exemplary development in the form of high-quality, well-designed, attractive, and sustainable homes and neighbourhoods."*

3.4 In this context, the dGCLP seeks to achieve only what is expected of any other authority area across the country, which is to meet its housing requirement as derived from the standard method for calculating objectively assessed needs. Even when taking this approach, the NPPF is clear that such objectively assessed needs should be met *"as a minimum"*[6] and yet the development strategy treats it as a limit, stating: "*we consider there to be no exceptional circumstances for releasing land from the Green Belt to meet development needs as a matter of principle."*[7] Requirements for wider growth to meet government objectives are not addressed at all.

3.5 LIH/P's Regulation 18 submissions dealt with this point and reference is made back to those submissions, so it is sufficient to state here that such a conclusion seems all the more remarkable in light of the strength of up to date government support for significant growth in and around Cambridge.

3.6 The decision to not more properly consider Green Belt land is contrary to the dGCLP's own evidence base which highlights that sites on the edge of Cambridge frequently perform very well in terms of sustainability. The Sustainability Appraisal ('SA') prepared by LUC states that *"development at [locations around Cambridge within the Green Belt] is likely to have good access to existing services, facilities and employment within Cambridge, therefore minimising the need to travel, as well as good access to sustainable transport links. This will help to minimise the increase in carbon emissions arising from new development."*[8]

3.7 The reference to good access to employment should not be overlooked. LIH/P's Regulation 18 submissions highlighted the growing imbalance between target employment growth and

[6] NPPF 2024, paragraph 11(b).
[7] Development Strategy (2026), paragraph 3.18.
[8] Draft Greater Cambridge Local Plan: Sustainability Appraisal (2026). LUC. Paragraph 4.108.

the planned housing delivery to support it. There has been no change to the target number of homes nor to the target level of jobs growth in this Regulation 19 version of the dGCLP and therefore that imbalance remains, which relies on more in-commuting than alternative strategies would by delivering more homes closer to where they are needed to support job growth.[9] The resulting reduction in homes per job and the spatial strategy for delivering those homes in locations further from major employment hubs will result in an increasing separation between where people live and where the new jobs are and are being created.

3.8 This is in the context of Cambridge having the largest Travel to Work Area by geographic area of any city in England and Wales, stretching north of Ely and as far south as Harlow. CBC Ltd have been clear on the impacts this has on the ability off institutions to attract and retain staff, and on the quality of life of workers, which includes hospital key workers who are frequently less able to access affordable housing in locations relatively proximate to where they work and therefore have to have longer, costlier commutes, compounding their affordability pressures.

3.9 The Draft Interim Greater Cambridge Transport Strategy sets out the case for change in this regard:

"The case for change is that Greater Cambridge cannot continue to rely on patterns of travel and investment that increase congestion, car dependency and environmental pressure. A different approach is required: one that begins with the desired future outcomes for people and place, aligns transport and land use, and then identifies the combination of interventions needed to achieve those outcomes."[10]

3.10 That case for change echoes paragraph 110 of the NPPF, which states that *"The planning system should actively manage patterns of growth in support of* [promoting sustainable transport]*. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health."* The dGCLP however misaligns the spatial strategy for jobs growth and housing by setting itself against Green Belt release to positively plan for growth.

3.11 Importantly, experience shows that sustainable urban extensions of Cambridge deliver. The need for reliable allocations that can deliver housing quickly should be plain from the experience of North East Cambridge. Great Kneighton, Trumpington and Clay Farm are all demonstrations that this be achieved through targeted, strategic release of edge of Cambridge Green Belt sites. Instead, the plan allocates sites beyond the Green Belt that it recognises are highly dependent on new transport infrastructure delivery to make them sustainable. The Local Plan Inspectors will therefore need to be reassured that that infrastructure is deliverable and will not burden developments such that they cannot contribute to other priorities such as affordable housing and other types of social, green and blue infrastructure.

3.12 Cambridge South stands out in this regard. It is in a location where the infrastructure already exists but perhaps more importantly its location and relationship with CBC reduces the need for additional infrastructure in the first place.

[9] Employment and Housing Evidence Update 2025. Iceni. Paragraph 4.31.
[10] Draft Interim Greater Cambridge Transport Strategy. Steer (June 2026). Paragraph 2.20.

3.13 The plan's principled position against Green Belt release is further complicated by the approach taken to assessing whether there are grey belt opportunities to deliver growth.

3.14 The *Greater Cambridge Green Belt Assessment: Review following changes to National Policy and Guidance* ('the GCGBA Review') was issued alongside the dGCLP and has the purpose of updating the last GCGBA that was published in August 2021. The document's stated intention is to reflect the introduction of the concept of 'grey belt' to the NPPF. The NPPF defines in Annex B what constitutes grey belt land: which is Green Belt land that does not strongly contribute to any of the Green Belt purposes (a), (b), or (d) as set out in paragraph 143 of the NPPF (referred to as 'the NPPF Purposes').

3.15 PPG then supplements the NPPF by providing further clear guidance on how potential grey belt land should be assessed, including indicative criteria for what would represent a strong, moderate or limited contribution to each of the three purposes.[11]

3.16 The GCGBA Review has not, however, been prepared in accordance with the NPPF's definition of grey belt nor with the PPG on how grey belt land should be assessed. Rather, it retrofits the previous assessment with the current national policy in a manner that is less than convincing. Section 3 of the GCGBA Review sets out why the continued use of the Cambridge Green Belt purposes is a suitable *"local application"* of current national policy:

> *3.14 There are clearly similarities between NPPF Purpose A and Cambridge Purpose 1 in that the former is intended to prevent urban sprawl whilst the latter is intended to preserve the city's compactness, so land around Cambridge could be considered to contribute to Purpose A. NPPF Purpose B can be likened to Cambridge Purpose 3 in that it considers gaps between settlements, but is not directly applicable as the gaps in the Cambridge Green Belt are associated with villages rather than the separation of towns. Almost all open land can be considered part of the countryside, and so will contribute to NPPF Purpose C. However, the city only has a Green Belt because of its historic character, so assessing the Cambridge purposes as a locally-specific application of NPPF Purpose D provides a more helpful structure for the analysis of variations in the role of Green Belt land than an assessment against the other NPPF purposes.*

3.17 Paragraph 3.15 of the report then continues to state *"there is no reason to question the use of the Cambridge Green Belt purposes as a local application of NPPF Purpose D."* Clearly there is reason to question the use of the Cambridge Green Belt Purposes rather than those required by national policy.

3.18 Paragraph 3.14 of the GCGBA Review is illustrative of the misguided approach. NPPF Purpose A is not *"intended to prevent urban sprawl"* as the paragraph claims, rather it is to *"check the unrestricted sprawl of large built up areas."* This may be a subtle difference but it is an important one nonetheless. It does not follow, for instance, that land on the edge of Cambridge necessarily makes a strong contribution to Purpose A as the GCGBA Review seems to imply. Paragraph 3.14 then acknowledges the different roles that NPPF Purpose B and Cambridge Green Belt Purpose 3 play, but does not appear to try to resolve those differences. Rather, the Review conflates all three CBG Purposes with NPPF Purpose D, which has the unfortunate result of expanding NPPF Purpose D beyond its original meaning and beyond the guidance for considering contributions to Purpose D set out the in NPPF. For instance, CGB Purpose c refers to preventing *"communities in the environs of Cambridge*

[11] PPG Paragraph: 005 Reference ID: 64-005-20250225

from merging into one another and with the city" but the PPG is explicit that the grey belt test is about preventing the merging of towns and not villages.

3.19 As part of its representations to the Regulation 18 consultation, LIH/P submitted a Green Belt appraisal of the Site that found that the Site does not make a strong contribution to any of NPPF Purposes (a), (b) or (d). The Site therefore qualifies as grey belt, a status that would not be disengaged by the application of any footnote 7 policies. The Site would therefore represent sensible grey belt development that can deliver on the NPPF's Golden Rules and provide for much needed housing to support the major employment hub in the region.

3.20 LIH/P's review is considered in the document Greater Cambridge Green Belt Assessment - Response to Comments from Site Submissions Update and Draft Local Plan Consultation (2026). That Response to Comments document, however, perpetuates the misguided approach from the GCGBA Review by considering the Site against the Cambridge Green Belt purposes, finding that the Site contributes to CGB Purposes 1 and 3 (although it is not clear if that contribution is 'strong').

3.21 In other words, it does not consider the Site's grey belt credentials in accordance with national policy and guidance as LIH/P's own assessment does. Two different conclusions were reached because two different methodologies were used. LIH/P's approach was done in accordance with the NPPF and PPG; GCSP's was not.

3.22 The practical consequences of this feed through to the spatial strategy underpinning the dGCLP. Appendix 5 of the Development Strategy Topic Paper states that a reconsideration of the spatial strategy has been carried out since the Regulation 18 consultation. In relation to sites in the Green Belt, that document states *"we reviewed the case for exceptional circumstances to release land from the Green Belt both to meet general development needs and to meet site specific circumstances, and having done so – including based on updated Green Belt evidence - we reconfirmed the conclusions identified at draft plan stage."*[12]

3.23 Clearly, the dGCLP is deliberately not seeking to allocate a site such as Cambridge South due to its location in the Green Belt and is limiting itself to the minimum levels of housing delivery to do so. If it were genuinely open to that prospect then the Local Plan Inspectors should be aware that conclusions reached as to its suitability and planning benefits have been erroneously reached.

3.24 This in turn puts into sharper focus the role of the Greater Cambridge Development Corporation in supporting plans and projects that are able to deliver the type of *"nationally significant growth at the pace and scale required"* to meet government's ambitions of boosting the Cambridgeshire and UK economy. The government is clear that *"adoption of the draft* [Greater Cambridge] *local plan should not limit or delay future ambition for growth and, subject to its adoption, successor plans would be expected to build positively on the draft local plan's foundations to support continued growth."*[13]

[12] Development Strategy Topic Paper Appendix 5: Alternative approaches considered for jobs opportunities. Paragraph 7.7.

[13] Greater Cambridge Development Corporation: Analysis of consultation responses and next steps. HM Government (3rd June 2026). Available here: https://www.gov.uk/government/consultations/establishing-a-development-corporation-in-greater-cambridge/outcome/greater-cambridge-development-corporation-analysis-of-consultation-responses-and-next-steps

4 Vision and policies

4.1 This section sets out representations in relation to specific aspects of the vision and the draft development management policies contained in the dGCLP.

4.2 LIH/P's Regulation 18 made suggested changes to certain of those policies. LIH/P are glad that its recommendations in relation to Policy H/BR have been taken on board. Points that have not been addressed are not repeated but are reiterated. This is particularly in relation to the need for a better balance between homes and jobs (as set out in the section above) and for amendments to be made to the Vision to ensure it is positively prepared and is at least complementary to the objectives for further growth that the Development Corporation will seek to deliver.

4.3 The key change since the Regulation 18 consultation has been the publication of the updated NPPF (August 2026). The dGCLP is being examined against the December 2024 NPPF but its policies will be implemented and considered against the August 2026 NPPF. This is relevant because paragraph 2 of Annex A of the 2026 NPPF directs that development plan policies that are materially inconsistent with decision-making policies in this Framework should be given very limited weight. For the dGCLP to be effective, therefore, its policies should not be materially inconsistent with the decision making policies in the 2026 NPPF.

Policy S/DS: Delivery Strategy

4.4 Policy S/DS refers to *"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…"* For the reasons set out in Section 3 of these representations, the ongoing use of the Cambridge Green Belt purposes is materially inconsistent with the approach of the 2026 NPPF, which is to set out in Policy GB7 instances where the development of land within the Green Belt is not inappropriate. This is further evidence that the plan is taking a 'business as usual' approach to growth rather than seeking to plan for the ambitions set by government and Mayor Bristow through the Local Growth Plan.

Policy S/GB: Cambridge Green Belt

4.5 The same applies to Policy S/GB, which whilst it refers to approving new development in the Green Belt in accordance with the National Planning Policy Framework, also refers to having regard to the Cambridge Green Belt purposes. This is therefore both not in accordance with paragraphs 154 and 155 of the 2024 NPPF and is materially inconsistent with Policy GB7 of the 2026 NPPF.

Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

4.6 As with the Regulation 18 response, the inclusion of an allocation for the expansion and regeneration of CBC is nationally important and strongly supported. Part 9(c) of the draft policy continues to allow the delivery of approximately 1,000 additional homes on the campus. It is notable that consultation responses made by Cambridgeshire County Council and Prologis recommended that 1,300 homes be allowed for to give greater flexibility on the type of housing that is likely to be delivered on the Campus, which would tend towards smaller and sharer-type units. It is also noted that the Cambridge Biomedical Campus On Site Housing (2025) paper prepared by CBC Ltd recognises that even with the onsite delivery of 1,100 affordable homes *"this would leave on off-site need for affordable housing of 14,900*

units required in the 25 years up to 2050… It is accepted that even with an expansion in accommodation, the plans for accommodation on campus will be insufficient to address the full extent of affordable housing needs for staff at CUH and across the campus."[14]

4.7 It is clear that there is a significant residual need for housing to support the Campus that Policy S/CDC alone does not meet.

Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

4.8 Previous submissions made by LIH/P highlighted a lack of clarity as to the expectations for the Grange Farm site to contribute towards the delivery of the Cambridge South East Transport ('CSET') scheme, including an extension of it to serve the site.

4.9 The dGCLP is now supported by an updated Infrastructure Delivery Plan ('IDP') which notes that CSET has a cost of £161m and which "funded" through the GCP City Deal. The updated IDP now has an Appendix C which includes Site Specific Infrastructure Delivery Proformas. For Grange Farm, the only item relating to CSET is the delivery of the CSET Busway extension to Grange Farm (£30m), which it notes would be funded partly through the GCP City Deal and partly through section 106 contributions from the Grange Farm development. It appears that the business case for CSET does not rely on contributions from emerging development. Should that change, it is expected that Grange Farm would make significant contributions towards it given the heavy reliance that site has on the delivery of CSET as the Grange Farm site relies on CSET to make it a sustainable location, and without which it would be heavily reliant on travel by car.

Policy H/AH: Affordable Housing

4.10 Policy H/AH states that major development proposals will provide affordable housing in accordance with Table 6 of the dGCLP, which then sets out the mix of tenures within the affordable housing component of scheme. The lack of flexibility is arguably at odds with both 2024 NPPF paragraph 66 and with 2026 NPPF Policy HO8, both of which recognise the role that location plays in determining what the appropriate tenure mix may be. This is especially important in the context of the need for housing to support key workers and Cambridge's employment clusters, which often have bespoke needs that are not best met through a generalised mix and tenure requirement.

[14] Cambridge Biomedical Campus On Site Housing paper. CBC Ltd (April 2025). Paragraphs 6.2 and 6.5.

5 Summary

5.1 Cambridge South represents a nationally important opportunity to respond positively to the relationship between housing need, employment growth and infrastructure-led placemaking. The Site can deliver up to 4,000 new homes, including 50% affordable housing, immediately adjacent to the Cambridge Biomedical Campus. In doing so, it would support the continued success of a internationally significant healthcare, research and life sciences cluster, provide homes close to where need is generated, reduce reliance on longer-distance commuting, and create a new landscape-led community with social, transport, green and blue infrastructure alongside wider biodiversity, recreation and public access benefits.

5.2 Delivering housing on Cambridge South would be directly consistent with the 2024 Written Ministerial Statement, which calls for the accelerated delivery of housing associated with the Campus and to meet the needs of the Campus's staff. The Site is unique in its scale and suitability to achieve this. The WMS is a clear statement of government policy that the dGCLP has not taken into account.

5.3 The dGCLP continues to plan only for Greater Cambridge's standard method housing need, notwithstanding the scale of planned and supported employment growth, the acute affordability pressures associated with that growth, and the Government's clear ambition for Cambridge to deliver nationally significant economic growth. These representations therefore recognise the deliberate limitations of the plan, which could only be resolved if a fundamentally different approach was taken.

5.4 If such a different approach is taken, either by GCSP or by the plan's Inspectors, Cambridge South should be allocated and these representations set out the importance of the Cambridge South proposals in that context.

5.5 The representations draw attention to a number of failings in the plan's approach which would also be highly relevant in that context.

5.6 However, LIH/P recognise that it may be pragmatic for the plan to proceed to adoption to provide a baseline from which the Greater Cambridge Development Corporation can plan for further growth at the pace and scale required to meet the Government's ambitions for Cambridge.

5.7 The purpose of these representations is therefore to establish the importance of the Cambridge South development in the event that the plan takes a different course but to explain that LIH/P recognise the deliberate limitations of the plan, which is why the proposals for Cambridge South will be pursued through a planning application to the GCDC to determine outside the confines of the plan.

© Quod 2026