

Your ref:  
Our ref:  
DD: [REDACTED]  
E: [REDACTED]  
Date: 30/01/2026

Planning Policy Department  
South Cambridge District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

Dear Planning Policy Department,

## **LOCAL PLAN REPRESENTATIONS: GREATER CAMBRIDGE DRAFT LOCAL PLAN – REGULATION 18**

### **EMMANUEL COLLEGE: LONG ROAD, CAMBRIDGE**

These representations have been prepared by Bidwells on behalf of Emmanuel College, Cambridge (hereafter 'the College') in response to the Greater Cambridge Local Plan Regulation 18 Consultation.

These representations are made with respect to land north of Long Road, Cambridge (hereafter "the Site"), as identified in the plan at Appendix 1. The red line boundary extends to approximately 7 hectares.

### **Introduction**

The Site has not previously been promoted through the emerging Local Plan and is therefore a new site for consideration. In parallel with these representations, the Site has been submitted as a 'New Site' as part of the concurrent Call for Sites exercise.

For the reasons set out elsewhere in this representation, the Site falls within the definition of 'grey belt' land and represents a highly accessible and sustainable location, suitable for residential or employment led development. Land in the east of the Site is designated as 'Safeguarded East West Rail' land. The Site is not subject to any known physical constraints that would preclude development.

The Site is currently crossed by a number of established pedestrian desire lines. Any future development proposals would respond positively to these routes, ensuring that connectivity across the Site is retained and enhanced.

The Site is located to the west of the Cambridge Guided Busway, between the Cambridge Biomedical Campus and the CB1 area surrounding Cambridge Railway Station. As such, it occupies a highly sustainable location within the urban context of Cambridge, with excellent access to key employment areas, public transport infrastructure and services.

The New Call for Sites Submission should be considered for allocation in the Local Plan.



Bidwell House, Trumpington Road, Cambridge CB2 9LD  
T: 01223 841841 E: [info@bidwells.co.uk](mailto:info@bidwells.co.uk) W: [bidwells.co.uk](http://bidwells.co.uk)

## Emerging Local Plan Policies

### Policy S/JH (New Jobs and Homes)

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.

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.

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.

### Policy S/DS (Development Strategy)

The College objects to the development strategy set out in Policy S/DS.

The draft strategy relies excessively on a small number of very large strategic allocations to meet housing needs. Delivery of these sites is dependent on complex, strategic-scale infrastructure that must be provided in advance of development, introducing significant risk to the timely and effective delivery of the Plan.

In particular, the proposed allocations at Cambourne North (13,000 dwellings) and Grange Farm (6,000 dwellings) are heavily reliant on major infrastructure interventions. Cambourne North depends on the delivery of a new East West Rail station and substantial works to the A428, while Grange Farm requires improvements to the A505 and safe access across it to the proposed Cambridge South East Transport (CSET) Phase 2 Guided Busway Travel Hub. The Plan assumes delivery of 5,100 dwellings from these two sites by 2045, which is considered highly uncertain given the scale, complexity and external dependencies involved.

Historic housing delivery from strategic sites across Greater Cambridge shows that the Planning Authority has consistently anticipated housing delivery to be sooner than has proved to be the case and at a delivery rate higher than has been the case. Taking the strategic sites over the last two Local Plans shows, on average, there has been a delay of 4.1 years from when the Planning Authority first anticipated housing completions and when they actually happened (not accounting for some sites that have not commenced at all).

This over optimistic approach to housing delivery is set again into the emerging Local Plan. The over reliance on too few sites to deliver so much of the housing need, embedded within the consistent over optimism in housing delivery, forms a housing delivery strategy that is primed to fail.

As drafted, Policy S/DS lacks flexibility and resilience, placing undue reliance on a limited number of strategic sites. A more balanced approach is required, with additional housing land allocated across a wider range of sites, sizes and locations to reduce delivery risk and ensure a genuinely plan-led approach to sustainable growth.

This approach would better align with the reformed National Planning Policy Framework (2026), which emphasises the effective use of land, optimisation of development in well-connected locations, and the need to meet housing requirements in a positive and effective manner. Without such changes, Policy S/DS risks being ineffective and not positively prepared, contrary to the tests of soundness.

### Policy S/SH (Settlement Hierarchy)

The College objects to the proposed settlement hierarchy set out in Policy S/SH.

As drafted, the policy fails to recognise highly sustainable locations outside defined development extents that are functionally and spatially part of the urban area of Cambridge. The policy provides no mechanism for such sites to be assessed positively, irrespective of their relationship to the city, accessibility to employment and services, or ability to support sustainable travel patterns.

Despite being located within the urban context of Cambridge, the policy applies only to land within defined development extents. It is therefore unclear how the Site is intended to be assessed under the settlement hierarchy policy, notwithstanding its strong functional and physical relationship to the City of Cambridge.

The settlement hierarchy places undue weight on administrative boundaries rather than a comprehensive assessment of sustainability, connectivity and functional integration.

The reformed NPPF (2026) emphasises directing development to the most sustainable locations, optimising development in well-connected areas, and making effective use of land in and around urban areas. A settlement hierarchy that precludes sustainable development within the wider urban context of Cambridge is inconsistent with this approach and risks diverting growth to less sustainable locations solely because they fall within defined boundaries.

Given the scale of growth required in Greater Cambridge, the settlement hierarchy should allow appropriately located sites to be assessed positively against sustainability criteria. Without such flexibility, Policy S/SH risks being unduly restrictive, insufficiently responsive, and inconsistent with national policy and the tests of soundness.

### **Policy S/DE (Defined Development Extents)**

The College objects to the defined development extents as set out in Policy S/DE and on the accompanying Policies Map.

The Site occupies a highly sustainable location on the Cambridge Guided Busway, within the urban context of Cambridge. It is located approximately 1.5km from Cambridge Railway Station and 0.6km from the Cambridge Biomedical Campus, including the Cambridge South Railway Station. The Site is therefore well related to key employment areas, services and public transport infrastructure.

As a result of the way the development extents have been drawn, the Site falls outside the defined development extents and is subject to a presumption against development, despite its strong sustainability and connectivity benefits.

As drafted, Policy S/DE adopts a rigid, boundary-based approach which fails to recognise highly sustainable sites outside defined development extents that are functionally and spatially part of the urban area of Cambridge. The policy provides no clear mechanism through which such sites can be assessed positively, regardless of their accessibility, relationship to the city, or ability to support sustainable travel and low-carbon development.

The reformed NPPF (2026) places strong emphasis on directing development to the most sustainable locations, optimising land use in well-connected areas, and making effective use of land in and around urban areas. A policy approach that precludes sustainable development within the wider urban context of Cambridge solely due to the position of an administrative boundary is inconsistent with this direction of travel and risks displacing growth to less sustainable locations.

Policy S/DE should therefore be revised to allow appropriate flexibility for well-located, highly sustainable sites to come forward outside defined development extents, where this would support sustainable patterns of growth and the effective delivery of development needs.

### **Policy S/GB (The Cambridge Green Belt)**

The Site is currently designated as Green Belt in the adopted Local Plan (2018).

In December 2024, the Government introduced substantive changes to national Green Belt policy, including the formal definition of “grey belt” and new requirements for authorities to review Green Belt land where development needs cannot otherwise be met. However, the Emerging Local Plan relies on a Green Belt Assessment undertaken in August 2021, which predates these changes. The omission of any

reference to grey belt, or identification of grey belt land within Greater Cambridge, is therefore fundamentally flawed and is formally challenged.

The NPPF (2024) defines grey belt as land within the Green Belt comprising previously developed land and/or other land that does not strongly contribute to purposes (a), (b) or (d) of paragraph 143, excluding land subject to strong policy protections under footnote 7. The Site has been assessed against these purposes.

In respect of purpose (a), the context of Cambridge has evolved significantly since the Green Belt was designated, with substantial development to the south of the city, including the Cambridge Biomedical Campus. The Site now forms a contained parcel within the built-up area. Development would not result in unrestricted sprawl, as the Site is bounded by strong and defensible features, including retained tree belts, the Cambridgeshire Guided Busway and safeguarded East West Rail land, and Long Road to the south.

Development of the Site would not result in the merging of neighbouring towns (purpose (b)), nor would it harm the setting or special character of historic towns (purpose (d)). The Site is not subject to any footnote 7 constraints. It should therefore be regarded as grey belt land for decision-taking purposes.

The Development Strategy Topic Paper (2025) acknowledges that a revised Green Belt Assessment will be undertaken to reflect changes in national policy, but this work will not inform the Draft Local Plan or Regulation 18 consultation. This approach is unsound. Given the scale of national policy change, the revised assessment should have informed the Draft Plan.

Furthermore, the growth figures underpinning the Plan are overly conservative and do not reflect the Government's stated ambition to "supercharge growth" within the Oxford–Cambridge Corridor. Anticipated future evidence from the Cambridge Growth Company and proposals for a centrally led Development Corporation are likely to necessitate higher growth targets, which may not be achievable without further Green Belt review.

Paragraph 146 of the NPPF (2024) confirms that Green Belt boundaries may be altered where identified development needs cannot otherwise be met. Regardless of whether Green Belt release is immediately required, national policy and PPG require grey belt to be identified through Green Belt assessments. This direction is reinforced in the emerging reformed NPPF (2026) and Appendix E.

To ensure the Plan is positively prepared, justified and consistent with national policy, it is necessary to:

- publish a revised Green Belt Assessment aligned with current national policy;
- consider higher growth scenarios and the implications for Green Belt and grey belt land; and
- identify and incorporate grey belt land within Greater Cambridge to guide development to the most sustainable locations.

Without these steps, the Draft Local Plan lacks robustness, flexibility and longevity and cannot be considered sound.

### **Policy S/LAC (Other Site Allocations in Cambridge)**

The College object to the proposed Policy S/LAC.

As set out previously, the draft strategy places excessive reliance on a small number of very large strategic allocations to meet housing needs. Delivery of these sites is dependent on the timely provision

of complex, strategic-scale infrastructure that must be in place prior to development, introducing significant risk to the effective and timely delivery of the Plan.

A more balanced and robust approach is required, involving the allocation of additional housing land across a wider range of sites, sizes and locations. This would reduce delivery risk, support a genuinely plan-led approach, and better ensure the timely delivery of housing to meet identified needs.

The Local Plan should consider the new site submission for land north of Long Road.

The Site has the potential to make a highly effective use of land in a very strategic and sustainable location. Sited on the guided busway, between the Central Cambridge Railway Station / CB1 and the Cambridge Biomedical Campus / Addenbrookes hospital, the site is in a highly desirable location with the potential to deliver much needed housing.

The policy direction of the government through the draft National Planning Policy Framework is clear; to make effective use of land within settlements. The proposal achieves this aim while appropriately respecting the wider historic setting of Cambridge.

### **Policy BG/BG (Biodiversity and Geodiversity)**

The College object to the proposed wording of Policy BG/BG.

The proposed requirement to uplift the mandatory minimum to 20% BNG for major development is considered unsound, as it is not adequately justified and is inconsistent with national policy.

The uplift is not supported by a robust evidence base and does not sufficiently demonstrate that it is proportionate or deliverable across all sites.

The national BNG framework provides clarity and certainty for plan-making and decision-taking. Any local requirement exceeding the statutory minimum must therefore be clearly justified, flexible, and grounded in site-specific ecological capacity and viability.

Biodiversity enhancement is supported, but a blanket-approach to the matter risks stifling the delivery of sites and the considered merits of different sites. Policy BG/BG risks undermining policy certainty by imposing a fixed uplift beyond the national framework without adequate justification. Any BNG delivered above the mandatory 10% requirement should be treated as a material benefit in the planning balance, rather than a fixed policy requirement.

### **Policy BG/TC (Improving Tree Canopy Cover and the Tree Population)**

The College object to the proposed wording of Policy BG/TC.

The statutory requirement to deliver a minimum 10% Biodiversity Net Gain already provides a robust, outcome-based mechanism for securing ecological enhancement. This framework is flexible, evidenced and capable of responding to site-specific circumstances. The proposed tree canopy requirement appears to duplicate or cut across the BNG regime, without sufficient justification, and risks prioritising a single ecological metric over a balanced planning judgement.

Chapter 11 of the National Planning Policy Framework (2024) is clear that planning policies should promote the effective use of land in meeting the need for homes and other uses, particularly in sustainable locations. The need for making an effective use of land is further strengthened through the direction of travel set out in L2 of the reformed NPPF, supporting densification.

The requirement for major development to demonstrate a minimum of 30% tree canopy cover on site risks introducing an inflexible and prescriptive constraint that could undermine development capacity, density and viability. As such, it is not aligned with national planning policy or with the Government's stated ambition for growth.

The policy and supporting text state that canopy cover should be calculated using a Council-approved calculator or metric. However, neither the policy itself nor the Biodiversity and Green Spaces Topic Paper identifies what calculator or methodology is intended to be used. In the absence of a defined and agreed approach, the policy lacks clarity and certainty.

In the Cambridge context, where sites are often constrained and development viability is already heavily influenced by multiple policy requirements, the introduction of a fixed canopy cover threshold risks placing an additional and unjustified burden on development. This could compromise scheme deliverability and, in turn, the ability of the Local Plan to be implemented as intended.

### **Policy I/SI (safeguarding Important Infrastructure)**

The College seeks clarification on the plan-making and decision-taking role of Policy I/SI.

As shown at Appendix 2, land to the east of the Site is safeguarded for the proposed East West Rail scheme. While the principle of safeguarding is not contested, the policy lacks clarity on how the designation should be applied in determining planning applications.

Policy I/SI supporting text requires consultation with National Highways and/or East West Rail for development within safeguarded areas, but, does not explain the circumstances in which development may be acceptable. Although the supporting text implies that safeguarding does not preclude development and is intended to inform scheme design, this is not clearly reflected in the policy wording.

As drafted, the policy creates uncertainty and risks an overly restrictive interpretation of safeguarding.

Policy I/SI should therefore be amended to confirm that safeguarding does not represent a presumption against development and to set out clear criteria for assessing proposals, including the role of consultation, scope for mitigation through design, and circumstances where development may be supported. Without such clarification, the policy lacks precision and risks being ineffective and unsound.

### **Conclusions**

These planning representations have been prepared by Bidwells LLP on behalf of Emmanuel College, Cambridge in response to the Greater Cambridge Local Plan Regulation 18 Consultation.

It is evident that the Local Plan should be catering for additional homes to support the economic needs of the area and that such additional homes should be allocated, in part, within Cambridge, as a significant base for sustainable development.

Additional homes on additional sites will also provide a robustness to the housing trajectory to reduce the current risk of over relying on a small number of sites to fulfil a rolling five-year housing supply and to fulfil the Local Plan housing needs. As such, the well-located and connected Site north of Long Road should be included as an allocation at the next publication stage in order to ensure the Plan is positively prepared, effective and consistent with national policy.

Emmanuel College look forward to working with Greater Cambridge and stakeholders to take forward a successful highly sustainable development; one that can bring benefit to the locality and delivered in a manner to help the Council meet its objectives underpinning the emerging Local Plan.

Kind regards

[Redacted signature]

[Redacted contact information]