



Our ref: KLW/JB/LP/24-0048

30th January 2026

Dear Sirs,

Draft Greater Cambridge Local Plan: Regulation 18 consultation - Land West of Duxford Road, Whittlesford, South Cambridgeshire, CB22 4NQ

Introduction

These representations have been prepared on behalf of our client, Croudace Homes, in response to the Draft Greater Cambridge Local Plan Consultation, which is taking place from 1st December 2025 – 30 January 2026.

Croudace Homes has a controlling interest (through option agreement) over two parcels of land to the west of Duxford Road, Whittlesford. The sites are linked by the footpath along Duxford Road, and together are being promoted for residential development of 300-350 new homes.

KLW Planning wishes to respond on behalf of Croudace Homes to relevant policies in the draft Plan, and relevant parts of the evidence base, including the Housing and Economic Land Availability Assessment 2025 (HELAA).

Policy S/JH – New Jobs and Homes

Based on the Government’s standard methodology for calculating housing need (December 2024), policy S/JH identifies a requirement for 48,195 new homes in Greater Cambridgeshire between 2024 and 2045 (2,295 new homes per annum). Existing planned development is anticipated to deliver 37,865 new homes, with a net increase of 10,330 (620 homes per annum) required to be delivered by this Plan.

We welcome the fact that the Plan is making provision for its full housing requirement, using the Government’s Standard Methodology.

Paragraph 3 states that development will meet the specialist accommodation needs for older people and people with disabilities over the period 2024 – 2045. Paragraph 2.20 of the draft Plan identifies a significant need for additional housing units for older and disabled people; specifically, in South Cambridgeshire, there is a need over the plan period for 795 additional housing units with care.

Paragraph 2.108 sets out the provision of specialist older person care on the strategic sites, some of which are located at Grange Farm. These units will therefore take many years to be delivered, as part of a large, strategic sites. Table 2 confirms that only 5 other sites are allocated for development in the ‘southern cluster’ – together these will deliver only 385 new homes, with no provision made for older persons’ care. As a result, only a fraction of the total housing requirement will be delivered in South Cambridgeshire, resulting in delayed provision for older people or people with disabilities. The strategy has similar implications for delivery of affordable housing.

Development of Land west of Duxford Road Whittlesford could include an element of housing for older persons/disabled care within the development, where residents would benefit from proximity to the village of Whittlesford, accessibility to Whittlesford Parkway station and living in new, energy efficient homes in an area which is flat and accessible, and with which they are familiar.

Policy S/DS – Development Strategy

The plan proposes that the majority of the planned 10,330 new homes will be delivered by three strategic developments including North East Cambridge (3,950 new homes), Cambridge East (3,950 new homes), and Land adjacent to the A11 and A1307 for 6,000 new homes.

However, as is often the case with large strategic sites, there is some uncertainty over the delivery of North East Cambridge. Page 73 of the draft Plan states that:

‘There is currently uncertainty regarding the effective delivery of the Councils’ vision for North East Cambridge. At this stage the allocation is retained, but the Local Plan housing trajectory does not include housing delivery for this site, other than development already with planning permission.’

Paragraph 1.33 confirms that the uncertainty results from the Government announcement in August 2025 that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) through its Housing Infrastructure Fund.

We acknowledge that the housing trajectory does not include further new homes at North East Cambridge, but refer to the issue of uncertainty in delivery of strategic sites as an example of the risk to the delivery of the Plan when a reliance is placed on the delivery of specific infrastructure – this is not uncommon. The uncertainty over North East Cambridge’s

delivery confirms our position that the Plan should not focus development in very few, very large locations, such as NE Cambridge and such as the new town proposed adjacent to the A11. This site also has a number of constraints to rapid delivery. Given the pressures for housing, in addition to this, the spatial strategy should also seek to disperse new homes on sustainable sites in rural areas where there are sustainable travel options, and on smaller sites. These sites are significantly quicker to deliver as they are less complicated, often in single ownership/control and require markedly less infrastructure, such as Land at Duxford Road, Whittlesford.

A further reason not to concentrate the majority of development in very large, strategic sites is the timescale over which these sites are likely to be delivered. The Lichfields 'Start to Finish' study (3rd edition, March 2024) notes that:

'Sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling'.

These time frames are from the validation of a planning application; from allocation in a Regulation 18 plan such as the draft Greater Cambridge Local Plan Review, they will be considerably longer, to allow for the public consultation on draft Plans, and the Examination of the Plan.

In contrast, Table 3.1 of the report refers to build out times from validation of a planning application for 100-499 new homes, and notes that the median timeframe is five years but the lower quartile of the range is 2.6 years. Land at Duxford Road could be built out at the quicker end of this scale. This is for several reasons; because the site is mid sized, being promoted for up to 350 new homes; because no major infrastructure is required; and as Croudace Homes is a developer with an option on the land, build out of this site would be

able to begin far more quickly than on land managed by a promoter, who would need to sell the site to a developer following a planning approval.

Smaller sites should therefore be allocated for development to complement the strategic site provision - these sites can be delivered quickly, and require less infrastructure investment.

We contend that small and medium sized sites should also be allocated as they can be delivered early in the Plan period, to ensure the robustness of the housing land supply.

It is disappointing to see that option e) In the 'rural southern cluster' and wider rural area, 'at Rural Centres and Minor Rural Centres' is the Council's least preferred option, which comes after development within the Cambridge Urban Area, on the edge of Cambridge, at an expanded Cambourne and at other new settlements, in order of preference.

Figure 12 of the draft Local Plan confirms that the Greater Cambridge Plan intends that 44% of new housing over the plan period will be delivered in new settlements. This is a very high figure which makes the Plan heavily reliant on the delivery of strategic infrastructure, and reduces the flexibility and robustness of the spatial strategy to respond to changing circumstances.

The strategy provides only 16% of the new housing in rural areas, and yet rural areas comprise the majority of the area of the joint authority. The South Cambridgeshire website confirms that:

'Over 50% of the total population of the combined Greater Cambridge area (which includes both authorities) lives in the rural villages within South Cambridgeshire.'

In comparison with previous delivery, 30% of new homes were provided in rural areas under the Structure Plan, and 23% under the adopted Local Plans. The reduction in delivery of new homes in rural areas risks not meeting local market and affordable housing need in the rural areas, or delivering a more dispersed pattern and scope of investment in infrastructure, which would benefit both new and existing residents.

Currently the draft Plan only allocates two sites for release from the Green Belt and for economic development; Babraham Campus and Cambridge Science Park. In the context of the recent changes in national planning policy, which identifies housing need as one of the very special circumstances which could justify release of land from the Green Belt, and the Government's agenda for housing growth, the strategy must now be amended to release more sites from the Green Belt.

The proposed spatial strategy for residential development focuses the majority of allocations for residential development outside of the Green Belt. This results in a spatial strategy which focuses residential development in a narrow part of Greater Cambridge. Figure 9 of the draft Plan shows how the spatial distribution of proposed development is significantly skewed towards the north, east and west of Cambridge, with very little development proposed in South Cambridgeshire. This has implications for the provision of affordable housing, community and health facilities and sustainable travel infrastructure, with funding for these policy areas being directed towards the strategic development. Little is allocated to the existing and more rural towns and villages in the south of the District.

We contend that the spatial strategy should be changed to allocate sites more widely in the Green Belt across the Greater Cambridge area. This would:

- Reduce the reliance on very large, strategic sites;

- Locate development to more accurately reflect the current existing settlement pattern;
- Identify Green Belt sites which are in highly sustainable locations
- Provide for a greater mix of sizes of sites;
- Provide for investment in infrastructure more widely across the District;
- Allocate sites which have access to sustainable transport options, such as rail; and
- Encourage investment in infrastructure which would benefit a much larger area of the District, and would respond to housing need in many more locations.

The resulting spatial strategy would be more robust and flexible, more evenly distribute investment, infrastructure, affordable homes and would be better placed to respond to changing circumstances.

Policy S/SH – Settlement Hierarchy

Policy S/SH sets out the settlement hierarchy in which Whittlesford is defined as a Group Village. Paragraph 2.129 of the supporting text notes that:

'All Group villages have at least a primary school and limited development will help maintain remaining services and facilities and provide for affordable housing to meet local needs.'

Whittlesford has the benefit of a shop, a Post Office, the Tickell Arms public house and restaurant, a church, the Willam Westley Church of England primary school and a number of community facilities. The Government website¹ identifies that the primary school has a capacity of 210 and currently has 185 pupils, so there is some available capacity for any children who would live in the new homes.

¹ <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/110795>

The northern boundary of Land West of Duxford Road lies directly adjacent to the development limits of Whittlesford village, within walking and cycling distance of these facilities. The village is a sustainable location for development, providing local retail and community facilities and services. The proposed development on land west of Duxford Road would contribute to the viability and vitality of these services.

Policy S/GB - Green Belt

Policy S/GB relates to the Cambridge Green Belt. It notes that *'New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework, and having regard to the Cambridge Green Belt purposes'*.

The supporting text to Policy S/GB (paragraph 2.143) states that:

'The Cambridge Green Belt Assessment (2021) assesses the contribution of different parcels of land to these purposes and to identify grey belt land to inform plan making in line with the NPPF and national guidance.'

This is not correct, and this reference should be changed. The Cambridge Green Belt Assessment 2021 pre-dated the concept of Grey Belt. The Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025 (LUC, October 2025) notes in paragraph 1.7 that:

'The Councils have commissioned an update to the GCGBA to respond to changes in national planning policy, particularly in response to new policy regarding grey belt.'

That update does not appear to have been published as part of the evidence base for this consultation. This is a significant omission, as it would have informed a positive discussion about which sites are grey belt, and could be allocated for development. The grey belt work should be completed, published for consultation, and used as the basis for the allocation of sustainable sites which currently lie in the Green Belt, for residential development. A further Local Plan Regulation 18 consultation on these sites would enable all stakeholders to have the opportunity to comment on them before the Plan proceeds to Regulation 19.

In December 2024, the Government introduced the concept of grey belt land in national planning policy. The NPPF (December 2024) provides the definition of grey belt land:

‘For the purposes of plan-making and decision-making, ‘grey belt’ is defined as: land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.’

NPPF Paragraph 148 sets out the hierarchy of types of land which should be considered when preparing Local Plans. It states that:

‘Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.’

Although the draft Plan acknowledges the provisions of the NPPF 2024, it does not refer to the concept of grey belt. Nor does it proactively use NPPF policy to allocate grey belt sites

which are highly sustainable and which can be demonstrated to meet the grey belt criteria set out in National Planning Practice Guidance (PPG, February 2025).

Policy S/GB must be updated to acknowledge and plan positively for the delivery of grey belt sites. Land west of Duxford Road is one of these sites and should be allocated for development in the emerging Plan.

Grey Belt Assessment of Land west of Duxford Road

The Government published Planning Practice Guidance (PPG) 'Advice on the role of the Green Belt in the Planning System' in February 2025. This guidance has the same legal status as national policy and provides a clear assessment process to enable Local Planning Authorities and developers to establish whether sites can be designated as grey belt land.

It should be noted that the section of the PPG 'Proposals on grey belt land' refers specifically to sites. It is entirely appropriate, therefore, to undertake an assessment of an individual site, rather than seeking to establish the contribution which the site may make to the purposes of the Green Belt as part of any wider strategic land parcel.

A Landscape, Visual and Green Belt Assessment (LVA, Finc, January 2026) has been prepared and submitted in support of these representations. The LVA uses the PPG as the basis of the assessment of Land west of Duxford Road, Whittlesford, and is summarised below.

Paragraph 143 of the NPPF sets out the five purposes of the Green Belt, which are:

A) To check the unrestricted sprawl of large, built up areas

- B) to prevent neighbouring towns merging into one another
- C) to assist in safeguarding the countryside from encroachment
- D) to preserve the setting and special character of historic towns
- E) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The PPG notes that when making judgements as to whether land is grey belt, authorities should consider the contribution that sites make to Green Belt purposes A, B and D, as explained below.

Purpose A – to check the unrestricted sprawl of large built up areas

The Site lies adjacent to the village of Whittlesford which is by definition not a large built up area. Therefore, the Site is not capable of contributing to this purpose.

Notwithstanding the above, the Site is partially enclosed by existing development, including houses to the north and south, as well as fragmented linear settlement along the eastern boundary. The interface between the Site and these areas of settlement is typically characterised by rear gardens resulting in an abrupt and weakly contained settlement edge which includes numerous urbanising influences throughout the Site.

Furthermore, due to the partial containment of the Site by existing settlement on three sides (albeit fragmented to the east), development on the Site would be largely contained by the existing settlement. It would not result in an incongruous settlement pattern, or extend in an incongruous way into the wider Green Belt.

On the basis of the above, the Site makes no contribution to this purpose.

Purpose B – to prevent neighbouring towns merging into one another.

The Site lies adjacent to the village of Whittlesford and does not lie adjacent to a town. The southern edge of Cambridge lies approximately 6.5km north of the Site, while the southern edge of the Green Belt is located in the vicinity of the southern extent of the Site. The nearest town, Saffron Walden, is located approximately 10km further south of the designated area. The intervening landscape between these settlements and the Site is undulating. There is no intervisibility. On this basis, whilst the Site forms a very small part of a gap between towns, it makes no contribution to visual separation between these settlements, one of which is far removed from the Green Belt designation.

Therefore, the Site makes no contribution to this purpose.

Purpose D – to preserve the setting and special character of historic towns

The Site has no physical, visual or experiential relationship with the historic aspects of a town and therefore makes no contribution to this purpose.

Application of Footnote 7

The draft NPPF, which is currently the subject of public consultation, proposes to remove the consideration of Footnote 7 designations from the grey belt assessment process. However, even if this were to be retained, we demonstrate that the site is not affected by such designations.

PPG notes that the definition of grey belt currently excludes land where the application of policies relating to the areas or assets in footnote 7 of the NPPF (other than Green Belt) could provide a strong reason for refusing or restricting development. Footnote 7 refers to Local Green Spaces, National Landscapes, National Parks, Heritage Coasts, irreplaceable habitats, designated heritage assets (and other non designated heritage assets) and areas at risk of flooding or coastal change.

Land west of Duxford Road does not lie in any of these designated areas and there are no irreplaceable habitats on the site. There are no designated or locally designated heritage assets within or adjacent to the site, and the site lies in Flood Zone 1, the area at lowest risk of fluvial flooding. Footnote 7 does not therefore preclude the designation of the site as grey belt.

Considering the impact on the remaining Green Belt in the plan area

Having established that the site can be considered grey belt, the final part of this assessment seeks to establish whether the removal of the site from the Green Belt would fundamentally undermine the five purposes (taken together) served by the remaining Green Belt across the Plan area.

PPG notes that this assessment should assess the impact on the remaining Green Belt across the Plan area as a whole, and consider whether the release of the land would affect the ability of the remaining Green Belt areas across the area of the Plan from serving all five of the Green Belt purposes in a meaningful way. We suggest that this is for the Council to assess, through a Green Belt and Grey Belt assessment which should, and would naturally be published as part of the evidence base for the Local Plan.

We therefore request that the Council agrees with our assessment that the site is grey belt land, and allocates it for residential development through a further, focused Regulation 18 consultation.

Policy S/SCP – Policy Areas in the Rural Southern Cluster

Policy S/SCP site WHD supports a masterplan led approach to the comprehensive development of the policy area, and notes that:

‘This is to create a multimodal travel hub, employment and housing in a highly accessible location.’

The policy identifies land at Whittlesford Parkway Station Area for infrastructure and accessibility improvements. The policy makes provision for a number of measures, including connectivity between the station platforms, an extended network of cycle paths and safe crossing points and improvements to the junctions on the A505. It seeks to create a ‘multi modal travel hub.’ No new homes or employment facilities are specifically allocated for development at this site, although paragraph 3.4.53 states that:

‘Proposals will include complementary uses including residential and commercial development and appropriate associated infrastructure.’

Paragraph 3.4.56 refers to the Greater Cambridge Partnership (GCP) having explored potential transport infrastructure around the station and its surroundings to enable it to cater for future increased demand and to shift trips away from the car through the Greater Cambridge Partnership Whittlesford masterplanning exercise. It notes that:

‘This exercise also includes considering the potential for new employment and homes in the area...’

In the Local Plan, the station is identified as a policy area rather than as a specific site allocation, because *‘the full area has not been submitted... and as such as we do not have the evidence that a specific allocation would be deliverable.’*

Local Plan paragraph 3.4.54 acknowledges that:

‘Whittlesford Parkway Station has good rail connections to both Cambridge and London, is close to the southern cluster research and employment centres and is predicted to see further growth in passengers in the coming years.’

We contend that the inclusion of the Station area as a policy area, rather than as a formal allocation, does not sufficiently positively plan for the area. The Plan should proactively identify areas for growth around the station and should confirm this through a formal allocation for employment and residential development. The GCP masterplan has confirmed that there are willing landowners in the vicinity of the station. Croudace Homes should be included with these landowners in discussions about delivering sustainable residential and employment development around the station. The Councils should set out a delivery plan, with clear timelines, for delivery of the proposed improvements at Whittlesford Railway Station.

The recent Government consultation on the revised draft NPPF, published on 16 December 2025, confirms the principle that residential development of land which lies within reasonable walking distance of well connected train stations is acceptable.

Draft Policy S5 of the NPPF sets out the presumption in favour of residential development, including on Green Belt sites, within reasonable walking distance (800m) of railway stations. It

notes that development should be approved unless the benefits would be substantially outweighed by any adverse effects.

The policy allows for housing and mixed use development around railway stations, which offer high levels of connectivity. Such development should be limited to land physically well related to the station and within reasonable walking distance of it.

The southern part of Land at Duxford Road, Whittlesford lies within 800m of Whittlesford Parkway Railway Station.

Draft NPPF Policy L3 provides criteria which define ‘well-related’ stations. These are train stations in the top 60 Travel to Work areas (as these are the most productive areas). Significantly, Whittlesford Station and the site lie within one of these areas.

The policy defines ‘well-connected’ train stations as those with 4 trains per hour, or two trains per hour in any one direction. There are three trains each way in any one hour in the week, so the service at Whittlesford Parkway far exceeds the definition of ‘well-connected.’

The site fulfils the proposed ‘station’ criteria and in light of this, and on the basis that the principles are carried through in the next iteration of the NPPF later this year, as we expect them to be, the principle of its development should be approved. The HELAA assessment has identified no significant adverse impacts of the proposed development of the site and indeed has confirmed that *‘Development of the site has some policy constraints but these could be overcome through the planning application process.’*

The Greater Cambridge Partnership Whittlesford Station Masterplan 2018 provides further context. Paragraph 3.4.56 refers to the GCP having explored potential transport

infrastructure around the station and its surroundings to enable it to cater for future increased demand and to shift trips away from the car.... via the GCP Whittlesford masterplanning exercise. This exercise also includes considering the potential for new employment and homes in the area.

Gonville and Caius College and the Pampisford Estate are both large landowners in the vicinity of the station. The GCP Masterplan addendum report (January 2020) notes in paragraph 3.2.5 that both these landowners have expressed a willingness to work with the GCP to explore the delivery of the masterplan and find integrated solutions which cater for all of the development opportunities emerging within the A505 corridor.

The masterplan report highlights the lack of bus services which served the station at that time, and the lack of cycling infrastructure. The improvements to the station are an important opportunity to improve both areas of provision. Moreover, the allocation of land around the station would enable further significant investment in accessibility improvements to take place through developer contributions.

Residential development in this area would also complement the significant employment provision which is being planned for. The 2019 permission for development of the Wellcome Genome Campus, creating 4,000 new jobs and 1,500 new homes will increase the local population and improve the viability if creating new links to the station. In addition, proposals for new employment sites at Unity Campus and the Babraham Campus and an aviation research park adjacent to Duxford will all increase the requirement for infrastructure improvements and connections to the station. The report notes that projections of the station's use have increased to 895,000 using the station by 2033.

The GCP report included a Whittlesford Conceptual Layout plan, which identified the potential for the delivery of a new car park between the A505 and Station Road west. Our clients would be happy to discuss appropriate and proportionate contributions, which could support a draft allocation in the Local Plan and help to deliver this important piece of infrastructure for the station.

In summary, GCP work should be taken forward and developed to identify residential and employment allocations within 800m of the station, including this site, to respond to the Government's proposal to allow residential development within reasonable walking distance of well connected stations.

The attached vision document and transport assessment shows the links between Land west Of Duxford Road and Whittlesford Parkway Station, and the opportunities to improve accessibility between Whittlesford village, the site and the Whittlesford Parkway station.

[Croudace Response to Site Assessment](#)

The Councils have assessed the site on the basis that it covers 18.68 ha, is proposed for 300-350 new homes and that it lies adjacent to Whittlesford, a group village. The site reference for Land west of Duxford Road is ID 115231.

In relation to adopted policy, it is noted that: *'Development of the site has some policy constraints but these could be overcome through the planning application process.'* There would be no detrimental impact on any designated biodiversity or geodiversity designated site, nor on any sites with a regional or local protection. The Biodiversity 'Red Amber Green' (RAG) status is green.

Flood Risk

The assessment notes that the site lies entirely in Flood Zone 1, and is at a 1 in 1,000 year event risk of surface water flooding. It is annotated a RAG status of amber, although we contend this should be green due to the very low risk of flooding.

Landscape

A Landscape, Green Belt and Visual study was undertaken by Finc architects has been prepared in January 2026, which responds to the Council's 2023 and 2025 landscape assessment - this report is submitted in support of these representations. The study noted that the landscape is not designated for its landscape or scenic beauty. It is subject to urban influences, particularly to the north and to the south. It found that the Site is predominantly well contained, albeit due to the undulating landform there are views of the elevated parts of the Southern Parcel from the wider landscape to the southwest, and the Site's eastern boundary hedgerows form an important visual component along Duxford Road. The Site is not readily perceptible from within the cores of Whittlesford and Whittlesford Bridge, including Whittlesford Conservation Area.

It concluded that the Site is considered to have the capacity to accommodate residential development, subject to a sensitive landscape-led design approach that mitigates harm to the Green Belt.

Contamination

The contaminated land officer states that *'the site has potential for historic contamination and therefore, planning conditions will be required'*. However, the heritage report confirmed that:

‘Historic cartographic sources since 1808 consistently depict both sections of the Site as undeveloped agricultural land located to the south of Whittlesford village.’ We therefore contend that this assertion by the contaminated land officer is unsubstantiated.

Heritage and Archaeology

The assessment notes that the site forms part of the rural approach to the village of Whittlesford and large scale development of the site would change this character. However, fewer houses and landscape mitigation may reduce this harm.

A heritage impact assessment was undertaken by Wardell Armstrong in June 2024, and is submitted in support of these representations. The assessment identified five heritage assets that might potentially be affected by the proposed development, comprising the four Grade II listed buildings of Sheads House, Cromwell Cottage, The Shrubberies, the barn at Scutches Farmhouse, and the non-designated heritage asset of Whittlesford Conservation Area. It was determined that the impact of the proposed development on the settings of all five heritage assets would constitute less than substantial harm. The magnitude of impact of the proposed development was deemed to be either negligible adverse or minor adverse in all cases, resulting in either neutral or slight significances of impact.

The report made some suggestions for mitigation of the proposed development, which include providing a landscape buffer between the proposed development and Whittlesford village to the north, accessing the proposed development from Duxford Road rather than from the High Street, and restricting the heights of the properties to two storeys, as found in Whittlesford Village.

Wardell Armstrong also prepared a desk based archaeological assessment of the site in July 2024, which is submitted in support of these representations. It found that the Site has only a low potential for Anglo-Saxon, medieval and post-medieval and later finds and features. The main archaeological potential, albeit of low to moderate importance, of the Site is for Iron Age and Romano-British remains, associated with the archaeological record of the Whittlesford area.

Historic cartographic sources since 1808 consistently depict both sections of the Site as undeveloped agricultural land located to the south of Whittlesford village. By 1886, a residential dwelling, known as High Lands, stood between the two sections of the Site and along the western frontage of Duxford Road. Subsequent residential linear development took place to the immediate east of the Site throughout the 20th century, yet the Site remained undeveloped.

Previous ground disturbance at the Site is judged to be limited. The Site will have been subject to only minimal truncation, which will be associated only with its agricultural usage. The Site is regarded as having a low importance as a heritage asset, whilst the proposed development is judged to have a moderate adverse magnitude of impact, resulting in only a slight significance of impact.

In summary, there is no evidence to indicate that remains are present within the Site, which would preclude development. Consequently, it is anticipated that no further work would be required within the boundary of the Site at this stage; planning consent could be granted on archaeological grounds in compliance with legislation and planning policy.

There is therefore no substantive evidence for the archaeology officer comment (2025) which notes that a bronze age burial has been found to the west of the site, not within the site. We therefore question the archaeological officer's assertion that archaeological investigations would be necessary in advance of the development.

Accessibility and sustainable transport

The assessment gave the site an amber rating for accessibility. The officer noted that; the development of the site is acceptable in principle, subject to further detail and consultation; infrastructure will be required outside the site boundary to encourage more sustainable transport links and; that it is unclear whether these sustainable transport links can be achieved within the local available constraints.

A Transport Strategy (KMC, January 2026) has been prepared and is submitted in support of the submission of these representations. It notes that the site lies within 800m, ie reasonable walking and cycling distance, of Whittlesford Railway Station. The station provides regular and frequent services from Whittlesford Parkway to Cambridge, London Liverpool Street and local stations which are areas known for international research, healthcare collaboration, further transport interchanges and employment zones. Future services are also expected to service Cambridge South Railway Station, which is currently under construction, located adjacent to the Cambridge Biomedical Campus. In accordance with the draft NPPF, Whittlesford Parkway would be categorised as a 'well connected station' highlighting the highly sustainable location of the site in public transport terms.

The site also lies within walking and cycling distance of a range of shops and services including Whittlesford primary school, Whittlesford village shop and a number of places of employment including Duxford Imperial War Museum and the Wellcome Genome Campus. Sawston Business Park, the Babraham Research Campus, Granta Park and the Unity campus are also nearby.

The site has excellent accessibility to three bus stops (Mill Lane, Millfield and Station Road West), which all lie immediately adjacent to the site. Services from these stops provide regular connections to Trumpington Park and Ride in Cambridge, Sawston and Duxford.

The Transport Strategy identifies that the Cambridgeshire Local Cycling and Walking Infrastructure Plan 3 (LCWIP), which was adopted by Cambridgeshire County Council in 2022, includes a medium term project to upgrade the existing footway along Duxford Road. This route forms the eastern boundary of the site. The proposals highlight that the footway should be upgraded to a all shared-user path for pedestrians and cyclists, to improve the connection between Whittlesford village and Whittlesford Parkway Station.

The delivery of this infrastructure could be accelerated as part of appropriate infrastructure investment to support the delivery of Land west of Duxford Road, through allocation for development in the Greater Cambridge Local Plan. This would represent a significant benefit to new and existing residents of Whittlesford, providing a new shared-user path to safely link the village, the site and the railway station. The provision of this upgraded path responds to the Transport and Roads Guideline officer comments, who noted in 2023 that the site assessment's scoring is amber as the site is relatively to Whittlesford Parkway station (sic), and that the development would need to provide high quality local non-motorised user routes to the station and into Cambridge.

Deliverability

The assessment concludes by noting that the site is available and achievable, which is supported. Our clients wish to bring the site forward for residential development and as housebuilders, could deliver a significant proportion of the 300-350 new homes within 0-5 years.

Summary

Below, we provide a summary of the key points set out in these representations:

- Croudace Homes support the Councils' intention to meet their full housing requirement, as calculated by the Government's 2024 methodology.
- The spatial strategy should be amended to reduce the reliance on large, strategic sites; additional, smaller sites should be allocated for development in South Cambridgeshire
- Green Belt sites which fulfil grey belt criteria, and which lie in sustainable locations, with sustainable transport options available to them should be allocated for residential development
- Greenfield sites which lie within 800m (reasonable walking distance) of a well connected train station should be allocated for residential development
- The upgrading and re-development of Whittlesford Parkway Railway Station should form a formal allocation in the Plan, rather than a policy area, with upgrading of pedestrian accessibility. Land around the station should be allocated for residential

and employment uses. A new car park would support the station and remove on street parking.

- The HELAA should be updated in respect of the assessment of land west of Duxford Road to reflect the findings of technical work which is submitted with these representations, which demonstrate that the site lies in a highly sustainable location, with multiple sustainable transport options, that there are no anticipated adverse impact of its development and that it could deliver much needed 300-350 new homes.

I would be grateful if you would confirm safe and timely receipt of these representations,

Yours faithfully,

Lois

LOIS PARTRIDGE

ASSOCIATE

KLW