

South East Cambridge Greater Cambridge Draft Local Plan Representations

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LICHFIELDS

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1.0 Introduction

- 1.1 Lichfields is instructed by [REDACTED]
[REDACTED] to submit representations in response to the Greater Cambridge Local Plan ('GCLP') Regulation 18: Draft Local Plan ('the Reg 18 consultation'). The Joint Local Plan is being produced by Cambridge City Council and South Cambridgeshire District Council ('the Councils') for the combined areas. This document comprises a formal response to the consultation.
- 1.2 These representations are made in the context of CEG's interests at land South East of Cambridge ("the site") and follow-on from those previously submitted to the Issues and Options consultation in February 2020, and subsequently to the GCLP – First Proposals consultation in November 2021. In addition, smaller sub-parcels within the site were submitted to the ongoing call for sites process in March 2025.
- 1.3 The site referred to throughout these representations is located to the south of the existing employment allocations GB3 and GB4, follows the boundary of the Chalk Pits Site of Special Scientific Interest (SSSI) and Limekiln Road and down to Wort's Causeway, east of the existing housing allocation GB1.

2.0 Development Strategy

Policy S/DS Development Strategy

2.1 The GCLP identifies a vision for Greater Cambridge which flows from seven strategic priorities that arise from the seven themes that were first consulted upon through the Preferred Options Consultation in 2021. These include:

1. Climate Change
2. Biodiversity and Green Spaces
3. Wellbeing and Social inclusion
4. Great places
5. Jobs
6. Homes
7. Connectivity and Infrastructure

2.2 Policy S/DS is designed to set out the pattern and location of the identified housing and employment demands under Policy S/JH (New Jobs and Homes). Therefore, the development strategy, and associated strategic scale allocations for development, need to have regard to the economic context within which the GCLP sits, and the ability of Greater Cambridge to accommodate significant levels of economic growth.

2.3 This context of Cambridge as a significant driver of the UK economy has been set out by the Government making the ‘Case for Cambridge’¹ in March 2024, noting that:

“The size of the economic prize, and the potential contribution Cambridge could make to the UK economy is significant.... Continuing to foster the spirit of scientific discover that has driven its unparalleled success to date will unleash Cambridge to achieve its full economic potential”.

2.4 The importance of this economic contribution has been evidenced by Dealroom’s analysis² which indicated that the Cambridge tech ecosystem now had a value of \$191bn, representing 18% of the UK’s entire tech industry value, and which represented a value higher than Italy and Spain’s tech economy combined.

2.5 Ambitions for economic growth are also recognised locally, with the Cambridgeshire and Peterborough Mayor publishing in October 2025 a ‘Local Growth Plan’ which the Mayor considered to be “*unapologetically ambitious*” noting the aspiration to be “*the UK’s fastest growing local economy outside the capital*”.

2.6 The importance of the Cambridge region shows no signs of slowing, and Rachel Reeves in her bid to kick start the UK economy unveiled plans to deliver the Oxford-Cambridge Growth Corridor, with experts considering that it would boost the UK economy by up to £78 billion by 2035.³ In doing so, however, she noted that:

¹ HM Government. The Case for Cambridge. March 2024

² Dealroom. <https://dealroom.co/reports/the-rise-of-cambridge-tech-and-its-role-in-the-future-of-innovation>. 2024

³ Rachel Reeves. <https://www.gov.uk/government/news/reeves-i-am-going-further-and-faster-to-kick-start-the-economy>

“Oxford and Cambridge are two of the least affordable cities in the UK. In other words, the demand is there but there are far too many supply side constraints on economic growth in the region.”⁴

2.7 This recognition of some of the challenges that Cambridge faces in delivering its significant economic growth potential can also be seen through the establishment of the Cambridge Growth Company (CGC), which recognised that whilst Cambridge is one of the UK’s greatest success stories, this success has brought challenges noting that *“Housing affordability, transport congestion and environmental pressures risk holding back sustainable growth.”⁵*

2.8 The concerns around housing affordability and their potential to hinder economic growth in Cambridge are long established; a letter from Cambridge Ahead to the Chancellor and Secretary of State for Levelling up, Housing and Communities identified that there are *‘serious and urgent warning signs that growth could stall’* highlighting the rise in house prices of Cambridge by 78% over the past 10 years.

2.9 Reports instructed by the Greater Cambridge Partnership and Cambridge Ahead⁷ produced by the Centre for Business Research, show that Greater Cambridge still continues to outperform the national economy, albeit noting that:

“Whilst the fundamentals of the Greater Cambridge economy remain strong, investment in key infrastructure (e.g. transport, housing and water) is needed to deliver innovation-driven growth.”

2.10 As demonstrated above, Greater Cambridge is vital to the economic aspirations of the UK, both now and in the future. However, to ensure that continues, the GCLP needs to respond positively to the concerns raised by a range of stakeholders which would threaten the delivery of sustainable growth in the area which include:

- 1 The delivery of a quantum of housing that will enable the job growth expected across the wider Greater Cambridge region, including a wide range of sizes and tenures, to ensure that businesses can draw upon the necessary labour pool.
- 2 The location of houses in areas which are accessible to and well supported by public transport links and can take advantage of the significant investment that is going into improving local infrastructure such as the delivery of Cambridge South station, East-West rail and new guided busways.

2.11 There is an emphasis on the location of development having regard to the presence of sustainable transport options, and in that perspective the approach that Policy S/DS takes is therefore considered appropriate noting that the need for jobs and homes will be met as far as possible in the following order of preference:

- a) Within the Cambridge urban area;
- b) On the edge of Cambridge;

⁴ Rachel Reeves. <https://www.gov.uk/government/news/reeves-i-am-going-further-and-faster-to-kick-start-the-economy>

⁵ Cambridge Growth Company FAQs. <https://thecgc.org.uk/index.php?contentid=152>

⁶ <https://cambridgeahead.co.uk/news-insights/2024/uk-economy-at-risk-due-to-infrastructure-gap-in-uk-s-fastest-growing-city/#:~:text=to%20public%20service-,Letter,being%20done%20to%20propose%20solutions.>

⁷ Greater Cambridge Employment Update June 2025. <https://www.greatercambridge.org.uk/asset-library/Future-Investment/Research-and-Evidence/Employment-update-presentation-June-2025.pdf>

- c) At an expanded Cambourne;
- d) At other new settlements; and
- e) In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.

Edge of Cambridge

- 2.12 The policy acknowledges that the evidence produced in support of the GCLP demonstrates that the edge of Cambridge could be a sustainable location for homes and jobs, noting its accessibility to existing jobs and services.
- 2.13 At face value, CEG is in agreement with the Councils that this is a reasonable order of preference, with sites centrally located and on the edge of Cambridge given a high priority in delivering the jobs and homes that are demanded in such a high growth area. However, it is noted that this order of preference is considered within the context of the Cambridge Green Belt.
- 2.14 Whilst acknowledging that the Councils have to give consideration to the Green Belt, CEG considers that the approach to discounting sites based on Green Belt constraints has significantly hindered the plan's ability to take advantage of the most sustainable development opportunities. These sustainable locations are those which could do the most to help ease transport congestion and their associated environmental pressures by placing growth where there is a very viable alternative to the private car. This runs contrary to the strategic priorities related to climate change, wellbeing, great places and connectivity.
- 2.15 CEG is mindful that the Council's own evidence does not necessarily dispute these points. Indeed, the Strategy Topic Paper which summarises the Sustainability Appraisal (SA) growth options assessed states that:
- "Edge of Cambridge - Green Belt sites: perform better than Cambourne or Grange Farm new settlement in supporting trips by sustainable modes, being closer to existing jobs and services. The location of such sites would likely limit the need for completely new transport infrastructure, albeit development at such locations would likely add pressure to existing infrastructure, including green infrastructure, within Cambridge. Conversely, such sites may provide an opportunity to cater for GI deficits in neighbouring urban areas. Urban extensions to Cambridge would be likely to deliver marginally more homes within the plan period than those away from Cambridge (around 600 homes more than the other options within the plan period). The main disadvantage of such sites would likely be their significant harm to Cambridge Green Belt purposes, and to adverse impacts on the landscape and the historic environment of Cambridge." (emphasis added)*
- 2.16 This sweeping generalisation about the potential harm to the Cambridge Green Belt is a real concern and our specific comments on how Greater Cambridge has failed to adequately consider its Green Belt policy in this context are addressed more fully in our response to Policy S/GB: Green Belt.

Economic Potential

- 2.17 The approach to Green Belt release represents a frustrating lack of ambition by Greater Cambridge, which, whilst recognising that all of this development is helpful for the

continued growth of the Biomedical Campus, has not resulted in opening up the area to the expansion and development of other technology parks such as Peterhouse and Fulbourn Technology Parks on the edge of Cambridge.

- 2.18 CEG highlight that they support the expansion of the Biomedical Campus, Cambridge cluster companies successfully pitched for \$2bn funding in 2025, which was across both the tech sector (\$1.19bn) and life sciences (\$896m)⁸, highlighting that both sectors are highly important to keeping Cambridge as a vibrant tech city. It is therefore indicative that Cambridge has both a booming life sciences and tech sector and CEG highlights the removal of Fulbourn Technology Park from the Green Belt in the South Cambridgeshire Local Plan 2018 which has flourished as well as TusPark at the Cambridge Science Park. CEG emphasise that the GCLP offers a significant opportunity to release Green Belt in a highly sustainable location which can deliver significant economic growth. Restricting the release of the Green Belt to just enabling the expansion of one existing life sciences operator feels restrictive, and a highly limiting option in facilitating and realising the undoubted economic growth which has been demonstrated to exist in Greater Cambridge.

Sustainable Transport

- 2.19 The approach of the GCLP to strictly limit Green Belt release has the potential effect of constraining the economic stimulus that could be achieved through the delivery of new infrastructure developments that are currently taking place on the edge of Cambridge. Significant investment has been provided by the Government to bring forward Cambridge South train station⁹, which in addition to serving the Cambridge Biomedical Campus, will provide a direct connection to East-West rail and connect to the West Anglian Main line serving routes directly between Cambridge and London. It should be noted that part of the site this representation relates to, is on the opposite side of the road from the Biomedical Campus expansion which is being proposed for release from the Green Belt.
- 2.20 In addition to improved rail links, the delivery of the new Cambridge South East Transport (CSET) busway is progressing which will see a new guided busway linking the Biomedical Campus to a new travel hub off the A11 adjacent to the Babraham campus. This will also see the delivery of a path for pedestrians and cyclists which will run alongside the busway.
- 2.21 The delivery of such extensive public transport infrastructure provides a significant opportunity to deliver additional housing and employment hubs in these terminus areas, most notably around Cambridge South station, which in the context of the push for Government support for development around train stations¹⁰ in the consultation National Planning Policy Framework (NPPF) published in December 2025 and the Written Ministerial Statement on the topic published in November 2025, would seem an opportune location on the edge of Cambridge within which to deliver further development.

Active Travel

- 2.22 The delivery of the above public transport infrastructure will also help to encourage active travel which is a key component of ensuring that Greater Cambridge hit their net zero

⁸ <https://www.businessweekly.co.uk/posts/cambridge-cluster-companies-build-global-status-and-hook-more-than-2-billion-funding-in-2025>

⁹ BBC. <https://www.bbc.co.uk/news/uk-england-cambridgeshire-65807808>

¹⁰ <https://www.gov.uk/government/news/housebuilding-around-train-stations-will-be-given-default-yes>

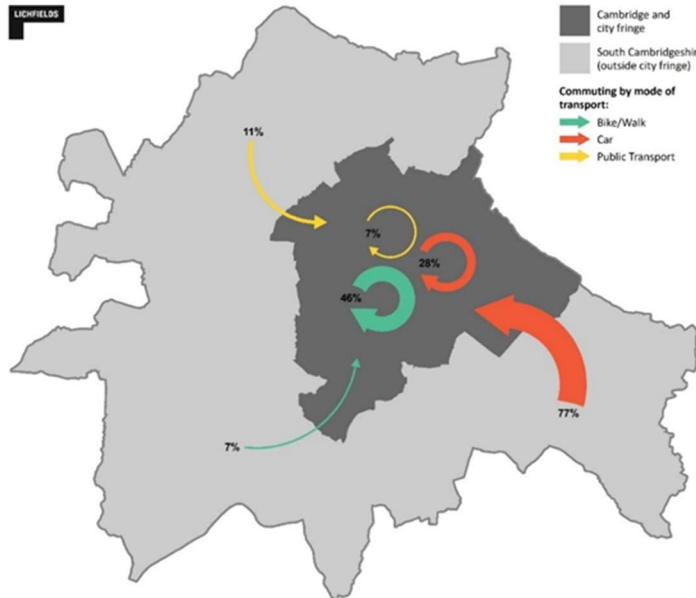
carbon target by 2045. A report produced by Network Rail indicated that it was expected that 95% of onward travel from Cambridge South Station would be by public transport, walking or cycling¹¹ with trips being made to the Biomedical Campus comprising 74% walking and cycling.

- 2.23 The prevalence of such strong public transport links being delivered on the edge of Cambridge makes it particularly surprising that the release of more Green Belt land in this location has not at least been explored. The delivery of both housing and employment allocations would seem logical in such a highly sustainable location, reducing the demand for private transport use across the area, inherent in several of the strategic priorities of the GCLP.
- 2.24 We have considered the travel patterns of people who live in or on the edge of Cambridge compared to those who live outside the edge of Cambridge, i.e. in the rural part of South Cambridgeshire¹². This has utilised Census 2011 data due to the unreliability of the 2021 Census data in respect of Travel To Work Areas. It is acknowledged that the Census 2011 is dated and travel patterns may well have changed over the past 15 years or so in and around Cambridge because of the investments made to place greater emphasis on walking, cycling and public transport to make it easier for residents and employees to choose active and sustainable modes of travel over the private car.
- 2.25 A total of just over 18,000 people travel to work from South Cambridgeshire (beyond the city fringe) into the city and fringe for work. As shown, 77% of people commute by car, with only 11% travelling by public transport and only 7% travelling by bike or walking.
- 2.26 A total of almost 61,000 people live in the city and fringe, and either travel to a fixed location from work or work from home. Of these people almost half (46%) cycle or walk to work – amounting to just over 28,000 people. The proportion driving is much lower than those travelling in from elsewhere in South Cambridgeshire, at 28% (17,300 people). 7% travel by public transport (4,200 people). A further 16% of people living/working in the city and fringe work from home (amounting to 9,500 people).

¹¹ <https://assets.publishing.service.gov.uk/media/63a2ff8dd3bf7f375f7c438d/cambridge-south-inspectors-report.pdf>

¹² This encompasses Cambridge and the Middle Super Output Areas (MSOAs) which directly adjoin the city boundary.

Figure 2.1 Commuting into Cambridge/city fringe by mode of transport – living within Cambridge/city fringe and from those living in South Cambridge

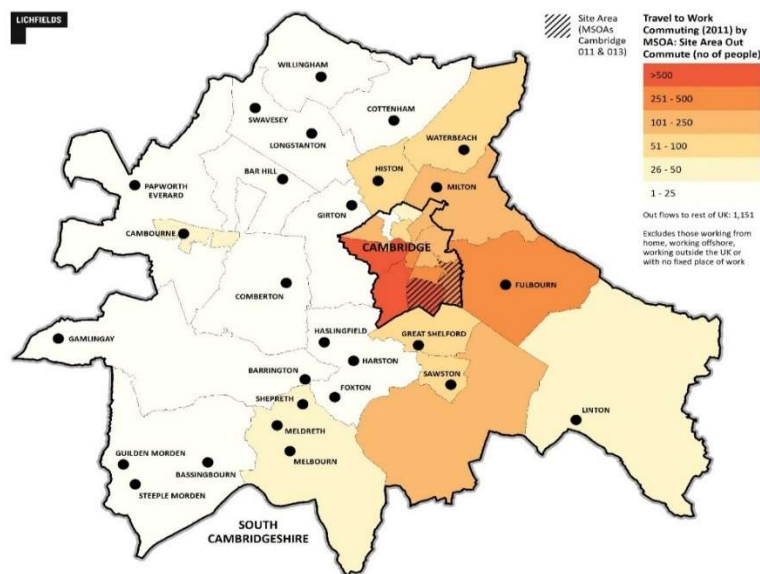


Source: Census 2011. Analysis refers to those who travel to a fixed place of work or work from home. It excludes those with no fixed place of work or who work offshore/outside the UK. *Car refers to those travelling as a driver of a car, van or motorcycle and those who travel by taxi. People travelling as passengers in cars (3%) and those working from home or commuting by another method of transport (16%) are not included in the above diagram

2.27

Looking specifically at the commuting patterns in the area around the site (south east Cambridge), most people who commute travel within the local area (i.e. work in the same Middle Super Output Area in which they live), commute into Cambridge City or into adjacent parts of South Cambridgeshire to the east and south (e.g. Fulbourn and Duxford).

Figure 2.2 Commuting Flows out of site area (MSOAs)



Source: Census 2011. Excludes people who work from home, have no fixed place of work or work offshore/outside the UK.

- 2.28 Of the 6,500 people living in the area around the site at the time of the 2011 Census who travelled to work somewhere within Greater Cambridge¹³, almost half – 3,100 – either cycled or walked to work. Most of these travelled to the city centre or worked locally (i.e. within the same MSOA), as a shown in
- 2.29 Travelling by car (or motorbike, as a driver, or by taxi) was the second most common method for those living in the local area, with 2,400 people (37%) travelling to work this way. However, this was mainly those who worked outside of Cambridge, in areas such as Fulbourn and Duxford. Some residents do drive to work in the city, particularly the west of the city where the University is mostly located (with 282 residents of the site’s local area commuting to this MSOA), but this is much fewer than the number cycling, walking or taking public transport (totalling 834). Public transport as a method of travel to work for those living in the site’s local area is modest at 11.5%.
- 2.30 It would be reasonable to assume that if housing and employment were co-located at South East Cambridge, the proportion who live and work in that local area who cycle or walk to work would be high because work would be within easy walking or cycling distance. At the time of the Census, of the 2,100 people who lived in the local area around the site and travelled to work in the same area, 68% either cycled or walked to work. A further 9% travelled by public transport suggesting reasonable bus links exist in/around the area which is likely to see further growth upon the completion of the CSET guided busway. Any new housing development would also likely boost this figure through the delivery of S106 contributions towards infrastructure to encourage sustainable travel in and around the local area.
- 2.31 It is evident that most sustainable methods of travel to work arise when people are close enough to walk/cycle, leading to the conclusion that housing and employment development is best suited to those areas a short distance from places of work/home i.e. in edge of centre locations. It is logical that the co-location of housing and employment will lead to the most sustainable outcomes and the empirical evidence supports this. Placing more housing and employment in edge of centre locations is most likely to produce the most sustainable live-work patterns and by conduit, help Greater Cambridge achieve a higher rate of active travel and achieve net zero targets.

¹³ As our analysis is concerned with the method of travel used by people who commute to a fixed place of work regularly, i.e. commuters, it excludes those who work mainly at/from home, those with no fixed place of work or those working offshore/outside the UK.

3.0 Assumed delivery and build out

Policy S/JH: New jobs and homes

3.1 The key questions related to Policy S/JH are:

- 1 Whether the planned level of economic growth in the draft GCLP aligns with wider aspirations for economic growth in Greater Cambridge; and
- 2 In any event, whether the draft GCLP contains an amount of housing that is sufficient to support its planned level of job growth.

1. Is the planned level of economic growth sufficiently ambitious?

3.2 Policy S/JH of the GCLP states that development will meet the need for 73,000 jobs, over the plan period, equating to just under **3,500 jobs** per year on average. This is based on the Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU) which explores two economic scenarios for Greater Cambridge:

- 1 a ‘**central**’ scenario which similarly sees recent (10-year) growth rates continue for the next 5 years, but with a quicker return to the long-term (20-year) balanced growth rate thereafter. This would see total job growth of 73,200, or c.**3,500 jobs** per year; and
- 2 a ‘**high**’ growth scenario which sees recent (10-year) job growth rates continue for the next 5 years, with a gradual return to the long-term (20-year) more balanced growth rate thereafter. This would see total job growth of 90,900, or c.**4,300 jobs** per year.

3.3 The EHEU notes that this central growth scenario is considered ‘more moderate but still a growth scenario’ when compared to the identified high growth scenario but provides allowance for periods of slower growth over the full length of the plan period. Paragraph 2.11 of the GCLP confirms Policy S/JH is based on the ‘central’ scenario.

3.4 Of particular relevance to Cambridge’s economic growth potential is NPPF paras 85-86 which states that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth.... particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential...planning policies should...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing...” (NPPF paras 85-86) (emphasis added)

3.5 Cambridge plays a vital role in supporting the national economy, and the Government has described the Oxford-Cambridge Arc as “a globally significant place, home to world-leading technology clusters”¹⁴ which has the potential to “be one of the most productive places in the world”¹⁵. The Government is also seeking to support Cambridge’s economic growth potential through the establishment of the Cambridge Growth Company (CGC) which recognises Cambridge as “a place where world-class research, innovation and enterprise thrive alongside a rich mix of architectural, cultural and natural heritage” but

¹⁴ House of Commons Library Research Briefing, July 2021 ([here](#))

¹⁵ Creating a vision for the Ox-Cam Arc, July 2021 ([here](#))

that it is also the “*most unequal city in England, with housing unaffordability, [and] traffic congestion, ... holding back further sustainable growth...*”¹⁶.

- 3.6 Ambitions for economic growth are also recognised locally, with the recently published ‘Local Growth Plan’ by the Mayor of Peterborough and Cambridgeshire, Paul Bristow, setting “*an ambition for Cambridgeshire & Peterborough’s economy to grow faster than any other region in the UK*”¹⁷. Its baseline growth ‘business as usual’ scenario assumes annual economic growth at 1.2%, but the Local Growth Plan considers two further scenarios:
- **Doubling our Economy:** our core scenario - would see the Cambridge economy **double** in size by 2050 to £62.3bn GVA. The Local Growth Plan states “*we can achieve this goal of doubling the size of the economy by addressing major constraints, allowing us to return to this competitive rate of 2.8%. By doing so, we will be able to achieve the central economic pledge of the CPCA from the initial devolution deal, i.e. to double GDP in 25 years*”; and
 - **Aspirational Growth:** our Growth ambition is to see the economy **triple** in size by 2050 to £97.1bn GVA, unlocking an economic powerhouse. Whilst the plan acknowledges that this level of growth would require a strong and co-ordinated effort, including with central Government intervention and devolution, it notes that “*our historic Growth and track record demonstrate that we are one of only a few UK areas capable of achieving this magnitude of economic growth*”.
- 3.7 Housing forms a key element of the Local Growth Plan as a vital element of infrastructure needed to support economic growth; housing and infrastructure are discussed at length throughout the Mayor’s plan.
- 3.8 In the context of the national importance placed on the economic potential areas like Cambridge, and local ambitions for growth, the ‘high’ scenario considered in the EHEU represents a relatively modest uplift in jobs (around 25% above the ‘central’) compared with the baseline level of job growth. We consider the ‘central’ level of job growth to be a baseline because the EHEU shows it is the amount of jobs that would be supported by the standard method, which is the minimum level of housing mandated by Government. **At the very minimum, the Councils should be considering the ‘high’ job growth scenario of c.4,300 jobs per year – if not even higher job growth scenarios – to ensure that its evidence base contains the full range of aspirational scenarios for Cambridge.** This evidence should be used to inform housing needs in the GCLP.
- 2. Does the draft GCLP contain enough housing to support its planned level of economic growth?**
- 3.9 Notwithstanding that we consider the economic basis of the plan to be insufficiently ambitious, failing to reflect Cambridge’s economic potential, the amount of homes in the plan is insufficient even to support the planned level of job growth.
- 3.10 The supporting text to Policy S/JH (para 2.10) states “*for jobs, the [EHNU] central forecast assumes strong growth of around 4,000 additional jobs per annum ... We consider that we should plan for this forecast of the most likely level of new jobs*”. This statement is not

¹⁶ Why Greater Cambridge? CGC ([here](#))

¹⁷ Local Growth Plan, Cambridgeshire and Peterborough Combined Authority

reflective of the EHNU, which shows (Table 3.7) the ‘central’ scenario being associated with 3,490 jobs per year. The 4,000 jobs per year referred to at para 2.10 is closer to the ‘high’ scenario, which Table 3.7 of the EHNU shows is 4,330 jobs per year. If policy is planning on the basis of around 4,000 jobs per year, over a 21-year plan period the difference between the actual number of jobs (3,490 per year) and those asserted (4,000 per year) is nearly 11,000 jobs.

- 3.11 The GCLP provides significant upward flexibility for its employment land provision (even with necessary allowances for vacancy and flexibility), providing significantly more floorspace than the EHEU shows to be required for the ‘high’ scenario in both R&D and industrial/warehousing uses. Whilst this is welcomed (because we consider that the GCLP should be more economically ambitious than it currently is) this degree of employment land must be supported by a commensurate amount of housing. If not, this would almost certainly exacerbate unsustainable commuting patterns, impact on housing affordability, and affect the ability of local businesses to be resilient and remain competitive. Fundamentally, a lack of housing to support employment growth would undermine all of the objectives of sustainable development in the NPPF and many objectives of the GCLP.

Buffer

- 3.12 The Councils’ total identified housing supply amounts to 51,328 homes (excluding North East Cambridge), giving a 6.5% buffer above the minimum requirement of 48,195 dwellings set out in Policy S/JH. As a point of principle, 6.5% does not provide sufficient headroom to ensure delivery of the housing requirement should some sites not deliver in the timescales, or at the pace assumed in the housing trajectory. This is particularly so in the context of the market pressures set out above. Something akin to 10% would be more reasonable.

Optimistic delivery assumptions

- 3.13 To add to the commentary above, the Cambridge Housing Delivery Study Addendum (October 2025) (‘the Addendum’) cites particularly high annual build out rates, noting these have previously been achieved due to the continued economic growth within Greater Cambridge. The Addendum identifies features of the Greater Cambridge market that support very high build rates including the delivery of more affordable housing in Greater Cambridge than the national average due to a higher policy requirement in the area.
- 3.14 Whilst an elevated level of affordable housing has historically helped to achieve faster build out rates, the Addendum fails to take into account both viability concerns and the current housing market slowdown.
- 3.15 CEG has seen evidence of high infrastructure costs affecting development in Greater Cambridge, most notably the relocation of the Cambridge Waste Water Treatment Plant where the Government pulled funding in the wake of escalating material and labour costs in August 2025.
- 3.16 Additionally, there is no consideration given to the slowing down of the housing market in Greater Cambridge which have been compounded due to both supply and demand side challenges, noting the removal of Government support through the abolition of the Help to Buy scheme and the lack of support for first time buyers.

3.17 As set out in our response to Policy S/DS, the Strategy Topic Paper which summarises the SA growth options assessed states that edge of Cambridge sites in the Green Belt, or urban extensions to Cambridge, would be likely to deliver more homes within the plan period than those away from Cambridge. Yet, the spatial strategy for the GCLP is allocating sites away from the edge of the city which evidence shows deliver more slowly in this geography.

3.18 It also notable that the GCLP carries forward allocations in the urban area which have not delivered since the adoption of the previous local plans. There are well documented difficulties around the viable delivery of brownfield sites in the current economic climate so assumptions about their delivery should be realistic in this context.

Windfall allowance

3.19 The Addendum published alongside this consultation acknowledges the recent downward housing delivery trends but has stated *”it is not considered necessary to amend existing typology-based assumptions regarding lead-in times or build-out rates”*.

3.20 The Addendum further states that *“although more recent data shows a short term fall in windfall completions, 425 dwellings per annum (dpa) remains appropriate for use in Greater Cambridge.”* The Addendum considers that this is a *“cautious but realistic assumption”*, noting that policy changes should improve windfall site delivery. However, Paragraph 75 of the NPPF states that:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply”.

3.21 The Addendum fails to advance any evidence at all that policy changes will have a material impact on the delivery of windfall sites and therefore it is unclear how this policy aligns with the requirements of the NPPF.

3.22 In lieu of not allocating further sites, the Councils should consider the potential of omissions sites which could be strategically planned with accompanying policies designed to meet the strategic goals of the plan, the Councils could facilitate a more joined-up approach to development for the 7,225 homes currently anticipated on windfall sites. This would encourage plan-led development, in line with the NPPF’s ambitions.

3.23 In summary, bringing all the above points together means that:

- 1 Even of the 51,328 homes identified in the GCLP for delivery over the plan period, more than 7,000 of these are windfalls, or future speculative, unidentified development. Only 44,104 homes are allocated or planned for on a specific site.
- 2 The draft GCLP currently plans for more than sufficient employment floorspace to deliver jobs in line with ‘high’ job growth scenario;
- 3 The EHEU shows that the ‘high’ job growth scenario would require c.540 dwellings per year more than the ‘central’ job scenario¹⁸;
- 4 Over a 21-year plan period, if job growth were aligned with the ‘high’ scenario but housing were only provided according to ‘central’ scenario needs, there would be a **shortage of c.11,300 homes**. This is because the ‘high’ scenario requires c.59,400

¹⁸ EHEU Table 4.6 shows ‘central’ scenario requires 2,292 dpa; ‘high’ requires 2,829 dpa = difference of +537 dpa.

dwellings whilst the ‘central’ provides only c.48,100 dwellings. Whilst there is currently some upward flexibility in the housing supply, even if all allocated sites came forward the amount of housing would still fall short of this need by between **c.4,000-8,000 homes**;

- 5 This shortage would be higher still if actual job growth exceeded the ‘high’ scenario, which would occur if most or all of the allocated employment land came forward, i.e. the shortage is likely to be **even greater** still.
- 6 The actual amount of housing which should be allocated to meet ‘high’ [or higher] job growth with a 10% buffer applied to the overall housing needs of 59,400 dwellings would equate to a total of **c.65,400** homes allocated in the plan [minimum].
- 7 Against the GCLP stated housing supply of 51,328 homes, a housing requirement which is reflective of enough homes to meet the high job growth economic scenario with a 10% buffer (c.65,400 homes), **more than 14,000 homes** should be for. Do demonstrably reduce the unplanned for windfall allowance of over 7,000 homes which is implicit in the supply, this figure could increase to **well over 20,000 homes**.
- 8 In the context of delivering such a significant quantity of additional housing, it is a key point of sustainability that job expansion should come forward in the same locations. South East Cambridge provides an exceptionally logical location for this, with Peterhouse and Fulbourn Technology Parks both with scope to expand their operations.

3.24 On this basis, the draft GCLP as currently drafted is **not sound** because:

- It is **not positively prepared** (NPPF para 36a) as it does not meet the area’s objectively assessed development needs; and
- It is **not justified** (NPPF 36b) as it’s evidence base does not show that it would result in an aligned housing and employment strategy, that is consistent with sustainable development.

Allocation of more development sites

3.25 It is evident that there is a need to deliver housing development on substantially more sites than is currently allocated in the GCLP. But it is in this context that new allocations to this consultation, like Grange Farm, need consideration. The allocation of Grange Farm from a spatial planning perspective is not a logical conclusion when the evidence on sustainable patterns of development around the Greater Cambridge area are taken into account. This is explored extensively in our response to Policy S/DS. The edge of Cambridge can deliver housing sustainably, utilising rail connections from a soon to be opened station. Conversely, Grange Farm is heavily reliant on the delivery of the CSET busway to enhance its sustainability credentials, which has suffered delays and is only now close to public inquiry later this year. As set out extensively in our response to Policy S/GB, when there is a need to allocate so many more housing sites, the blunt application of Green Belt to any consideration of further allocation on the edge of Cambridge, which is shown to be one of the most sustainable locations for growth in the GCLP evidence base, is at best illogical.

4.0 Green Belt

Policy S/GB: Green Belt

- 4.1 In our response to the first draft consultation in 2021, the direction of the indicative themes of the plan were supported, recognising that Greater Cambridge needed to balance the support for development through GCLP policies whilst ensuring that sustainability remained at the forefront of decision making. However, given the presence of the Cambridge Green Belt, CEG warned that the Councils should not arbitrarily limit themselves by not countenancing Green Belt release. The development of some Green Belt sites on the edge of Cambridge such as South East Cambridge would lead to more sustainable forms of development through shortened commuting distances and prevalence of public transport options than strategic growth options beyond the Green Belt.
- 4.2 Unfortunately, this GCLP has only crystallized these concerns. A review of the GCLP highlights that only one area of Green Belt release has been proposed on the edge of Cambridge, to facilitate development needs of the Cambridge Biomedical Campus. Whilst not objecting to the release of this land specifically, it is noted that this lack of Green Belt release is within the context of Greater Cambridge recognising at Para 2.62 of the GCLP that their evidence shows that the “*edge of Cambridge could be a sustainable location for homes and jobs, being accessible to existing jobs and services*”. It is therefore frustrating that a sweeping, generalised approach has been taken to the rest of Green Belt land on the edge of Cambridge with no further release considered.
- 4.3 Supporting information justifying this approach¹⁹ sets out that the ‘*Government attaches great importance to Green Belts as set out in national planning policy*’ and that Greater Cambridge does not consider that their development needs alone provide the ‘exceptional circumstances’ required in national policy to justify removing land from the Green Belt in this local plan.
- 4.4 Whilst CEG acknowledge that the Government does place a strong emphasis on the importance of Green Belts within national policy, there has been a recognition that in order to achieve their target of 1.5m homes a year it will be necessary for areas of Green Belt in sustainable locations to be considered for development. This was acknowledged through the 2024 NPPF update whereby the Government indicated a new ‘common-sense approach’²⁰ to be introduced to the Green Belt, requiring local planning authorities to review Green Belt boundaries and to identify areas of ‘Grey Belt’ land.
- 4.5 This is reflected within paragraph 148 of the NPPF, where it is considered that it is necessary to release Green Belt land for development, plans should give priority to previously developed land (PDL) and then consider Grey Belt as the second most sequentially preferable location.
- 4.6 New and updated Green Belt planning practice guidance (PPG) was published in February 2025 to advise Local Authorities that in addition to the reviewing their Green Belt boundaries that the government expects “*local authorities to identify Grey Belt land to*

¹⁹ Policy S/DS – Development Strategy Supporting information <https://consultations.greatercambridgeplanning.org/draft-greater-cambridge-local-plan-consultation/development-strategy/policy-sds-development>

²⁰ Gov Press Release. <https://www.gov.uk/government/news/planning-overhaul-to-reach-15-million-new-homes>

inform this review and the prioritisation detailed in paragraphs 147 and 148 of the NPPF”.

- 4.7 This is not something that has been done with the updated GCLP consultation. The consultation indicates that due to the general development needs having been met and Green Belt not being required, there has been very little consideration of the Green Belt, and no consideration of Grey Belt sites as part of the GCLP’s site allocation process. CEG understands that the Green Belt assessment which forms part of the evidence base is currently in the process of being updated to consider Grey Belt sites and this will be published later in 2026.
- 4.8 CEG consider that the approach taken by Greater Cambridge is therefore fundamentally incorrect, including failing to consider the potential for Grey Belt sites to accommodate growth. As both the NPPF and PPG identify clearly, a full Green Belt review should be undertaken in authorities where Green Belt release is required to fulfil development needs. Whilst the GCLP might have a strategy to meet needs which only has minimal Green Belt release, it is not aligned with its strategic priorities for the GCLP, with its own evidence clearly concluding that development on the edge of Cambridge would perform better than new settlements in supporting trips by sustainable modes, being closer to existing jobs and services and likely limiting the need for completely new transport infrastructure. To emphasise this point, in identifying Green Belt release to support the expansion of the Biomedical Campus and enable the delivery of the Babraham Research Campus, there is tacit acknowledgement from Greater Cambridge that the release of Green Belt was necessary to achieve this.
- 4.9 The supporting information to Policy S/GB makes reference to ‘The Cambridge Green Belt purposes’ document established through the Cambridgeshire and Peterborough Structure Plan (2003), emphasising that the Cambridge Green Belt in particular has a particular role and function and this is alluded to within Page 19 of the Local Plan which considers that the ‘*Cambridge Green Belt was established to preserve the unique character of Cambridge*’. However, there is no provision within national policy that would provide Greater Cambridge with any particular dispensation to avoid having to undertake the full requirements of national policy because of any perceived unique local circumstances. Consideration of whether a site is Grey Belt for example, is defined as not strongly performing against purposes a), b) or d) of the Green Belt as set out in the NPPF. There is not clause for giving special policy dispensation for areas with bespoke Green Belt purposes.
- 4.10 As such, CEG consider that the approach taken on Green Belt land is currently incomplete, including failing to consider the availability of Grey Belt land on the edge of Cambridge. In order to facilitate necessary development, the plan has identified areas of Green Belt release. However, the Green Belt assessment which underpins the GCLP has not fully triangulated itself with the strategic priorities of the plan, especially with regard to sustainability. Furthermore, it is a reasonable expectation that sites which would be considered ‘Grey Belt’ will be identified on the edge of Cambridge which are in a highly sustainable location and support the growth of Greater Cambridge that is being targeted at both a local and national level, including the CEG land at South East Cambridge. To avoid speculative applications successfully making this case outside the local plan process, especially in the context of slowing housing delivery and problems associated with

maintaining a five year housing land supply in the short term, it would be advantageous to plan for this type of development now in the GCLP.

5.0 Addressing HELAA Conclusions

5.1 The site was previously assessed under the Housing and Employment Land Availability Assessment (HELAA) published by Greater Cambridge in 2021 (Site ref 40058). The site was originally submitted as one singular red line, with confirmation from CEG that the site was available immediately for development. The assessment confirmed that both availability and achievability were given ‘green’ outcomes, however the site was deemed not to be suitable for residential or commercial development. This was due to a ‘red’ assessment on landscape and townscape grounds which considered the site to be *‘isolated in nature’* with the openness of the site resulting in the site being *‘exposed to wide views... Material harm to the surrounding countryside’s landscape character and views.’* As such, any development at the site was considered to be *‘difficult or impossible to mitigate in terms of visual impact and harm to the openness of the Green Belt and setting of the historic city’*.

5.2 As part of an updated call for sites submission in March 2025 three individual sub-parcels within the site were submitted. Careful consideration was given to each and their extent reflected advice on parcels within the wider land holding which could be suitable for development in landscape terms and meet the definition of Grey Belt, thereby addressing the alleged harms to the purposes of the Green Belt. The parcels are:

- 1 Southern extension to Peterhouse College (A southern expansion to previously released Green Belt sites GB3/GB4) (HEELA Site ID 200790);
- 2 An easterly expansion to the previously released Green Belt site GB1 (HEELA Site ID 40058b); and
- 3 Southern extension to Employment site E/3 (HEELA Site ID 200795, which incorrectly merges it with Site ID 200790 above).

5.3 These parcels were submitted as new sites to the HELAA process as CEG considered they should be assessed on their own merits.

Peterhouse Technology Park

5.4 The northeastern tip of the site abuts Peterhouse Technology Park, a world renowned technology park, which within the last 12 months has seen the completion of ‘The Optic’, a high-quality lab and office space which has been fully occupied by ARM holdings. The attraction of such inward investment is indicative of Cambridge as an important tech city, but in particular the desirability of such an edge of centre location. This marks the continued long-term investment by ARM, with The Optic being the seventh building that ARM occupies on site. Developing this parcel of South East Cambridge would enable a natural extension southwards of the GB3 and GB4, two sites that were previously released from the Green Belt through the Cambridge City Local Plan 2018. The continued expansion of both the Fulbourn Road Business park and Peterhouse Technology Park would represent a natural extension to an existing business cluster in a highly accessible, sustainable location.

5.5 This parcel was considered to be available and achievable, however deemed unsuitable due to the site access assessment which stated that *“the site does not link to the adopted public highway and is therefore inaccessible to highway users”*.

- 5.6 Whilst it is acknowledged that this is currently accurate, it is unclear why this was given a ‘red’ rather than ‘amber’ assessment score when this issue could be easily rectified. The submission to the call for sites assessment confirmed that the parcel would form an extension to the existing Peterhouse Technology Park and promoted on behalf of the landowners, thereby ensuring that an access could be facilitated through the existing Technology Park which connects to Fulbourn Road. CEG therefore disagrees with the findings of the HELAA and re-emphasise the case put forth through the call for sites that the site is suitable, available and achievable, with no constraints that could not be suitably mitigated. In the alternative, there could be access across the land to the south of Employment Site E/3 for the reasons given below.

Southern Extension to Employment Site E/3

- 5.7 This parcel was considered to be available and achievable, however deemed unsuitable due to the site access assessment which stated that “*the site does not link to the adopted public highway and is therefore inaccessible to highway users*”.
- 5.8 CEG strongly disagrees with this conclusion, noting that the covering letter submitted with the submission to the call for sites explicitly stated that access would be provided via the roundabout within the consented scheme on Site allocation E/3. There are legal rights to enable this access to be delivered across Employment Site E/3. The ‘red’ score is, therefore, unjustified and unsupported by the evidence already presented to the Councils. The score should be ‘green’.
- 5.9 The parcel is not subject to any constraints whilst providing a natural extension to an existing employment hub which is globally recognised, enabling additional future growth and increased levels of inward investment to Greater Cambridge.

Eastern Expansion to GB1

- 5.10 The easterly expansion to GB1 is included within Appendix 2 of the HELAA Addendum 2025 (JDi number 40547). The addendum states that the site was not assessed, noting that the ‘*boundary amendment to the site would not result in a change to the previous HELAA assessment for the site*’.
- 5.11 However, if one navigates to the interactive HELAA map²¹ the site appears to have been assessed (Site ID 115197, HELAA Site ID 40058b) which considers that the easterly expansion to GB1 is given a ‘red’ suitability with regards to landscape. It is unclear why these two separate bits of the evidence base contradict each other, and why Greater Cambridge has seen fit not to include the assessment of the site within its updated HELAA document. However, taking the interactive map assessment at face value, the assessment states:

²¹

<https://placemaker.greatercambridgeplanning.urbanintelligence.co.uk/p/document/5/?appid=fb3771f8fa0f42e2af8511978fd8ec62>

“The openness of the site which is exposed to wide views, in part due to the topography, means that there would be a significant material harm to the surrounding countryside’s landscape character and views from the wider and local area. Any development would be difficult or impossible to mitigate in term of visual impact and harm to the openness of the Green Belt and setting of the historic city.”

- 5.12 As set out above, this is a much smaller parcel of land to that previously assessed by the HELAA. The previous HELAA assessment of the full site considered the site to be unsuitable due to landscape considerations, with comments relating to openness of the site and impact to the surrounding countryside’s landscape character being primarily related to the contouring of the site. These comments were taken onboard and it is unclear why this parcel, which is situated to the west of the high ground and located outside of those views directed through the centre of Cambridge, has not been reconsidered on landscape grounds. It is not plausible that the same conclusions can be reached on this smaller parcel which avoids high ground and the setting of views of the City.
- 5.13 In our view, this parcel of land would form an appropriate extension to the previous GB1 allocation, providing two key benefits. Firstly, additional development in this location would enable the delivery of local services and facilities to cater to the needs of both current and future residents of GB1 and GB2 such as a local shop or GP surgery. Secondly, the parcel is in close proximity to the Biomedical Campus which has been identified as requiring c.20,000 homes of various tenure types²² to support the workforce and enable continued growth. It therefore provides an opportunity to allocate a residential site which can help meet identified housing needs and delivery housing in a highly sustainable location within walking and cycling distance of a prominent employer within Greater Cambridge.

²² <https://cambridge-biomedical.com/wp-content/uploads/2024/07/CBC-Housing-Study-Report-Final-May24.pdf>