

By Online Consultation Portal

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31/3/2026

Response to consultation on Establishing a Development Corporation in Greater Cambridge

The following sets out the consultation questions and our response.

Why a Greater Cambridge Development Corporation is needed

1. What do you think about the current delivery of infrastructure and homes in Greater Cambridge?

Greater Cambridge has a high quality, award-winning planning service which is already delivering a large number of homes and employment, for example 2024/25 delivery of 2,265 new homes (687 affordable) and ~63,000 sqm employment floorspace and permission already granted for ~37,000 homes on strategic sites and ~400,000 sqm office/lab space (to mid-2030s).

However, our area faces key infrastructure deficits with utility infrastructure (water, waste water, electricity), transport infrastructure, green infrastructure and social infrastructure (schools, health facilities, cultural facilities, etc). These need to be addressed to create a greener, fairer city, ensure community consent for growth and improve quality of life for all and thereby attract and retain top international talent. We are concerned that the consultation material (and thus the government) is focusing too heavily on utility and transport infrastructure. A survey of young employees by Cambridge Ahead in 2021 identified that alongside housing costs and transport, the lack of an accessible, high-quality nature rich environment was the biggest constraint to living and settling in Cambridge. In some surveys the lack of accessible nature scored more highly in needs than even housing or infrastructure. If this is not recognised, no matter how many houses are built or jobs created, or travel times reduced, companies will not be able to attract or retain the skilled workers they require and will eventually relocate to somewhere with a better environment and hinterland.

One of the main challenges we face is that housing is too expensive. Workers moving to Cambridge cannot afford to live here and are living increasingly distant to Cambridge including in parts of Suffolk, Essex, Hertfordshire, Bedfordshire and wider Cambridgeshire. This in turn creates transport and environmental problems. Over the past 20 years the housing market in Cambridge has consistently demonstrated that it cannot deliver housing that is

affordable to workers. Without changes to the way the housing market operates having a Development Corporation will not solve Cambridge's main growth problem.

Our growth problems have been exacerbated by too many councils and associated politics, combined with additional layers of bureaucracy in the form of the Greater Cambridge Partnership and Combined Authority (all of which are inadequately resourced by central government to support rapid growth). Local Government Reorganisation will help solve this problem in Greater Cambridge, as would more funds from government to ensure that our local authorities and national agencies have sufficient capacity to handle the levels of growth that are being proposed.

In short, greater Cambridge does not need help with planning, nor more confusing layers of responsibility, it needs four things:

- Firstly, a radical change to the way the housing market operates.
- Secondly, help with infrastructure. This is both funding from government and government intervention to make it happen.
- Thirdly, the ability to plan strategically for the Cambridge economic area, including parts of neighbouring counties and districts.
- Fourthly, a bold, comprehensive and coherent vision to endure the test of time and political changes - like the Finger Plan for Copenhagen or the Circulation Plan for Ghent.

2. What do you think about the proposal to create a centrally-led urban development corporation (UDC) in Greater Cambridge?

1. There are no other UK examples of a development corporation being established to cover a dynamic historic city and its rural hinterland. A Greater Cambridge Development Corporation will be an experiment with the future of one of the nation's most important economic areas. It is an unnecessary risk. We believe that a Development Corporation in the form proposed is the wrong solution to the problems.

The government hasn't set out what other options it has considered and why they were not chosen, this is essential for transparency. For example, another approach could be two-pronged. Firstly, a strategic planning initiative that could spatially plan for development and infrastructure across the Cambridge economic area (including the relevant areas of Suffolk, Essex, Herts, Beds and Cambridgeshire). Secondly, once a plan is agreed, a delivery organisation could be established to fund, co-ordinate and deliver those aspects of the plan that local authorities and agencies can't. This might take the form of a Development Corporation but one with more defined purposes, and likely to be more akin to previous development corporations in other parts of the UK.

Any type of Development Corporation for the Cambridge economic area needs a bold, comprehensive and coherent vision to endure the test of time and political changes - like the Finger Plan for Copenhagen or the Circulation Plan for Ghent.

Delivering such an ambitious plan on time and without self-defeating compromises requires a transparent, inclusive process for creating the vision. The Greater Cambridge Partnership stands as a cautionary tale of what happens without one. Conventional consultation of the kind used for Local Plans and Local Transport Plans is not enough: it reaches too few people, is too technical, and asks too much of those who engage with it.

We believe a Citizens' Assembly, informed by a broad range of experts, needs to be a key component in the process of developing a vision. The Lambeth Kerbside Strategy is an example of a fairly radical plan that is succeeding at least in part because it emerged from a Citizens' Assembly (on climate change).

The Greater Cambridge Partnership (GCP) held a Call for Evidence in 2015 and a Citizens' Assembly in 2019. Both of these could have guided the GCP on a much more fruitful path than it has followed, but it chose to ignore most of the advice and recommendations in favour of delivering a little-known plan adopted in 2014 (the [Transport Strategy for Cambridge and South Cambridgeshire](#)).

A democratic mandate is essential for controversial change, again to endure the test of time and political changes. It is extremely unlikely that the leaders of the relevant local authorities will come to a consensus view on controversial change. For example, they might agree to the principle of light rail, but not to the details or the complementary measures (e.g. road pricing or restricting movement by car) required to make it feasible and financially viable.

The Greater Cambridge Development Corporation's plan needs to be based on a manifesto put to a vote, and led by a democratically accountable public representative. This is the only proven model for rapid transformational change in democratic societies - for example in London (Ken Livingstone), Manchester (Andy Burnham), Paris (Anne Hidalgo), Ghent (Filip Watteeuw), Groningen (Koen Schuiling), New York City (Janette Sadik-Khan) or Bogotá (Enrique Peñalosa).

Adding a Development Corporation to the local governance structures will add yet more complexity, political conflict, waste of public funds, public confusion around powers and responsibilities, and mistrust in government – the complete opposite of a democratic mandate.

2. The supporting text in the case for a Development Corporation states: “It (Cambridge) is special because of its world-renowned history, heritage in the built environment, the quality of green spaces and natural landscapes, its communities and cultural assets.”

However, this statement is not completely accurate in terms of the natural environment. The quality of the natural landscapes around Cambridge are highly degraded.

Cambridgeshire is one of the most nature-depleted counties in England, one of the most nature-depleted countries of the world. Over 70% of Cambridgeshire is arable farmland, most of it intensively farmed and not accessible to the public. South and east of

Cambridge there are wards with no public rights of way from the City to the surrounding countryside. The biodiversity and natural environment of the Greater Cambridge area is in poor health with a low land cover dedicated to nature habitats and many remaining high-value nature sites being damaged by visitor pressures.

Any analysis of infrastructure needs must begin with an accurate analysis. The consultation document ignores the plight of the natural environment and starts from an incorrect premise.

The Wildlife Trust and Cambridge Past Present & Future published the Cambridge Nature Network report in 2021 (Cambridge Nature Network – Full Report). This set out the scale of the challenge but also provides a framework within which sustainable development can be brought forward in and around Cambridge.

The Greater Cambridge Development Corporation

3. What matters most to you about the future of Greater Cambridge?

What most matters to Cambridge Past, Present & Future is ensuring that Greater Cambridge's distinctive character, heritage and natural environment are protected and improved.

Who wouldn't agree with statements in the consultation, such as *"It would be guided by a commitment to sustainable growth, delivering high quality placemaking that protects and enhances Greater Cambridge's distinctive character, heritage and natural environment, and creating beautiful, well-designed places where people want to live, work, study and visit."*?

However, experience shows that it would be naive to believe that this is possible on a city-scale. There are always pros and cons of any development. Trade-offs, or 'the planning balance', always needs to be considered. The question is who has the democratic legitimacy to make those decisions on the trade-offs in the public interest – and how those decisions are made.

As an example, Peter Freeman (on behalf of the Cambridge Growth Company) appeared at a public inquiry for the Cambourne-Cambridge Busway insisting it should be approved. The route of that busway would have a significantly harmful impacts on a county wildlife site and on an important landscape area for Cambridge. The busway cannot be said to be *"delivering high quality placemaking that protects and enhances Greater Cambridge's distinctive character, heritage and natural environment, and creating beautiful, well-designed places"*.

4. Do you have any views on the objectives of the Greater Cambridge Development Corporation, as set out in the consultation document?

1. We are shocked that there is not a single mention of heritage given that Cambridge's world class heritage is an essential element of what makes it attractive and successful. This does not instil confidence in a Development Corporation.
2. We strongly support objective 4 "Deliver environmentally sustainable and climate resilient outcomes through creating and maintaining large, connected, high-quality green and blue

spaces, and long-term stewardship of natural assets.” as a starting point but this objective is not followed through in the rest of the consultation material, with only a very short section addressing water shortages and supply challenges.

This objective is already at risk of being undermined if government proceeds with proposed changes to the National Planning Policy Framework to remove the ability of a Development Corporation or our local councils to set rates of Biodiversity Net Gain above 10%. It is currently proposed to be 20% in Greater Cambridge.

There needs to be a much clearer definition of what is ‘environmentally sustainable’ and this needs to be given equal weight to economic and social considerations.

Cambridge needs nature recovery at the scale proposed within the Cambridge Nature Network (Cambridge Nature Network - Full Report), with the creation of large areas of downland, woodland and meadows, and wetlands in the order of hundreds or thousands of hectares.

Given that there will be no new water supply to our area until 2032 we question how a Development Corporation could bring forward any additional development during that period without harm to the environment (thus failing to achieve objective 4).

3. Many constraints are due to the failure of the housing market and successive central government regulatory failures (utilities, infrastructure, health, local funding) and/or lack of investment. The Development Corporation should seek to overcome these issues, and accelerate delivery of existing permissioned and planned growth sites.

Proposed boundary of the Development Corporation

5. What do you think about the proposed boundary of the Greater Cambridge Development Corporation, as set out in Annex B of the consultation document?

We believe you have got this wrong. The boundary excludes many of the most suitable areas for development and supporting infrastructure within the economic area of Cambridge, namely:

1. Surrounding market towns including: Royston, Ely, Bury St Edmunds, Haverhill, St Neot's, Huntingdon and Saffron Walden. A significant percentage of Cambridge workers already live in these places.
2. Newmarket-Bury St Edmunds railway line (part of East West Rail).
3. Royston railway line Hitchin (Ashwell & Morden is one of the best served rural stations in the country).
4. Larger villages such as: Bottisham and Great Chesterford

One of the main benefits that a Development Corporation could bring to our area is to overcome the problems of planning and delivering development and infrastructure across administrative areas. This **is** a genuine constraint to unlocking regional growth. Currently the

Cambridge economic area includes parts of North Hertfordshire and Hertfordshire County councils, Uttlesford and Essex County councils, West Suffolk and Suffolk County councils, Central Beds Council (unitary) and Huntingdonshire and East Cambs (both Cambridgeshire and possibly to become a unitary). The consultation refers, several times, to the challenges of working across councils and agencies but once Local Government Reorganisation takes place there will only be one council for greater Cambridge and therefore the previous problems of multiple councils in greater Cambridge will no longer exist. However, the challenge of better connecting housing, infrastructure and jobs across the other administrative boundaries will remain. This is compounded by the fact that our Mayoral area excludes Hertfordshire, Essex, Bedfordshire and Suffolk.

The proposed boundary also fails to align with the aspirations for the Ox-Cam corridor, namely that growth will benefit the area as a whole and not be concentrated only in Cambridge and Oxford.

Proceeding with a Development Corporation for greater Cambridge only would be a missed opportunity to genuinely unlock growth and we strongly encourage you to think again.

Power and functions

6. What do you think about the phased approach we have proposed in regard to plan making powers?

We agree that plan making should not commence until after the next Local Plan is adopted (in 2028).

7. What do you think about the proposals to give the Development Corporation plan making powers as set out in the consultation document?

We object to the current proposals.

We object to an unelected board having these powers. By this, we mean that the people making the decision on future plans must be democratically elected. If the board is made up of elected and appointed members, then either the majority of the board should be elected, or the elected representatives should have the power of veto. If that were the case, then we would have no objection.

Following Local Government Reorganization (LGR), there will be one local authority with planning and transport powers for greater Cambridge. It would be much more effective for that authority to have full plan making powers for greater Cambridge, with the role of the Development Corporation to inform, influence and support the delivery of whatever plans it agrees. Any Local Plan has to be approved by a government inspector, and this gives the government the opportunity to ensure that any plan meets its national objectives.

LGR is simplifying governance into a single, powerful unitary authority for planning, housing, and highways. The Development Corporation would create a confusing three-tier system (Development Corporation, unitary council, mayor), undermining LGR's goals.

What would be more beneficial to our area, and help unlock growth, is for the Development Corporation to take on a spatial planning role that covered the wider Cambridge economic area (in the adjacent areas of Suffolk, Essex, Herts, Beds and Cambridgeshire), see our answer to question 5, and for the local plan making process to remain with local government.

We support the proposal that the Secretary of State uses a direction to restrict the use of plan making powers by the Development Corporation when it is established. We believe that this should be permanently in effect and only lifted if it appears that local government is not adequately able to progress any future Local Plans (i.e. those beyond 2028). This would be consistent with the proposed approach to transport powers.

8. What do you think about the proposals to give the Development Corporation powers to determine planning applications as set out in the consultation document?

We object.

Your own case states that: *“The Greater Cambridge Shared Planning Service and local councils have a strong track record in facilitating high-quality housing delivery, with 22,422 homes built between 2011 and 2024”* and *“the Greater Cambridge Shared Planning Service was recognised as the Royal Town Planning Institute Planning Authority of the Year 2025”*. As the saying goes “if it isn’t broken, don’t fix it”.

As well as housing, in the last two years the service has given approval to over 10 years’ worth of lab and office space. To such an extent that there is now over-supply.

There is no evidence that the performance or decisions of the local planning authorities and the Greater Cambridge Shared Planning Service has held up development in any meaningful way.

On the other hand, taking over some (but not all) of the work of the local planning authority could be catastrophic for the remainder of the planning service. It would result in a two-tier planning service for Greater Cambridge, with local government planning starved of funds and resources by the Development Corporation. This would result in a worse planning system for small developments than is the case currently. This would be contrary to the objects set for the Development Corporation.

We are especially concerned about this because it is the small developments that relate to changes to Cambridge’s world-class built heritage. We would have world-class heritage being protected by a second-rate planning service, unable to afford the specialist conservation officers that are needed. This would place Cambridge’s built heritage at risk, which is also contrary to the objects set for the Development Corporation.

We believe that there should be only one planning service for greater Cambridge. Either the Development Corporation does everything, or it enters into a Service Level Agreement to use (and fund) the GCSPS services for the planning of large developments only.

We do not agree that a planning committee of the Development Corporation should “comprise technical experts in planning, urban design and infrastructure delivery, as well as

local representation.” Any planning committee should be made up of locally elected representatives who are informed by reports from technical experts in planning, urban design and infrastructure delivery. Following LGR the new Greater Cambridge council will have a planning committee and therefore it will be more effective and make better use of public funds to have one planning committee rather than two, run by two different organisations. In the Development Corporation should use existing planning committee to determine applications. This will also ensure democratic accountability and a public mandate for new development.

Every planning decision is about planning balance, weighing the pro’s against the con’s. Such decisions are political, not technical.

9. Do you agree with using thresholds for the Development Corporation taking decision making powers? Which minimum thresholds for determining planning applications do you think are appropriate?

We don’t agree that a Development Corporation should take over the powers for determining planning applications but if it were to do so it should only be for the largest strategically significant developments, much larger than those suggested in the consultation. The thresholds should be higher than proposed to ensure that the Development Corporation can focus on only strategic scale growth. We have suggested some thresholds that we believe are more appropriate.

Use Class C3 should be set with a minimum of threshold of 1000 dwellings or equivalent floorspace.

Use Classes C1, C2, C2a and F are not considered strategically significant developments.

Use Classes E and B should be set with a minimum threshold of 15,000 sqm. This is based on the size of recent single plot developments in Cambridge. These range from 11,000-20,000 and we do not consider them strategically significant. It should be noted that the Government consider that a figure of 15,000sqm or more captures the strategically important schemes as this figure is being proposed in the consultation on consulting the Secretary of State on planning decisions.

Development Type	Proposed threshold minimum
C3 (Residential dwellinghouses)	A minimum set at 1,000 dwellings or equivalent floorspace
C1 (hotels) and C2 (hospital/care homes)	Not strategic
C2a (Secure Residential Institutions)	Not strategic

Development Type	Proposed threshold minimum
Class E (commercial, business and service)	A minimum set at 15,000 sqm
Class B (general industrial B2 and storage distribution B8)	A minimum set at 15,000 sqm
Class F (learning, non-residential institutions recreation and community uses)	Not strategic

10. Do you have any other views on the proposed approach to the Development Corporation's powers and functions?

- Lack of clear government financial commitment; figures floated (£800m) are inadequate relative to precedent (Ebbsfleet, Docklands, Milton Keynes). We must not see a repeat of projects being pulled due to costing too much as we saw with the relocation of the Cambridge Wastewater works.
- Creating Development Corporation without real capacity/funding will compound frustration and damage.
- There is a clear economic inefficiency in the tax-payer funding two planning authorities for the same area and having an additional organisation. There doesn't appear to have been any consideration as to the most cost-effective solution to the challenges facing our area.

Governance

11. What do you think about proposed local representation on the Development Corporation board, as set out in the consultation document?

In order to have local consent for the Development Corporation's plans and work it is essential that the people making the decision on future plans must be majority democratically elected. Given the proposal is for a government led Development Corporation, we would like to see the relevant local MP's appointed to the Board to ensure democratic accountability.

The proposal is that "At the end of this (25 year sic) period, it is expected assets and powers would transfer back to locally-accountable institutions." Because of this, it seems unacceptable for a Development Corporation Board to make decisions that would determine future local liabilities without those who will pick up the bill having a majority say. For example, the maintenance of transport infrastructure or green spaces.

It is essential that the Board is informed by a wider constituency of voices, if it is not possible for these to be on the Board itself, then some advisory committees should be established. This should include a citizen's assembly.

We are concerned about conflicts of interest. Given their importance to Cambridge, it is essential that the likes of Cambridge University and the Cambridge Biomedical Campus give their views, but they will inevitably have a conflict of interest that should exclude them from Board positions. This has proved to be the case with the Greater Cambridge Partnership (where they have a voice but not a vote).

12. What do you think about the board having expertise in areas such as planning, property development, design, environment, finance, and infrastructure delivery?

As stated in our answer to questions 7 and 11; The essential thing is that elected representatives either make up a voting majority or have the power of veto. If that is in place, then we have no in-principle objection to having board expertise, however we question whether that is the best approach.

We believe that Board decisions will essentially be political in nature and therefore the Board should be structured and appointed on that basis. We would prefer to see an advisory board established with expertise in the areas needed, to help inform the Board decision-making.

We believe that 'expertise' should also include community knowledge (meaning knowledge of the local community).

Given the proposal is for a government led Development Corporation, we would like to see the relevant local MP's appointed to the Board to ensure democratic accountability.

Yours sincerely

Sarah Nicholas

Principal Planning Officer