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	NIAB Trust (c/o Agent)	Adam Davies
Organisation (where relevant)		Ceres Property
Job Title (where relevant)		
Address, including Post Code		Ceres Property The Old Hospital London Road Saffron Walden CB11 4ER
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	Policy S/JH, Policy S/DS
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	No (please refer to accompanying Consultation statement for details)

Sound	No (please refer to accompanying Consultation statement for details)

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.

Introduction

This representation on the Greater Cambridge Draft Local Plan (Proposed Submission Local Plan Regulation 19 Consultation) ('the DLP') is made on behalf of NIAB Trust in respect of Niab Park Farm Campus ('the Site').

Previous representations were made in relation to separate parts of the wider Niab Park Farm Campus Site to the earlier Regulation 18, Issues and Options and Call for Sites consultation stages, summarised as follows:

- Land East of Redgate Road, Girton (HELAA 40241)
- Land West of South Road (HELAA 40232)
- Land North-East of Villa Road, Impington (HELAA 40236)
- Barn 3, Park Farm (HELAA 200772)
- NIAB Park Farm (HEELA 208851)

This representation relates to all the above sites, which are now collectively referred to as the 'Niab Park Farm Campus'.

In accordance with the requirements of the consultation, this representation has been focused on the matters related to the soundness of the plan.

This representation should be reviewed in conjunction with our Regulation 18 consultation response, which provided detailed technical information to demonstrate that the Site is fully deliverable in planning terms, in a way that responds positively to the Site's context, opportunities and constraints.

As part of the Regulation 18 response the following documents were submitted:

- Niab - Greater Cambridge DLP Consultation Statement
- Redgate Road, Girton - Access Appraisal, prepared by KMC Transport Planning
- South Road, Impington - Access Appraisal, prepared by KMC Transport Planning
- Flood Risk Note, prepared by Rossi Long Consulting

Background

It is important to recognise that NIAB is a charitable trust and that while development of the proposed employment sites has a clearer link to the research work undertaken at

Park Farm, any profit realised from the development of the two proposed housing sites would be reinvested to support the Trust's continued research work and expand facilities. Furthermore, some of the housing could potentially be developed as key worker homes suited to occupation by some of Niab's employees.

Park Farm is located on the south-western side of Histon with the Cambridgeshire Guided Busway running along its north-eastern boundary, providing accessible public transport links between St Ives to the north and the centre of Cambridge to the south. The A14 forms the southern boundary of the holding, beyond which is Darwin Green, currently being developed as a major urban extension to Cambridge. Niab have the benefit of access via a private bridge over the A14 which provided them with a link to their previous headquarters, shared with University of Cambridge in Lawrence Weaver Road. This bridge could become a vital active travel route for pedestrians and cyclists connecting Histon, Impington and Girton with Cambridge over Niab's land.

Park Farm itself forms an important green gap between the conjoined villages of Histon and Impington, and Girton, and also with Cambridge in the south. The use of the Farms fields for agricultural trials provides a valuable productive use for this piece of relatively enclosed landscape which helps maintain the openness of the area and a diverse wildlife habitat, while supporting its beneficial use and the important agricultural research and innovation activities undertaken by Niab, one of the leading UK independent crop science organisations.

It is therefore important to consider these proposals as a whole; a potential development opportunity at the Park Farm Campus, which could release some modest levels of housing, substantial new employment opportunities, active travel connections, in a highly sustainable location, while respecting the contribution that the wider farm makes to the landscape and biodiversity between its surrounding settlements.

Regulation 19 Policies Response

NIAB supports the vision for Greater Cambridge to be a place where a big decrease in climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all communities.

Achieving this vision is contingent upon the adoption of a sound Local Plan which sets ambitious targets for growth and is positively prepared, justified, effective, and consistent with national policy (in accordance with the tests set out in Paragraph 36 of the NPPF 2024). As set out within these representations, in its current form the DLP requires amendments to ensure that the level of growth and housing allocations reflect the Vision for Greater Cambridge as set out in the DLP.

Plan Period

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

Paragraph 22 of the NPPF states that strategic policies should look ahead to a minimum of 15 years period from adoption to anticipate and respond to long term requirements and opportunities, such as those arising from infrastructure. Where large scale developments such as new settlements or significant extensions to existing villages or

towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account of the timescale for delivery. The emerging Local Plan proposes a number of new settlements and significant urban extensions, which make up the vast majority of growth in the plan. Table 2 of the emerging Local Plan sets out a housing trajectory for the draft allocated sites. All the larger strategic draft allocations have a growth trajectory that is well in excess of the plan period.

In October 2025 the Greater Cambridgeshire and Peterborough Combined Authority Board approved the Local Growth Plan which has a core ambition to double the size of the area by 2050 and an aspiration to triple it if possible. The Local Growth Plan looks ahead to 2050, and the government has also set out a vision for growth in Cambridge between now and 2050.

Following the publication of the Local Growth Plan, the Greater Cambridgeshire and Peterborough Combined Authority are now in the process of preparing a Spatial Development Strategy for their area which will be built on the Local Growth Plan and will include geographical and land-use designations. The mayor has committed to publication of a draft version of this plan next year, with a view to adopting the Spatial Development Strategy in 2028.

There will be a requirement for the new Local Plan to align with the mayor's spatial strategy, particularly given they are both due for adoption in 2028.
Therefore, to align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the plan, it is considered that the plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives. This amendment is required in order for the plan to accord with national policy and for it to be justified.

Proposed Amendment Vision

In order for the plan to be positively prepared, justified and therefore sound, the plan needs updating throughout to provide a plan period of 2024-2050. This would need to include amendments to the Vision and policy S/JH to provide a plan period from 2024-2050.
The increase in the plan period, will have a resulting impact in the need to plan for additional housing and employment, which will need to be reflected throughout the plan.

Policy S/JH: New Jobs and Homes

Policy S/JH New Jobs and Homes, sets out that development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for: 73,300 additional jobs and a minimum of 48,069 new homes. The number of new homes has had a minor reduction from 48,195 proposed as part of the Regulation 18 stage.

As set out in detail within our Regulation 18 response, the level of employment and housing growth proposed over the plan period is underpinned by the Employment and Housing Evidence Update 2025 (EHEU 2025), which forms an evidence base document that has not been updated since the Regulation 18 version of the Local Plan. The two key drivers for the proposed job and housing growth appears to be predicated mainly on how many jobs the government's mandatory minimum housing need calculation would

support, and separately the most likely future forecast for jobs for Greater Cambridge and the homes that this would require.
The Regulation 19 consultation includes an updated Development Strategy Topic Paper (June 2026) to justify the level of growth proposed. This Development Strategy Topic Paper sets out that between 2024- 2045, the current supply of sites (either allocated or sites with planning permission) is 38,378, which leaves a residual requirement to allocate 9,691 to meet Greater Cambridge's objectively assessed housing needs using the plan period. The emerging Local Plan allocates 13,654 new dwellings from new allocations, which the Development Strategy Topic Paper and emerging Local Plan provides an 8.2% supply in headroom in relation to housing need.

As set out within the June 2026 Development Strategy Topic Paper, the Councils commissioned a review of economic data having regard to representations made at Regulation 18 stage and concluded that recent data is not considered to provide sufficient basis for reviewing the EHEU (2025) and that in the view of the Council, the EHEU most likely forecast remains robust. In this regard Iceni were commissioned to prepare a Review of Economic Data, Context and Representations (June 2026).
The earlier version of the Development Strategy Topic Paper included the below table which sets out the Standard Method, Central and High projected job increases and housing needs (Figure 3). This table has been removed from the June 2026 version, but it is included below as it is considered to provide an important overview of the range of job and growth forecasts considered at earlier stages of the plan making process.

Table 1: Projected housing need – range of job growth forecasts – Greater Cambridge (2024-45)

	Jobs change 2024-45 (Census 2011 commuting)	Dwellings per annum (Census 2011 commuting)	Dwellings change 2024-45 (Census 2011 commuting)
Standard method	73,362	2,295	48,195
Central	73,248	2,292	48,132
High	90,936	2,829	59,409

Source: Iceni analysis

Figure 1 Development Strategy Topic Paper Table 1

For jobs, the EHEU 2025 identifies a "Central" most likely future jobs forecast. The Central forecast assumes growth of around 4,000 additional jobs per annum or more through to 2045. This is set out as a mixture of continuing the recent period of rapid growth seen in Greater Cambridge's Knowledge Intensive sectors over the last 10 years, but also building in an assumption that there will be slower or contracting periods and unforeseen shocks. The EHEU 2025 also identifies a higher growth forecast, placing

greater weight on what is described as 'r*apid growth in the recent past'*, particularly in key sectors, and recommended providing flexibility in employment land in case the market delivers more jobs than anticipated.

For homes, the EHEU 2025 identifies that the outcome of the Government's Standard Method for calculating minimum housing need, which increased significantly in 2024, would support the most likely forecast for future jobs.

It is argued that as the Standard Method figures broadly correlate with the Central (suggested most likely) job and housing projections and that adoption of these figures is appropriate. However, for reasons explained within this representation, the level of growth proposed does not align with either the government's, or the Cambridgeshire and Peterborough Combined Authorities aspirations for growth within Greater Cambridge. It also does not provide sufficient flexibility to increase housing numbers, should employment growth continue at the pace it has for the last 10 years. In this regard, there is considered to be a very strong case that employment growth in Cambridge will continue at the pace it has for the last 10 years and that this should be the minimum level of growth planned for.

The Iceni Review of Economic Data, Context and Representations Report (June 2026) seeks to support the Councils position on the basis that maintaining growth rates in line with historic growth rates, means ever increasing year on year actual change, which in the view of Iceni and the Council is difficult to achieve over time. However, this does not account for Cambridge being an international and national focus for job growth. Therefore, in accordance with the requirements of the NPPF, this is not considered to be appropriate strategy taking into account reasonable alternatives and other publicly available evidence. As it stands, for reasons explained below, Policy S/JH is not justified and the DLP should not be found sound.

Paragraph 36 a) of the NPPF is clear that to be positively prepared, the Local Plan should *as a minimum, seek to meet the areas objectively assessed housing needs.'* The standard method housing requirement should be a minimum starting point for housing growth. Therefore, it is unclear why the Development Strategy Topic Paper (2025) identifies housing figures that are marginally below the standard method requirements for both housing and job growth as a 'central growth' figure. In reality, this is the absolute minimum level of growth that should be planned for and should be identified as the low growth scenario within the topic paper.

The EHEU dismisses the higher growth scenario, principally on the basis that it is considered that the standard method level of growth is the 'most likely' growth scenario. This is not considered to be a justified or sound basis for setting the growth targets, which should be plan and evidence base led.

Paragraph 39 ID: 61-039-20190315 of the NPPG is clear that establishing the overall housing need should be conducted using the standard methodology unless specific circumstances justify an alternative. As evidenced by extensive research, over the recent years the level of job growth within the Greater Cambridge Area has been substantially higher than the Adopted Local Plan projections. In this regard, it is considered that within Greater Cambridge there is a compelling case that the level of growth should be higher than the minimum level of growth as proposed using the Central level of growth or standard method housing and job figures.

The arguments and evidence for ambitious growth targets for Cambridge have been set out in a multitude of high-profile studies, plans, and government statements, which are set out below.

Cambridgeshire and Peterborough Independent Economic Review

The Cambridgeshire and Peterborough Independent Economic Review September 2018 (CPIER) is referenced in detail within the evidence base documents to support the emerging Local Plan. The CPIER report sought to develop an authoritative evidence base on the economic performance and potential of Cambridgeshire and Peterborough and informed choices on policy priorities and strategic investment. Regarding employment and housing the report sets out:
'we have reached the clear conclusion that recent employment growth rates have been rather stronger than indicated by official figures, and we believe that the area can continue to deliver rapid growth with the right support' … 'growth in employment has not been matched by corresponding house-building, or developments in infrastructure'.
Further to the above, it is explained that:
'success here is of national significance... but it will only be attained if there is more ambition with regard to the development of new housing, and a careful prioritisation of infrastructure projects'.
The CPIER report is clear that house building has for the last 30 years not kept pace with the level of job growth. This in turn has resulted in a substantial rise of house prices within Cambridge, with demand vastly outstripping supply, which in turn has created substantial affordability issues.
This data is strengthened by further data for example as set out in the Housing Key Facts, evidence based document published by Cambridge City Council (2025). This sets out that the current ratio of medium house price to medium income is 8.8 in Cambridge, which is above the national average of 7.7. For the lowest income quartile, this figure rises to 11.5, putting the city well above national affordability standards. This is further compounded by average rental prices, which are now on average £1,774 per month (based on ONS Housing Prices for Cambridge), which leaves little scope for professionals and workers renting to save money to get onto the housing ladder. Boosting housing supply in and around the City is therefore critical to addressing this acute housing shortfall.
Clearly basing proposed housing growth on employment projections and the standard method alone is too narrow an approach and more ambitious aspirational targets should be set. Particularly given the long history in Greater Cambridge of underestimating the level of employment growth in the past.

The Case for Cambridge

In March 2024 'The Case for Cambridge' was published by the government, which set out ambitious plans for growth in Cambridge noting:

'population growth is causing problems: pressure on house prices; high levels of congestion… a truly ambitious plan for growing the city and population will bring benefits, as opposed to frustrations, to residents'.

Two illustrative scenarios were put forward:

- *Building 100,000 new homes by 2050 has the potential to add approximately £4.3 billion to the economy (between £2.1 billion and £6.4 billion with a central estimate of £4.3 billion). This in turn has the*

potential to translate in today's terms into an annual increase of approximately £1.5 billion of additional receipts for the exchequer (income from taxes and other sources), which can be spent on public services.

- *Building 150,000 new homes by 2050 has the potential to add approximately £6.4 billion to the economy (between £3.2 billion and £9.7 billion with a central estimate of £6.4 billion). This in turn has the potential to translate in today's terms into an annual increase of approximately £2 billion of additional receipts for the exchequer (income from taxes and other sources), which can be spent on public services.*

The current government subsequently reconfirmed its commitment to growth in Cambridge. In August 2024 Matthew Pennycook MP said the government was *"ambitious for Cambridge"* and that the city had been *"constrained economically by the lack of housing".* Again, the importance of setting bold aspirational targets for growth in Cambridge are highlighted at the highest levels of government. Whilst the current government has not provided a specific figure on housing growth, the government has set up a Development Corporation to accelerate growth in Greater Cambridge.
The emerging Local Plan covers a plan period to 2045. Table 3 of the plan sets out that the plan will deliver 52,032 dwellings between 2024 and 2045. If the housing growth in the Local Plan is continued on a pro rata basis using the 2,289 dwellings per annum for another 5 years, this would still only deliver 63,477 homes by 2050, which is still almost 37,000 dwellings lower than the government's lower of the two Case for Cambridge growth scenarios. Whilst it is acknowledged that the aspiration to deliver 100,000 dwellings by 2050 is optimistic, there is considered to be a strong case to substantially increase the level of housing and employment growth above the standard method figures.

In this regard, the Mayor for Cambridgeshire and Peterborough Paul Bristow said in June 2026: 'Our Local Growth Plan is intentionally the most ambitious in the country and delivering it means tackling infrastructure constraints we've put off for too long.' As set out above, it is considered important for the emerging Local Plan to align with the Local Growth Plan.

Paragraphs 1.19 to 1.21 of the DLP acknowledge that the government has set up Cambridge Growth Company to accelerate growth, but then concludes that this Local Plan is only based upon the Council's own evidence base for plan making. This is considered to provide a missed opportunity to accelerate growth in Greater Cambridge in the short term, prior to the Development Corporation having planning powers.

<u>Conclusion on Policy SJ/H – Homes and Jobs and Amendments Required</u>

Having regard to the clear growth aspirations set out by both the government and the Local Growth Plan, it is considered that the emerging Local Plan and Policy SJ/H needs to be revisited to provide a higher level of growth. A higher level of growth would align with both the governments and Mayors Vision for growth within the area and not providing this assessment is a current flaw of the plan and in turns results in the current plan not being justified or positively prepared.

As set out above, delivery of growth in Greater Cambridge is of national significance. In the past, employment growth rates have been stronger than official figures and have outstripped delivery of housebuilding and infrastructure. The government has confirmed

its continued support for high levels of growth in Greater Cambridge. This ambitious level of growth is also supported by the Local Growth Plan and will likely be reflected in the emerging Spatial Development Strategy.

Based on this evidence, it is considered that the levels of job and housing growth targeted are not justified and are not an appropriate strategy taking into account the reasonable alternatives. A far more ambitious level of job and housing growth should be planned for. As it stands, Policy S/JH is unsound and requires amendment.
It is recommended that in order to be sound that the higher growth scenario as set out in the development strategy topic paper is followed, which is considered to be a more appropriate strategy for growth. This would require part 1 of Policy S/JH to be amended to replace the requirement to deliver 73,000 additional jobs with a requirement to deliver 90,936 jobs over the plan period and to replace the requirement to deliver a minimum of 48,069 dwellings, with a requirement to deliver a minimum of 59,409 dwellings.

As set out in these representations, sustainable sites which can be delivered early in the plan period, such as those at the Niab Park Farm Campus, would support this ambitious level of growth and therefore should be allocated in the DLP.

Policy S/DS: Development Strategy

Policy S/DS: Development strategy sets out the proposed strategy for the pattern, scale, and design quality of places created in Greater Cambridge, for the plan period to 2045 and beyond. This is one of the key strategic policies within the plan. The policy is set out in different parts. Part 1 of the policy states the following:

Policy S/DS: Development Strategy, sets out that the need for jobs and homes will be met in the following order of preference, having regard to the purposes of the Cambridge Green Belt:

a) *Within the Cambridge Area*
b) *On the outer edge of Cambridge*
c) *At an expanded Cambourne*
d) *At other new settlements*
e) *In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres*

…

Part 1 of Policy S/DS

Part 1 of Policy S/DS is strongly supported. It is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge, accounting for the global importance of Cambridge as the focus for growth.

Part 2 of Policy S/DS and Strategic Allocations

Part 2 of Policy S/DS sets out that the vast majority of growth will be met via the following 3 new allocations, to supplement the existing allocations in the Adopted Local Plans:

Cambridge East (Marshalls Airport) – allocated for approximately 8,000 dwellings (3,950 homes to delivered in the plan period) and 20,000m2 employment space

Cambourne North – allocated for approximately 13,000 dwellings (delivering 2,720 homes within the plan period and 108,00m2 employment space
Grange Farm Little Abington – allocated for approximately 4,500 dwellings (2,550 homes in the plan period) and 35,000m2 of employment space.

This places a very high level reliance on the delivery of growth across only three sites, all of which are 4,500 dwellings or larger in size and all of which are predicated on significant infrastructure improvements. Since the publication of the Regulation 18 consultation, Cambridge North- East allocation has been amended to reduce the number of proposed new dwellings to 580 dwellings. However, rather than replace this allocation with new allocations, which would assist in reducing the reliance on the above 3 sites, the reduction in Cambridge North- East has resulted in a smaller housing buffer being provided. For reasons explained in this section of this report, this approach results in substantial concerns regarding the likelihood of housing delivery being delayed, which is likely to result in insufficient housing being delivered across the plan period.

Table 1 of the Local Plan sets out that the current supply is 38,378 dwellings, with a further 9,691 dwellings required between 2024-2045 to meet the required need. Table 3 of the DLP sets out that the Council has identified sites to deliver a further 13,654 homes over the plan period. 9,220 of the new dwellings, (which represents the majority of the 13,654 dwellings) will be met via 3 new urban extensions/new settlements at Cambridge East (Marshalls Airport Allocated under Policy S/CE), Cambourne North (Allocated under Policy S/CBN), and Grange Farm, Little Abington (Allocated under policy S/GF). The plan provides for an 8.2% buffer in housing delivery against the standard method. Accounting for the high reliance on the delivery of growth via only 3 sites, all of which have complicated infrastructure constraints it is considered that a buffer nearer to 20% would be preferable and would assist with providing a robust plan.

Based on the housing trajectory set out in the plan, it is apparent that 2025-2026 had a particularly low level of housing completions. This is concerning, particularly given that the early years of the plan are to a large extent reliant on existing allocations to deliver growth. The housing trajectory states that upon adoption of the plan there will be a 5.47 housing land supply. However, this is based on the Liverpool method to assessing housing land supply, which is not the preferred method by Government. Paragraph 68-031 of the PPG is clear that the preferred method for assessing land supply is the Sedgefield approach, which requires any backlog to be delivered within the following five years. This is to ensure that any backlog in supply is addressed early and not pushed back to later in the plan period. Using the Sedgefield approach, the housing land supply falls to 5.03 years. The trajectory also sets out that in the year of 2029/2030 annual completions will be almost 4,000 dwellings, which is more than a 1,000 units higher than all of the other (20 years) within the plan period. This delivery figure for the year of 2029-2030, appears to be highly optimistic and appears to have been increased with the purpose of ensuring that a 5 year housing land supply can be maintained during the early years of the plan.

Accounting for the reliance of the emerging Local Plan on a limited number of new settlements and urban extensions (of 4,500 dwellings and larger in size), there is a good prospect that the 5 year housing land supply will drop below 5 years. Figure 8 of the DLP shows the housing trajectory and it is clear that as a result of the vast majority of new growth being planned for within new settlements/urban extensions of more than

4,500 dwellings in size, there is very little growth from new allocations within the early years of the plan period.

This does not align with the NPPF's objectives to significantly boost housing land supply and it has also resulted in the Shared Planning Service advocating the use of the Liverpool approach. This is not justified, particularly given that a large quantum of growth in the emerging Local Plan is made up of existing allocations. This should be addressed by the allocation of additional deliverable sites, such as Niab Park Farm Campus, which can provide a positive contribution to housing supply and job creation, and it they can also be delivered in the shorter to medium term without the need to rely on significant infrastructure improvements.

Allocation of additional smaller deliverable sites, such as NIAB's proposed sites a Park Farm, would provide greater flexibility and help mitigate against slow or non-delivery of strategic sites.

The Local Growth Plan

In October 2025 the Greater Cambridgeshire & Peterborough Combined Authority Board approved the Local Growth Plan. This growth plan was heavily informed by the CPIER Report and the Plan includes three growth scenarios:

- *Baseline growth, or 'business as usual' would see the size of the economy grow to £42.5bn by 2050 - an annual growth rate of 1.2%.*
- *Doubling our Economy: our core scenario - would see the economy double in size by 2050 to £62.3bn GVA.*
- *Aspirational Growth: our growth ambition is to see the economy triple in size by 2050 to £97.1bn GVA, unlocking an economic powerhouse*

It is also noted that:

'these growth scenarios have undergone rigorous modelling and can be deliverable by 2050 with the right levels of support and investment'.

Page 155 of the Growth Plan is also clear that, to support a doubling of the economy by 2050, would require a minimum of 214,760 dwellings to be delivered in the County during this timetable. Whilst the Local Growth Plan does not define a District by District breakdown of housing figures, it is clear that Greater Cambridge, as the focus for growth within the County, should be responsible for a substantial proportion of this growth. On a pro-rata basis, if the 214,760 dwellings were delivered equally between the six local authority areas in Cambridgeshire and Peterborough, this would result in Greater Cambridge having a requirement to deliver a minimum of 71,586 dwellings between now and 2050. In reality, accounting for Cambridge being the International Life-Science and employment driver for the County, in accordance with the government's Case for Cambridge, the growth within the Cambridge City and South Cambridgeshire administrative areas would be expected to be substantially higher.
As set out above, as part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority are developing a Spatial Development Strategy for their area which will build on the Local Growth Plan and will include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028.

Paragraph 25 of the NPPF is clear that strategic policy making authorities should collaborate to identify strategic matters, which they need to address in their plans. They should engage with elected Mayors and Combined Authorities. Paragraph 26 of the NPPF then goes on to state that effective and ongoing joint working between strategic plan-making authorities and relevant bodies is integral to the production of a positively prepared and joint strategy.

In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging Local Plan is aligned to the Local Growth Plan (2025) and the emerging Spatial Development Strategy. As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives of the Local Growth Plan.

Agri-Food and Tech Sector

As explained within the Local Growth Plan, the Agri-Food & Tech sector uses science, innovation and technology to develop the value chain from farm production to final consumption. The purpose is to integrate technology to support the management of agriculture and food practices, helping meet challenges related to changing climate, increasing input costs, food security and improvements in nutrition.
In Cambridgeshire and Peterborough, the Agri-Food & Tech sector employs 3,500 people across 115 companies, generating approximately £1billion in revenue. Agri-Food & Tech businesses benefit from excellent land quality for farming, world-renowned academic institutions, a strong supply chain in terms of international food processing, food packing, distribution and logistics, and world leading R&D facilities.
The Local Growth Plan projection maps predict growth of the agri-food and tech sector by £1.2bn by 2050 and expect to see employment growth in this sector of 7,700, a 57% increase from now. Niab are recognised in the Local Growth Plan for their facilities and proposed developments to provide the potential for rapid growth in this sector. The Local Growth Plan provides background on Niab as an agri-tech research center:

"The National Institute of Agricultural Botany (NIAB) is one of the oldest agricultural science research centres in the country, established in 1919. NIAB specialises in genetics and breeding, varieties and seeds as well as agronomy. It has actively contributed towards the development of seed testing and certification as well as the adoption and advancement of modern field trial techniques."

The Local Growth Plan identifies that Niab has invested in developing a national capability in this space through their Precision Breeding Centre:

"We are keen to partner with CPCA to drive a significant expansion of this capability which is already leading within Europe with regards scale and quality. Through this move we can better leverage the fundamental research carried out by our partner, the Crop Science Centre at the University of Cambridge, and the world-class translational research undertaken by NIAB. In addition to providing research, translational and regulatory services in agriculture and horticulture, NIAB provides facilities including laboratory, office and glasshouse space to Agritech companies through incubator facilities on its Cambridge site. Alongside this, Agri-Tech E offers award winning networking support to the sector. The underlying infrastructure offered by these organisations, coupled with proposed developments for scale-up space both at NIAB and other facilities across the region provide the potential for rapid growth in the sector."



Figure 2: NIAB, extract from the Local Growth Plan

The Local Growth Plan indicates that it will support the agri-food and tech sector by:

Developing a multidisciplinary skills taskforce to support our food manufacturing businesses to upskill and encourage the adoption of digital technology and automation technology within local production and processing.

Supporting the development of Agri-Food Tech testbeds for piloting automation, robotics and digital solutions in agriculture and food production.

We will leverage our expertise in agri-science as a catalyst for achieving our Net Zero objectives by deploying innovative nature-based solutions that enhance sustainability and reduce agricultural emissions across the region.

To supercharge the sectors, The Cambridgeshire & Peterborough Combined Authority will align their approach to the Governments industrial strategy, including:

Support regional businesses to access the £200m Farming Innovation Programme up to 2030.
Utilise the new Agri Tech Export Accelerator Programme to improve access to international markets.
Influence with Government around the evolving regulatory environment.
Support the collaboration of our other growth sectors and Agri-Food & Tech.

As set out in this representation, sustainable sites which can be delivered early in the plan period, such as the Niab Park Farm Campus, would support this ambitious level of

growth in the agri-food and tech sector, and as such it is considered that they should be allocated in the DLP.

HELAA Response

To support the emerging Local Plan, the Greater Cambridge Shared Planning Service have prepared a Housing and Economic Land Availability Assessment (HELAA). In accordance with the Planning Practice Guidance, the HELAA provides an assessment of the suitability, availability, and achievability of each individual site submitted as part of the Call for Sites. The HELAA was originally undertaken in 2021, but has been updated in 2025 to reflect any change in planning circumstances since the original site submission.

The Niab Park Farm Campus site comprises various sites submitted as part of the Regulation 18, Issues and Options and Call for Sites stages. Each site has been assessed as part of the HELAA.

The Regulation 18 representation provides a detailed review and commentary regarding the individual HELAA assessments. One Site (NIAB Park Farm, Villa Rd, Histon) was submitted in addition at the Regulation 18 stage, and since then, has been assessed under HELAA reference 208851. The HELAA assessment is reviewed below:

The HELAA states that development of the site has some potential policy constraints, but these could be overcome through the planning application process.
In respect of flood risk, the HELAA assessment scored flood risk as Red. However, as shown on the latest Flood Maps the site is not located in Flood Zones 2 & 3 as the assessment suggests.

The HELAA scores the site green in terms of landscape. It confirms that development within this green belt site could be achieved if adequate landscape buffering were provided to the south and western edges. Heights of any new buildings will need to remain low to ensure that impacts remain low and in keeping with the edge character condition.

The HELAA scores the site green for biodiversity and geodiversity. The assessment confirms that a development of the size and scale described would not provide any specific ecological risks to statutory or non-statutory designated sites. However, this does not remove the likelihood of protected and priority species being impacted, nor that a development of the type described would likely be eligible for mandatory biodiversity net gain. Natural England should be consulted on large infrastructure such as warehousing / industry where total net additional gross internal floorspace following development is 1,000m² or more.

The site is scored green for open space and green infrastructure. It lies wholly outside of protected open space, and as such, detrimental open space impacts are not anticipated. The HELAA scores the site green for the historic environment, confirming that development of the site would not have a detrimental impact on any designated or non-designated heritage assets.

The site is scored green in relation to archaeology. Whilst the assessment confirms that features of Bonze Age date are recorded to the west and enclosures of probable Roman

origin are known from cropmarks to the immediate south, archaeological works could be secured by condition of planning permission.

The site was scored red for access, stating the site does not have a direct link to the adopted public highway. Clearly this incorrect, the site is part of an existing developed site which does have a connection to highway network via Villa Road. In respect of the assessment for the Barn 3 Site (200772) which forms a smaller element of this Site in respect of access that assessment scored access as amber noting that the site access is acceptable in principle, subject to further detail and consultation.

The HELAA also scores the site amber for transport and roads. It notes that any potential impact on the functioning of trunk roads and/or local roads will need to be mitigated. The site is adjacent to the Cambridgeshire Guided Busway. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use.

Overall, however the Site was then scored Red for suitability which does not seem reasonable given the generally overall positive scores and the unreasonable score of Red attributed to Flood Risk and Access.

Niab Park Farm Campus

Overall, the HELAA assessment undertaken for all the sites that form the Niab Park Farm Campus demonstrate many positive aspects, however, they have been discounted for a variety of reasons which actually seem to warrant further review.

As it stands this has resulted in the Niab Park Farm Campus not being allocated and an important opportunity, which could have an extremely positive impact through the delivery of rapid economic growth in the Agri Food and Tech Sector in Greater Cambridge as well as the delivery of more new homes, being missed.

Histon and Impington is identified as a Rural Centre in the settlement hierarchy which should have no limitation on the size of development. It is a highly sustainable location, in close proximity to Cambridge with excellent transport links, including the Guided Busway and other bus services. It also already supports a strong employment area at Vision Park, located on the opposite side of the Guided Busway.

This proposed site allocation clearly aligns with the Shared Planning Services Preferred Development Strategy and the Local Growth Plan which is to focus growth around Cambridge as the most sustainable location for development, making the most efficient use of existing sites, and supporting the particular locational opportunities associated with the Agri- Food and Tech sector. It will also support NIAB's overall growth ambitions at Park Farm and as such, in our opinion, the Site should have been included as an allocation in the Draft Local Plan.

Locational Sustainability

Whilst it is acknowledged that the Local Plan will be assessed under the NPPF 2024, it is relevant to note that new planning applications will be determined under the 2026 NPPF.

Policy GB7 (Development which is Not Inappropriate in the Green Belt) sets out the categories of development that are not inappropriate in the Green Belt.
Part h) includes residential or mixed use development which would:

i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
ii. Be physically well-related to the station or the settlement within which the station is located;
iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and
iv. Not prejudice any proposals for long-term comprehensive development in the same location.
v. In the case of proposals for major development, comply with policy GB8.

Policy S5 (Principle of Development Outside Settlements) confirms that where development would not be inappropriate in these locations (through the application of policies HC8 and GB7), proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework, and applying paragraph 2 of this Policy S5.

The Niab Park Farm Campus is considered to be in a location which would comply with the spirit of part h) of Policy GB7, and therefore, a highly sustainable location that is not inappropriate in the Green Belt.

Both terms; reasonable walking distance and well-connected stations are defined in Annex B of the NPPF.

Reasonable walking distance is defined as being:

For the purpose of policies S5, L3, GB7 (relating to land around well-connected stations), this should be considered to be around 800 metres, or around 10 minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away. For the purpose of policy HC5 (hot food takeaways) it should be considered to be around 400 metres, or around five minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking up to 400 metres. Where a reasonable walking distance is required to be calculated when applying policies S5(1)(h), L3(2)(c) and GB7(1)(h), and only part of the site falls within the reasonable walking distance, those sub-paragraphs of policies S5, L3 and GB7 only apply to the area of the site within that reasonable walking distance.

Well-connected stations are defined as being:

Railway stations and underground, tram and light rail stops located within a top 80 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) [footnote 72] and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by at least four trains or trams per hour overall, or at least two trains or trams per hour in any one direction.

Cambridge is ranked at number 10 in the top 80 travel to work areas, and the Site is within walking distance to the Histon Guided Busway Station (less than 600m walking distance) and as such should be considered an appropriate location for development. This is illustrated on Figure 2 below, which shows that the guided busway is within an 800m walking distance to the campus.

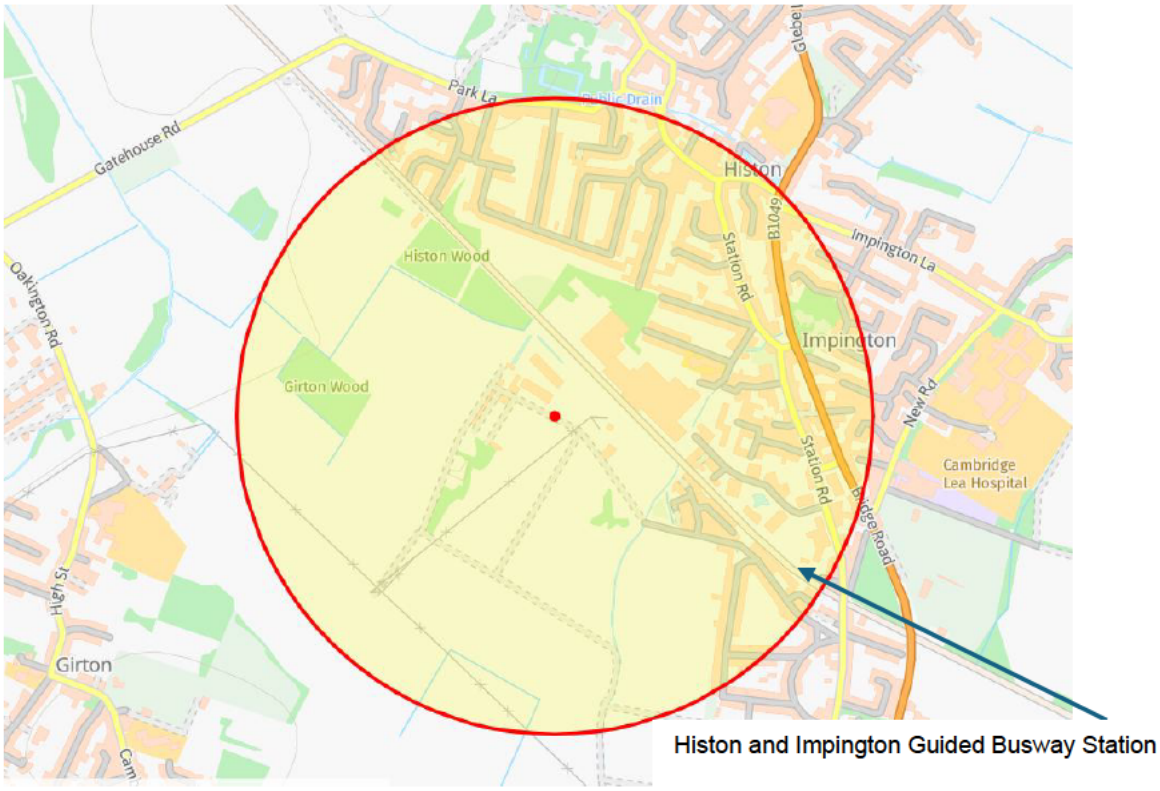


Figure 2 - 800 metre radius from the Niab Park Farm Campus

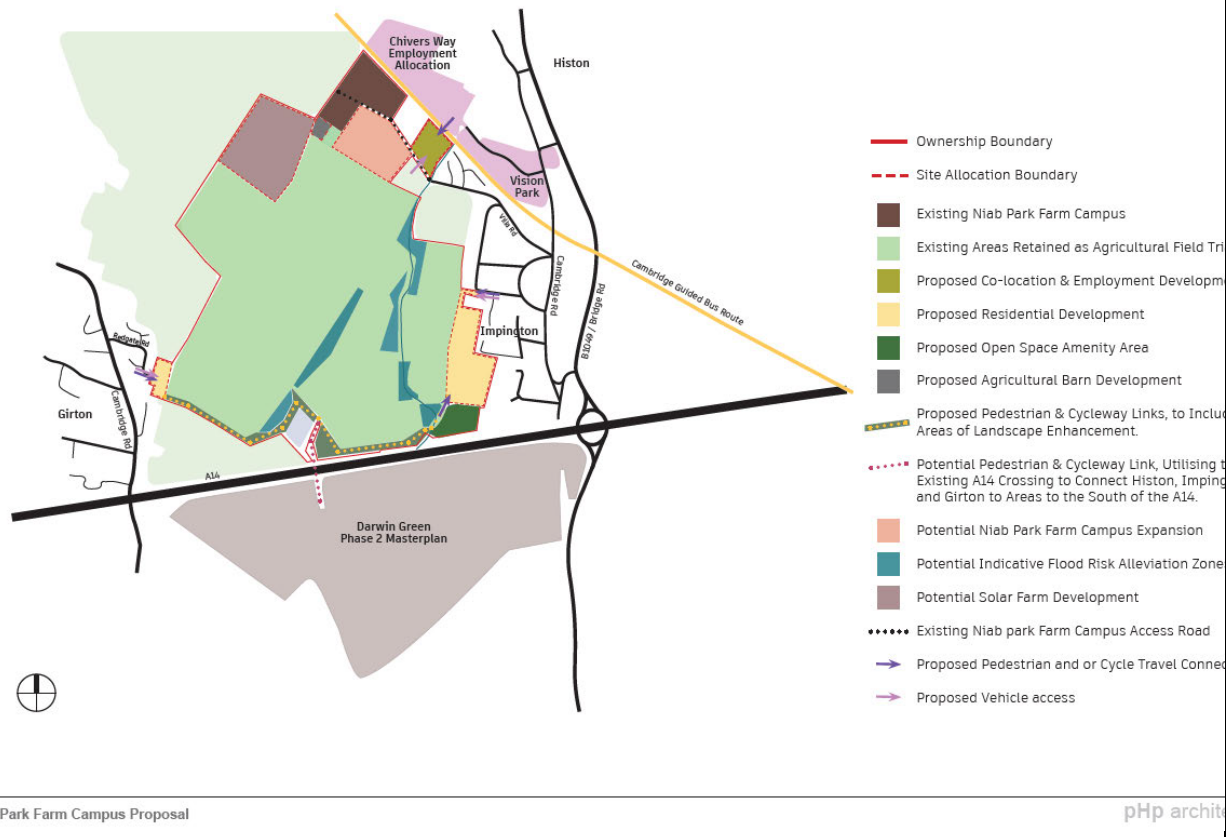
The weekday timetable is served through the day time by at least two bus services per hour in any one direction.

This Site is considered to be within a highly sustainable location with regards to the NPPF. Whilst the Local Plan is not examined under the 2026 NPPF, this is still an important consideration, given planning applications are to be determined under the new Framework.

Proposed Allocation

The following draft Local Plan Masterplan and allocation policy wording has been prepared to assist with providing a legally sound policy for the allocation of the Niab Park Farm Campus.

Policy XXX – Niab Park Farm Campus



Objectives and Place Identity

The Niab Park Farm Campus in line with the Masterplan, will create an exceptional, integrated place encompassing a range of uses for those working, living and visiting the site. It will continue to develop as a center for Agri Tech research excellence.

The expansion of Niab will be a landscape-led development. It will be highly sustainable, well-connected with active travel connections and embedded in a network of multi-functional green infrastructure.

Uses

The Niab Park Farm Campus is allocated for a mixed use development, comprising the following:

- Approximately 15,000 square metres (GIA) employment uses, including research and development, office and workspace (Class E);
- Approximately 6.15 hectares of residential development (C3) including a proportion of Key Worker Accommodation;
- Retention of the agricultural field trials area;
- New agricultural barn development;
- New Pedestrian & Cycleway Links, to include areas of landscape enhancement and open space;
- Flood Risk Alleviation Zones; and
- An area of Solar Farm Development;

The development of the Niab Park Farm Campus must do the following:

Context:

- Through the retention of the open filed trails agricultural land use maintain separation and openness between the settlements of Histon and Impington to the east, Girton to the west and Cambridge to the south.

Built Form:

- Ensure the built area is contained within the site allocation boundary shown on the policies map.
- Be comprehensively planned and delivered to ensure that development proposals do not prejudice the creation of a fully cohesive and successful campus.
- The site must take a sequential approach to the site layout, with more vulnerable development located outside any areas at risk of surface water or fluvial flooding.

Public Space:

- Deliver a network of multi-functional public spaces, connected by linear landscaped connections throughout the site.

Nature:

- Protect and enhance ecological assets.
- Introduce access to existing natural environments.
- Create new ecological features.

Movement:

- Provide a legible and comprehensive movement network for the whole campus that interconnects those who live and work on the site, and to wider networks beyond, to encourage the use of sustainable modes of transport and travel.
- Delivering active travel connections.
- Designing and delivering a site wide approach to car and cycle parking provision.

Lifespan:

- Planning for essential services, facilities and infrastructure must be undertaken in a comprehensive manner, anticipating future needs, and establishing suitable mechanisms to deliver the infrastructure in a timely and efficient way to achieve the successful delivery of the campus.
- An Engagement Strategy, must be prepared by the applicant to meaningfully enable local engagement.

Conclusion and Summary

This representation has been prepared by Ceres Property on behalf of NIAB Trust and demonstrates that the Niab Park Farm Campus would be a very sustainable and logical allocation for growth as part of the emerging Greater Cambridge Local Plan. It is considered that there is a compelling case for the allocation of the Site.

Elements of the emerging Local Plan are supported. In particular, Part 1 of the Development Strategy (Policy reference S/DS) are strongly supported. It is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge at Rural Centres, accounting for the global importance of Cambridge as the focus for growth.

However, in order to be considered as sound, the following changes are required to the Plan:

- The level of housing and employment growth as set out in policy S/JH seeks to only meet the minimum levels of housing and employment as required under the standard method. It is not considered that this is the most reasonable approach when considered against the alternatives. Higher housing and employment growth would align with the Local Growth Plan and the government's Case for Cambridge. It is also imperative that housing supply is boosted to address the very acute housing affordability crisis in the area and to readdress the imbalance with job and employment growth within Greater Cambridge.
- The Local Plan period should be increased to 2050 as a minimum in order to align with the Local Growth Plan (2025) and to align with paragraph 22 of the NPPF. This is considered to be particularly appropriate given the number of new settlements/urban extensions proposed.
- There is a clear need to increase the number of new allocated sites both to increase housing delivery and to ensure a suitable supply of sites. The current housing buffer of 8.2% is considered inadequate, particularly given that the vast majority of new allocated growth is limited to 3 new sites, all of which have substantial and complicated infrastructure requirements in order to be delivered.
- It is imperative that additional sites are allocated that can be delivered within the first 10-15 years of the plan period, and should include the allocation of the Niab Park Farm Campus site. This would boost employment floor space and housing land supply. It will also help to maintain a 5 year housing land supply.
- In addition, more flexible employment sites are required to support the ambitious growth aspirations set out in the Local Growth Plan and to support the focus sectors such as NIAB's Agri- Tech Park Farm Campus.

As set out above, delivery of growth in Greater Cambridge is of national and regional significance. In the past, employment growth rates have been stronger than official figures indicate and have outstripped delivery of housebuilding and infrastructure. The Government has confirmed its continued support for high levels of growth in Greater Cambridge. This ambitious level of growth is also supported by the Local Growth Plan and will be reflected in the new Spatial Development Strategy.

The proposed expansion of NIAB's research facilities at Park Farm could deliver both new employment space and some housing in a sustainable location while safeguarding in long term the landscape and biodiversity contribution the continued field trails use of the farmland provides to the area. The Local Growth Plan highlights the importance of the Agri-Food and Tech sector to the region's future growth, as well NIAB's national importance to the Sector. Including NIAB's proposals for the sensitive development of their Park Farm sites as a Niab Park Farm Campus allocation in the emerging Local Plan would support the delivery of the vision set out in the draft Plan for the future development of Greater Cambridge.

Please provide a 100 word summary of your representation.

Part 1 of Policy S/DS is strongly supported, however, in order to be considered as sound, changes are required. Housing and employment growth should increase to reflect the Local Growth Plan, the Case for Cambridge and housing affordability pressures. The plan period should extend to at least 2050, consistent with national policy. More allocated sites, such as NIAB Park Farm Campus are required to strengthen supply and reduce reliance on 3 new sites, which rely on infrastructure for delivery. Additional flexible employment land is also needed to support priority sectors, including NIAB's proposed Agri-Tech campus development.

Please refer to the Supporting Statement for full comments.

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.

- NIAB - Greater Cambridge Reg 19 Consultation Statement
- NIAB Park Farm Campus Development Masterplan

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.

In order to be considered as sound, the following changes are required to the Plan:

- The level of housing and employment growth as set out in policy S/JH seeks to only meet the minimum levels of housing and employment as required under the standard method. It is not considered that this is the most reasonable approach when considered against the alternatives. Higher housing and employment growth would align with the Local Growth Plan and the government's Case for Cambridge. It is also imperative that housing supply is boosted to address the very acute housing affordability crisis in the area and to readdress the imbalance with job and employment growth within Greater Cambridge.
- The Local Plan period should be increased to 2050 as a minimum in order to align with the Local Growth Plan (2025) and to align with paragraph 22 of the NPPF. This is considered to be particularly appropriate given the number of new settlements/urban extensions proposed.
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- It is imperative that additional sites are allocated that can be delivered within the first 10-15 years of the plan period, and should include the allocation of the Niab Park Farm Campus site. This would boost employment floor space and housing land supply. It will also help to maintain a 5 year housing land supply.
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Please refer to the Supporting Statement for full comments.

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.

We would like to reserve our right to participate in the Examination Hearing in order to respond to the Inspectors' matters and issues, particularly in relation to the growth of the agri-food and agri-tech sector.

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