

Your ref: 115090  
Our ref: Woodcock Close, Impington  
DD: [REDACTED]  
E: [REDACTED]  
Date: 26/01/2026

Planning Policy  
Greater Cambridge Planning  
**Via Email**

Dear Sir / Madam,

## **REGULATION 18-DRAFT GREATER CAMBRIDGE LOCAL PLAN CONSULTATION**

### **LAND ADJACENT TO ST GEORGES WAY AND WOODCOCK CLOSE, IMPINGTON, CB24 9AF (HELAA SITE ID: 115090)**

On behalf of our client, [REDACTED], we are responding to the Regulation 18 consultation on the emerging Greater Cambridge Local Plan (hereafter “the Plan”). This representation considers the wider spatial strategy proposed by the Council, before focusing on [REDACTED] land interests on land adjacent to St Georges Way and Woodcock Close, Impington (hereafter “the Site”) (HELAA Site ID: 115090) (**Appendix 1**).

Bidwells has a long history of promoting development proposal sites for clients through Local Plans in Cambridge and South Cambridgeshire. We are very concerned that the draft strategy for the Plan (Policy S/DS) relies heavily on allocating significant dwelling numbers on a small number of very large sites. These sites rely on the timely provision of strategic scale infrastructure which must be in place before these sites can be delivered.

The proposed new strategic scale allocations we are particularly concerned about are the Cambourne North new settlement (13,000 dwellings) relying on a new railway station associated with East West Rail (hereafter “EWR”) and complicated works to the A428. Grange Farm (6,000 dwellings) relies on works to the A505 and the complication of providing new residents with safe access to the proposed Cambridge South East Transport (hereafter “CSET”) Phase 2 Guided Busway on the adjacent side of the A505.

The Plan requires these two sites to deliver 5,100 dwellings between them by 2045. We believe this is highly unlikely for reasons set out in this representation.

### **National Planning Policy Framework (NPPF) – Direction of Travel**

We are aware that the Council will be preparing this Plan under the current Local Plan system, rather than the new system to be introduced early this year under the Levelling Up and Regeneration Act; and therefore, the Plan will be examined against the 2024 NPPF.

However, the NPPF consultation running until March 2026 sets a clear direction of travel in the long term which we believe the Council should consider further.

Some of the key matters in relation to this Site are:



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- Policy GB2: Assessing existing Green Belt land - at limb 3, requires the preparation of local plans to be informed by an assessment which identifies Grey Belt and informs any Green Belt boundary alterations.
- Policy HO6: Planning for a diverse mix of sites – retains the requirement for Council's to allocate at least 10% of the housing requirements in Local Plans on sites no larger than one hectare and introduces a further 10% on sites between one and two and a half hectares (unless strong reasons why this cannot be achieved). It also states that sites should be allocated to support and enhance the vitality of rural communities and enable villages to grow and thrive (similar to NPPF 2024, paragraph 83).

The draft NPPF text is also supplemented by a document explaining the proposed changes and inviting responses to specific questions<sup>1</sup>. This document recognises the importance of these smaller sites as they tend to be built quicker, and allocating such sites will support small and medium-sized enterprise housebuilders (also see paragraph 73 of 2024 NPPF).

### Proposed Extent of New Homes and Jobs

Policy S/JH sets out the level of objectively assessed needs in Greater Cambridge over the period 2024-2045 for jobs and homes. It states that 73,300 additional jobs and a minimum of 48,195 new homes are required to meet the needs for the total population.

The provision of 73,300 additional jobs and 48,195 new homes across the plan period should be regarded as the very minimum rather than a maximum or constraining target. Supporting evidence to the policy titled the 'Greater Cambridge Employment and Housing Needs Update 2024-2045 (September 2025)', concludes at 3.55 that the various scenarios modelled indicate a need of between 67,600 and 90,900 additional jobs over the plan period. This compares to between 66,600 and 75,800 additional jobs modelled under the previous 2023 results. This significant increase in the upper end of the modelling indicates that economic growth expectations have strengthened exponentially, not diminished.

As set out in the Employment and Housing Needs Update, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The evidence identifies a 'Central growth' scenario of 73,200 jobs across the plan period, representing sustained annual growth of around 3,500 jobs. Crucially, the Central growth scenario builds in assumptions of slower periods, contractions, and economic shocks, and is therefore inherently conservative rather than reflective of the full growth capacity of the Cambridge economy and its resilience to riding these shocks.

However, there have been recent significant changes in the national and strategic planning policy context that heighten the urgency in increasing job creation and housing supply and result in a step-change in the wider policy framework within which the Draft Local Plan must be considered.

On 23rd August 2024, Matthew Pennycook reaffirmed the Government's commitment to Cambridge stating; "*The economic growth of Cambridge has been a phenomenal success and we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy.*" Pennycook goes on to say; "*Greater Cambridge has a vital role to play in this Government's mission to kickstart economic growth.*" The Cambridge Growth Company was then established in 2024 to address barriers to growth and help unlock Greater Cambridge's full potential. In terms of approach, in October 2025, the Government announced its intention to consult on the case for a centrally led Development Corporation as one potential route for delivery. This is to be the subject of statutory consultation in 2026.

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<sup>1</sup> Proposed reforms to the National Planning Policy Framework and other changes to the planning system – December 2025: [National Planning Policy Framework: proposed reforms and other changes to the planning system](#)

Furthermore, Greater Cambridgeshire has been, and continues to be, the location of strategic infrastructure investment that will continue to drive upwards increases in the need for new jobs and homes. This includes the proposed East West rail station as well as the proposed public transport improvements for the Cambourne to Cambridge corridor and the Cambridge Eastern Access corridor. The Cambridgeshire and Peterborough Local Growth Plan 2025 also identify priority growth sectors, and the need for further skills development.

The Employment and Housing Needs Update acknowledges a 'High' and 'High Sensitivity' scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This high level of growth is feasible in Cambridge and would support the Government's direction of travel. It is therefore important to recognise that higher-growth outcomes remain credible and should not be ruled out by policy. This requires revision to the proposed policy wording.

For these reasons, the Local Plan should consider utilising more optimistic and realistic figures for job and housing numbers and include explicit support for higher-growth scenarios. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity

### **The Proposed Greater Cambridge Development Strategy**

Whilst in principle we do not object to the principle of seeking to deliver a large number of new homes at scale as set out in Policy S/DS. We consider that this approach sets the Council on a path of over-reliance on these sites which is problematic for the following reasons:

- The speed at which these developments can deliver homes is often far slower than the Council has envisaged historically. A review of historic Annual Monitoring Reports demonstrates that whilst some of the large strategic sites in the current Development Plan, may now be delivering at an appropriate rate, most sites came on stream several years later than anticipated, did not deliver as quickly once the first completions were achieved, and many still deliver less homes year on year than planned for.
- The Council has not identified any new allocations for housing in the rural area which fails to support the vitality of the rural area and existing settlements. We believe that this decision, has been made in part, to avoid development in the Green Belt, and therefore fails to strike a more balanced approach to housing delivery and mix of housing across the Plan period.
- The 'lumping' together of rural centres, minor rural centres, group villages and infill villages from the settlement hierarchy (taken from Policy S/SH), effectively as the locations with the lowest preference to deliver jobs and homes, clearly fails to distinguish between what may be highly sustainable locations in the rural area (ie: Histon and Impington) a Rural Centre-the highest of these categories (where there will be no limit on scheme size), and which is clearly capable of delivering an appropriate scale of development (ie: up to 50 dwelling sized sites as encouraged in the adopted Neighbourhood Plan).

### **Small and Medium Sized Sites**

Small and medium sites such as this Site are key to a far more balance approach to housing. Paragraph 73 of the NPPF (December 2024) identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. They are also essential for small and medium enterprise housebuilders to deliver new homes whilst being built out relatively quickly.

The Plan does not propose to allocate any new housing sites to address this requirement, essentially because they consider:

- It is challenging to identify a large number of small sites to meet the 4,820 homes required to meet the 10% requirement.
- It would be considered to undermine the Council's development strategy and necessitates the release of Green Belt sites conflicting with the aim of protecting the Cambridge Green Belt as the larger and better served villages are located within the Green Belt.

We have two concerns with this approach which need to be considered and addressed by the next iteration of the plan.

### Green Belt / Grey Belt

Firstly, the Green Belt Assessment which underpins the Council's evidence base is dated 2021 which pre-dates the introduction of Grey Belt in planning policy.

The Council has not publicly committed to undertake a review of potential Grey Belt sites and their development potential as an alternative spatial strategy, which is apparent in the October 2025 Sustainability Appraisal.

However, Bidwells understands that consultants on behalf of Greater Cambridge are currently considering the process of examining Grey Belt issues and possibly sites across the joint local plan area. Officers have stated at various committees that grey belt sites are not required to accommodate housing allocations and the '*Plan is not configured for this*'. However, the fact that LDA are looking Grey Belt suggests the draft Plan does need to cover this important issue given the increasing importance of Grey Belt policy in the draft NPPF currently being consulted on.

The NPPF (2024) introduced a clear duty for Grey Belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). The direction of travel towards authorities being required to identify Grey Belt land within local plans is further evidenced within the forthcoming Consultation Draft NPPF (2025)(GB2[3]) and at Appendix E where the criteria for undertaking Green Belt Assessments is outlined. Hence, regardless of whether the Draft Local Plan can meet the identified needs for growth without Green Belt release, the relevant Plan Policy (S/GB) should include explicit reference to Grey Belt (consistent with the NPPF) and the identification of Grey Belt land within Greater Cambridge. To ensure the longevity of the Local Plan, it is recommended the revised Green Belt Assessment is undertaken with regard to Appendix E of the NPPF 2025.

It is important the Council does not assign the same importance to all Green Belt given the biggest policy change to Green Belt it in several decades.

### Windfall

Secondly, primarily relying upon windfall development to address as much of the 10% requirement as possible, does not help provide small and medium enterprise housebuilders with the certainty required to invest in delivering sites. Across Greater Cambridge there has also been a general decline in the delivery of windfall sites over the years.

The Greater Cambridge Housing Delivery Study Addendum<sup>2</sup> in section 2 considers windfall delivery between 2006 and 2024 and consider a windfall allowance for 425 dwelling per annum would be robust.

This section of the report sets out what it considers the favourable policy which may assist the delivery of windfall sites in the future. However, it fails to identify why over time there has been a general trend

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<sup>2</sup> [Cambridge Housing Delivery Study Addendum October 2025](#)

downward on windfall sites, and whether in reality, particularly in the South Cambridgeshire area there is now a lack of available sites to continue to deliver windfall at scale across the plan period.

For instance, it presents a data set as far back as 2006 – 2007 for windfall completions to find an average delivery rate of 470 dwellings per annum, fails to realise that Greater Cambridge has not delivered more than 470 dwellings in a year from windfall since 2016 – 2017. Even if the Council uses 425 dwelling per annum for windfall over the previous seven years of data the average delivery has been 395 dwellings per annum.

As such, there needs to be greater certainty injected into small and medium sized sites by allocating these in the emerging Local Plan, to aid with confidence of being able to deliver such sites but also recognising that opportunities for brownfield redevelopment or residential sub-division can only continue to deliver so much housing across Greater Cambridge.

A final point of note; whilst the Site is larger than 2.5ha and therefore exceeds the 2.5ha site area set in the NPPF for small sites, the Site area can easily be reduced slightly to meet the threshold without undermining the ability to deliver housing in this location.

### Vitality of the Rural Area

The Council suggests at 2.44 that allocations in the Rural Area would result in an overreliance on the private motor vehicle. However, this position overlooks several important factors:

- The spatial strategy proposed by the Council does not consider the unique characteristic of each of the settlements in the rural area individually, and their ability to grow to support the vitality of settlements and the viability of their services. This is a consequence of effectively grouping the whole rural area into one pot within Policy S/DS.
- Expanding the rural settlements may potentially lead to increased viability / opportunities to improve sustainable transport opportunities.
- Whilst the Council does not readily allocate any new developments at the rural settlements, it is clear that the Council does not view all settlements in the rural area as being unsustainable. For instance, Policy S/SH – Settlement Hierarchy does not set a limit of the size of residential development within the defined extent of Rural Centres such as Histon and Impington subject to demonstrating adequate services and facilities exist.
- Some Rural Centres such as Impington and Histon are actually closer and as well served as the city in terms of access to large employment centres (ie: Science Park).

Policy S/SH effectively creates a juxtaposition whereby it is recognised that growth within Histon and Impington need not be constrained as it benefits from a high level of services, facilities and accessibility to the main urban area; yet in failing to allocate any sites, growth is basically constrained to the settlement boundaries where windfall opportunities are restricted.

### Failing to offer sufficient choice and flexibility

The focus upon large new settlements, urban redevelopment and SUEs fails to properly consider the need to offer sufficient choice and flexibility to perspective homeowners. Not all perspective purchasers will be able to, or wish to buy, in these locations. For instance, existing young residents of Histon and Impington may wish to buy a home in the settlement to be close to existing family for childcare which may not be possible should they have to move to other proposed allocations.

### Local Housing Need

The adopted neighbourhood plan encourages sites of up to 50 dwellings and finds:

- That the third most important matter to local residents was the affordability of housing.

- The supply of affordable housing was considered the second most important in terms of need for improvement.

Despite this both the neighbourhood plan and emerging Local Plan fail to identify housing sites to meet the identified local need. Rather, it puts the onus entirely on windfall sites and exceptions sites which carry high risk for developers and therefore are not likely to come forward at scale. Additionally, windfall sites within the settlement not delivering 10 or more dwellings and under the area restriction will not be required to deliver any affordable housing.

The proposed development strategy will only exacerbate the affordability issue in Histon and Impington, likely pushing young people out of their local communities away from their support networks. This may also exacerbate the car dependence concerns the Council has by pushing these people further from Cambridge to seek cheaper housing in less well served areas (ie: rural East Cambridgeshire).

### **The Site and Green Belt**

The majority of the Site is within the Cambridgeshire Green Belt and is predominately undeveloped land. The Site is well contained by dense boundary vegetation to the east providing screening between existing and proposed properties and the wider Green Belt.

Greater Cambridge's Green Belt Assessment (2021) identifies variations in openness and the extent to which land contributes to the purpose of Green Belt and uses this information to determine the potential harm to those purposes of releasing Green Belt land. The approach to the assessment differs from that in the NPPF Green Belt purposes (though we note that this has previously been accepted by Inspectors), the 'Cambridge Purposes' are:

- Cambridge Purpose 1: Preserved the unique character of Cambridge as a compact, dynamic city with thriving historic centre (NPPF purpose 1).
- Cambridge Purpose 2: Maintain and enhance the quality of its setting (NPPF purpose 4, and closely related to purpose 3).
- Cambridge Purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city (NPPF purpose 2).

The assessment rates sites against the expected harm to the Green Belt, should it be released for development, using a 5-point scale.

Whilst we note the assessment has been accepted before, and that this Plan will be assessed under the December 2024 NPPF, the Council may wish to consider the direction of travel in the emerging NPPF. The current NPPF consultation includes a requirement to assess Green Belt boundaries in Local Plans in accordance with the process contained at Annex E (see policy GB2: Assessing existing Green Belt Land).

Within the 2021 study, the Site was assessed under parcel HI12 and was found to have the following contributions to the Cambridge Purposes:

- Purpose 1: A relatively limited contribution to preserving Cambridge's character;
- Purpose 2: A relatively limited contribution to maintaining and enhancing the quality of Cambridge's setting;
- Purpose 3: Limited to no contribution to preventing merging of communities with one another and with the city.

It was concluded that the additional impact on the Green Belt from the release of the parcel would be negligible and the harm resulting from its release would be low.

Since the 2021 study, the Government introduced the concept of Grey Belt in the December 2024 NPPF with the purpose of allowing development on poorly performing pieces of Green Belt, which otherwise would have been restricted to demonstrating very special circumstances.

The Site is considered to have the potential to qualify intrinsically as Grey Belt land. Based upon the Council's own Green Belt evidence base, the Site clearly does not strongly contribute to NPPF Green Belt purposes a), b) and d), nor does it have any footnote 7 policies that would form a strong reason for refusing development. Development would also clearly not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the Plan area.

Histon and Impington is defined as a rural centre and the Site being adjacent to it means it is clearly in a sustainable location, a key cog of demonstrating the Site can qualify as Grey Belt.

### Housing and Economic Land Availability Assessment (HELAA) (2025) Response

The Site has been assigned 115090 in the latest HELAA. We have the following comments to make:

- **Flood Risk:** Whilst the Site has pockets of surface water flood risk these can easily be designed out through the development process remove any risk on or off site. As such, there is no reason why the Site could not score green in this regard.
- **Landscape:** There are no updated 2025 comments in this regard. It is disappointing there is no consideration of Grey Belt potential on this Site and across the wider council area.
- **Site Access:** The score should be upgraded to green as the proposals would clearly not have a detrimental impact on local or trunk roads given the scale of development, this follows the provision of additional information March 2025 demonstrating access to the public highway.
- **Transport and Roads:** The Site is still assigned an amber from 2021 with no update. The methodology does not address this matter, and it is clear that a development in this location and scale could be delivered without adverse effect.
- **Available:** The Site has been scored amber despite the Council agreeing there are no issues around landownership or delivery period. As such, the score should be updated to green.

### Summary

Whilst we do not object to the principle of allocating large new housing developments, we object strongly to the failure to balance this approach with a more diverse approach to housing delivery across Greater Cambridge in the emerging Local Plan specifically in relation to the development strategy at Policy S/DS and the Council's handling to date of Grey Belt since the 2024 NPPF updates. We believe that the Plan as drafted results in a significant missed opportunity to balance housing need more appropriately, and increase housing delivery in rural centres such as Histon and Impington that are highly sustainable and have an identified housing need, particularly in relation to affordable housing.

Allocating small and medium sized housing developments in sustainable locations such as at Histon and Impington would:

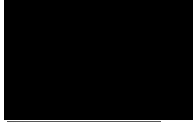
- Deliver homes more quickly;
- Provide certainty to small and medium enterprise housebuilders;
- Support the vitality of the rural area;
- Delivery affordable housing in areas with pressing need; and
- Offer greater flexibility for house buyers.

The Council is currently placing a lot of risk for housing delivery in a limited number of very large pots, and in particular the proposed large new allocations at Cambourne North and Grange Farm require the delivery of infrastructure at scale which is likely to delay their delivery. These delays have been experienced across many of the large strategic sites in Greater Cambridge in recent decades.

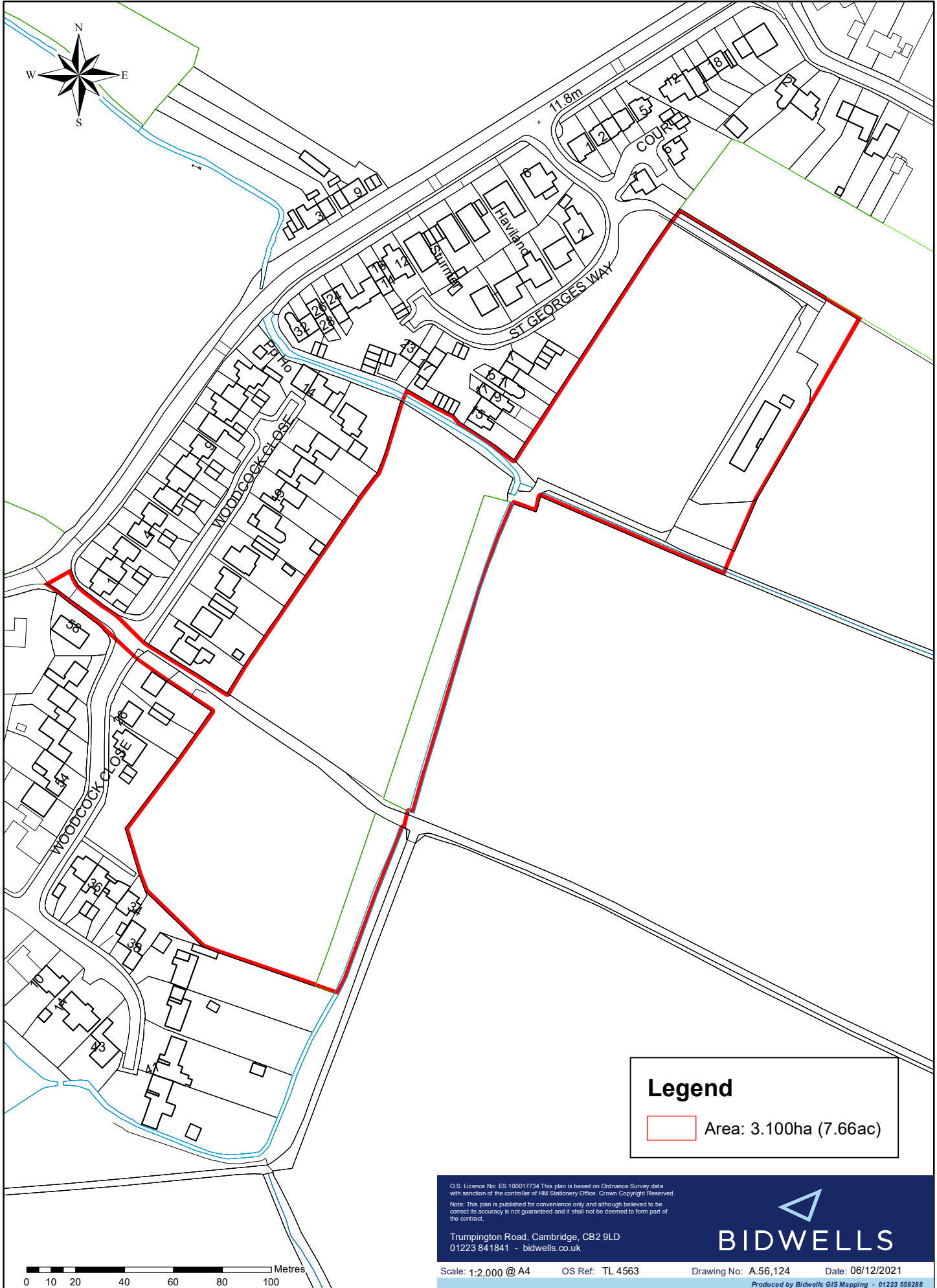
Instead, we suggest a more blended approach, with a more rational approach to sustainable rural development is considered, alongside a review by the Council of potential Grey Belt sites which then need consideration as part of a reasonable alternative in the Sustainability Appraisal.

Should you have any questions, please do not hesitate to get in touch.

Kind regards,



# Land Adjacent to St George's Way and Woodcock Close, Impington



**Legend**

Area: 3.100ha (7.66ac)

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