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SUBMITTED BY EMAIL

Greater Cambridge on behalf of Cambridge City Council and South Cambridgeshire District Council Local Plan Regulation 19 Representations

Proposed Reg. 19 Response

Introduction

These representations are submitted by DP9 Limited ('DP9') to the Greater Cambridge Shared Planning Team ('GCSP') on behalf of Trinity College (CSP) Limited ('CSP Ltd') in respect of land known as Cambridge Science Park North ('CSPN') to the Regulation 19 Greater Cambridge Local Plan consultation ('eLP').

CSP Ltd submitted representations to the Regulation 18 Draft Local Plan in January 2026, setting out the case for the allocation of Cambridge Science Park North (CSPN) and the exceptional circumstances justifying its release from the Green Belt. CSP Ltd notes that the Council has not allocated CSPN within the Proposed Submission Plan and has published a specific response to CSP Ltd's Regulation 18 case within the Development Strategy Topic Paper (Appendix 9: Review of issues raised by promoters of employment sites, paragraphs 2.24–2.36).

This letter responds directly to that assessment, while also setting out matters which, in CSP Ltd's view, the Council's evidence base and reasoning do not adequately address.

Summary of the proposals and the case for exceptional circumstances

CSPN (HELAA reference 40096) comprises land north of the A14 and south of Milton Road, Impington, extending the established Cambridge Science Park. Founded in 1970 by Trinity College as the first science park in Europe and today comprising some c.250,000 sqm of predominantly research and development floorspace, supporting around 7,500 jobs across more than 170 companies in the AI/digital, life sciences, creative and clean energy sectors. CSPN would extend this globally significant cluster onto some 165ha of land, comprising mid-tech commercial floorspace, a transport hub, an education hub, sports provision and a biodiverse country park, and has been promoted by CSP Ltd through both the Local Plan process and the emerging North East Cambridge Area Action Plan for a number of years.

The proposals would deliver approximately 3,500 skilled jobs and at least 460 training and apprenticeship places, focused on the mid-tech and advanced manufacturing sectors identified as a

priority in the Council's own economic evidence, together with a dedicated STEM educational hub developed in partnership with Cambridge Regional College.

The scheme is not proposed solely as an employment allocation. Of the 165ha site, around 80ha would be retained as a publicly accessible country park providing a permanent green buffer between the science park and the neighbouring villages, together with a community farm, nursery and sports pitches, a converted farmhouse providing community facilities, and new walking and cycling connections linking Milton, Histon, Impington and Cambridge North Railway Station. The new Waterbeach to Cambridge Guided Busway runs through the centre of the site.

The proposals work with the site's existing green infrastructure, retaining and enhancing hedgerows and broadleaved woodland, with an aspiration to deliver a 30% net biodiversity gain against existing conditions, and are proposed as a net positive development incorporating on-site water recycling and mass water storage, on-site energy generation and storage, food production facilities to serve the local community, and circular economy principles.

The site benefits from direct accessibility advantages not shared by the alternative locations identified in the Council's evidence base: proximity to Cambridge North station, an existing and well-used A14/A10 interchange, an existing guided busway corridor adjacent to the southern boundary of the site, and a stop proposed within the site on the emerging Waterbeach guided busway corridor.

CSP Ltd's case is that these factors, taken together, establish the exceptional circumstances required to justify release of the site from the Green Belt, and that the mid-tech provision within the eLP is not sound without CSPN's allocation or safeguarding. In summary:

- an identified and growing shortfall in deliverable mid-tech floorspace which the Council's own alternative sites do not reliably meet, whether because of occupier restriction, limited scale, or dependency on unconsented infrastructure (see Sections 3 and 4 below);
- wider public benefits beyond employment floorspace: country park, community and educational facilities, and active travel connectivity, which are material to the planning balance in their own right (Section 5);
- a site which is demonstrably deliverable, being HELAA-rated Green for both Availability and Achievability, in contrast to several of the Council's preferred alternatives (Section 4);
- sustainable transport credentials and a Green Belt/grey belt case which, properly and consistently assessed against the Council's own methodology, do not support the 'very high harm' conclusion reached in the Council's evidence (Section 6);
- independently evidenced local, educational and business support, engaging directly with the presumption that the proposal is locally unwanted (Section 7); and
- the recent establishment of the Greater Cambridge Development Corporation, which underscores the strategic case for safeguarding a proven and deliverable site for future nationally significant growth (Section 8).

Each of these points is addressed in turn below, together with CSP Ltd's response to the Council's specific reasoning in Appendix 9 of the Development Strategy Topic Paper.

This letter should be read alongside the following supporting technical evidence:

- Volterra – CSPN Response to Regulation 19 (September 2026)

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The Regulation 19 test and the Council's Appendix 9 response

Representations at this stage of plan-making are considered by the Planning Inspector against the statutory tests of soundness set out in the National Planning Policy Framework (NPPF): that the eLP is positively prepared, justified, effective, and consistent with national policy, together with compliance with the Duty to Cooperate and other legal requirements. CSP Ltd's representations are framed against these tests.

These representations are reviewed in accordance with the transitional arrangements set out at Annex A of the National Planning Policy Framework (NPPF), and by reference to the December 2024 NPPF as the version against which the eLP has been prepared and tested for soundness. CSP Ltd notes, however, that for the purposes of decision-making the revised NPPF published on 17 August 2026 takes immediate effect, and this is reflected accordingly within this response where decision-making, rather than plan-making, policy is engaged.

The Council's Appendix 9 concludes that Iceni's research (referring to the Warehouse and Industrial Space Needs study, 'WISN', 2025) "has not highlighted sufficient need for the scale of development proposed at Cambridge Science Park North, and there are other more appropriate sites… there is no justification for exceptional circumstances required for Green Belt release" (para 2.36). This conclusion rests on three propositions which CSP Ltd considers are not adequately evidenced:

- that stakeholder engagement in WISN 2025 demonstrates only limited demand for mid-tech floorspace;
- that the notional 10% mid-tech share of the 317,000 sqm industrial requirement is an adequate basis for planning rather than a cap in practice; and
- that identified alternative sites (Eddington, Cambridge Research Park, Bourn and Sawston) can meet mid-tech need in a way that removes the requirement for Green Belt release.

Each is addressed below.

Mid-tech need: response to the Council's evidence

Volterra's September 2026 Technical Note provides a thoroughly evidenced rebuttal. Applying suppressed demand modelling triangulated against vacancy, rents, take-up and occupier requirements, Volterra identifies a realistic industrial floorspace need of between 420,000 sqm and 525,000 sqm. This is materially above the Council's 317,000 sqm figure and is consistent with recent appeal decisions giving weight to suppressed demand evidence, including at Hichingbrooke (March 2026), Thrapston (October 2025), Theale (June 2025) and the called-in Beehive Centre decision within Greater Cambridge (December 2025). Iceni's objection that Greater Cambridge is not an appropriate functional economic market area (FEMA) for this purpose is inconsistent with its own approach elsewhere: in its Hinchingbrooke and Newlands Park evidence, Iceni treats Huntingdonshire and Peterborough (a narrower subset of its own stated wider FEMA) as a standalone geography for the same purpose.

WISN's own stakeholder engagement record is more supportive of CSP Ltd's case than the Council's summary in Appendix 9 suggests. The same WISN paragraph the Council relies upon for 'mixed' views also records that mid-size and larger manufacturers could readily take up a further 50,000 sqm of floorspace if supply allowed, and separately identifies specific occupiers, including Cambridge Medical Robotics and Paragraf, as having left Cambridge Science Park for want of suitable premises, a clear record of demand unable to express itself, which is the definition of suppressed demand. For

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reference, Cambridge Medical Robotics have taken space at Evolution Business Park, which is essentially land at Cambridge Science Park North.

As set out in CSP Ltd's January 2026 representations, the Greater Cambridge Employment and Housing Needs Update (EHNU 2025) identifies a requirement for 1,341,000 sqm of employment floorspace across Greater Cambridge between 2024 and 2045, of which 317,000 sqm relates to industrial floorspace. Against this, the eLP allocates a materially lower supply, and the mid-tech element of this figure is treated by the Council as a notional c.10% share rather than a distinct, protected quantum. CSP Ltd's position remains that this approach understates genuine demand for mid-tech space specifically, which has distinct locational and specification requirements from general industrial and logistics floorspace and cannot simply be assumed to be met from within a general industrial allocation elsewhere.

Mid-tech is defined under Policy J/PB's supporting text (para 8.28e) as: "modern general industrial premises that have a greater emphasis on the office/R&D element alongside manufacturing and storage/distribution." It sits across Use Classes E(g)(iii) (light industry), B2 (general industry) and B8 (storage/distribution), bridging the gap between pure lab/office R&D and traditional industrial estate uses.

The Council's own evidence base illustrates how significantly mid-tech need has been under-forecast over time. Iceni's recommended figure for B1c, B2 and B8 floorspace need for Greater Cambridge rose from 35,091 sqm in 2020, to 200,000 sqm in 2022, to 317,000 sqm in the 2025 evidence relied upon in the Proposed Submission Plan, an increase of almost tenfold within five years, and one which the Council itself acknowledges does not account for suppressed demand. CSP Ltd's position is that this pattern of repeated, substantial upward revision should inform how much confidence the Council's evidence base, and the Inspector, place in the current figure as a ceiling on need. It should not be treated as a settled and reliable basis for concluding that Green Belt release is unnecessary.

This gap is compounded by the absence of any plan-wide, quantified mid-tech need figure. 'Mid-tech' has no entry in the eLP's own Glossary of terms and abbreviations, and its only description anywhere in the document is the informal one in Policy J/PB's supporting text. The Greater Cambridge Employment and Housing Needs Update (EHNU 2025), which underpins the eLP's headline employment floorspace figures, splits total need into 302,600 sqm of offices, 600,000 sqm of R&D space, and 317,000 sqm of industrial/warehousing floorspace (Use Classes B2/B8), with no separate mid-tech line item in either category. Mid-tech, by the Council's own definition, could properly be drawn from either the R&D or the B2/B8 figure, or some blend of both, and the published evidence does not indicate which, or in what proportion. It follows that there is no way to verify, from the eLP's own evidence base, whether the mid-tech floorspace explicitly allocated across the Plan is proportionate to actual need, oversupplied, or undersupplied. CSP Ltd's position is that this evidential gap, on a use type the Council itself describes as strategically important, further undermines the reliability of the conclusion reached in Appendix 9.

Volterra's review of the Council's four named alternative sites finds their combined secure contribution falls well short of identified need. Cambridge Research Park, Bourn and Sawston together provide well under 70,000 sqm, with no defined mid-tech component identified for any of them, while Eddington's often-cited 40,000 sqm figure is not derived from or tested in WISN 2025 and this reflects its absence in Table 7.4. Even applying the Council's own 10% assumption to the 317,000 sqm allocation (31,700 sqm), only around 19,650 sqm of the WISN-identified 34,652 sqm of E(g)(iii) supply

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is reliably suited to mid-tech use once the 15,000 sqm WISN itself describes as uncertain is excluded. This represents a shortfall against the Council's own starting assumption, before any suppressed demand is considered.

This is reinforced by market evidence published since January 2026. Bidwells records occupier requirements of 1.4 million sq ft against availability of only 5.6% at mid-2026, below the 8% level associated with a well-functioning market, and DTRE records mid-tech take-up up 35% year-on-year, including an 80,000 sq ft letting at Bourn Quarter with a further 70,000 sq ft under offer. Cambridge Science Park's own May 2026 masterplan submission, seeking to increase built floorspace from around 2.8 million sqft to around 8 million sqft, further reinforces the need for adjacent mid-tech capacity to retain growing firms within the cluster as they scale beyond office and laboratory space. The Council's own June 2026 Review of Economic Data, Context and Representations maintains WISN's recommendation for 'a new mixed industrial/tech park on the Strategic Road Network, preferably but not critically located on the Cambridge fringe'. This would seem on face value to be a description of CSPN, providing around 120,000 sqm of industrial and mid-tech floorspace immediately adjacent to Cambridge Science Park.

Site-by-site analysis of the eLPs mid-tech provision

Appendix 9 treats Eddington, Cambridge Research Park, Bourn and Sawston, together with North East Cambridge (NEC), as a body of alternative supply sufficient to meet mid-tech need without releasing CSPN from the Green Belt.

CSP Ltd's review of the Council's evidence base indicates that this supply is considerably less robust, in combination, than Appendix 9 suggests. Each site carries a distinct limitation, occupier restriction, uncertain infrastructure, or limited scale, which the Council's summary treatment does not disaggregate. These are set out site by site below.

Site	eLP allocation	Key limitation identified	Infrastructure dependency
CSPN (40096)	Not allocated	None identified, HELAA rated the site Green for Availability and Achievability	None: adjacent to existing Cambridge Science Park and A14/A10 access outside NEC trip budget; routes A,B and T1 of Cambridgeshire Guided Busway adjacent to southern boundary. Proposed Cambridge to Waterbeach guided busways with TWAO to be submitted this year; within 10 – 20 minute cycle distance to existing Cambridge North Railway Station.

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Site	eLP allocation	Key limitation identified	Infrastructure dependency
North East Cambridge / Cowley Road Industrial Estate	S/AMC/NEC: No new-build figure, the policy retains and intensifies existing mid-tech/light industrial stock; any loss of floorspace must be offset by "a net gain in industrial capacity or functionality "	Retention/intensification of existing base, not a new allocation.	None: adjacent to existing Cambridge Science Park and A14/A10 access outside NEC trip budget; routes A,B and T1 of Cambridgeshire Guided Busway adjacent to southern boundary, pedestrian and cycle distance to existing Cambridge North Railway Station
Eddington (Phase 2)	S/ED: 40,000 sqm "university related mid-tech or commercial research" part of a 100,000 sqm total (with 60,000 sqm academic)	Restricted to 'university related' not identified as a mid-tech location by WISN 2025 at all, and the 40,000 sqm figure is not derived from or tested in that evidence.	Low – site substantially built out with established energy and water infrastructure
Cambridge East	S/CE: Minimum 20,000 sqm GIA B2/B8 "to provide for mid-tech and general industrial uses"	Explicit minimum, on top of unquantified "significant" E(g) office/R&D floorspace	The timing of delivery of Cambridge East is uncertain, and transport improvement required include relocation of Newmarket Road P&R, Cambridge Eastern Access Phase A, bus service enhancements, integration with a new Cambridge East Railway Station.
South of Coldham's Lane	S/C/SCL: Supports delivery of industrial floorspace (Classes B2/B8 and E(g)(iii)) – no minimum figure given, unlike Cambridge East	Unquantified – policy support only, no explicit mid-tech or floorspace minimum	Not yet established – requires confirmation
Cambridge Research Park	Part of mid-tech supply	Remaining developable capacity and permitted use	Not yet established – requires confirmation

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Site	eLP allocation	Key limitation identified	Infrastructure dependency
		classes not confirmed in evidence reviewed to date	
Cambourne North	S/CBN: Cambourne North - Longer-term mid-tech provision	Commercial capacity forms part of a wider new settlement not yet built substantially built out.	High – dependent on A428 Black Cat–Caxton Gibbet dualling (incomplete), East West Rail Cambourne station (pre-DCO) and the proposed Cambourne to Cambridge busway (unconsented)
Sawston (Mill Lane / former Spicers Estate, 40341)	S/RSC/FSS: Longer-term mid-tech provision	Comparable use already delivered at modest scale (c.400 jobs); limited further capacity relative to identified shortfall Uncertain	Low – existing residential road access, no major new infrastructure required

CSPN is independently rated Green for Availability and Achievability in the Council's own HELAA. Eddington's mid-tech contribution is occupier-restricted rather than freely available to the market, and Sawston's contribution, while genuinely deliverable, is modest in scale relative to the identified shortfall. Taken together, the alternative supply relied upon in Appendix 9 is considerably less certain, and less readily available to the wider market, than its treatment as a single body of substitutable supply suggests.

CSPN's deliverability is further supported by single ownership of the site by CSP Ltd, in contrast to sites requiring land assembly across multiple ownerships, which removes a common source of delay in bringing strategic sites forward.

A mixed-use, place-based scheme – not solely an employment allocation

The Council's Appendix 9 response addresses CSPN principally through the lens of employment floorspace need. CSP Ltd considers this understates the case for exceptional circumstances, which under the NPPF can properly have regard to the overall planning benefits of a proposal and its deliverability, not solely to a quantified need assessment.

CSPN is not proposed solely as an employment site. The scheme includes an 80ha country park, educational facilities including pre and post 16 provision, nursery, sports pitches, community facilities, and new walking and cycling connections between Milton, Histon, Impington and Cambridge North Railway Station.

The proposals work with the site's existing green infrastructure, retaining and enhancing hedgerows and broadleaved woodland, with an aspiration to deliver a 30% net biodiversity gain against existing conditions, and are proposed as a net positive development incorporating on-site water recycling and

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mass water storage, on-site energy generation and storage, food production facilities to serve the local community, and circular economy principles.

These wider benefits should be weighed as part of the exceptional circumstances case, alongside the site's demonstrated deliverability: CSPN is assessed within the Council's own HELAA as Green for both Availability and Achievability, and CSP Ltd confirms the site remains available, achievable and deliverable within the plan period.

Sustainable location and the updated Green Belt Assessment

CSP Ltd's Landscape and Green Belt Baseline Review (January 2026) noted that no grey-belt-compliant update to the Greater Cambridge Green Belt Assessment (GCGBA) was available at that time. The Council has since published the updated GCGBA and a Green Belt Assessment, Response to Comments from Site Submissions Update and Draft Local Plan Consultation (2026) ('the GCGBA Response'), which directly addresses the Green Belt assessment submitted on CSP Ltd's behalf. CSP Ltd welcomes this substantive engagement and responds to it below.

The GCGBA Response confirms that Site 40096 falls across six Green Belt parcels (HI11, HI12, HI13, HI14, KI1 and OA1). The majority are assessed as 'very high' harm, save for parcel HI12 ('low' harm) and parcel HI14 ('moderate' harm), located along the existing edge of Impington, which the Council accepts may constitute grey belt. CSP Ltd's position is that this is a material concession which the Council's evidence base has not previously acknowledged.

As to the remainder of the site, the GCGBA Response's reasoning turns on a single, contestable methodological proposition: that a road can only perform a Green Belt-containing role where development does not lie on both sides of it, and that because Site 40096 remains undeveloped, the containing function of the A14 'would be significantly compromised' by development coming forward there. CSP Ltd does not accept that this reasoning is sound, for the following reasons:

- The A14 is an engineered, dual-carriageway strategic trunk road of a kind expressly recognised by national policy and established Green Belt boundary review methodology as a durable, readily recognisable boundary feature, a quality which does not self-evidently depend on a binary test of whether development exists on each side;
- Cambridge Science Park itself already abuts the A14 on the Cambridge side of the corridor; the GCGBA Response's logic, if applied consistently, would suggest the A14's containing function is already compromised at this location irrespective of Site 40096, which is difficult to reconcile with the 'very high' harm rating attributed to the site;
- The Council's own evidence should be tested for consistency, namely, whether the same 'development on both sides defeats containment' reasoning has been applied uniformly to other Green Belt parcels adjoining the A14 elsewhere in Greater Cambridge, or applied only at this location; inconsistent application would itself be a soundness concern;
- The GCGBA Response's re-characterisation of the NPPF Purpose A argument as 'Cambridge Purpose 1' does not, in CSP Ltd's view, adequately engage with the substantive point made in CSP Ltd's own Green Belt assessment regarding existing urbanising influence (traffic, noise and lighting) already associated with the A14/A10 interchange itself, independent of built form on the Site.

CSP Ltd has identified an inconsistency in the Council's own evidence base which supports this critique. In responding to representations on Site 200770 (Land east of Horningsea Road and west of Ditton Lane, Fen Ditton), another site adjoining the A14, the Council's Green Belt Assessment Response accepts that the A14 'forms a relatively strong boundary feature' and does not apply the 'development

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on both sides defeats containment' reasoning used to dismiss the same road as a boundary at Site 40096. The Council instead relies on a different basis (depth of encroachment from the existing settlement edge) to find harm at that site.

CSP Ltd notes, for completeness and in the interests of accuracy, that the Council has applied reasoning consistent with its approach at Site 40096 when responding to two other A10-adjacent sites in the same parcel area at Milton (Sites 40365 and 54906), where development beyond the A10 was similarly found to breach and compromise the road's existing containing function, including rejecting an argument that a future guided busway could provide an alternative boundary. CSP Ltd's consistency point therefore does not rest on a claimed general pattern across all A14/A10-adjacent sites (the Council's methodology is applied evenly in those instances) but on the specific, evidenced departure from it at Fen Ditton. It is precisely because the Council's approach is otherwise consistently applied that the different treatment of the same physical feature (the A14) at Fen Ditton, without any reasoned distinction being offered between the two cases, is conspicuous and should be put to the Council directly. If unresolved, CSP Ltd reserves the right to raise this at Examination as a matter going to whether the Plan's evidence base is soundly and consistently applied.

A second, arguably stronger example supports the same point. In responding to representations on Site 200759 (Land at Girton Road, Girton), the Council's Green Belt Assessment Response states that, to the south of the A14, 'the allocated and consented Darwin Green Development ensures that separation will be maintained in perpetuity'. This is a case in which substantial, committed built development already sits immediately adjacent to the A14, and the Council's own position is that the road continues to perform a meaningful separating function notwithstanding that development. This directly undercuts the premise applied against Site 40096, that a road's containing function depends on the land beyond it remaining undeveloped, such that development on the CSPN side of the A14 would necessarily and fatally compromise it. If development immediately alongside the A14 at Girton does not negate the road's separating function in the Council's own assessment, the same logic should not automatically defeat the boundary function of the A14 at Site 40096. This is especially true where the proposals at CSPN include retention of the Green Belt to form a permanent green yet accessible buffer in the form of a Country Park between settlements as part of the proposals.

Independent of the Green Belt and grey belt debate, NPPF policy has particular regard to the sustainable transport credentials of a site as a relevant consideration in the planning balance, including proximity to stations providing a high level of connectivity to jobs and services. As set out in CSP Ltd's January 2026 representations, the site benefits from proximity to both an existing guided busway and the proposed Waterbeach guided busway, with a stop proposed within the site, together with proximity to Cambridge North Railway Station. CSP Ltd considers these credentials should be weighed alongside the Green Belt matters addressed above.

Local, business and educational stakeholder support

CSP Ltd's case for CSPN is independently supported by a genuinely broad range of stakeholders with no financial interest in the site, spanning the local community, education providers and the business sector. The Council's own Consultation Statement (Appendix 7: Response to Representations – Site Allocations) records that "a number of comments provided support for Cambridge Science Park North", and logs support from the following:

- Histon and Impington Community Land Trust (representation references 201880, 205960–205964), a local community organisation based in the villages most directly

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affected by the proposal, whose support directly answers any presumption that the scheme is locally unwanted;

- Cambridge Regional College (representation references 201597, 201598, 210411), which 'strongly supports the Cambridge Science Park North development because it will create a wide range of employment, training, and education opportunities in the growing mid-tech and advanced manufacturing sectors,' welcoming in particular the dedicated STEM educational hub proposed as part of the scheme;

- Constructed Pathways (representation references 201594–201596), a skills and employment-focused organisation, which supports the creation of around 3,500 skilled jobs and at least 460 training and apprenticeship places; and

- The Cambridgeshire Chambers of Commerce (representation references 203242 and 210710), which supports the same job and training figures and highlights the risk that, without this capacity in Cambridge, the relevant economic activity is lost to the UK altogether rather than simply relocating within Greater Cambridge.

This combination of local community, education and business support is significant because it directly engages the specific harm the Council relies on to reject the site, landscape and settlement-gap harm affecting Histon and Impington, with evidence that the community itself, and the institutions that would deliver the scheme's skills and training benefits, do not share the Council's presumption that the proposal is unwanted or unwelcome locally. This should be given weight in the planning balance alongside the economic case set out in Section 3 above.

Strategic context: the Greater Cambridge Development Corporation

Since CSP Ltd's January 2026 representations, the Greater Cambridge Development Corporation (GCDC) has been formally established, by statutory order with effect from 23 July 2026, as a centrally-led urban development corporation covering the administrative areas of Cambridge City and South Cambridgeshire. Government has confirmed its intention to grant the GCDC both plan-making powers and powers to determine planning applications for strategic development, subject to further statutory instruments.

The GCDC's stated purpose is to accelerate nationally significant, sustainable growth for Greater Cambridge, building on the interim work of the Cambridge Growth Company. CSP Ltd considers this is a material change in circumstances relevant to the soundness of the Plan. The Local Plan, once adopted, will form the framework within which the GCDC's future strategic decisions are taken; excluding a proven, sustainably located and deliverable site such as CSPN at this stage risks constraining the delivery vehicle established specifically to accelerate growth beyond what the current evidence base anticipates.

CSP Ltd does not suggest that the GCDC's future powers alone constitute exceptional circumstances for Green Belt release. Rather, CSP Ltd submits that the Plan should not foreclose the future availability of a well-evidenced, sustainably located and deliverable site, and that the Council should consider mechanisms, whether allocation, safeguarding, or an explicit reference within the Plan's monitoring and review framework, to ensure CSPN remains available for consideration as the GCDC's priorities and powers become clearer.

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Conclusion

For the reasons set out above and in CSP Ltd's January 2026 representations, CSP Ltd considers that the Proposed Submission Plan is not positively prepared, justified, or consistent with national policy insofar as it excludes CSPN. In summary:

- The Council's own evidence does not robustly demonstrate that mid-tech need is adequately met elsewhere, and the WISN 2025 findings relied upon in Appendix 9 require further scrutiny;

- CSPN offers material public benefits beyond employment floorspace, including an 80ha country park, community facilities and active travel connectivity, which should be weighed in the exceptional circumstances balance;

- The site's sustainable transport credentials, and the Council's own updated Green Belt evidence, support further consideration of CSPN against grey belt and sustainable location criteria;

- Local, business and educational stakeholders (including the Histon and Impington Community Land Trust, Cambridge Regional College, and the Cambridgeshire Chambers of Commerce) have independently logged support for the proposal, directly answering any presumption that the scheme is locally unwanted; and

- The recent establishment of the Greater Cambridge Development Corporation is a material change in circumstances which supports safeguarding a proven, deliverable and sustainably located site for future strategic growth.

CSP Ltd requests that CSPN is allocated, or otherwise safeguarded, within the Plan, and would welcome the opportunity to discuss this representation further with the Council ahead of Examination.

Yours faithfully

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