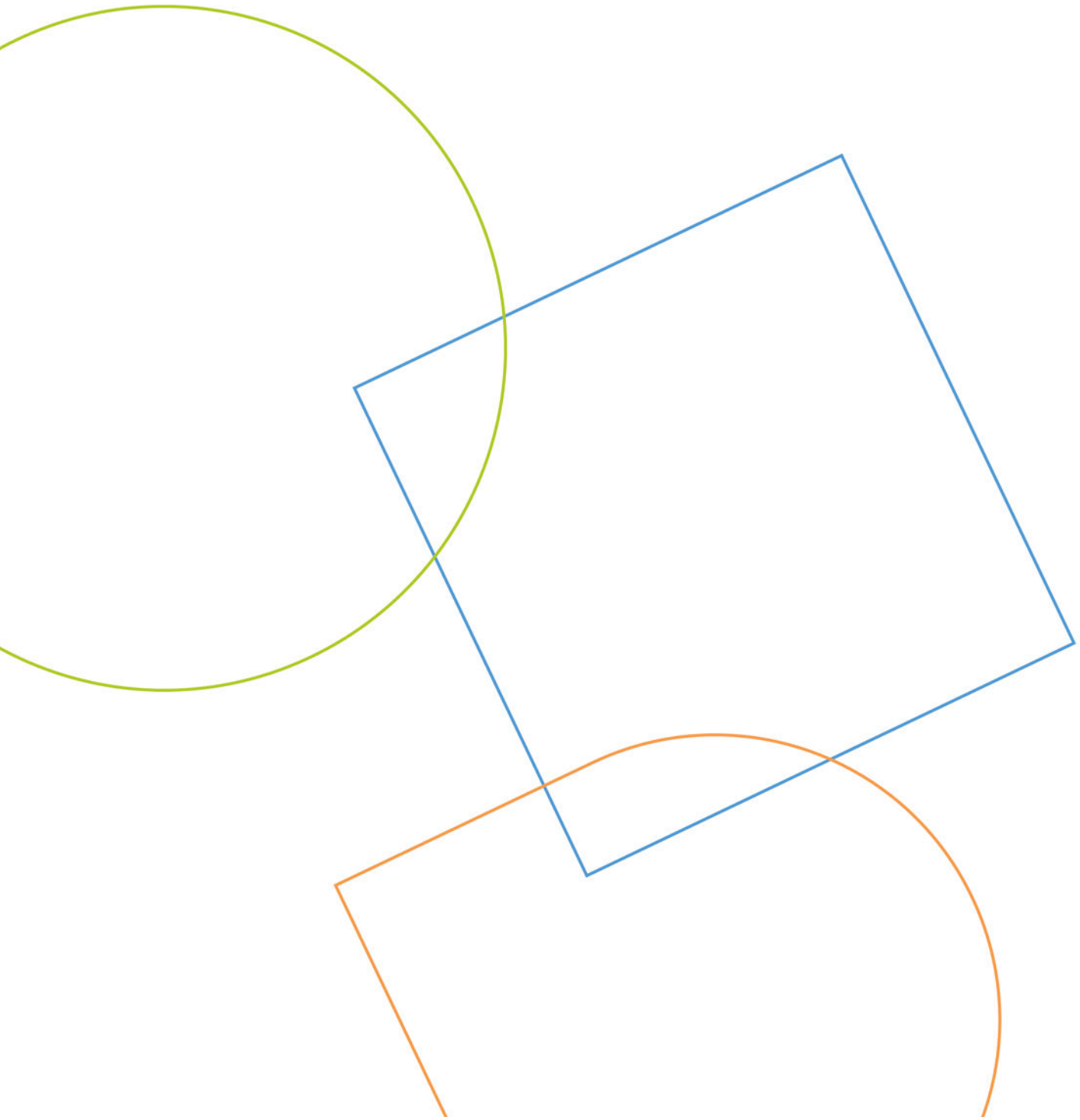


6550 – Land at Valley Farm, Meldreth, South Cambridgeshire (Site ID 115144)
Representations to Greater Cambridge Local Plan Regulation 18 Consultation



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Land at Valley Farm, Meldreth, South Cambridgeshire
(Site ID 115144)

Granta Land Limited



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Issue Sheet

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Representations to Greater Cambridge Local Plan Regulation 18 Consultation

Land at Valley Farm, Meldreth, South Cambridgeshire (Site ID 115144)

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Revision: V1.1

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1 Introduction

1.1.1 These Regulation 18 representations have been prepared by Lanpro Services Ltd on behalf of Granta Land Ltd ('our client'). The representations respond to the Greater Cambridge Planning Service's (the LPAs') Regulation 18 draft joint Local Plan policies that relate to our client's interests at Land at Valley Farm, Meldreth, South Cambridgeshire ('the Site'). A location plan of the Site is shown at **Appendix 1**. These representations follow previous representations submitted in relation to the Site.

1.1.2 The Site has been promoted through previous stages of the plan-making process, including through the Call for Sites and earlier Reg 18 consultations.

1.1.3 The updated Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) 2025, prepared in support for the draft Local Plan, provided an assessment of the Site within Appendix 1 (Melbourn Part 1). The Site has been assigned Site ID 115144 and HELAA Site ID 200807.

1.2 Granta Land Ltd

1.2.1 Granta Land Ltd (hereafter referred to as Granta Land) is a promoting the land on behalf of the landowners.

1.2.2 Granta Land is an East of England based company focused on land promotion and development, working with landowners who care about what their land becomes. Granta Land push for better outcomes for communities, both existing and new, and look to enable the building blocks for prosperous and sustainable places to live.

1.2.3 The team at Granta Land unite decades of experience in planning, development, and investment, spanning diverse sectors. Their collaborative approach is focused on creating measurable added value and lasting impact for their clients.

1.2.4 Granta Land is united by shared values, they channel their expertise and resources into creating impactful developments, enabling thriving communities, and lasting environmental assets for future generations.

1.3 Structure of Document

1.3.1 These representations to the Greater Cambridge Local Plan Regulation 18 consultation are structured as follows:

- Chapter 1: Introduction – This Chapter sets out the introduction to these representations and provides details of our client, Granta Land Ltd, the promoter.
- Chapter 2: Response to Consultation – This Chapter provides a response to the draft policies that are considered relevant to the Site.

2 Response to Consultation

2.1.1 This Chapter sets out our client's response to the draft policies that are considered relevant to the Site.

2.2 Policy S/JH: New jobs and homes

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

2.2.1 The total number of dwellings that the Councils calculate will be provided across the emerging Plan Period is greater than the standard method, which is supported.

2.2.2 The potential for additional growth to support the ambitions of the Cambridge Growth Company and by extension, the Government, should be incorporated into the draft Local Plan as a material consideration.

Main comments

2.2.3 This draft policy sets out the proposed housing growth for the Councils across the emerging Plan Period. It seeks to provide a minimum of 48,195 new homes of all mixes and tenures.

2.2.4 The Government's updated standard methodology for Greater Cambridge is 2,309 dwellings per annum (1,135 in Cambridge City and 1,174 in South Cambridgeshire).

2.2.5 It is noted that the number of dwellings per annum being provided by Greater Cambridge is 2,295, which is slightly fewer than the standard method. However, the draft Local Plan acknowledge that the total supply set out in Table 4 is 55,278 dwellings, which is from the current supply and new sites, including North East Cambridge. Therefore, the total number of dwellings that the Councils calculate will be provided across the emerging Plan Period is greater than the standard method, which our client supports.

2.2.6 However, it is considered that there may be potential for additional growth across Greater Cambridge. Both the previous and the current Governments recognised the potential of Cambridge to support national growth. The Government has set up the Cambridge Growth Company whose job is to work with local stakeholders to deliver "*high quality sustainable growth in Cambridge and its environs*".¹ Significant funding has been provided to the Cambridge Growth Company to enable and shape this growth.

2.2.7 The potential for additional growth to support the ambitions of the Cambridge Growth Company and by extension, the Government, should be incorporated into the draft Local Plan as a material consideration.

¹ <https://thecgc.org.uk/>

2.2.8 Development of the site at Valley Farm, Meldreth would support both the existing growth set out in the emerging Local Plan and any additional growth that is identified by the Cambridge Growth Company.

What changes do you think need to be made to the plan?

2.2.9 Revise calculation of housing need to take into account Government ambitions for Greater Cambridge, including the creation of and funding for the Cambridge Growth Company.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

2.2.10 Yes. In order to test the assumptions and evidence on which the draft Local Plan housing need is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

2.2.11 No. New draft policy.

2.3 Policy S/DS: Development strategy

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

- 2.3.1 The Development Strategy is so reliant on high levels of housing delivery in major strategic sites that the risk that housing need is not met is excessively high and the draft Local Plan is therefore unsound.
- 2.3.2 Many new strategic sites require uncertain new infrastructure, often without funding or consent.
- 2.3.3 The Development Strategy ignores the sustainability benefits of homes in rural areas for community resilience and is flawed.
- 2.3.4 The Housing Trajectory is based on over-optimistic delivery rates for strategic sites, well above historic rates, and is not credible.
- 2.3.5 Additional small sites should be allocated to ensure delivery rates early in the plan period.

Main comments

Over-Reliance on Major Settlements

- 2.3.6 The Development Strategy of the draft Local Plan is reliant on high levels of housing delivery in major strategic sites to such an extent that the risk that housing need is not met is excessively high and the draft Local Plan is therefore unsound.
- 2.3.7 There are fundamental issues with the distribution of housing growth across the Plan Period.
- 2.3.8 The Councils are distributing 44% of growth across the Plan Period in new settlements, and 29% in major sites on the edge of Cambridge which are similar to new settlements (Figure 12 of the Local Plan). Combined, 73% of growth is allocated to major strategic sites.

The table below sets out the distribution of growth during the Plan Period across these new settlements and whether these have planning permission.

Table 3.1: Delivery of new strategic sites during the emerging Plan Period

| Site | Number of Homes to be | Total number of dwellings | Extant permission | Percentage of homes delivered |
|------|-----------------------|---------------------------|-------------------|-------------------------------|
| | | | | |

| | delivered in Plan Period | | | during Plan Period |
|----------------------------|---------------------------------|--------|-----|---------------------------|
| Northstowe* | 6,229 | 10,107 | Yes | 62% |
| Waterbeach New Town* | 5,727 | 11,531 | Yes | 50% |
| Bourn Airfield | 3,500 | 3,500 | Yes | 100% |
| North East Cambridge | 3,950 | 4,925 | No | 50% |
| Cambourne North | 2,550 | 13,000 | No | 20% |
| Grange Farm New Settlement | 2,550 | 6,000 | No | 43% |

*Northstowe has delivered 1,401 dwellings prior to this emerging Plan Period. Waterbeach New Town has delivered 556 dwellings prior this emerging Plan Period.

2.3.9 The following table sets out the proposed housing trajectory of the new strategic sites which do not currently have extant consent during the emerging Local Plan timeframe.

Table 3.2: Proposed housing trajectory for new strategic sites without extant consent (2024/25-2044/45)

| New Settlement | 24/25-31/32 | 32/33 | 33/34 | 34/35 | 35/36 | 36/37 | 37/38 | 38/39 | 39/40 | 40/41 | 41/42 | 42/43 | 43/44 | 44/45 |
|-----------------------------|-------------|------------|------------|------------|------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| North East Cambridge | 0 | 50 | 150 | 250 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Cambridge East | 0 | 50 | 150 | 250 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Cambourne North | 0 | 0 | 0 | 50 | 100 | 150 | 200 | 250 | 300 | 300 | 300 | 300 | 300 | 300 |
| Grange Farm | 0 | 0 | 0 | 50 | 100 | 150 | 200 | 250 | 300 | 300 | 300 | 300 | 300 | 300 |
| Totals | 0 | 100 | 300 | 600 | 900 | 1000 | 1100 | 1200 | 1300 | 1300 | 1300 | 1300 | 1300 | 1300 |

2.3.10 It is not considered that the delivery rates for these sites are realistic, particularly with regard to the new sites which are yet to have been granted planning permission:

- North East Cambridge.
- Cambridge East.
- Cambourne West.

- Grange Farm.

- 2.3.11 In the latest ‘Start to Finish’ Report, undertaken by Lichfields in 2024², it confirms that sites comprising over 1,000 dwellings will take, on average, five years to obtain detailed planning permission and then a further 1.3-1.6 years to deliver the first dwelling.
- 2.3.12 Indeed, for sites over 2,000 dwellings, it states that the median timescale from validation of the first planning application to the completion of the first dwelling is 6.7 years.
- 2.3.13 The Councils’ Local Development Scheme anticipates that the emerging Local Plan will be submitted to the Secretary of State for examination in December 2026. In July 2024 (after their General Election win), the new Minister for Housing, Matthew Pennycook, wrote to the Planning Inspectorate and noted that the average length of time for the completion of examination had increased from 65 weeks on average in 2016 to 134 weeks on average in 2022 (approximately 2 ½ years)³.
- 2.3.14 Therefore, if the Plan were submitted to the Secretary of State in December 2026, then the earliest that the Plan is likely to be adopted is May 2029, using the data above. That would be equivalent to ‘Year 6’ (2029/2030) in the proposed housing trajectory.
- 2.3.15 If these new sites were to be approved in Year 6 (2029/30), then the earliest that the first house could be delivered according to the Lichfields ‘Start to Finish’ is in Year 12 (2035/2036). It is therefore unrealistic that the first dwellings will be delivered in North East Cambridge and Cambridge East in 2032/33 and in 2034/35 in Cambourne North and Grange Farm.
- 2.3.16 The current housing trajectory figures are overly ambitious for new strategic sites. There would be a reduction in 3,000 homes across the Plan Period which would not be delivered on new strategic sites.
- 2.3.17 Therefore, in order to meet this shortfall, the Councils should focus on providing a range of sites including smaller and medium sized sizes in and adjoining existing settlements, especially ones that have a number of services and facilities.
- 2.3.18 The Councils’ housing trajectory also reliant on the new strategic sites delivering 350 dwellings per annum. This is equivalent to seven plots delivering 50 dwellings per annum, by several housebuilders.
- 2.3.19 The Lichfields ‘Start to Finish’ document also sets out the housing completions of large sites. The table below sets out the average delivery of sites which are for over 5,000 dwellings across the years.

Table 3.2: Table of average housing delivery on sites larger than 5,000 dwellings

| Site Name | No of Dwellings | No of Years of Delivery | Average Delivery (rounded) |
|-----------|-----------------|-------------------------|----------------------------|
| | | | |

² [start-to-finish-3 how-quickly-do-large-scale-housing-sites-deliver.pdf](#)

³ [Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate \(July 2024\)](#)

| | | | |
|------------------------------------|--------|----|-----|
| Former Alconbury Weald, Huntingdon | 5,000 | 2 | 208 |
| Priors Hall, Northamptonshire | 5,200 | 11 | 135 |
| North West Preston | 5,300 | 8 | 290 |
| East Kettering SUE | 5,500 | 6 | 133 |
| Sherford, South Hams | 5,500 | 7 | 119 |
| South Ashford Garden Community | 5,750 | 2 | 75 |
| Houlton (Rugby Radio Station) | 6,200 | 3 | 139 |
| The Hamptons (Peterborough) | 6,320 | 25 | 224 |
| Ebbsfleet | 15,000 | 14 | 255 |

- 2.3.20 Therefore, the table above demonstrates that none of these new settlements achieved, on average, 350 dwellings per annum. Therefore, there should be a greater focus on delivering the required housing across sustainable settlements.
- 2.3.21 There are also concerns about the principle of the development at North East Cambridge, Cambridge East, Cambourne North and Grange Farm, although it is noted that the Councils acknowledge that North East Cambridge may not be available due to the Government withdrawing funding for the wastewater treatment relocation.
- 2.3.22 Regarding Cambridge East (the existing Cambridge Airport), in October 2025, Marshall Group confirmed that they were not relocating to Cranfield Airport, in Bedfordshire, as it was considered “no longer affordable”.
- 2.3.23 Since then, there has been no public reporting or statements setting out when Marshall Group intends to vacate the Site. Therefore, it is uncertain whether the emerging Local Plan can be reliant on these dwellings during the Local Plan period.
- 2.3.24 With respect to Cambourne North, the delivery of the settlement extension is principally reliant on the proposed new station that will be delivered as part of East West Rail.
- 2.3.25 Although it is acknowledged that in June 2025, as part of the spending review, the Government committed a further £2.5 billion for the continued delivery of East West Rail, there is not a certainty that this will be delivered. This Government is fully committed to the delivery of East West Rail but there are no guarantees that a future government would be as committed. Therefore, the emerging Local Plan should focus more growth in Rural/Minor Rural Centres.

⁴ <https://www.bbc.co.uk/news/articles/c62l6gnvdyqo>

- 2.3.26 Regarding Grange Farm, there is concern that there is currently no infrastructure and none planned, with the scheme wholly reliant on an extension to CSET which is currently not in the project scope. The delivery of CSET is not within the control of the LPA or the site promoters.
- 2.3.27 The Deliverability Paper that was submitted for Grange Farm as part of the previous ‘call for sites’, confirms that 3,560 dwellings (market and affordable) can be delivered during the emerging Local Plan period with the first dwellings being delivered in 2030.
- 2.3.28 The Councils’ housing trajectory states that only 2,550 dwellings can be during the Plan Period, so our client would question how accurate these figures are by both the Councils and the promoter for Grange Farm.
- 2.3.29 There is also a discrepancy between the number in the Housing Trajectory provided by the Council (up to 300 dwellings in 2040) and only 275 dwellings in the Housing Deliverability Note⁵. Therefore, it is not clear that the Council will be able to deliver that number of dwellings across the Plan Period.
- 2.3.30 In total, as set out in Figure 12 of the emerging Local Plan above, new settlements and edge of Cambridge sites will provide 73% of the total housing supply. Given the timings set out in the Lichfields ‘Start to Finish’ report, there is a severe risk of delay in delivering a significant number of Greater Cambridge’s housing sites, which will mean that the Councils will not be able to meet their housing needs across the Plan Period. If the Councils cannot demonstrate a five-year housing land supply or has a housing delivery percentage of less than 75%, set out in the Government’s Housing Delivery Test, then the Plan would be considered out of date. It would, therefore, be subject to paragraph 11 of the NPPF (2024) and attract speculative development.
- 2.3.31 In order to avoid this scenario and to ensure as far as possible a plan-led system can be successfully implemented and delivered, sites are needed that can help the Council deliver a consistent and deliverable supply of housing across the Plan Period, reducing the risk of the Council not being able to meet its housing needs, thereby attracting speculative development.
- 2.3.32 A greater mix of smaller and medium sized sites would help to ensure that in future Greater Cambridge is able to demonstrate a five-year supply of housing land. Smaller and medium sized sites typically come forward quicker than new large strategic sites which require significant infrastructure to support them. A good mix of these smaller sized sites also enables a wider range of house builders to enter the market providing a wider range in product and often leading to an increase in local employment.

Homes in Rural Areas

- 2.3.33 Policy S/DS takes no account of the sustainability benefits of locating some appropriately-sized development within or adjacent to existing villages in South Cambridgeshire.

⁵ <https://oc2.greatercambridgeplanning.org/form/59401>

- 2.3.34 Villages of all sizes with South Cambridgeshire benefit from increases in the housing stock: those with links to village can remain or return, new residents can find homes, the usage of local shops, community facilities and schools is increased. This maintains the resilience of established communities.
- 2.3.35 The Country Landowner’s Association’s report *Sustainable Communities: the Role of Housing in Strengthening the Rural Economy* (2022) states:
‘For rural areas to thrive, there needs to be an adequate, available, and diverse supply of homes, which includes different tenure types of varying sizes. The existing lack of homes in rural areas prevents young families to continue living in their community, key workers to be based near to their places of work and the elderly to downsize.’
- 2.3.36 However, the draft Local Plan makes allocations for just 265 homes on four sites adjacent to existing villages (Duxford, Highfields, and Melbourn).
- 2.3.37 This is the outcome of a fundamental flaw in the framing of the hierarchy of locations within this policy, which states that ‘jobs and homes will be met as far as possible in the following order of preference’. The hierarchy reflects an approach to sustainability that gives predominant weight to environmental factors, notably transport emissions, to the detriment of the social sustainability of existing settlements. Following this sequential hierarch leads the draft Local Plan to maximise allocations in locations in and around Cambridge as well as at new strategic sites. Only a small residual of housing need is allocated to villages, whereas there is localised housing need within almost all communities in the plan area, as regular village-level surveys show.
- 2.3.38 By failing to allocate new housing to existing villages, and ignoring the social impact of this, the draft Local Plan does not fully achieve sustainable development as defined in the NPPF.
- 2.3.39 Development of the site at Valley Farm, Meldreth would contribute to the social sustainability of the villages of Meldreth and Melbourn.

Five Year Housing Land Supply and Housing Trajectory

- 2.3.40 The Development Strategy of the draft Local Plan is underpinned by the Housing Trajectory set out in draft Appendix E. This anticipates that the local housing need (standard method) annual number of 2,309 is not achieved between 2024/25 and 2027/28, in 2032/32 or in the final four years of the plan period. For the years 2028/29 and 2029/30, anticipated completions are significantly higher, at 3,483 and 3,530 respectively. This results in a predicted number of completions for 2028-2033 of 14,427 units, which equates to a five-year supply of 5.32 years.
- 2.3.41 Analysis of the projected completions for individual sites suggests that the above anticipated completions numbers are based on estimates of completions on strategic sites for 2028/29 and 2029/30 are that are significantly above historic maximums and that do not take into account the planning context of each site.

- 2.3.42 At North West Cambridge, completion of the final Phase 1 dwellings permitted under the 2013 outline is expected in 2028. The outline application for future phases is currently under consideration and is unlikely to be approved before late 2026, with reserved matters to follow. It is therefore implausible that 305 and 376 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 100 per year, as the trajectory anticipate for most of the 2030s.
- 2.3.43 At Northstowe, the historic maximum annual delivery was in 2018/19, when 278 dwellings were completed. Only 92 dwellings were completed in 2023/2024 (on both Phase 1 and Phase 2). Phase 1 is now almost complete and Phase 2 has 706 dwellings permitted. It is therefore implausible that 473 and 467 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 300 per year, as the trajectory anticipate for 2030 onwards.
- 2.3.44 At Waterbeach New Town, 263 dwellings were completed in 2022/23, with completions declining since then. It is unlikely that 376 and 368 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 300 per year, as the trajectory anticipate for 2030 onwards.
- 2.3.45 If the above reasonable adjustments are made to the housing trajectory in Appendix E, the number of predicted completions is reduced by 965 and the five-year supply for 2028-2033 falls to 4.96
- 2.3.46 It is also noted that the housing trajectory relies on historically high delivery rates in 2028/29 and 2029/30 for four further major previously allocated strategic sites: North East Cambridge, Darwin Green, Cambridge East (Marleigh and Land north of Cherry Hinton), and Cambourne West.
- 2.3.47 Given historic experience of both general and site-specific causes of delays and reductions in delivery rates, notably the delivery of major infrastructure, it is not credible to assume that seven major strategic sites will all be able to deliver at historically exceptional rates.
- 2.3.48 In order to reduce reliance on uncertain major sites and increase the likelihood that overall completion rates will be close to or exceed standard method need over the first 5-10 years of the plan period, the draft Local Plan should make significant additional allocations for smaller developments close to existing settlements and that do not require enabling infrastructure investment.
- 2.3.49 The site at Valley Farm, Meldreth is available immediately and can deliver housing within the early years of the plan period.
- What changes do you think need to be made to the plan?*
- 2.3.50 Revise sequential hierarchy of types of location to account for sustainability benefits of sites adjacent to villages.
- 2.3.51 Revise housing trajectory with realistic figures for delivery on major sites.
- 2.3.52 Allocate significantly more sites in the rural area, including at Valley Farm, Meldreth.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

2.3.53 Yes. In order to test the assumptions and evidence on which the draft Local Plan development strategy is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

2.3.54 No. New draft policy.

2.4 Policy S/SH: Settlement hierarchy

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

2.4.1 Functionally, Melbourn and Meldreth should be considered as a single settlement. They have a wide range of services, many of which are shared.

2.4.2 The railway station in Meldreth serves both villages, but appears to have been ignored in the settlement hierarchy assessment for Melbourn.

2.4.3 Together, the villages of Melbourn and Meldreth should be designated as a Rural Centre.

Main comments

2.4.4 The draft Local Plan designates Meldreth as a Group Village and Melbourn as a Minor Rural Centre, which are the designations in the current Local Plan.

2.4.5 Given the functional and geographic links between Melbourn and Meldreth, it is proposed that the two villages be considered together within the Settlement Hierarchy and their status reviewed.

2.4.6 Combined, the two villages have a wide range of services, shops and community facilities. A secondary school is located in Melbourn, and each village has a primary school.

2.4.7 A railway station is located in Meldreth, between the two villages. It would appear that the Settlement Hierarchy Paper ignores the existence of Meldreth railway station in the assessment of Melbourn. Although this is in the parish of Meldreth, is close to and serves Melbourn. The Greater Cambridge Partnership recently upgraded the footpath/cyclepath from Melbourn to the station. The station is served by half-hourly services to Cambridge and London during peak times. Taking into account both the existence of the railway station and the forthcoming Greenway, the transport score for a combined Melbourn - Meldreth settlement should be higher.

2.4.8 A slightly higher score for either Melbourn or Melbourn-Meldreth would take the settlement into the category of Rural Centre.

2.4.9 The site at Valley Farm, Meldreth is well connected to the services in both villages of Meldreth and Melbourn, including the railway station, schools and shops.

What changes do you think need to be made to the plan?

2.4.10 Combine Melbourn and Meldreth a single settlement for the purposes of this policy.

2.4.11 Designate Melbourn and Meldreth as a Rural Centre.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

2.4.12 Yes. In order to test the assumptions and evidence on which the draft Local Plan development strategy is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

2.4.13 No. New draft policy.

2.5 Policy S/DE: Defined development extents

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

2.5.1 This policy is not consistent with the draft new NPPF policy S5 which supports development outside settlements where is within walking distance of a well-connected railway station.

2.5.2 Meldreth railway station is well-connected in terms of draft NPPF policy S5.

Main comments

2.5.3 This draft policy is not consistent with the draft new National Planning Policy Framework (December 2025), which includes provision for development that is outside a settlement but close to a well-connected railway station.

2.5.4 Paragraph 1 of Policy S5 of the draft new NPPF states that some ‘forms of development should be approved outside settlements [...], unless the benefits of doing so would be substantially outweighed by any adverse effects’. One of the stated exceptions is for:

‘h. Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services²⁶; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long-term comprehensive development in the same location;’

2.5.5 Footnote 26 reads as follows:

²⁶ Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains or trams per hour in any one direction.’

2.5.6 If this policy is included within the final new NPPF, it should, insofar as it is possible, be incorporated into the Policy S/DE.

2.5.7 The site at Valley Farm, Meldreth meets the requirements of draft new NPPF Policy S5(1)(h):

- It is within reasonable walking distance of a railway station, taken to be less than 800m;
- It is well-related to the settlement of Meldreth and the station, linked by footpaths and a road;
- Development the site would not require additional infrastructure;
- There are no long-term development plans for the location;
- It is within a top 60 TTWA;
- There is a reasonable prospect of the station being served by two trains per hour in each direction.

What changes do you think need to be made to the plan?

- 2.5.8 An additional exception should be added to paragraph 2 for development close to well-connected railway stations that refers to the new NPPF following publication of the final version in summer 2026.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- 2.5.9 Yes. In order to test the assumptions and evidence on which the draft Local Plan development strategy is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

- 2.5.10 No. New draft policy. Recent new draft NPPF.

2.6 Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

- 2.6.1 The proposed new settlement at Grange Farm relies entirely on major new transport infrastructure that is not consented, does not have secure finance and is technically challenging. Design of the settlement itself has not begun. The housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of the new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. In transport terms, the site is not sustainable. The allocation should be removed or the trajectory should be reduced and pushed back.

Main comments

- 2.6.2 This draft policy creates a new allocation for an entirely new settlement of around 6,000 homes, of which 2,550 are to be delivered during the plan period. It is located east of the Fourwentways junction of the A11 and A1307 roads. The justification for this site is that it is close to the Rural Southern Cluster of science innovation parks, in an area with relatively low housing supply. It is to be connected to Cambridge via an extension to the Cambridge South East Transport (CSET) segregated public transport scheme.
- 2.6.3 The Grange Farm depends on the construction of a new high quality public transport link to Cambridge, which has two elements: CSET and a further extension.
- 2.6.4 CSET is managed by the Greater Cambridge Partnership (GCP). It is a proposed segregated busway running from the Cambridge Biomedical Campus (including Cambridge South railway station) to a new park and ride site west of the Fourwentways junction, giving access to the A11 and A1307. It will serve the villages of Great Shelford, Stapleford and Sawston, as well as the Brabraham Research Campus. An application for a Transport and Works Act Order was submitted to the Department for Transport (DfT) in January 2025. It is expected that a public inquiry will take place in 2026.
- 2.6.5 In 2023, GCP concluded that it could not fund construction of CSET itself. Since then, central government has provided funding for the design to be advanced and the planning submission to be made. However, no construction funding has been secured. While there is political support for the project at both national and local level, there still remains uncertainty as to its delivery.
- 2.6.6 In its latest Board papers (November 2025), the GCP did not provide either a target completion date or forecast completion date for the CSET project. If permission were

granted in 2027, it is unlikely that construction would start before 2028-29 and that the scheme would be completed before 2032.

- 2.6.7 The link between the CSET park and ride and the Grange Farm site must cross both the A11 dual carriageway and the A1307 road. CSET feasibility work carried out in 2020 included an option for a park and ride east of Fourwentways, and this has been reviewed in the preparation of the draft Local Plan as an option for linking to Grange Farm. No other design or feasibility work appears to have been undertaken. A bridge over the A11 would cost tens of millions of pounds, with significant further work required for junctions and route. While it might be possible to complete the link at the same time as CSET, this element is at a very early stage.
- 2.6.8 Even with a busway link, Grange Farm would be severed from potential destinations to the west by the A11 and A1307 without significant further interventions.
- 2.6.9 The Grange Farm site is relatively isolated and is a considerable distance from other major settlements. The busway link will represent the only high quality public transport link for the settlement. No major settlement is within cycling distance. Given the limited range of services that could be sustained by a settlement of 6,000 dwellings itself, it is likely that a high number of external journeys will be made by car. No evidence has been provided that this is not the case, nor that high car usage can be limited. Development at this site is therefore not sustainable.
- 2.6.10 In summary, the Grange Farm allocation relies entirely on major new transport infrastructure that is currently not planned for, nor consented, does not have secure finance and is technically challenging. Design of the settlement itself has not begun. The housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of the new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. In transport terms, the site is not sustainable. The allocation should be removed or the trajectory should be reduced and pushed back.

What changes do you think need to be made to the plan?

- 2.6.11 Remove allocation..

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- 2.6.12 Yes. In order to test the assumptions and evidence on which the draft Local Plan allocation is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

- 2.6.13 No. New draft policy.

2.7 Policy S/RRA: Site allocations in the rest of the rural area

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

- 2.7.1 Additional allocations in rural areas are required to make the plan sound.
- 2.7.2 The site at Valley Farm, Meldreth is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan.
- 2.7.3 The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided.
- 2.7.4 The site meets the requirements of the new draft NPPF for development close to railway stations.

Main comments

- 2.7.5 In order to make the plan sound and meet housing need throughout the plan period, further small sites in sustainable locations in the rural area should be allocated for development.
- 2.7.6 The site at Valley Farm, Meldreth is located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable. It would therefore contribute to the objectives of the Local Plan.

The Site

- 2.7.7 The site at Valley Farm, Meldreth lies between the Cambridge-Hitchin mainline railway and the A10 road. The proposed developable area is 6.136 hectares. The majority of this area consists of agricultural land. An area of approximately 1.6 hectares in the southern part of the site includes the farmyard and a small business park. Station Road runs along the southern and southwestern boundary of the site. The River Mel runs through the centre of the site, dividing the developable area from further arable land to the north. The non-developable areas, including the land to the north and an area of scrubland and woodland to the northwest, extend to approximately 7.17 hectares.
- 2.7.8 Vehicular access to the site is from Station Road. Meldreth Railway station is immediately adjacent to the site to the west.

2.7.9 A public footpath runs through the centre of the site, linking the village of Melbourn with the railway station. Two further public footpaths run across the northern part of the site.

Masterplan and Site Capacity

2.7.10 In support of this submission, a masterplanning exercise carried out for the site, in coordination with relevant technical consultants, resulting in the accompanying illustrative masterplan reference 1415-003-04-V3.

2.7.11 The illustrative masterplan set out potential locations for residential development, for the retention and redevelopment of the existing business park, along with significant ecological and landscape enhancements.

2.7.12 The capacity of the site will be determined by detailed landscape-led design. Indicatively, depending on the final density, the site could accommodate between 198 dwellings at 35dph and 266 dwellings at 50dph. It is noted that the draft NPPF policy L3 proposes that a minimum density of 50dph should be achieved on sites close to well-connected railway stations.

2.7.13 The illustrative masterplan demonstrates that the site can be delivered through a comprehensive masterplanned approach.

Historic Environment

2.7.14 There are three Grade II listed buildings in proximity to the site: Meldreth Thatch, Fieldgate Cottage and Fieldgate Farmhouse. They form part of the post-medieval development of Meldreth relating to its agricultural and horticultural hinterland. This context has changed with the construction of the railway line and later the A10, together with the proliferation of structures on the Valley Farm and Fieldgate Nurseries sites. However a sense of the formerly rural setting survives.

2.7.15 The concept plan retains the southernmost part of the site as open space to protect the settings of Fieldgate Farmhouse and Fieldgate Cottage.

2.7.16 The proposed site access makes use of the existing access serving the commercial buildings at Valley Farm located immediately to the north of the listed building (Meldreth Thatch). The setting of this cottage to the north-east is characterised by large scale commercial structures such that its proposed use as the local centre could be delivered within the existing context. Indeed, there is scope to deliver enhancement through an improved access, landscaping and sensitive redevelopment of the existing built form.

2.7.17 The northern part of the site proposed for residential development and supporting infrastructure is visually and physically separated from the listed buildings by the existing commercial structures such that its development is unlikely to significantly impact their settings.

2.7.18 At the detailed design stage there would be opportunities to secure a locally distinctive form of development that responds to the former agricultural character and context of the site.

Transport and Movement

- 2.7.19 Valley Farm represents a highly sustainable development opportunity in transport terms and responds directly to the priorities established in the adopted National Planning Policy Framework (NPPF). The NPPF places clear emphasis on directing development to locations that maximise the use of sustainable transport modes, stating that significant development should be focused on locations which are or can be made sustainable, “through limiting the need to travel and offering a genuine choice of transport modes” (NPPF, paragraph 104a).
- 2.7.20 In this context, the NPPF explicitly supports residential and mixed-use development in locations well served by public transport. Paragraphs 104c and 105 strongly encourage development to be focused around transport hubs and require opportunities to promote walking, cycling and public transport to be identified and pursued. This direction is reinforced by paragraph 110, which seeks development that prioritises pedestrian and cycle movements and creates places that are safe, accessible, and well connected. Valley Farm responds directly to these requirements through its proximity to a mainline railway station and its strong integration with active travel networks.
- 2.7.21 Meldreth railway station provides direct access to Cambridge Central, Cambridge North and the soon-to-open Cambridge South station, all of which support many thousands of jobs of both local and national importance. The NPPF recognises the importance of supporting economic growth while reducing reliance on the private car, particularly by locating homes in sustainable locations with good access to employment (paragraphs 81 and 104). The delivery of new housing with high-quality, sustainable access to these key employment clusters is therefore a clear imperative at both local and national levels, and Valley Farm is well positioned to meet this need.
- 2.7.22 In addition to its excellent strategic rail connectivity, the site benefits from a strong network of local sustainable transport connections, which represent a key asset in delivering policy-compliant development. Running through the heart of the masterplan is a newly constructed, high-quality walking and cycling route that is 3.0 metres wide and fully lit, providing direct and attractive connectivity between Meldreth Station and Melbourn village centre to the east. This route forms a clear structuring principle for the masterplan and embeds the principles of walking, cycling and public transport use at the core of the development. This approach aligns directly with NPPF paragraph 110a and 110c, which seek developments that give priority to pedestrian and cycle movements and create well-connected places that encourage sustainable travel choices.
- 2.7.23 Connectivity to Melbourn is particularly important given the village’s role and function within the adopted South Cambridgeshire Local Plan (2018). Under Policy S/SH (Settlement Hierarchy), Melbourn is classified as a Minor Rural Centre, identified as one of the District’s most sustainable villages, providing a good range of services, facilities and employment opportunities, and therefore appropriate locations to accommodate development that meets both local and wider needs. Melbourn consistently sits at the upper end of the Minor Rural Centre category and offers a level of provision more typically

associated with a small market town, including a Village College, primary school, health centre/GP surgery, library, sports centre, community facilities and a wide range of shops and services. This pattern of development is consistent with Policy S/RA (Strategy for the Rural Area), which seeks to focus growth in villages that are well served by facilities and sustainable transport options – this is Melbourn and by definition of its direct connection to it, the site.

- 2.7.24 Vehicular access to Valley Farm can be provided in a manner consistent with both national and local policy. The site benefits from an existing access onto Station Road, which can be formalised and upgraded in accordance with Cambridgeshire County Council’s Highway Development Management – General Principles for Development. Preliminary access arrangements demonstrate that the site can be safely and efficiently accessed, with the proposed commercial uses at the frontage served initially before the access transitions into a residential street serving the wider masterplan. In accordance with County Council standards, a secondary emergency access can also be provided through land under the control of the promoter.
- 2.7.25 In summary, Valley Farm represents a deliverable and highly sustainable development in transport terms, strongly aligned with both the NPPF and the adopted South Cambridgeshire Local Plan. Its direct relationship with a mainline railway station offering regular and direct services to Cambridge, combined with high-quality walking and cycling connectivity and access to the extensive services and facilities within Melbourn, means that day-to-day reliance on the private car would be minimised. The site therefore accords with national and local policy objectives to focus growth in sustainable, accessible and well-connected locations.

Other Planning Matters

- 2.7.26 In landscape terms, the site is well enclosed, with significant existing woodland screening along the A10 and Station Road, with only glimpsed views of the site from the Station Road bridge. The site is open internally, which is appreciated from the public footpaths that cross the site. It is acknowledged that the site forms part of the spatial separation between the villages of Melbourn and Meldreth. However, it is considered that the A10 road, which is raised on a high embankment, constitutes the most important separation feature between the villages, especially in visual terms.
- 2.7.27 There are no nationally-designated sites of ecological interest in proximity to the site. The Melwood Local Nature Reserve is located approximately 80m from the site, to the west of the railway line, and it is not considered that significant effects are likely with mitigation. The majority of the site consists of agricultural land and sealed surfaces, with limited ecological interest.
- 2.7.28 The developable area of the site is in Flood Zone 1. A narrow band of land alongside the River Mel is within Flood Zones 2 and 3. There are small areas at risk of surface water flooding within the site.

Site Availability and Deliverability

- 2.7.29 The site is under the control of a single group of landowners and is being promoted by Granta Land Ltd. The landowners are able to make the site available for development immediately.
- 2.7.30 No major enabling infrastructure is required. The site is therefore immediately available and deliverable.

Conclusion

- 2.7.31 The site at Valley Farm, Meldreth is a sustainable location for a new residential-led mixed use development. It is immediately adjacent to a railway station with a frequent service to employment locations in Cambridge and elsewhere. A wide range of services, including schools, shops and community facilities, are located within walking distance.
- 2.7.32 The site meets the requirements of the new draft NPPF for development close to railway stations, which are given significant support.
- 2.7.33 The site is available and deliverable, without the need for major infrastructure, in early stages of the plan period.

What changes do you think need to be made to the plan?

- 2.7.34 Allocation of Land at Valley Farm, Meldreth for residential-led mixed use development.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- 2.7.35 Yes. In order to present in support of this allocation.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

- 2.7.36 No. Proposed new policy.

2.8 Policy BG/BG: Biodiversity and geodiversity

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

2.8.1 The new draft NPPF policy N1 does not permit local plans to require BNG above the statutory level.

2.8.2 A blanket policy requirement for 20% does not account for site specific conditions and should be removed.

Main comments

2.8.3 The requirement of this draft policy for 20% BNG does not comply with the draft new NPPF.

2.8.4 Paragraph 2 of Policy N1 of the draft new NPPF states that:

“Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable.”

2.8.5 A blanket policy requirement for 20% does not account for site specific conditions and should be removed.

What changes do you think need to be made to the plan?

2.8.6 Reduce base BNG to 10%, with higher percentages only for specific sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

2.8.7 Yes. In order to test the assumptions and evidence on which the draft Local Plan biodiversity strategy is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

2.8.8 No. New draft policy. Recent new draft NPPF.

2.9 Appendix E: Housing trajectory and five year housing land supply calculation

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to co-operate? Yes

Summary of your comments

2.9.1 The Housing Trajectory is based on over-optimistic delivery rates for major strategic sites, well above historic rates, and is not credible.

2.9.2 Anticipated completions for 2028/29 and 2029/30 are particularly high. A more reasonable estimate for sites such as Northstowe, Waterbeach New Town and North West Cambridge reduces the five-year supply to under 5.

Main comments

2.9.3 The Development Strategy of the draft Local Plan is underpinned by the Housing Trajectory set out in draft Appendix E. This anticipates that the local housing need (standard method) annual number of 2,309 is not achieved between 2024/25 and 2027/28, in 2032/32 or in the final four years of the plan period. For the years 2028/29 and 2029/30, anticipated completions are significantly higher, at 3,483 and 3,530 respectively. This results in a predicted number of completions for 2028-2033 of 14,427 units, which equates to a five-year supply of 5.32 years.

2.9.4 Analysis of the projected completions for individual sites suggests that the above anticipated completions numbers are based on estimates of completions on strategic sites for 2028/29 and 2029/30 are that are significantly above historic maximums and that do not take into account the planning context of each site.

2.9.5 At North West Cambridge, completion of the final Phase 1 dwellings permitted under the 2013 outline is expected in 2028. The outline application for future phases is currently under consideration and is unlikely to be approved before late 2026, with reserved matters to follow. It is therefore implausible that 305 and 376 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 100 per year, as the trajectory anticipate for most of the 2030s.

2.9.6 At Northstowe, the historic maximum annual delivery was in 2018/19, when 278 dwellings were completed. Only 92 dwellings were completed in 2023/2024 (on both Phase 1 and Phase 2). Phase 1 is now almost complete and Phase 2 has 706 dwellings permitted. It is therefore implausible that 473 and 467 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 300 per year, as the trajectory anticipate for 2030 onwards.

- 2.9.7 At Waterbeach New Town, 263 dwellings were completed in 2022/23, with completions declining since then. It is unlikely that 376 and 368 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 300 per year, as the trajectory anticipate for 2030 onwards.
- 2.9.8 If the above reasonable adjustments are made to the housing trajectory in Appendix E, the number of predicted completions is reduced by 965 and the five-year supply for 2028-2033 falls to 4.96
- 2.9.9 It is also noted that the housing trajectory relies on historically high delivery rates in 2028/29 and 2029/30 for four further major previously allocated strategic sites: North East Cambridge, Darwin Green, Cambridge East (Marleigh and Land north of Cherry Hinton), and Cambourne West.
- 2.9.10 Given historic experience of both general and site-specific causes of delays and reductions in delivery rates, notably the delivery of major infrastructure, it is not credible to assume that seven major strategic sites will all be able to deliver at historically exceptional rates.
- 2.9.11 In order to reduce reliance on uncertain major sites and increase the likelihood that overall completion rates will be close to or exceed standard method need over the first 5-10 years of the plan period, the draft Local Plan should make significant additional allocations for smaller developments close to existing settlements and that do not require enabling infrastructure investment.

What changes do you think need to be made to the plan?

- 2.9.12 Revise housing trajectory with realistic figures for delivery on major sites.


If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

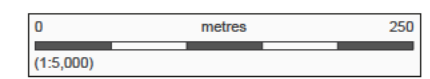
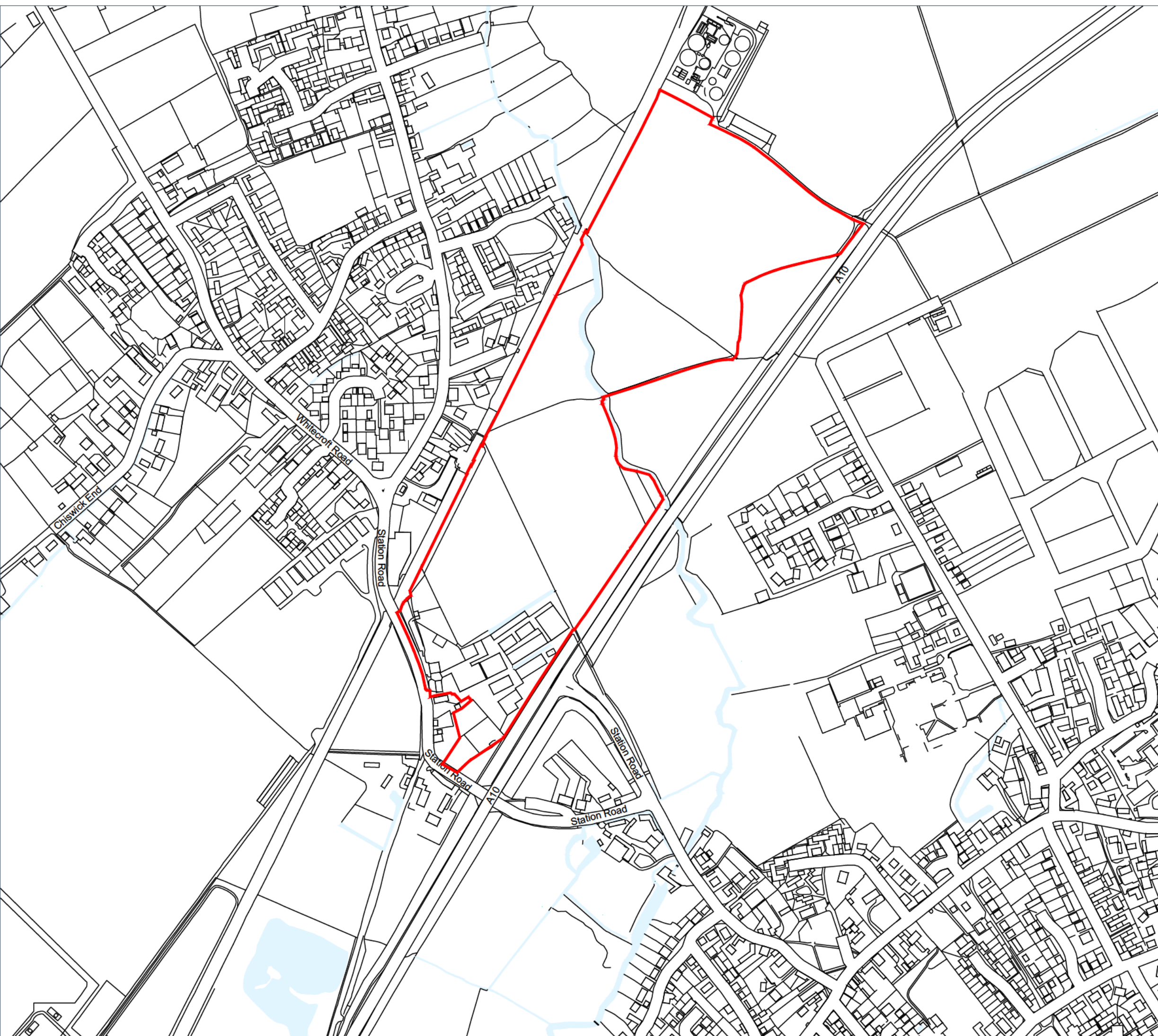
- 2.9.13 Yes. In order to test the assumptions and evidence on which the draft Local Plan housing trajectory is based.

Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?

- 2.9.14 No. New draft policy.

Appendix 1 Location Plan

 Site boundary

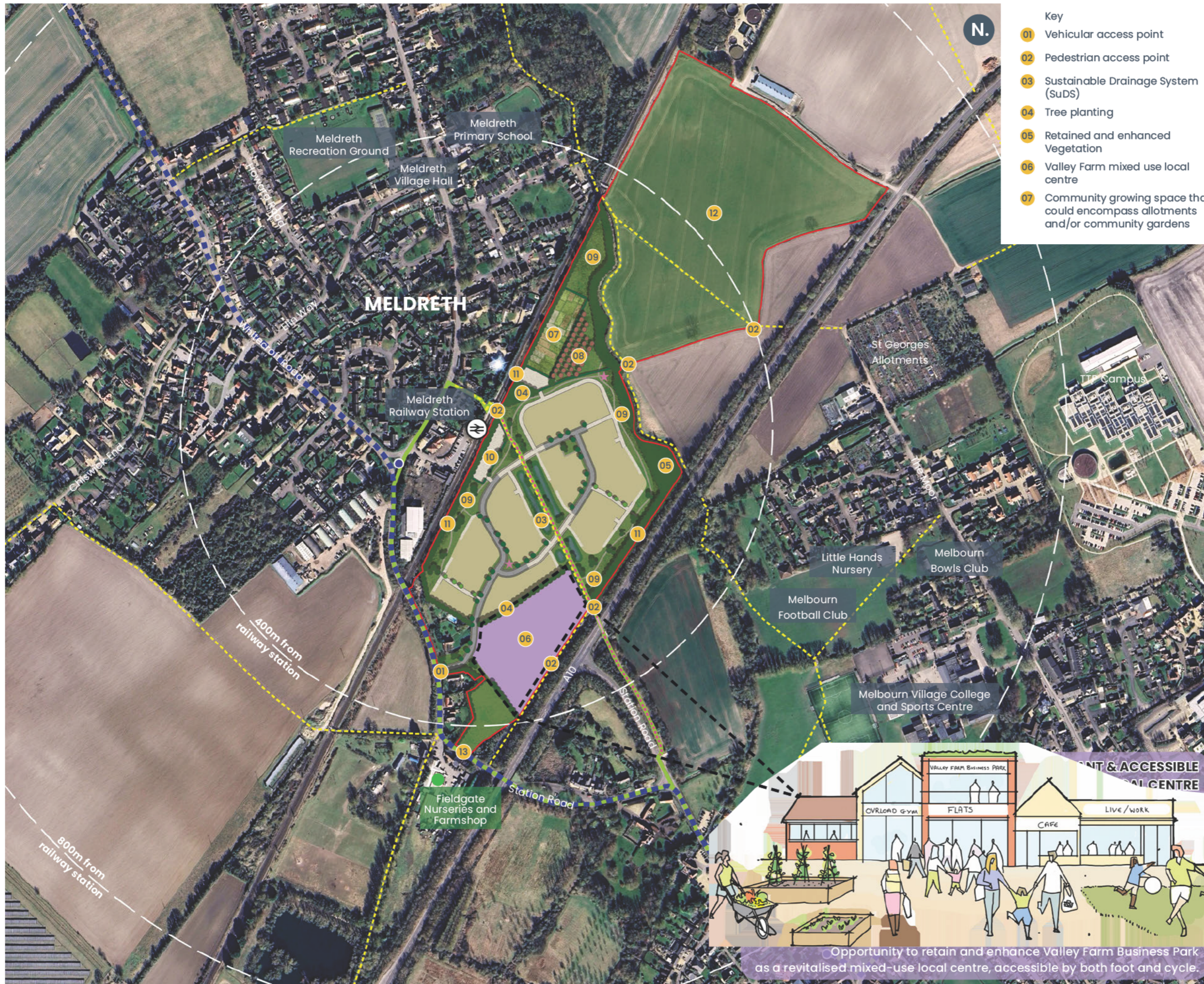


Project
Land at Valley Farm

Drawing Title
Site Location Plan

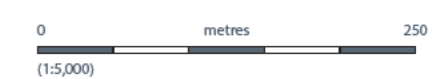
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| 1415 | 001-03 | B | |

Appendix 2 Illustrative Masterplan



- Key
- 01 Vehicular access point
 - 02 Pedestrian access point
 - 03 Sustainable Drainage System (SuDS)
 - 04 Tree planting
 - 05 Retained and enhanced Vegetation
 - 06 Valley Farm mixed use local centre
 - 07 Community growing space that could encompass allotments and/or community gardens

- 08 Community orchards
 - 09 Meadow planting and species rich landscapes
 - 10 Opportunity to provide an additional railway station car park
 - 11 Offset from railway line and/or the A10 to allow for acoustic features, if required
 - 12 Retained agricultural land or land biodiversity enhancements, if required
 - 13 Emergency, cycle and pedestrian access point
- Development area
 - Extents of Valley Farm mixed use local centre
 - Children's play space
 - Railway station
 - Bus stop
 - Bus route
 - Proposed Melbourn Greenway Route
 - Public right of way: Footpath
 - Meldreth Station Link
 - Underpass
 - Footpaths/leisure routes
 - Site boundary



CLIENT:
Granta Land

PROJECT:
Land at Valley Farm

DRAWING:
Framework Masterplan

PROJECT NUMBER:
1415

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CHECKED BY: SR

REVISION: V3
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SCALE: 1:5,000

