

30 January 2026



Greater Cambridge Planning Service



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Cambridge CB2 8PA  
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Dear Sirs,

**Draft Greater Cambridge Local Plan for consultation**

**Representations on behalf of St John's College Cambridge**

Thank you for the opportunity to comment on the Draft Greater Cambridge Local Plan for consultation. Savills (UK) Ltd is instructed to make representations on behalf of St John's College Cambridge as owner of land that we consider should be allocated as part of a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

**Policy S/JH: New Jobs and Homes**

It is the College's position that the Draft Local Plan does not currently provide sufficient land to meet the housing requirement.

The Regulation 18 Draft Plan aims to meet the objectively assessed needs between 2024-2045 for 73,300 jobs and a minimum of 48,195 new homes. We support the increase in jobs being planned for in the Draft Local Plan to around 73,300 additional jobs, up from the 66,600 jobs referenced in the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023 and the 58,500 included in the Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021). It is important that the housing supply meets this need.

It is evident that the housing land identified in the Draft Local Plan is insufficient to meet the real-world need in and around Cambridge including for two key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites. The latter point is expanded upon under the S/DS: Development Strategy & Key Diagram heading below.

When compared to the First Proposals Draft, Greater Cambridge are proposing 8.5% more homes annually. This is though against the background of a significantly increased Standard Methodology figure for Greater Cambridge. The Draft Plan proposes around 25% more jobs across the plan period than the First Proposals, meaning there is an increasing disparity between the jobs target and the housing target. St John's College supports the recognition that the proposed employment figures outlined in the First Proposals were insufficient, but would highlight that the true need is likely greater still than the 73,300 jobs in the Regulation 18 Draft. Greater Cambridge should be pursuing a corresponding increase in housing delivery because anything else jeopardises the continued economic success of Cambridge. The current Government is clear that they intend to capitalise upon the previous success of the region with Matthew Pennycook confirming in August 2024 that "We believe that the recent focus on Cambridge and its untapped economic potential are entirely warranted" and "there remain significant barriers to realising the area's full potential".



In terms of in-commuting:

The Councils' Development Strategy Topic Paper recognises that "a critical assumption informing the relationship between the number of jobs and homes - is imperfect." It is understood why the 2021 census information is not considered robust, as it was influenced by the COVID-19 pandemic, but it is not robust to use "Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this" as the basis for justifying the housing requirement. Previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. Using previous commuting assumptions will result in increased numbers of workers commuting into the area. Some will use public transport, but this will inevitably result in an increased number of workers using Greater Cambridge's constrained road network. The proper planning of the area would see a greater housing requirement identified, and that requirement being met by sites that can readily access existing and 'currently being delivered' public transport and cycle links. The proposed (inadequate) identified housing requirement risks increasing strain on key infrastructure whilst also driving up property values due to a shortage of supply relative to demand. As evidenced within the Case for Cambridge report, it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country. ONS data confirms that the median house price reached £425,025 in 2024, equating to 9.5x median earnings, compared to a median house price of £290,000 (7.7x median earnings) across England as a whole.

#### **Policy S/DS: Development strategy**

A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. It does though lead to the conclusion that Greater Cambridge needs to adopt a more substantial housing supply buffer than the 6.5% (excluding any potential delivery at the former Waste Water Treatment Works site which the Councils acknowledge cannot be relied upon) currently proposed. A higher housing supply buffer would provide the necessary flexibility of delivery, and ensure a robustness of supply. The current buffer of 6.5% is insufficient and fails to recognise the delivery challenges which have historically held back early delivery on the large-scale strategic sites within Greater Cambridge. As a result, Greater Cambridge should employ a housing land supply buffer of over 10% and we would suggest circa 15-20% above the identified requirement which, for the reasons set out under the Policy S/JH: New Jobs and Homes heading above, also needs to be higher than the Standard Methodology figure.

The 'Supporting information' to Policy S/DS states that "We made sure to consider the sustainability impacts of focusing growth outside the green belt in comparison with alternatives of releasing green belt land, as we are required to do by national planning policy". It is not evident though that the Councils have given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which would justify a more flexible and permissive approach to grey belt release in particular. We understand that the Councils are undertaking a Grey Belt review which is due to be published after the Draft Local Plan consultation. It will be important to ensure that this review is published and the opportunity provided for it to be reviewed and commented upon in advance of the finalisation of the Proposed Submission Consultation (Regulation 19) scheduled for Summer / Autumn 2026.

Limited growth within villages, including villages within the Green Belt, is also essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. The NPPF already expects that Local Plans identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Adding to this, the proposed new requirement in the NPPF consultation published in December 2025 is that "10% (of the housing requirement should be provided) on sites of between one and two and a half hectares, unless there are strong reasons why these targets cannot be achieved". This recognises the key role that sites of less than 2½ hectares can make to deliver, and early delivery, and should form part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge.



The College has previously submitted the following sites as part of the Local Plan:

Site Address	Site ID	HELAA Site ID
Land east of Marfleet Close, Great Shelford	115767	47733
Land west of Hinton Way, Great Shelford	115771	40485
Land south of Granhams Farm, Great Shelford	115770	40484
Land west of Granhams Farm, Great Shelford	115769	40483
Land at Whitefields, Hinton Way, Great Shelford	115773	40481
Cockerton Road, Girton	115390	40555
Land at Dodford Lane, Girton	115391	40487
Land north of Huntingdon Road, Girton	115563	40486
Land off high Street, Girton	115389	40060
College Farm, Whitwell Way, Coton	115534	40494
Triangle Site, Stacey Lane, Cambridge	115528	40396
Land south of 8-10 Adams Road, Cambridge	115530	40391
Land south of Wilberforce Road, Cambridge	115531	40298
Land south of Wilberforce Road, Cambridge	115532	40298a
Land north of Madingley Road, Cambridge	115536	40393
Land north of Whitwell Way, Coton	115623	40488

Of these sites, the following have now already been redeveloped with ‘Demolition of existing buildings/structures and the erection of college accommodation, new access and landscaping’ at Land South Of Wilberforce Road, Cambridge (planning reference 21/02052/FUL). These sites therefore no longer need to be allocated.

Site Address	Site ID	HELAA Site ID
Land south of 8-10 Adams Road, Cambridge	115530	40391
Land south of Wilberforce Road, Cambridge	115531	40298
Land south of Wilberforce Road, Cambridge	115532	40298a

The following site is within the built-up area of the city and therefore is not reliant on an allocation to establish the principle of its redevelopment:

Site Address	Site ID	HELAA Site ID
Land north of Madingley Road, Cambridge	115536	40393

Of the remaining sites, it is contended that they are all deliverable, available and suitable, and should be allocated as part of such a balanced, blended spatial strategy that includes modest sized green belt releases, but the following are considered to be particularly suitable, and the most appropriate to deliver as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge:

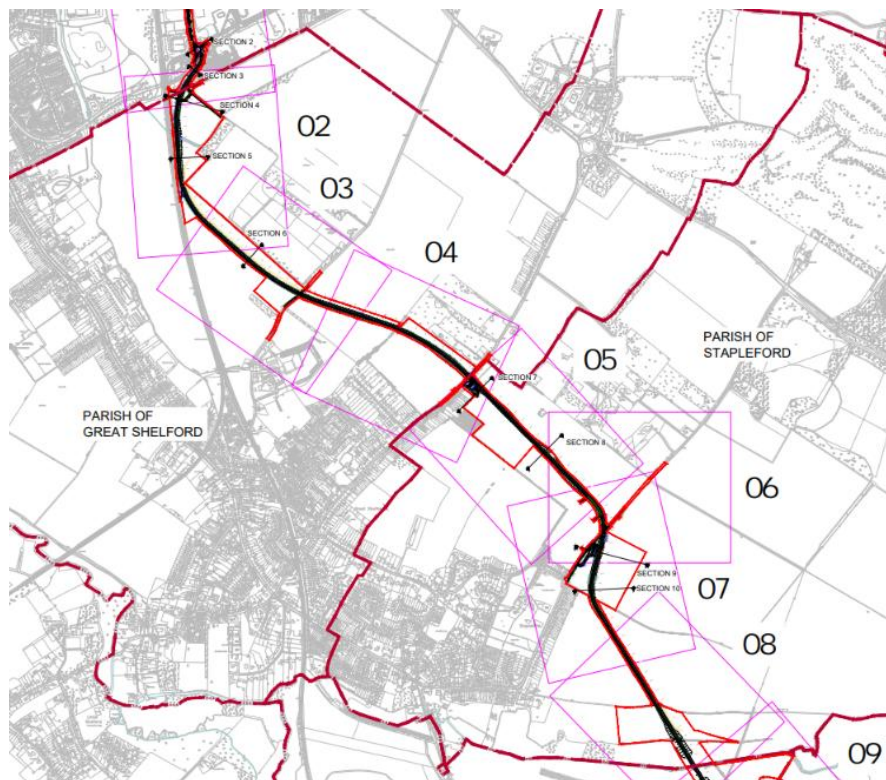
Site Address	Site ID	HELAA Site ID
Land west of Hinton Way, Great Shelford	115771	40485
Land west of Granhams Farm, Great Shelford	115769	40483
Cockerton Road, Girton	115390	40555
College Farm, Whitwell Way, Coton	115534	40494
Land north of Whitwell Way, Coton	115623	40488

Taking each in turn (and having regard to the Council's 2025 HELAA):

Land west of Hinton Way, Great Shelford (115771 / 40485)



The following extracts from the Cambridge South East Transport (CSET) Transport and Works Act Order application that has been submitted provide important context to the assessment of the Site.



Sheet 04 (through the Site)



**Adopted Development Plan — Amber:** The site shows some inconsistency with adopted policy, but these issues are minor and can be resolved through allocation-stage justification and design that aligns with an appropriate settlement-edge character. Constraints identified are manageable and not fundamental.

**Flood Risk — Amber:** The site lies entirely within Flood Zone 1, with only minimal surface water susceptibility during extreme events. Standard SuDS, including infiltration and permeable surfacing, can fully address flood risk.

**Landscape — Red:** Under the HELAA Landscape and Townscape criterion, a red rating applies only where development would cause “significant negative impact which cannot be mitigated.” The assessment for this site identifies wide and local visibility and considers development inconsistent with rural character. However, the same assessment notes that the site includes mature vegetation which limits views internally. This indicates the landscape is not uniformly open and does not necessarily meet the threshold of being unmitigable. The assertion of unavoidably significant harm appears to rely on a generalised perception of prominence rather than a demonstrated inability to reduce effects through standard landscape management measures. In terms of the criterion’s requirements, the evidence does not rule out the potential for impacts to be reduced to the “detrimental but satisfactorily mitigated” level associated with an amber classification. Furthermore, as the plan extracts above demonstrate, the Cambridge South East Transport (CSET) route passes through the Site, and the Site will thereby sit between development in Coppice Avenue and the proposed CSET route further minimising any perceived encroachment or landscape impacts of development on the Site.

**Biodiversity — Amber:** Habitats on site are typical of farmland and are not designated. Retaining hedgerows and delivering off-site biodiversity net gain where needed ensures biodiversity impacts are manageable.

**Policy — Green:** There is no conflict with protected open space. Any incidental effects can be mitigated through design.

**Historic Environment — Green:** No heritage assets are harmed by the development.

**Archaeology — Amber:** Although prehistoric and medieval activity is recorded nearby, this is typical locally, and standard archaeological evaluation can fully mitigate any impact.

**Accessibility — Amber:** The site has moderate access to services. Enhancing connections for walking and cycling can improve overall performance. Moreover, as the plan extracts above demonstrate, the location of the Site adjacent to a proposed CSET stop with ready access to the Biomedical Campus and Cambridge would present great connectivity.

**Site Access — Amber:** A safe vehicular access can be delivered through detailed design adjustments.

**Transport and Roads — Amber:** Likely transport impacts can be managed with proportionate junction or sustainable transport measures.

**Noise, Odour and Light — Amber:** Potential amenity impacts can be mitigated by appropriate layout and buffer design.

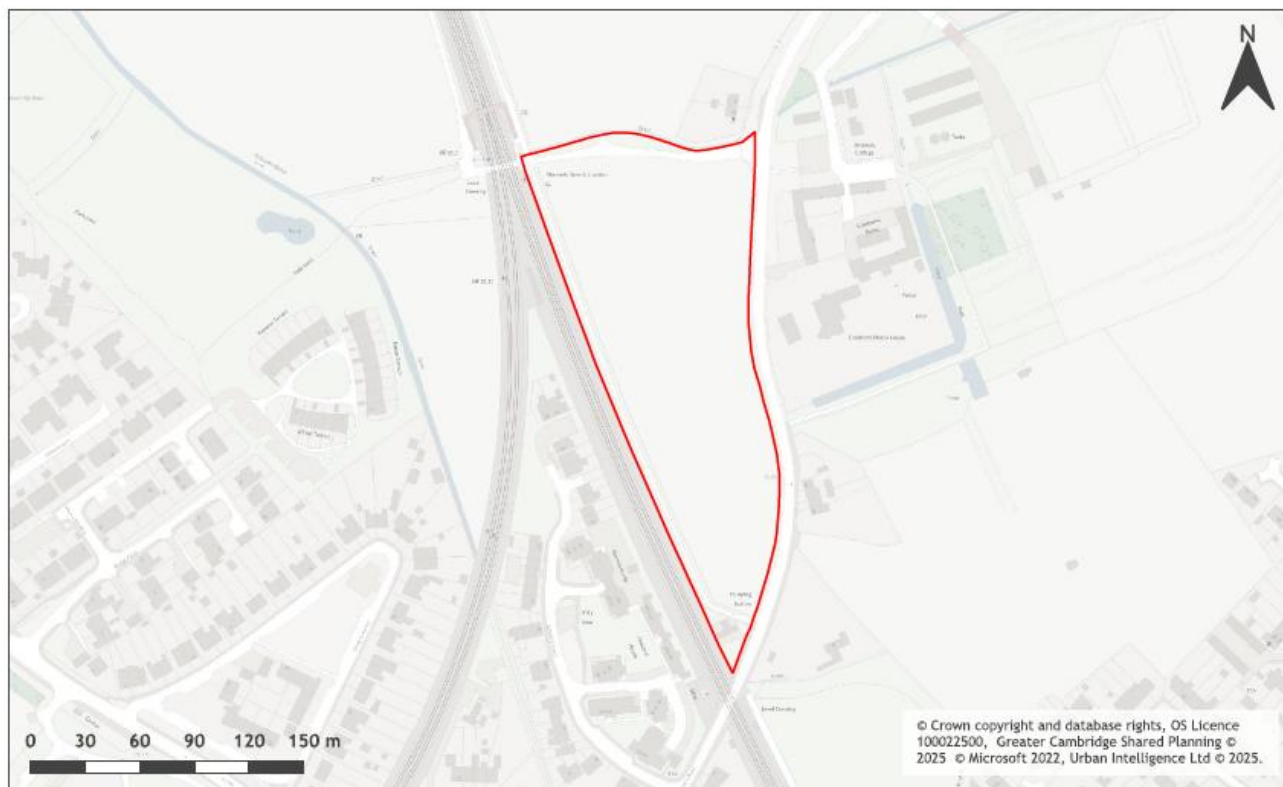
**AQMA — Green:** The site lies outside any AQMA and presents no air-quality restraint.

**Contaminated Land — Amber:** Any contamination associated with agricultural use can be addressed through investigation and planning conditions.

**Overall Suitability — Red:** This rating is driven entirely by landscape assessment. As all technical constraints are mitigable, the unsuitability conclusion is unnecessarily conservative.

Only Landscape is rated as Red in the HELAA, and this can be carefully mitigated (potentially through built development of only part of the Site), and especially as the Site sits between development in Coppice Avenue and the proposed route of the Cambridge South East Transport (CSET). The Site should be categorised as Grey Belt. Moreover, the location of the Site adjacent to a proposed CSET stop with ready access to the Biomedical Campus and Cambridge would present greater sustainability benefits than any perceived landscape harm.

Land west of Granhams Farm, Great Shelford (115769 / 40483)



**Adopted Development Plan — Amber:** The site exhibits minor plan inconsistencies, but these can be addressed through design measures and strategic justification during allocation.

**Flood Risk — Amber:** The site is in Flood Zone 1 with minimal surface water risk. Standard SuDS solutions can fully mitigate these issues.

**Landscape — Red:** The HELAA's red assessment states that development would have a significant adverse effect on landscape character and represent an urbanising intrusion. Under the Landscape and Townscape criterion, this conclusion requires that impacts cannot be mitigated. The site, however, is directly adjacent to existing village-edge development, enclosed by built development on all sides apart from part of the northern boundary and is modest in scale. The assessment does not present evidence that visual effects arise from qualities that are inherently unmitigable, such as an elevated, highly exposed landform with no capacity for enclosure or screening. Instead, the concerns relate to localised openness and the character of a settlement edge, both conditions that the criterion recognises as capable of mitigation where change is not inherently incompatible. The reasoning provided does not clearly meet the criterion's threshold for unmitigable harm.

**Biodiversity — Amber:** Ecological features are typical and manageable. Retained field boundaries and off-site BNG contributions can resolve residual impacts.

**Policy — Green:** No protected open space designations are affected.

**Historic Environment — Amber:** Village-gateway sensitivities can be mitigated by preserving view corridors, limiting building heights and ensuring an appropriate frontage treatment.

**Archaeology — Amber:** Although medieval and Roman features lie nearby, these can be addressed through excavation and recording, consistent with standard practice.

**Accessibility — Green:** Good access to local services supports the site's suitability.

**Site Access — Amber:** A workable access can be secured at planning stage.

**Transport and Roads — Amber:** Localised highway interventions can mitigate transport impacts where necessary.

**Noise, Odour and Light — Amber:** Railway noise can be managed with appropriate layout and building specification.

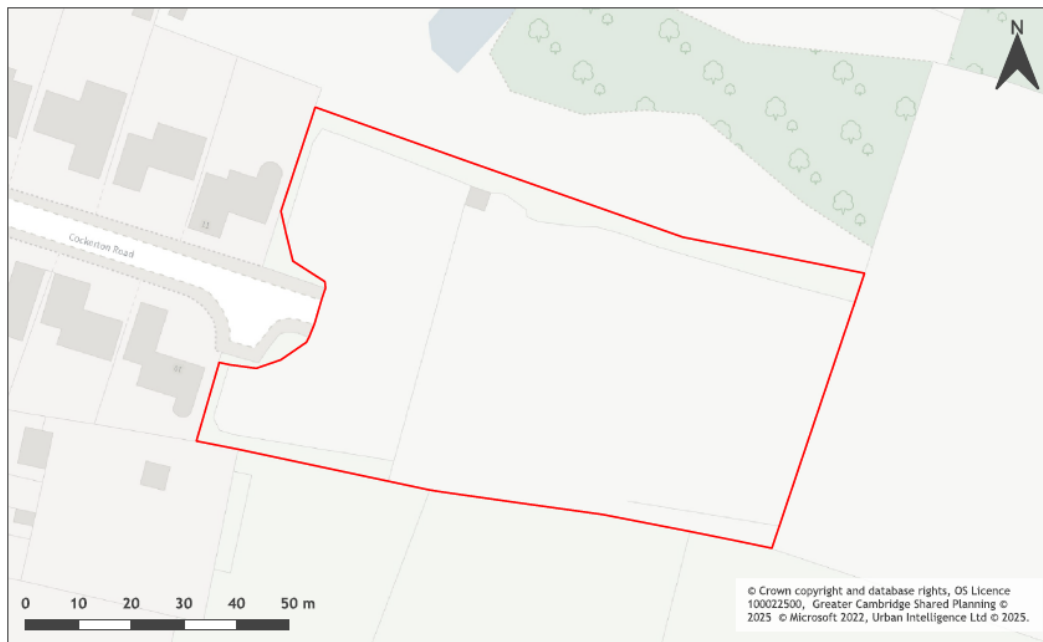
**AQMA — Green:** No air-quality constraints apply.

**Contaminated Land — Amber:** Any contamination associated with agricultural use can be addressed via investigation and remediation.

**Overall Suitability — Red:** Landscape is the sole decisive negative factor. As landscape mitigation is achievable, this red assessment is disproportionate relative to technical constraints.

Only Landscape is rated as Red in the HELAA, and this can be carefully mitigated (potentially through built development of only part of the Site), and especially as the Site is enclosed by built development on all sides apart from part of the northern boundary. The Site should be categorised as Grey Belt. Moreover, the location of the Site provides convenient access to the Biomedical Campus and Cambridge via the cycleway alongside the rail line that would present greater sustainability benefits than any perceived landscape harm. This is also a Site of between one and two and a half hectares that the Government is proposing should be included as part of Local Plan strategies.

Cockerton Road, Girton (115390 / 40555)



**Adopted Development Plan — Amber:** The site shows some policy constraints, but these can be overcome through the planning process.

**Flood Risk — Amber:** Only small pockets of surface water susceptibility exist, which can be addressed through SuDS.

**Landscape — Green:** The assessment identifies negligible landscape impact due to strong boundary planting and limited visibility. This supports the site’s development potential.

**Biodiversity — Green:** There are no priority habitats within the site, and biodiversity-related constraints are low.

**Policy — Green:** No protected open-space conflicts are noted.

**Historic Environment — Amber:** Potential effects on the village core can be mitigated through sensitive design, ensuring heritage settings remain intact.

**Archaeology — Amber:** Saxon-period remains in the vicinity necessitate evaluation, but mitigation through excavation and recording is straightforward.

**Accessibility — Amber:** The site provides adequate access to local services, meeting expected thresholds.

**Site Access — Amber:** Vehicular access is achievable with detailed design development.

**Transport and Roads — Amber:** Transport impacts can be managed without major interventions.

**Noise, Odour and Light — Green:** Environmental conditions pose no significant constraint.

**AQMA — Green:** The site is outside any AQMA and acceptable in air-quality terms.

**Contaminated Land — Amber:** Agricultural contamination risks are low and readily mitigable.

**Overall Suitability — Amber:** With no red ratings, the site is clearly developable subject to minor mitigation measures.

All matters are rated as Green or Amber in the HELAA, and can be addressed. In the ‘Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025’, in relation to a site in Impington/Histon, it states that “the larger Impington/Histon and similar settlements (such as Girton) become, the more they will affect perceptions of the city’s compactness”. This concern is not relevant to this Site. It is evident that its location and small scale would have no effect on the perceptions of Cambridge’s compactness, or any other Green Belt considerations. The Site should be clearly be categorised as Grey Belt. It is also a small site that can be delivered with certainty and early.

College Farm, Whitwell Way, Coton (115534 / 40494)



**Adopted Development Plan — Amber:** Plan-related constraints exist but are manageable through the planning process.

**Flood Risk — Amber:** The site has low levels of surface water risk, readily addressed by SuDS.

**Landscape — Red:** The red classification, according to the HELAA criterion, implies significant adverse harm that cannot be mitigated. The assessment cites limited boundary vegetation, notable local views and perceived countryside encroachment. These characteristics describe a sensitivity to change, but they do not demonstrate an absence of mitigation potential. The site is small, immediately adjacent to established village development, and the factors highlighted, view sensitivity, openness, and edge character, are consistent with conditions that the landscape criterion treats as potentially mitigable in similar contexts. The assessment does not provide evidence of exceptional attributes (e.g., distinct landscape rarity or irreplaceable structural openness) that would raise the impact above the amber threshold. Accordingly, the conclusion that harm “cannot be mitigated” is not substantiated when measured directly against the criterion.

**Biodiversity — Green:** No designated habitats are present, and ecological effects are limited.

**Policy — Green:** No protected open-space designations affect the site.

**Historic Environment — Amber:** Effects on views of St Peter’s Church can be managed with appropriate setbacks and height control.

**Archaeology — Amber:** Archaeological potential is typical and can be mitigated through evaluation.

**Accessibility — Amber:** Access to local services is adequate.

**Site Access — Amber:** Access can be achieved with detailed design input.

**Transport and Roads — Amber:** Transport constraints are manageable and do not preclude development.

**Noise, Odour and Light — Amber:** Amenity impacts can be controlled through standard design responses.

**AQMA — Green:** There are no air-quality constraints.

**Contaminated Land — Amber:** Agricultural contamination can be addressed easily through planning processes.

**Overall Suitability — Red:** The red assessment relies on landscape conclusions that are realistically mitigable.

Only Landscape is rated as Red in the HELAA, and this can be carefully mitigated (potentially through built development of only the southern part of the Site), and especially as the Site sits between existing built development. The Site should be categorised as Grey Belt. Moreover, the location of the Site – on the Comberton Greenway route and with a proposed Coton bus stop on the Cambourne to Cambridge bus route – would present greater sustainability benefits than any perceived landscape harm.

Land north of Whitwell Way, Coton (115623 / 40488)



**Adopted Development Plan — Amber:** The site presents material but manageable policy considerations.

**Flood Risk — Amber:** Surface water risk is minor and fully addressable with SuDS.

**Landscape — Red:** HELAA assigns a red rating on the basis of high local and amenity views, open boundary conditions and potential effects on settlement and landscape character. Under the Landscape and Townscape criterion, these elements indicate susceptibility, but not necessarily unmitigability. The assessment does not identify landscape constraints that are inherently resistant to change, such as a defining ridge, extensive long-distance visibility, or a highly valued landscape designation. Instead, the issues highlighted concern typical village-edge characteristics, topography, hedgerow condition and view lines, that the criterion recognises as potentially manageable. As a result, the evidence does not fully demonstrate that impacts would remain significant even after reasonable mitigation, meaning the reported effects align more closely with the amber definition of “detrimental but satisfactorily mitigated.”

**Biodiversity — Amber:** No priority habitats are present; habitat enhancement and BNG delivery make ecological impacts fully manageable.

**Policy — Green:** There is no conflict with protected open-space designations.

**Historic Environment — Amber:** Long-range views towards St Peter’s Church can be preserved through setbacks and careful massing.

**Archaeology — Amber:** Archaeological considerations are typical and manageable through evaluation.

**Accessibility — Amber:** The site achieves acceptable access to key services.

**Site Access — Amber:** Safe access is achievable with detailed design.

**Transport and Roads — Amber:** Transport-related effects can be mitigated through standard measures.

**Noise, Odour and Light — Green:** Environmental constraints are minimal.

**AQMA — Green:** No AQMA constraints apply.

**Contaminated Land — Amber:** Potential contamination is typical and manageable through investigation.

**Overall Suitability — Red:** The unsuitability conclusion is based entirely on landscape considerations, which are capable of mitigation. Technical factors do not justify a red rating.



Only Landscape is rated as Red in the HELAA, and this can be carefully mitigated (potentially through built development of only part of the Site). Moreover, the location of the Site – on the Comberton Greenway route and with a proposed Coton bus stop on the Cambourne to Cambridge bus route – would present greater sustainability benefits than any perceived landscape harm.

**Conclusion**

The housing requirement is higher than as set out in the Draft Local Plan, and the housing supply does not meet the true requirement or provide sufficient buffer to provide for flexibility of delivery or ensure a robustness of supply. The inclusion of small to medium sized sites within villages, including villages within the Green Belt, that is not provided for in the Draft Local Plan is also essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. It is not evident that the Councils have given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which justify a more flexible and permissive approach to grey belt release in particular.

The five sites considered in detail in these representations are Grey Belt sites that are particularly suitable, and the most appropriate to deliver as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge. They should be included as allocations within the next iteration of the Local Plan.

Yours sincerely

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