

**Greater Cambridge
Local Plan
Regulation 18 Consultation**

January 2026

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Contents

1. INTRODUCTION	4
1.1 Scope of Representations	4
2. NATIONAL PLANNING POLICY AND GUIDANCE	5
2.1 National Planning Policy Framework	5
2.2 National Planning Policy Framework Consultation	6
2.3 Planning Practice Guidance.....	6
3. LEGAL COMPLIANCE	7
3.1 Duty to Co-operate	7
3.2 Sustainability Appraisal/Strategic Environmental Assessment	8
4. Greater Cambridge Local Plan	9
4.1 Context.....	9
4.2 Vision and strategic priorities.....	10
4.3 Planning Policies.....	10
5. Site Submission	23
5.1 Land at Mingle Lane, Great Shelford	23
6. CONCLUSIONS	27
6.1 Assessment of soundness	27

1. INTRODUCTION

1.1 Scope of Representations

- 1.1.1 These representations provide the response by Nightingale Land and Hill Residential Ltd (NLHRL) to the current consultation held by the Greater Cambridge authorities on the pre-submission version of the Greater Cambridge Local Plan (GCLP) under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.1.2 NLHRL have land interests in Great Shelford (land at Mingle Lane) and are promoting the site for residential development for approximately 110 dwellings. The site was originally identified as a preferred option for development at the 'First Proposals' stage of the GCLP under site reference "S/RSC/HW" accommodating approximately 100 dwellings. Nightingale Land have acquired additional land to the north of this which could increase the development potential of the site to approximately 190 dwellings. The site has subsequently been removed from the current consultation following the identification of land at Grange Farm.
- 1.1.3 The proposed spatial strategy now runs the risk of being too heavily focused on the delivery of large scale strategic sites to meet local housing needs without a suitable mix of sites of a less strategic scale to provide a flexible and responsive supply of housing land until the large scale strategic sites commence delivery.
- 1.1.4 The site meets the Grey Belt criteria and the sustainability of the site remains unchanged from the Council's initial identification of the site. The site should be reintroduced as an allocation within the emerging GCLP to cater for the housing needs of Great Shelford and Stapleford as demonstrated through these representations.

2. NATIONAL PLANNING POLICY AND GUIDANCE

2.1 National Planning Policy Framework

- 2.1.1 The National Planning Policy Framework (the Framework) was first published on 27th March 2012 and updated on 24th July 2018, 19th February 2019, 20th July 2021st, 5th September 2023, 19th December 2023, 12th December 2024 and 7th February 2025. This sets out the government's planning policies for England and how these are expected to be applied.
- 2.1.2 The Framework is clear that the planning system should be genuinely plan-led. It is vital that up-to-date Local Plans are in place which provide a positive vision for the future of the area and to ensure housing and economic needs are met in full.
- 2.1.3 Paragraph 20 makes clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. National policy is clear that sufficient provision should be made for housing (including affordable housing), employment, retail, leisure and other commercial development.
- 2.1.4 The Framework sets out four tests that must be met in order for the Local Plan to be found sound. In this regard, the plan must be:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.2 National Planning Policy Framework Consultation

- 2.2.1 The latest Local Development Scheme (LDS) confirms that the Council intend to consult on the proposed submission version of the Local Plan in Summer/Autum 2026 and submit to the Secretary of State in December 2026.
- 2.2.2 The Greater Cambridge Authorities will be aware of the publication of the proposed changes to the Framework relating to both plan making and national decision-making policies. The consultation is currently ongoing and closes on 10th March 2026.
- 2.2.3 The Greater Cambridgeshire Authorities will need to be mindful of the proposed changes and what effects it may have on the development strategy. Indeed, whilst the plan may fall under the current 2024 Framework and its plan making policies, the consultation document is explicit that the National Development Management Policies will take effect upon adoption.
- 2.2.4 The proposed reforms seek to implement 12 key policy changes. Of note is permanent presumption in favour of suitably located development and the establishment of a “default yes” for suitable proposals that develop land around rail stations within existing settlements, and around well-connected train stations outside settlements, including on Green Belt Land.

2.3 Planning Practice Guidance

- 2.3.1 The Planning Practice Guidance (PPG) was first introduced in 2014 and has been updated in the intervening period and provides clarification on how the requirements of the Framework should be interpreted.
- 2.3.2 Relevant to this submission is the guidance in relation to housing needs and affordability which will be referred to in section 4 of these representations.

3. LEGAL COMPLIANCE

3.1 Duty to Co-operate

- 3.1.1 The Duty to Cooperate is a legal requirement which all authorities are expected to adhere to¹. It requires local planning authorities to engage constructively with neighbouring authorities on cross-boundary strategic issues throughout the process of plan preparation.
- 3.1.2 The Duty to Cooperate is a process of ongoing engagement that is meant to produce effective policies on cross-boundary strategic matters such as unmet housing needs.
- 3.1.3 The Council has included in its evidence a Duty to Cooperate Statement of Compliance and Statement of Common Ground. In principle, it is supported that these interim documents have been prepared to support the current consultation.
- 3.1.4 Following the Matthew Pennycook's letter to the Planning Inspectorate on 27th November 2025, this acknowledges that the DtC will cease to apply when the Regulations come into force early 2026, including for plans at examination at that point. Despite this, the proposed reforms to the Framework still require plans to be positive and realistic based on effective joint working on cross boundary strategic matters
- 3.1.5 Whilst it is recognised that there is engagement between Cambridge City Council and South Cambridgeshire District Council as this reflects the geographical and functional relationship of the area, there are wide ranging cross boundary strategic issues which the Councils will need to demonstrate a written record of the progress to the point of submission with relevant key stakeholders, particularly in relation key infrastructure bodies and whether any requests to accommodate unmet housing needs of neighbouring authorities have been received.

¹ Subject to NPPF reforms.

3.2 Sustainability Appraisal/Strategic Environmental Assessment

- 3.2.1 The Sustainability Appraisal (SA) is an iterative process required through the plan making process which needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach and assess these against the baseline environmental, social and economic characteristics².
- 3.2.2 The results of the SA will need to explain clearly why some policy options have progressed and others have been rejected through a comparative and equal assessment of all reasonable alternatives.
- 3.2.3 Although the Council have considered a range of alternatives, it should be noted that no assessment has currently been undertaken concerning Grey Belt land. Paragraph 148 of the current Framework states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed and then other Green Belt locations. The Council has considered the release of Green Belt land but not Grey Belt land, and therefore this should be considered as a reasonable alternative to help inform the proposed spatial strategy.

² PPG Reference ID: 11-018-20140306

4. Greater Cambridge Local Plan

4.1 Context

- 4.1.1 This section of the representations will address matters of concern relating to the soundness of the plan associated with the proposed policy choices and supporting evidence base.
- 4.1.2 Both the South Cambridgeshire Local Plan and the Cambridge Local Plan were adopted in 2018 and are now 6 years old. Work commenced on the joint GCLP in 2019 to replace the existing development plans for South Cambridgeshire and Cambridge.
- 4.1.3 In 2021, the Council consulted on its preferred options consultation which identified land at Mingle Lane as a draft allocation for approximately 100 dwellings. In 2022, the LDS confirmed the Councils intended to undertake a Regulation 19 consultation in Autumn 2024.
- 4.1.4 By 2024, the Councils confirmed that the Regulation 19 consultation had been delayed by a further 2 years and that this consultation was not expected to take place until Summer/Autumn 2026 subject to the outcome of the Cambridge Waste Water Treatment Plant (CWWTP) DCO application. This relates to the regeneration of North East Cambridge which is considered an important employment cluster, alongside education facilities and transport assets such as Cambridge North and seeks to deliver circa 8,350 new homes with 5,500 homes located on the existing CWWTP site together with significant employment land and associated community infrastructure. The Government confirmed in August 2025 that funding for the CWWTP will not be provided through the Housing Infrastructure Fund and therefore there is uncertainty over whether this site (as well as sites of a similar scale) will deliver at the anticipated rates.
- 4.1.5 Taking the delays into account and in the context of a local and national housing crisis, together with the acute affordable housing need in Greater Cambridge and the sites excellent connectivity to Shelford Train Station, it is nonsensical to delete the proposed allocation at Mingle Lane. The development of this site will assist in delivering a number of benefits to the local community including market and affordable housing needs as identified in the recently made Stapleford and Great

Shelford Neighbourhood Plan (SGSNP). This SGSNP was developed on the understanding that the Local Plan would allocate the site for development to meet the identified housing needs. Consequently, the site should be reallocated for development within the draft Local Plan.

- 4.1.6 It should be noted that NLHRL entered a Memorandum of Understanding with the Council to carry out a full suite of survey, technical and design work to support its inclusion as an allocation. The reports demonstrate that there are no constraints that would prevent the development proposed from coming forward.

4.2 Vision and strategic priorities

- 4.2.1 In principle, NLHRL support the proposed vision which seeks to ensure the delivery of a variety of jobs and homes (including affordable) together with supporting infrastructure to meet the needs of Greater Cambridge. This is in line with the Labour Government's national growth agenda which seeks to boost housing delivery supported by the changes to national policy to facilitate this.

- 4.2.2 However, the proposed spatial strategy does not cater for the needs of many local communities across Greater Cambridge, such as Great Shelford. Whilst the vision sets out an appropriate aspiration, the policies as drafted do not facilitate the delivery of non strategic sites that don't require extensive infrastructure, which are required to provide the homes required in response to local communities housing needs. This will result in significant consequences on the ability of local communities accessing good quality housing and further perpetuates the existing affordability issues present in the area. Accordingly, the spatial strategy needs to be amended so that the plan caters for these needs and will be discussed in section 4.3 below.

4.3 Planning Policies

Policy S/JH: New jobs and homes

- 4.3.1 Policy S/JH seeks to meet the objectively assessed needs in Greater Cambridge over the plan period 2024 – 2045 through the provision of a minimum 48,195 new homes meeting the needs for the total population, including affordable housing and specialist accommodation of specific groups.

- 4.3.2 There are no exceptional circumstances that would warrant a different approach other than the standard method being used as a starting point to determine the housing requirement for Greater Cambridge. However, these should be seen as the minimum housing requirement to plan for. In this regard, the jobs target is 73,300 additional jobs. It is noted that the jobs target is not aligned with the housing target. Consequently, a job target that is higher than the housing target would require potential employees to commute into Greater Cambridge to fill those jobs. This outcome being an increase in in-commuting to Greater Cambridge, most of which would be by car, particularly if public transport options are not available or the delivery of transport infrastructure projects are subject to unconfirmed funding decisions and associated development.
- 4.3.3 The Greater Cambridge City Deal recognised the relationship between housing and economic growth, and that the shortage of available and affordable housing within Greater Cambridge has had an impact on house prices, commuting patterns, and recruitment and retention of employees. The housing target in Policy S/JH ignores the commitments made in the Greater Cambridge City Deal and the Cambridgeshire and Peterborough Devolution Deal. It also ignores the findings of work undertaken by the National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership.
- 4.3.4 NLHRL consider that there is a need for more housing in Greater Cambridge, namely to address the current housing crisis that is seen at both a national and local level, providing affordable housing which is an acute issue in the area and to support employment growth given Cambridge's role as a key economic driver and its role in terms of economic growth nationally.
- 4.3.5 Whilst the proposed housing requirement seeks to meet the minimum level of housing required by the standard method, it should be increased to align with the jobs target and to support affordable housing delivery, one way of achieving this is not removing allocations that have been assessed as both logical and sustainable. Indeed, the headline figure taken from the latest Housing Needs Assessment (2025) confirms at paragraph 7.72 that there is a net affordable housing need of 1,636dpa across the plan area representing over 60% of the total housing requirement for all tenures. Paragraph 1.41 also clearly states:

“It does need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does, however, suggest that affordable housing delivery should be maximised where opportunities arise.” (emphasis added)

- 4.3.6 The PPG is clear³ that the total affordable housing need can be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the proposal percentage of affordable housing to be delivered by eligible market housing led developments and that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable housing.
- 4.3.7 Whilst it would be difficult to deliver the full affordable housing need in terms of how many market homes would need to be delivered, given the ongoing shortage of affordable homes and implications for not delivering a sufficient number, it is considered that there is a strong case for an uplift to the housing requirement to assist in affordable housing delivery which will result in both social and economic benefits and help to rebalance the housing market.

Housing requirements for Neighbourhood Areas

- 4.3.8 Policy S/JH also sets out housing requirements for designated neighbourhood areas for which any additional or amended neighbourhood areas would be calculated as set out in Appendix D of the consultation document. The methodology is calculated based on the overall housing requirement, the development strategy, the population of the neighbourhood area and its proportion of the Greater Cambridge population. It therefore leaves a remaining housing requirement of 6,305 dwellings with no delivery associated with North East Cambridge to be met from other sources or windfall sites.
- 4.3.9 For Stapleford and Great Shelford it identifies a requirement of 134 homes to be delivered over the period 2024 – 2045. In this regard, the plan provides no

³ Paragraph: 024 Reference ID: 2a-024-20190220

mechanism for the delivery of the 134 homes. Whilst it is accepted that the development known as ‘Strawberry Fields’ (at land between Haverhill Road and Hinton Way) does make an important contribution towards older person housing, the C2 Extra Care development does not include C3 family homes. The Stapleford & Great Shelford Housing Needs Assessment prepared by AECOM (2023) confirms at para 189 that residences that fall into Use Class C2 are largely beyond the scope of this research. Furthermore, the assessment confirms an affordable housing need of 648 over the period 2023 – 2043. In the absence of an allocation for housing development, there is simply no real policy mechanism for the demonstrable need for both market and affordable housing within the settlement.

- 4.3.10 The SGSNP was made in October 2025 and covers a slightly different plan period of 2024 – 2041. The SGSNP was prepared in the context of the emerging Local Plan allocating land at Mingle Lane to meet the settlement’s housing needs as the settlement is fully contained within the existing Green Belt boundary. This is considered a strategic matter for the local planning authority to consider through the preparation of the GCLP. Indeed, this is reflected in South Cambridgeshire District Council’s response to the Neighbourhood Plan Regulation 16 consultation in which the Council states at paragraph 10 that:

“The Neighbourhood Plan highlights that there is a high level of affordable housing need in the plan area, including from those with a local connection to the area. The response to meeting the needs of those with a local connection is usually to deliver rural exception sites for affordable housing, and the Neighbourhood Plan supports this, but any rural exception sites are unlikely to deliver the number of homes necessary to meet needs...Neighbourhood Plans cannot allocate sites within the Green Belt or remove land from the Green Belt in order to allocate sites. It is therefore considered acceptable for Neighbourhood Plans in this situation to specify that local connection criteria can be applied to a proportion of the new affordable homes on future Local Plan allocations and any windfall sites (that are not rural exception sites, and where affordable housing can be secured) outside of the development framework boundary”. (emphasis added)

- 4.3.11 The Stapleford & Great Shelford Housing Needs Assessment prepared by AECOM (2023) confirms an affordable housing need of 348 homes for social and affordable rent and 300 homes for affordable home ownership over the period 2023 – 2043

and is therefore not too dissimilar to the period associated with the emerging Local Plan. Following the making of the SGSNP, the Greater Cambridge authorities have since removed the proposed allocation at land at Mingle Lane. As a result, it is unlikely that any affordable housing will be delivered given rural exception sites will not deliver sufficient homes to meet the identified need as stated above, nor will minor windfall development be required to contribute to the acute affordable housing shortfall.

- 4.3.12 The SGSNP is therefore in a policy vacuum given that it was prepared on the basis of land at Mingle Lane being allocated for development. If a review were to occur there are no available brownfield sites at scale which could accommodate the level of development required. Consequently, the community's housing needs will go unaddressed and affordability pressures will increase. Therefore, land at Mingle Lane will need to be reincluded in the plan to achieve the proposed housing requirement.

Policy S/DS: Development Strategy

- 4.3.13 Policy S/DS sets out the development strategy of the area. The focus of development is within Cambridge, on the edge of Cambridge, the expansion of Cambourne, at other new settlements within the rural southern cluster and wider rural area.
- 4.3.14 The plan seeks to identify land to meet a housing need of 48,195 homes over the plan period. This consists of 37,865 homes located on existing committed sites and/or allocations. A total 10,330 additional homes have been identified on proposed allocations to meet the residual need.
- 4.3.15 The GCLP places a significant over reliance on the ability of strategic and/or new settlements as part of the spatial strategy. It proposes 44% of the housing target would be delivered at new settlements. Indeed, following the outcome of the CWWTP DCO application regarding the proposed allocation at North East Cambridge there remains significant uncertainty as to whether this site will come forward.
- 4.3.16 Whilst such sites can make an important contribution to the overall growth strategy, they are often complicated to bring forward due to land assembly, land

remediation, submission of the initial application, discharge of conditions etc. Indeed, the Lichfields Start to Finish Report Third Edition suggests on average annual delivery of schemes of 2,000 dwellings or more build out at a rate of 100-188dpa and schemes of 500-999 dwellings build out at a rate of 44-83dpa depending on the number of outlets operating on each site.

- 4.3.17 Whilst the development strategy identifies a number of strategic sites it fails to identify growth in sustainable settlements, such as Great Shelford, in terms of sites of a less strategic scale which are required for existing and future housing needs across many communities within the plan area. If any slippage occurs on these strategic sites, then it jeopardises the Councils' ability to demonstrate a flexible and responsive supply of housing land over the duration of the plan period. Indeed, it is not considered that the Council is currently able to demonstrate a housing land supply at present.
- 4.3.18 In this regard, the Councils' previously allocated land at Mingle Lane (ref: S/RSC/HW) to provide 100 dwellings to meet the needs of Great Shelford and Stapleford. The supporting text to this policy stated that there is potential for higher capacity if additional access could be provided and that the site is very well located in relation to existing railway station, with resulting excellent access to Cambridge and Cambridge Biomedical Campus once the new Cambridge South station is open. The latter was the Council's justification that this provided exceptional circumstances required for Green Belt release as it ensured carbon benefits of locating homes close to jobs in the research parks where there are existing and future opportunities to enable sustainable modes of travel. NLHRL do not disagree with this assertion.
- 4.3.19 The recent ongoing consultation on the proposed reforms to the Framework allows development within reasonable walking distance to well-connected rail services, even on land designated as Green Belt, which provides a high level of connectivity to jobs and services and is physically well related to a settlement. In addition, there are further exceptional circumstances to justify its release i.e. affordable housing need.
- 4.3.20 As part of this consultation, the proposed allocation has been deleted. The supporting text in the consultation document still considers Mingle Lane as a

‘highly sustainable location’. The only reason for its removal is that the Council now considers exceptional circumstances no longer justify its release. The Councils continue to progress a strategy which seeks to limit climate change impact, enable national and global economic employment sectors to flourish and therefore these exceptional circumstances to Green Belt release still apply.

4.3.21 NLHRL contend that the site is Grey Belt and given the Government’s emphasis of directing homes where they are well related to rail services it should be reallocated for development. The Site Allocations Topic Paper states the Housing Land and Availability Assessment considers the site as a deliverable option. At paragraph 6.67 it states that the decision to allocate the new settlement at Grange Farm now means that there is a significant allocation in this area and on the route of the Cambridge Southern Corridor transport improvements. It concludes that the Council considers sufficient sites have been identified without the need to release land from the Green Belt and therefore considers that there are no exceptional circumstances for the release of Green Belt.

4.3.22 The identification of Grange Farm, whilst located in the southern cluster does not specifically respond to the needs of individual settlements such as Great Shelford and Stapleford in which existing residents need access to new homes. It is also located further from Cambridge/Biomedical Research Campus meaning increased motor vehicle trips.

4.3.23 Furthermore, affordable housing is a key issue which must be addressed by the plan (as will be discussed later in this response). The inclusion of smaller sites across the district will help to provide more affordable housing locally to areas of need.

Policy S/SH: Settlement Hierarchy

4.3.24 The settlement hierarchy seeks to direct development towards higher level services with Cambridge as a focal point for future development followed by the towns of Cambourne, Northstowe and Waterbeach.

4.3.25 NLHRL support the identification of Great Shelford and Stapleford as a Rural Centre which is one the largest and most sustainable villages within Greater

Cambridge. The settlements have access to a number of services including rail, primary education, employment opportunities, shops, and restaurants.

4.3.26 NLHRL recognise the Councils' approach that development should be directed towards higher order settlements. However, the PPG is clear that a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development needs to be supported by robust evidence of their appropriateness.

4.3.27 Whilst we agree with the placement of Great Shelford and Stapleford within the settlement hierarchy, it must be remembered that this area has excellent access to Cambridge which will improve as part of future infrastructure initiatives such as the CSET busway and the new Cambridge South Station as part of the Cambridge Biomedical Campus which will be directly accessed from Shelford station. Given the recognition of the number of services and facilities available within the settlement and its position within the settlement hierarchy it is imperative that sufficient growth is directed toward this location through the reintroduction of land at Mingle Lane as a proposed allocation to enable better distribution of growth across Greater Cambridge.

4.3.28 Whilst no strategic constraint to the amount of development or redevelopment is imposed to these areas, this only relates to development within existing built limits. Consequently, there is a lack of flexibility in terms of land adjacent to settlement boundaries particularly in the context of Grey Belt land and in locations that are within an acceptable walking distance to rail services which should be recognised in the draft plan. Land at Mingle Lane is considered a sustainable site in a suitable location for growth and its allocation is therefore required to meet the housing needs of the local community and to alleviate issues with affordability which is an acute issue.

Policy S/DE: Defined development extents

4.3.29 Policy S/DE seeks to define settlement boundaries for settlements located within Greater Cambridge. Whilst the policy stipulates what development can come forward this is limited to allocations within Made Neighbourhood Plans, rural exception sites and development which requires a countryside location i.e. horticulture, forestry etc.

4.3.30 The use of settlement boundaries should not preclude the ability of sustainable development opportunities from coming forward and should include a mechanism to ensure that development beyond settlement boundaries can come forward to respond to changes in circumstances over the plan period. Indeed, such an approach is currently being consulted by Government as part of the national decision-making policies and the policy should be modified to allow such flexibility with circumstances relevant to Greater Cambridge. Development should be directed to the more sustainable villages including Great Shelford and Stapleford to support existing services and facilities, deliver additional facilities, and meet identified affordable needs of villages.

Policy S/GB: The Cambridge Green Belt

4.3.31 Policy S/GB seeks to maintain the existing Cambridge Green Belt. The Greater Cambridge Green Belt Assessment (2021) prepared by LUC consulting provides the latest assessment of the Greater Cambridge Green Belt. NLHRL are aware that the Councils are seeking to update the Green Belt assessment to comply with national policy. The Council is seeking to allocate land within the Green Belt relating to the draft allocations at Cambridge Biomedical Campus and land at Babraham Research Campus. Whilst recognising the importance of these locations and their expansion to the local and national economy, the PPG is clear that where local authorities seek to review and alter Green Belt boundaries it is expected that authorities identify grey belt land to inform this work and prioritise development in accordance with paragraphs 147 and 148 of the Framework.

4.3.32 Where land is identified as grey belt land, any proposed development should be considered against the requirements of paragraph 155 of the Framework which now includes the Golden Rules set out at paragraph 156.

4.3.33 The Green Belt Assessment (2021) identifies the level of harm to the Green Belt of the site at Mingle Lane, Great Shelford, as 'moderately high'. However, it scored as follows:

Settlement	Parcel Ref	Release scenario	Area (ha)	P1 contribution	P2 Contribution	P3 Contribution	Harm
Great Shelford	GS9	Release of land as expansion of Great Shelford	43.91	Moderate	Relatively limited	Limited/no contribution	Moderate High

4.3.34 The overall conclusion of “Moderate High” doesn’t align with the conclusion reached for each criteria, which ranged from no contribution to moderate contribution.

4.3.35 NLHRL submitted a Landscape Statement incorporating a Green Belt Assessment prepared by CSA as part of its evidence to support the allocation of Land at Mingle Lane in line with the guidance set out in the PPG. The overall conclusions of this review demonstrate that the site provides a weak/no contribution against purposes (a), (b), (d) and only a moderate contribution to purpose (c). It therefore meets the criteria for Grey Belt as set out in the NPPF.

4.3.36 Furthermore, the current NPPF consultation outlines at GB3 that Green Belt boundaries should be altered through the preparation and updating of local plans and where:

- A. This would enable development of land around stations; **or**
- B. Exceptional circumstances are fully evidenced and justified. (emphasis added)

4.3.37 Given the site meets the criteria for Grey Belt, is within walking distances to rail services and would provide significant market and affordable housing to meet the local community housing needs, it should therefore be reintroduced as an allocation to meet the needs of Great Shelford and Stapleford.

4.3.38 Furthermore, it is requested that Purpose 1c in Policy S/GB is amended to refer to towns and not communities in accordance with national policy. The amended text should be as follows: prevent towns in the environs of Cambridge from merging into one another and with the city.

Policy CC/FM: Managing Flood Risk

4.3.39 This policy requires updating so that it takes account the latest guidance in the PPG to take account of the fact that the sequential test no longer needs to be applied where a site-specific Flood Risk Assessment demonstrates that the occupiers will remain safe from surface water flood risk for the lifetime of the development without increasing flood risk elsewhere.

Policy BG/BG: Biodiversity and geodiversity

4.3.40 The above policy requires all development to provide a minimum of 10% biodiversity net gain. It further states major development must provide a minimum 20% biodiversity net gain unless exempt under the Environment Act 2021 to be provided on-site where this is feasible and effective.

4.3.41 The draft Local Plan Viability Assessment (2025) considers the proposed 20% threshold is viable, this could have significant implications on the delivery of wider plan requirements. BNG is a statutory requirement which cannot be amended. Setting the threshold at double the legal requirement may hinder the wider plan requirements such as the need to deliver affordable homes and the deliverability of strategic sites the Council is currently proposing. The PPG is clear that:

“Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented⁴.”

4.3.42 The Draft Local Plan Viability Assessment (2025) considers that the 20% threshold is viable. The evidence supporting the 20% threshold is based upon the DEFRA ‘Impact Assessment Biodiversity Net Gain and Local Nature Recovery Strategies IA No. RPC Reference No: RPC-4277(1)-DEFRA0EA and SQW report ‘Viability Assessment of Biodiversity Net Gain in Essex’ (August 2024). In this regard, the

⁴ PPG Paragraph: 006 Reference ID: 74-006-20240214

market in Essex is invariably different to Greater Cambridge and it is unclear what effects setting a 20% threshold will have on development viability in the local area. Further evidence is required to demonstrate a local need for the higher percentages and impacts on viability related to Great Cambridge market area is required to justify any increase above the statutory 10% threshold.

Policy H/AH: Affordable Housing

4.3.43 In principle, NLHRL are generally supportive of Policy H/AH which sets out the affordable housing requirements for the area. It requires all major developments to provide at least 40% of new homes on site as affordable housing unless a different requirement is set out within an allocation policy or is on land within the Green Belt to which at least 50% affordable housing requirement will apply.

4.3.44 The Government's Written Ministerial Statement (June 2024) affirms the importance of affordable housing delivery. It states that:

“Although increasing supply will be an essential part of improving affordability, we must also go further in building a greater share of genuinely affordable homes. That is why the Government is committed to the biggest growth in social and affordable housebuilding in a generation...”

4.3.45 The Council's assessment of affordable housing need identifies that it would be necessary to deliver over 60% of all homes in the form of affordable housing to meet demand and that delivery of affordable housing delivery has lagged behind the actual level of need. Accordingly, this points to a need to increase the housing requirement figure and identify further housing land to help reduce the level of acute need in Greater Cambridge.

Policy H/HM: Housing Mix

4.3.46 It is important that the policy allows for sufficient flexibility so that it can respond to housing mix over the lifetime of the plan period and that the proposed housing mix is not strictly adhered to as an overall approach and is instead treated on a case by case basis through the development management process.

Policy H/CB: Self and Custom Build Homes

4.3.47 The above policy requires development proposals including 20 or more dwellings to provide at least 5% of new homes as service plots for custom and self build homes.

In principle, NLHRL are generally supportive of the approach to assist in the delivery of custom and self build homes if evidence demonstrates the need for this type of development. However, it is typically the case that if plots remain unsold that they are returned to the developer to be provided as part of the market housing element. Whereas in this instance, the developer is required to either allow for a period of further marketing or that the plots are transferred to a registered provider at affordable housing land values.

4.3.48 The imposition of this aspect of the policy is therefore a never-ending period of marketing which could slow down housing delivery on the wider site until plots are acquired and stalling the delivery of much needed housing. Further, whilst there is an acute need for affordable housing, there is no guarantee that individual plots will be acquired by registered providers who would typically acquire development blocks that are already built to their specification to enable certainty over future management and costs associated with these homes. It is unlikely that Registered Providers will seek to acquire individual plots that are not built out by the developer and it is questionable whether this is actually viable for them to acquire individual plots that are likely to be pepper potted throughout the development which will unlikely fit into their business structure.

4.3.49 Notwithstanding this, if these plots were transferred to a Registered Provider it would mean that the land value would ultimately reduce from custom build to affordable and may have an unintended consequence of rendering a development unviable. NLHRL also question how this policy interacts with the 40-50% affordable housing policy requirement as it seems if self build plots are not sold then this will artificially increase affordable housing contributions above a policy compliant affordable housing contribution and thus questions whether this policy is compliant with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. The policy should be modified so that after a period of marketing that the homes will revert to open market housing.

5. Site Submission

5.1 Land at Mingle Lane, Great Shelford

5.1.1 NLHRL have land interests in Great Shelford and are working in collaboration to promote land at Mingle Lane for residential development. The site extends circa 7.44ha and was previously identified as a preferred option for development in the Councils' First Proposals consultation in 2021. The site being promoted by NLHRL and is illustrated at figure 1 below and includes additional land for wildflower, native tree and thicket planting. This is acceptable in the context of the surrounding landscape. An illustrative framework plan is included at appendix 1 of this submission to illustrate how the site could come forward.

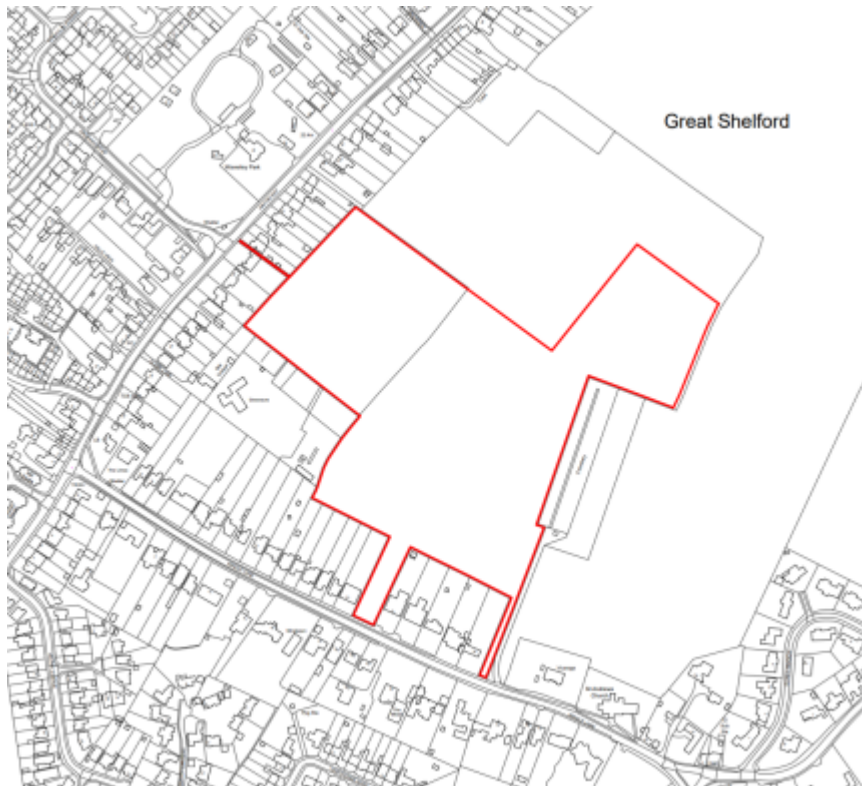


Figure 1: Location Plan

5.1.2 Separately, Nightingale Land control additional land to the north of the site which provides an additional circa 4.6ha of land. A location plan is included at Appendix 2 of this submission. A Concept Masterplan is also included at Appendix 3 which illustrates how the wider site can come forward in tandem with the previous allocated site.

- 5.1.3 Great Shelford is well placed to accommodate new development. The village centre is less than a 15-minute walk from the centre of the site and includes a delicatessen, library, pharmacy, barbers, butchers, hot food takeaway, convenience store, café and Memorial Hall. Other services include a Health Centre and tennis and bowls club.
- 5.1.4 The site is well served by sustainable modes of transportation. Multiple bus stops are located within the vicinity of the site and less than 4-minute walk away. Shelford railway station (which has at least two services per hour in each direction) and is accessible from Hinton Way which is approximately 656m/8minute walk from the site's centre providing routes to Cambridge and London. In addition, the settlement will also benefit from access to Cambridge South East Transport route providing a dedicated guided busway between the travel hub and Cambridge Biomedical Campus once implemented.
- 5.1.5 The proposed development has been guided by the principles established as part of the First Proposals consultation and policies contained in the now made Neighbourhood Plan. Extensive community engagement has been undertaken since 24th February 2025. The illustrative framework plan attached at appendix 1 reflects discussions which have taken place with Great Shelford Parish Council, Stapleford Parish Council and South Cambridgeshire District Council to date.
- 5.1.6 The following benefits can be achieved:
- The developable area extends 3.99ha and can deliver up to 110 market and affordable dwellings at circa 27.5dph. The mix of housing types and tenures has been informed by the latest assessment of local housing need to align with the requirements in the made Neighbourhood Plan and to the respond to the local character of the area.
 - At least 50% affordable housing will be provided meeting the acute needs of the local community and wider area.
 - Circa 53% of the total site area to provide public open space and landscaping increasing biodiversity net gains. This will include:
 - Publicly accessible, high-quality green spaces for the benefit of existing and future residents. This includes a network of recreational routes throughout the site. There is a potential for a circular loop around the

perimeter of the north eastern parcel and green spine route which will enhance access to nature and support community wellbeing.

- The site will include a Locally Equipped Area of Play at the centre of the Green Spine ensuring natural surveillance and fostering a safe and inclusive environment. Additional trim trails will be proposed along the recreational route.
- Sustainable Drainage Systems will be incorporated into the landscape buffer along with native tree planting and meadow planting. These basins will be designed to maximise benefits for biodiversity and to create attractive and varying landscape.
- Existing vegetation across the site would be retained, conserved and enhanced as far as possible. Any minimal losses will be mitigated by new native species planting.
- The site provides excellent connectivity to wider services and facilities. This can potentially be increased through the provision of a pedestrian and cycle link to Hinton Way.
- Local and district-wide benefits through investment in the local community resulting in increased economic activity because of construction phases and increase footfall supporting local businesses. The site is expected to generate 96 FTE jobs on site every year for the 4 years of the build (or 398 FTE positions over the entirety of the project). The development of 110 dwellings also has the potential to generate approximately £273,284 in Council Tax revenue per annum.

5.1.7 There are no technical constraints which prevent the site from coming forward and given the acute affordable housing need both in the context of the settlement and wider local authority area it is considered necessary to reintroduce the site as a draft allocation to ensure a flexible and responsive supply of housing land is available. The site represents a logical extension to the settlement with an overall positive effect for residents and accords with the adopted neighbourhood plan.

5.1.8 The evidence prepared by the Greater Cambridge Authorities and that prepared by NLHRL is clear that the site is sustainable and in a suitable location for housing.

5.1.9 Notwithstanding the above, the additional land under Nightingale Land's control provides the opportunity to increase the developable area of the site in response

to housing needs of the area, particularly the acute affordable housing needs and will provide further ecological enhancement and public open space. It also responds directly to the Draft NPPF which provides that development in close proximity to well-connected rail stations is likely to be acceptable. The extended site is circa 12.04ha and can accommodate circa 190 dwellings.

5.1.10 The land remains within a suitable walking distance to the railway station. Notably, the Council's HELAA (site ID: 45545) confirms that any potential policy constraints could be overcome through the planning application process, that the site has good accessibility to key local services, transport including within walking and cycling distance of Shelford Station. Its proximity to Shelford Station and sustainable modes of transportation provided the Council's justification for exceptional circumstances in allocating the site for residential development within the Regulation 18 Local Plan. This remains unchanged but strengthened in the context of the reforms to the Framework which provide a 'default yes' for development proposals that are suitably located near rail services. The latest landscape commentary is provided from 2021 considered that subject to a suitable amount of retained fields and transitional landscape this would counteract any harm caused to the village edge. Consequently, the previous allocation should be reallocated and expanded to include this additional land.

6. CONCLUSIONS

6.1 Assessment of soundness

6.1.1 The Framework sets out four tests that must be met in order for the Local Plan to be found sound. In this regard, the plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

6.1.2 NLHRL do not consider the plan to be positively prepared, justified, effective or consistent with national policy due to the matters raised in relation to reliance of strategic sites without placing reasonable level of growth towards sustainable settlements such as Great Shelford and Stapleford. Accordingly, modifications are required to the plan to address these concerns through the allocation of land at Hinton Way.

6.1.3 Nightingale Land request to be added to the consultation database to be kept informed of any future updates to the Local Plan.