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Greater Cambridgeshire Local Plans Team
South Cambridgeshire Hall,
Cambourne Business Park,
Cambourne,
Cambridge,
CB23 6EA

21st September 2026

Dear Policy Team,

Draft Greater Cambridge Local Plan for Consultation – Regulation 19

Representations on behalf of LGH Hotels Management Ltd

CBRE is instructed by LGH Hotels Management Limited in respect of their land interest in Cambridgeshire referred to in the Draft Local Plan as 'Cambridge Bar Hill Hotel Bar Hill CB23 8EU' (Site ID: 115190/59381).

As the site is known to the Council through the Call for Sites submission we have not within this response sought to re-introduce the location of the site and its accessibility. It is relevant to note that part of the site is brownfield land. Whilst the remainder of the site is located within the Green Belt, part of this located within the defined settlement of Bar Hill (as shown on the Proposals Map).

The site currently has the status as an omission site in the Draft Local Plan but has been favorably assessed through the evidence base with the conclusion that *"Development of the site has some potential policy constraints, but these could be overcome through the planning application process."* It is positive that through the last Call for Sites submission the work undertaken by JTP has been positively received and it is acknowledged that the site could be appropriately accommodated within its landscape setting. The principal reason for the site not being taken forward is the site's location with the Green Belt. We understand that no residential sites are proposed to be released from the Green Belt with only the Bio-Medical Campus development put forward as a suggested Green Belt release.

Our principal response to the Draft Greater Cambridge Local Plan Consultation is that the proposed future delivery of housing is contingent on a handful of very large, strategic allocations. As for the reasons set out below, we consider that the allocation of Bar Hill for circa 500 – 700 homes would help to diversify the sites that the Council is relying on to meet its development needs and to help bring much needed contingency into the Local Plan to ensure that it is resilient and responsive should delivery on any of the strategic site/sites stall. As articulated in our previous Call for Sites submission, we consider that there is a strong argument for the site to be classified as Grey Belt.

Our response to the Draft Greater Cambridge Local Plan Consultation is structured as follows:

1. Jobs and Homes
2. Market Absorption Rates
3. Reliance on Strategic Sites

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Jobs and Homes

The Draft Local Plan states that *"Our development strategy aims to direct development to where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live."*

Such an approach and ambition is consistent with Paragraph 110 of the NPPF (2024) which states that:

> *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*

We note that the Draft Local Plan includes a significant allocation Land north of A1307, Bar Hill (Slate Hall Farm). This includes approximately 220,000 sqm of employment floorspace. This is located opposite the site. Whilst we do not object to the allocation in principle and understand the strategic drivers for the site to be located where it is, given the Council's decision to allocate this site for development there is a missed opportunity to allocate housing land for development at Bar Hill to provide homes in close proximity to major centre of employment, therein helping to manage more effective patterns of development sustainably.

Market Absorption Rates

Choices around the spatial distribution of development is relevant to considerations of market absorption. The Cambridge Housing Delivery Study Addendum (October 2025) in respect of supporting a more dispersed housing option states that *"providing development in the villages (alongside urban extensions and new settlements) will provide a wider choice of housing in the market for people in terms of size and location and will increase the market absorption rate."* We understand that for the purpose of the Council's assessment Bar Hill is treated as a village.

Paragraph 2.104 of the same document continues to note that *"Updated national planning policy should further support windfall brownfield development within existing settlements, and new 2024 NPPF policy support for greater levels of affordable housing in the Green Belt and grey belt and support for mixed tenure housing developments* ***have the potential to improve market absorption rates compared to when the 2021 HDS was published****."*

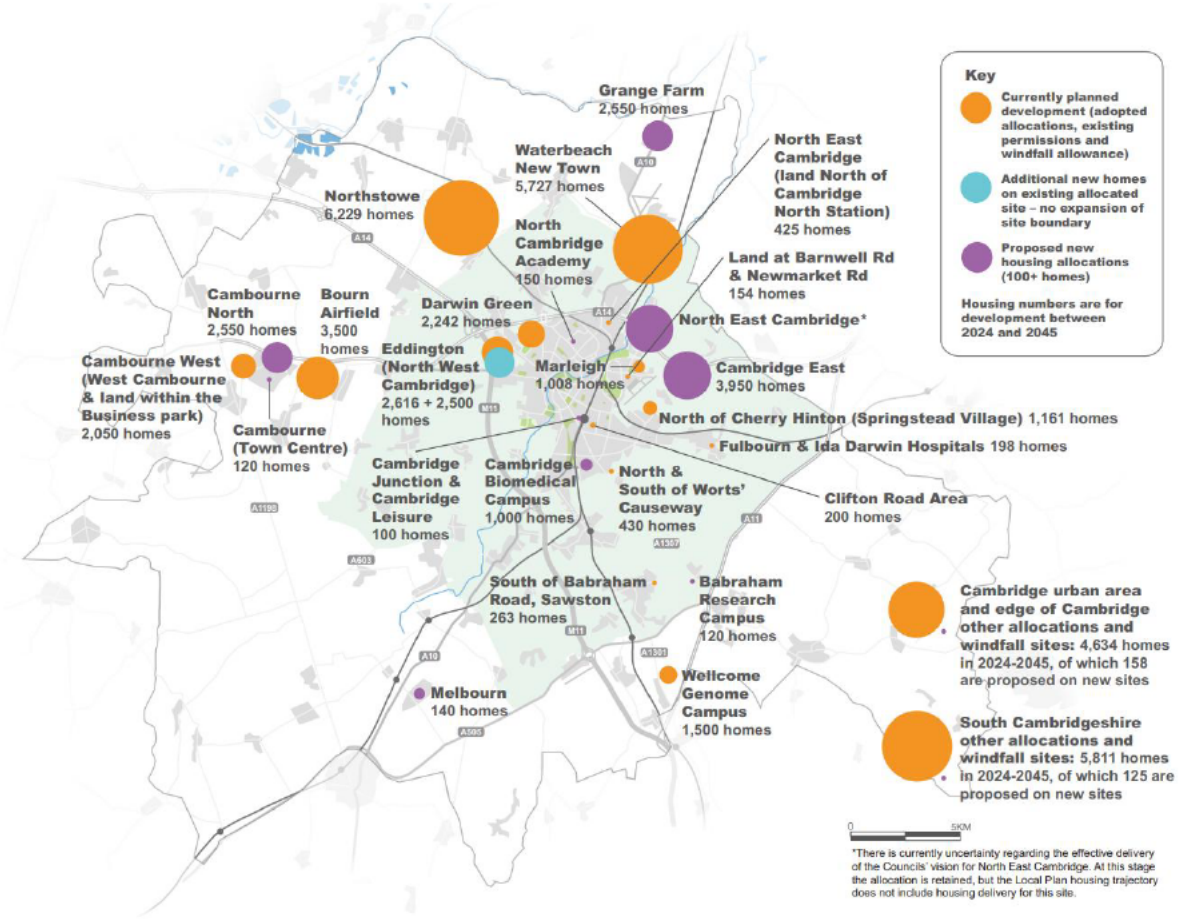
It is unclear how this is factored into the Sustainability Assessment when assessing different strategic options. The Housing Delivery Study Addendum (October 2025) is clear that promoting development in locations such as Bar Hill as part of a suite of site of locations would have the benefit of improving market absorption rates. The Draft Plan's reliance on a handful of new, strategic sites (see further detail below) is a potential risk to ensuring that housing completions occur at the rate needed in order to meet housing need. We are of the view that sites such as Bar Hill need to be allocated in the plan to ensure that there is a robust and diverse local housing market which can support the level of housing completions required.

Reliance on Strategic Sites/ Sustainability Assessment of Mid-Sized Sites

The Draft Local Plan notes that an additional 10,330 homes are required to meet the housing need figure of 48,195 homes (37,865 is made up of committed supply, allocations and permissions).

The Draft Local Plan states that land has been identified within New Sites that totals 13,463 (circa 3,100 over the current shortfall). It is noteworthy that a substantial proportion of the 13,463 is comprised of large strategic allocations. These are set out graphically below but can be summarised as follows:

- Cambridge East – 3,950
- Eddington – 2,500
- Cambridge Biomedical Campus – 1,000
- Cambourne North – 2,550
- Grange Farm – 2,550



Of the 13,463 required, 12,550 (or 93%) is made up on the five sites above. There is thus significant reliance upon these sites delivering on time in order to meet the proposed delivery. Larger sites typically have greater infrastructure requirements. This is unlike Bar Hill which as an extension to an existing settlement can be

delivered more expediently. The delivery of significant development at a village location can also help in providing the critical mass that is needed to ensure that they themselves can become more sustainable (as the additional population helps in sustaining and improving the viability of existing services). The allocation of Bar Hill (as an already established location) could help to mitigate the market absorption concerns mentioned previous.

The Sustainability Appraisal at 4.26 also notes that *"larger developments could result in a lower level of affordable housing provision due to greater costs to deliver additional infrastructure, but this may be offset overall by smaller sites coming forward within the other sources of supply in this option."* To this end, there is no real acknowledgement in the Sustainability Appraisal as to the role that the Golden Rules (notably the provision of 50% affordable housing) would have as an assessed alternative. Through the Sustainability Appraisal scoring development in the Green Belt is marked as lower scoring as it is not considered as being an "efficient use of land." We would question if such an assessment criteria appropriately reflects where national Green Belt policy has moved to, notably Grey Belt. It would be appropriate for the Sustainability Appraisal to distinguish between options that would involve Green Belt vs those that would involve the use of Grey Belt.

The Sustainability Appraisal notes the potential concerns around the delivery of Cambridge East with the potential uncertainty of Marshalls relocation[1]. It is also noted that any delay to the phasing of East-West Rail and the new railway station at Cambourne could delay completions. This further reinforces the need for sites such as Bar Hill in order to ensure contingency in the supply of land moving forward.

The Sustainability Appraisal seems to "mark down" Green Belt sites on the edge of Cambridge (which we would assume Bar Hill could fall under) as *"as applications cannot be 'twin-tracked' alongside plan making due to the need to demonstrate very special circumstances for Green Belt release."* We are unaware of any provisions that would prevent this twin tracking taking place and have had experience in doing this with other local planning authorities. Linked to the previous point in respect of Grey Belt, there is a general lack of depth to the way in which the Sustainability Appraisal seeks to grapple with options that would involve development of the Grey Belt.

The Sustainability Appraisal states that *"In 2025, four further Strategic Spatial Options were identified by the Councils in response to the increased objectively assessed need for homes for the plan area, and to ensure fair testing of a Strategic Spatial Option not previously identified."* The Spatial Options assessed includes:

- **Spatial Option 9a**: 2025 growth option: Hybrid spatial strategy including new settlement, and expanding Cambourne.
- **Spatial Option 10a**: 2025 growth option: Hybrid spatial strategy including Edge of Cambridge: Green Belt, and expanding Cambourne.
- **Spatial Option 11a**: 2025 growth option: Hybrid spatial strategy including Expanding an existing market town: Royston, and a new settlement.

[1] https://www.bbc.co.uk/news/articles/c62l6gnvdyqo

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- **Spatial Option 11b**: 2025 growth option: Hybrid spatial strategy including Expanding an existing market town: Royston, and expanding Cambourne.

Reviewing the description at Paragraph 4.17 of the Sustainability Appraisal (2025) it is clear that relatively limited/no development in the villages is a constant across all four options. Whilst appreciating that it is not necessary for soundness for a Sustainability Appraisal to assess every single reasonable option, given the concerns mentioned in other aspects of the evidence base around market absorption rate associated with relying on larger, strategic developments as well as their delivery rates (due to reliance on infrastructure) an option assessing more mid-ranged size development (i.e. 200 – 700) would seem a reasonable alternative to assess.

For the reasons set out above, the site represents a highly sustainable and unconstrained location for housing delivery that should be prioritised in the spatial options to be assessed in the Greater Cambridgeshire Local Plan.

We would be grateful if the Policy Team could confirm receipt of this response and look forward to discussing it further in due course.

Yours sincerely,



Adam Kindred
Senior Director, CBRE Ltd

cc. Kevin Trudgeon – LGH Hotels Management Limited