

DRAFT GREATER CAMBRIDGE LOCAL PLAN REG.18 CONSULTATION – JANUARY 2026 LAND AT DERNFORD RESERVOIR, DERNFORD LANE, STAPLEFORD, CB22 5DY

CAMBRIDGE AGRI-TECH & COMMUNITY CAMPUS

ON BEHALF OF THE LANDOWNERS; RUSSELL SMITH FARMS AND YELLOW BRICK FARMS

REPRESENTATIONS

INTRODUCTION

The consultation on a Reg.18 Draft Greater Cambridge Local Plan (draft GCLP) is taking place between 1st December 2025 and 30th January 2026. This document provides draft representations to the consultation. The final version of the representations will be uploaded to the online consultation system.

Detailed representations as set out below will be submitted in relation to the specific Policy reference details.

The site was submitted as part of the additional Call for Sites exercise carried out in early 2025. The site has been attached Site ID 115166 and assessed as part of the HELAA. With the HELAA the site has been scored Red on suitability with concerns raised regarding landscape impacts and access. In response to this, a suitable vehicular access from the A1301 Cambridge Road to serve the site can be provided. Any potential landscape harm can be mitigated and this mitigation would be secured within a future planning application. It is important to note that the site does constitute Previously Developed Land.

Vision

Set across 107 acres including the 65m-gallon Dernford Reservoir, the vision is to develop a major Data Centre tailored to the needs of the AI boom, complemented by innovation-inducing infrastructure in agricultural technology to contribute the local community's talent pool and economy, whilst making a global presence for Cambridge in AI.

Data Centre Need

Due to a constrained Grid, the UK has lagged behind the rest of the World in developing DCs which has restricted a major technological advancement. This has meant that the UK currently only has c.500 Data Centres with a power capacity of 1.6GW, while the Government has announced that we need 6GW of AI-capable DC capacity, and the capacity including the pipeline is just 3.6GW.

Cambridge is even further behind with only 3 small co-location facilities under 20,000 square feet and less than 2MW in power, meaning it has a shortage of sufficient digital infrastructure to support AI incubation and new life sciences parks, so it will not be as competitive in comparison to cities like Oxford where there is already an AI Growth Zone allocated at Culham.

The Cambridge Agri-Tech and Community Campus will bring this attention and capital to Cambridge, whilst creating a DC that is needed to be physically close to local data-intensive businesses.

Why Dernford Reservoir

Dernford Reservoir has a reservation for 450MW of power and can connect to one of three major substations within a 20-mile radius – a pivotal feature. A DC of this size would make it appealing to AI demand from Hyperscalers (Google, Amazon, Meta, Microsoft and Oracle) with global customers, as well as major co-locators who lease 'Racks' to local business in AI, R and D, life sciences etc. to enable their growth.

REPRESENTATIONS TO DRAFT GCLP

Vision for Greater Cambridge

The vision for Cambridge as set out through the draft GLP is as below:

“We want Greater Cambridge to be a place where a big decrease in our climate and environmental impacts comes with the continued flourishing of our internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities. New development must: minimise carbon emissions and reliance on the private car create thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure we need, increase our network of nature, wildlife and multi-functional green spaces, and safeguard our unique, locally distinctive heritage and landscapes.

The vision flows into seven strategic priorities for the plan as follows:

- **Climate change:** Help Greater Cambridge transition to net zero carbon by 2050, by ensuring that development is sited in places that help to reduce carbon emissions, is designed to the highest achievable standards for energy and water use to reduce environmental impacts, adapts to and mitigates against climate change, and is resilient to current and future climate risk, including the longer term risk of flooding.
- **Biodiversity and green spaces:** Increase and improve our network of habitats for wildlife, and green spaces for people, ensuring that development leaves the natural environment better than it was before.
- **Wellbeing and social inclusion:** Help improve equality of access and opportunities for people in Greater Cambridge to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs.
- **Great places:** Sustain the unique character and identities of Cambridge and South Cambridgeshire, and complement it with well-designed and distinctive development, creating a place where people want to live, work, visit and play.
- **Jobs:** Encourage a flourishing, dynamic and mixed economy in Greater Cambridge which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation.

- **Homes:** Plan for enough housing to meet our needs, including significant quantities of housing that is affordable to rent and buy, and different kinds of homes to suit our diverse communities.
- **Connectivity and infrastructure:** Plan for transport, water, energy and digital networks; and health, education and cultural facilities; in the right places and built at the right times to serve our existing and growing communities.

Overview

There is a clear shortage of large-scale plant science, indoor farming and agri-tech type uses in the southern Cambridge corridor, where Dernford Reservoir is located. Surprisingly, no provision has been made in the draft Plan for Data Centre uses. There is considered to be a significant need for this type of a use within the area, particularly given the location of the site in close proximity to the large employment sites at; Granta Park, Babraham, Wellcome Genome and the Biomedical Campus. The Plan does not conform with National Planning Policy provided within the NPPF which requires Local Planning Authorities to identify suitable locations for data centres. The draft plan does not make any reference to data centres, nor is this requirement identified within the accompanying Greater Cambridge Warehouse and Industrial Space Needs Assessment.

This site represents a development opportunity well located to bring forward, high-quality space to meet these unmet needs.

The central jobs forecast informing the draft Greater Cambridge Local Plan assumes growth of around 4,000 additional jobs per annum. Draft policy identifies a need for 73,300 additional jobs over the period 2024-2045.

The draft Local Plan assumes a 'central' rather than a 'high' scenario aligning more with a growth trend over the last 20 years than the higher growth of the last 10 years despite national aspirations for sustained economic growth in the area. There is significant concern therefore that the needs identified through the draft Local Plan do not reflect Cambridge's potential and are not sufficiently ambitious.

The Government's "*Greater Cambridge: Growth Scenarios*" research (2025) envisages that additional activity in knowledge intensive sectors and housing delivery could enable a substantial increase in employment, over and above that aspired to by Greater Cambridge.

This would suggest that Greater Cambridge's strategy is not as ambitious as it should be and critically, not as ambitious as the Government would like it to be. There is a strong argument therefore that the Greater Cambridge should review its economic strategy and identified more sites for employment floorspace, such as the promoted opportunity for the Cambridge Agric-Tech and Community Campus at Dernford Reservoir. Sites also need to be identified to accommodate Data Centres, this is a National requirement.

Policy S/JH: New Jobs and Homes

Object

The central jobs forecast informing the Draft Greater Cambridge Local Plan assumes growth of around 4,000 additional jobs per annum. Draft policy S/JH therefore identifies a need for 73,300 additional jobs over the period 2024-2045. Need is specifically identified for:

- 302,600 sqm offices and 600,000 sqm of Research and Development (R&D) space
- 317,000 sqm of industrial / warehousing (use classes B2/B8).

We have significant concern that the needs identified do not reflect Cambridge's potential and are not sufficiently ambitious.

The Employment and Housing Evidence Update 2025(EHEU), which informs the Draft Greater Cambridge Local Plan, assumes a 'central' rather than a 'high' scenario, in effect downgrading growth to a lower longer term growth trend (the last 20 years) rather than the more aspirational rate of growth seen in Greater Cambridge over the last 10 years. The EHEU assumes this the most realistic scenario on the basis of the anticipated housing delivery.

It is notable however that at paragraph 3.62 the EHEU states:

"It is important to acknowledge that the high scenario could be achieved or exceeded. For this to take place it is considered that a step change in infrastructure investment and development would be needed to facilities growth..."

In 2024 the Government established the Cambridge Growth Company with the driving goal to maximise Cambridge's full economic potential and to deliver nationally significant growth. The Growth Company specifically aims to unlock and accelerate development for Cambridge, and to deliver the homes, jobs and infrastructure needed for the long-term and sustainable growth of the City.

Further to this the Government recently announced, 23rd October 2025, a £400 million investment in Cambridge to help facilitate the delivery of affordable homes, infrastructure and business expansion.

It is not clear in this context therefore why the draft Cambridge Local Plan would assume impediment to the higher growth scenarios and adopt the 'central' scenario.

This is further evident in the "Greater Cambridge: Growth Scenarios" research published by Government in November 2025. It identifies that additional activity in knowledge intensive sectors and housing delivery could enable a substantial increase in employment. Over and above that identified by the draft Local Plan.

The growth scenarios modelled in this research suggest that Greater Cambridge could support 380,000 to 465,000 jobs by 2050. This represents a 60% to almost doubling of the size of the existing Greater Cambridge workforce (236,000 jobs) and would see employment around 20% to 45% higher than in the baseline forecast (321,000 jobs).

Whilst these scenarios stretch as far as 2050 it is clear that these figures are significantly higher than the 73,300 new jobs envisaged by the draft Greater Cambridge Local Plan.

We are extremely concerned therefore that the economic forecasts for the Draft Greater Cambridge Local Plan are not as ambitious as they should be and do not match up to the Governments aspirations for the area. As a result, too few sites are allocated for employment development.

There is a strong argument for Greater Cambridge to look again at the evidence which underpins the economic strategy and to support more economic development on sites.

We strongly object to the scale of employment development identified in draft Policy S/JH: New Jobs and Homes. We recommend that Greater Cambridge review the economic forecasts underpinning their economic strategy and support increased employment development, including consideration of the opportunity presented for the new Cambridge Agri-Tech and Community Campus at Dernford Reservoir.

Policy S/DS: Development Strategy

Object

Policy confirms that sites on the edge of Cambridge will be prioritised as locations for meeting the need for jobs and homes in Greater Cambridge, outside the Cambridge urban area.

We object to the employment allocations as listed in the policy (point 2). There is need to identify additional sites for employment development in Greater Cambridge, including to the south of Cambridge. An additional site should be allocated to deliver a major Data Centre tailored to the needs of the AI boom, complemented by innovation-inducing infrastructure in agricultural technology to contribute the local community's talent pool and economy, whilst making a global presence for Cambridge in AI

Need for additional sites:

We are extremely concerned that the economic forecasts of the draft Greater Cambridge Local Plan are not as ambitious as they should be and do not match up to the Governments aspirations for the area. As a result, too few sites are allocated for employment development.

There is a strong argument for Greater Cambridge to look again at the evidence which underpins the economic strategy, to adopt more proactive and positive scenarios for growth and to support more economic development on sites such as the opportunity presented by the Cambridge Agri-Tech and Community Campus at Dernford Reservoir.

Dernford Reservoir:

It is clear that R&D as a sector has a long tradition of growth in and around Cambridge. This growth remains strong and is an important contributor to not only the local and regional economy but also the whole of the UK. It is vital therefore, that the right quantum of new development is identified, but also that it is in the right places, and can support a range of occupiers.

There is a clear shortage of large-scale plant science, indoor farming and Agri-Tech R&D uses in the South Cambridge Corridor. The site at Dernford Reservoir represents a development opportunity well located to bring forward, high-quality space to meet these unmet needs. No provision has also been made within the Plan for Data Centre's and is not compliant with guidance provided within the NPPF. The NPPF states at Para.86 that Planning Policies *should 'play particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, giga factories, data centres, digital infrastructure, freight and logistics'*. This need has not been met within the plan and Dernford Reservoir constitutes a suitable location

for such a use, particularly given the availability of water and access to power. These are key considerations which demonstrate the acceptability of Dernford Reservoir to accommodate a Data Centre.

Dernford Reservoir has the benefit of being on the edge of Cambridge and as such being prioritised as a suitable location for growth, outside of the Cambridge built up area. In addition, it benefits from direct access to both the M11 and A14, linking the site to the wider region, and connectivity with the Biomedical Campus. Connectivity with the other major employment sites locally at Granta Park, Babraham and Wellcome Trust will also be enhanced with the introduction of CSET transport scheme.

Currently the employment allocations as listed at Policy S/DS: Development Strategy are predominantly to the north (Waterbeach) the North West (off the A14) and the South (Cambridge Bio Medical Campus and Wellcome Genome Campus).

There is considered to be a requirement for an additional allocation to the south at Dernford Reservoir and it is well connected to existing employment sites and public transport. This should be recognised through Policy S/DS: Development Strategy.

Campus led Plant Science, Indoor farming and Agric-tech R&D accommodation:

It is evident that the growth scenarios for establishing need for employment floorspace are derived principally from quantitative modelling. Little regard has been had to the bespoke nature of the accommodation, facilities and locations required by the innovative operators, potentially global, that Greater Cambridge is keen to attract.

The 'update' to the EHEU is fundamentally based on a market report from some 6 years ago, in 2020. The draft Greater Cambridge Local Plan is reliant therefore on market trends that, given the dynamic nature of commercial sector in Cambridge, are already outdated. It is not clear therefore if the sites identified through the plan and the nature of development sought accurately reflect current commercial needs.

Specifically, the EHEU fails to appropriately reflect the requirement for plant-science and Agric-Tech R&D uses. In qualitative terms, there appears insufficient consideration, in the EHEU, and Greater Cambridgeshire Local Plan, of the nature and location of property stock likely to be sought by such operators.

It is evident that none of the other employment land allocations identified in the plan specifically target the introduction of plant-science, indoor farming or Agri-Tech R&D type uses, nor is any provision made for Data-Centre type uses. In this regard, we object to Policy S/DS: Development Strategy on that basis.

The development of a Campus at Dernford Reservoir would be crucial for the UK's economy, fostering innovation, driving growth in high-tech sectors (like plant sciences, AI, space), creating high-value jobs, attracting investment, and strengthening collaboration between universities, businesses, and government, essentially acting as a regional innovation hub that would anchor talent and boost productivity in the knowledge economy.

An allocation of the site focusing on the plant sciences sector and delivery of a Data Centre will further enhance the employment offering within the South of Cambridge. The site can leverage

proximity to the M11 and A14 corridors, its proximity to the proposed CSET travel hub and existing Railway Stations at Great Shelford and Whittlesford Parkway to enhance connectivity credentials whilst ensuring that it aligns with regional economic objectives and complements major allocations at Babraham and Wellcome Genome Campus.

We object to Policy S/DS: Development Strategy. There is need for additional sites to be allocated for employment development within the south of Cambridge. No provision is made within the plan for Data Centres and there also needs to be specific allocations made to meet the requirements for plant science, indoor farming and Agri-tech R&D employment accommodation along with complimentary facilities which at Dernford Reservoir would include community uses (including Scouts HQ), engaging with local charities, sports facilities and public open space. It is strongly recommended that the Cambridge Agri-Tech and Community Campus opportunity presented at Dernford Reservoir is considered in this context.

Policy S/GB: The Cambridge Green Belt

Object

Draft Policy S/GB states the intention that the Green Belt will be maintained around Cambridge with the specific purpose to:

- a. Preserve the unique character of Cambridge as a compact, dynamic city, with a thriving historic centre
- b. Maintain the enhance the quality of its setting; and
- c. Prevent communities in the environs of Cambridge from merging into one another and with the City.

We object to draft Policy S/GB: The Cambridge Green Belt on the basis that none of these purposes are as listed at paragraph 143 of the NPPF. Having regard to the merging of places paragraph 143 makes it clear that the purpose of the Green Belt is 'specifically to prevent neighbouring towns merging into one another' as opposed to 'communities in the environs...'

It is notable that the policy does not reference Grey Belt, nor does the policy allow for any consideration of need or Green Belt review over the plan period. Notwithstanding, that Green Belt release has been considered acceptable to facilitate development at East Cambridge and Cambridge Bio Medical Campus.

We are extremely concerned that the economic forecasts of the draft Greater Cambridge Local Plan are not as ambitious as they should be and do not match up to the Governments aspirations for the area. As a result, too few sites are allocated for employment development. Equally, Policy S/DS: Development Strategy makes clear that sites on the edge of Cambridge are to be prioritised for housing and employment development, outside of the Cambridge Urban Area. In this context further release of green belt, to facilitate opportunities such as Dernford Reservoir, needs to be considered to meet this need.

The NPPF (December 2024) defines Grey Belt as land in the Green Belt that does not strongly contribute to any of the purposes (a) to check the unrestricted sprawl of large built up areas, (b) to prevent the neighbouring towns merging into one another or (d) to preserve the setting and special character of historic towns, listed at paragraph 143.

The Greater Cambridge Green Belt Assessment (August 2021) makes clear that the Dernford reservoir site is closely associated with the settlement of Great Shelford. It therefore makes no contribution to the unique character of Cambridge. In this context, the Dernford Reservoir opportunity is considered below having regard to Grey Belt considerations:

- (a) **To check the unrestricted sprawl of large built up areas:** Development of the site would not read as the sprawl of the Cambridge Urban Area. Whilst benefiting from strong connectivity to the south of Cambridge, generally the site at Dernford Reservoir would operate as a standalone campus associated with Stapleford.
- (b) **To prevent the neighbouring towns merging into one another:** the development of this site would not lead to the merging of neighbouring towns. Cambridge is identified at the top of the settlement hierarchy, whilst Great Shelford and Stapleford is identified as a 3rd tier (middle tier) 'Rural Centre' in the draft Local Plan. Notwithstanding this, Cambridge is bordered by agricultural fields, with the site also located to the south of the village of Great Shelford/ Stapleford. Importantly, development at Dernford Reservoir would not read as a continuation of the Cambridge Urban Area.
- (c) **To preserve the setting and special character of historic towns:** Development of the site would not impact the historic setting of Cambridge. As is identified in the Greater Cambridge Green Belt Assessment (2021) the land is not close enough to the main urban area of Cambridge to be associated with it.

Having regard to Policy S/GB: The Cambridge Green Belt, it is not consider that the site contributes significantly to any of the three stated purposes. Relative to the consideration of any impacts of the Green Belt in this location however is the ability to expand any existing large-scale research and development sites within Greater Cambridge to meet the need for additional plant science/ Agri-Tech related floorspace. The Green Belt implications of any such proposals in the context of draft Policy S/GB are summarised below:

- Cambridge Biomedical Campus: The site is not considered Grey Belt and additional expansion to the west would have significant impact on the setting of Cambridge, whilst expansion to the east would also result in moderate to relatively significant impact.
- Babraham Research Campus: Possibly the site is grey belt, but expansion of the campus would have moderate to relatively significant impact on Cambridge's setting.
- Cambridge Science Park: The site is not considered grey belt. Development of the site would have significant impact on the unique character of Cambridge whilst also having moderate impact on Cambridge's setting.
- Peterhouse Technology Park: The site is not considered grey belt. Development of the site would have relatively significant to significant impact on the unique character of Cambridge whilst also having relatively significant impact on the quality of Cambridge's setting.
- St John's Innovation Centre: Green Belt considerations are not applicable, but the site is subject to other constraints.
- Wellcome Genome Campus: Outside of the Green Belt

- Melbourn Science Park: Outside of the Green Belt
- Granta Park: Outside of The Green Belt

It is clear then that all sites in close proximity to Cambridge require Green Belt release to meet additional need for employment floorspace. Of these the opportunity at Dernford Reservoir presents the least impact in terms of loss of Green Belt.

We object to Policy S/GB: The Cambridge Green Belt on the basis that further green belt release is required to meet additional need for employment floorspace. It is recommended that the removal of the Dernford Reservoir site from the Green Belt should be considered in this context, particularly given the identified need for a data centre alongside plant-science and agri-tech related employment opportunities.

In summary, an additional employment allocation should be made at Dernford Reservoir to facilitate the delivery of the Cambridge Agri-Tech and Community Campus. There are significant benefits of locating a Data Centre at this location and these can be summarised as follows:

- Data Centre development is the most cost intensive type of Real Estate development, so no other project in the local plan can compete in terms of construction contributions to the local economy.
- The AI start-ups Cambridge wants to incubate require Data Centres to store and process data sets and AI algorithms.
- Further information on need and the benefits of the Cambridge Agri-Tech and Community Campus is provided on the attached Briefing Note which has been issued to the Cambridge Growth Company.
- Waste would be recycled from the scheme with the potential for excess heat/ energy to heat nearby homes.
- Why here? There is on-site water for cooling, a 450MW power offer (the Grid is closed to new applications, so this is the way for Cambridge to get a Data Centre soonest) and strong fibre connectivity in this exact location as it is close to Dark Fibre and JANET, the cable network which is critical for supporting academic institutions.

Carter Jonas – January 2026