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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 SPORTS GROUND, WILBERFORCE 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.

The representations build upon previous submissions and representations in respect of land at Wilberforce Road, Cambridge (hereafter “the Site”). This includes submissions made to the Preferred Options (First Proposals) 2021 consultation, the 2019 Call for Sites, and the 2020 Issues and Options consultation. The Site is identified under reference 40380 in the Council’s Housing and Economic Land Availability Assessment (HELAA). The technical documents submitted to the Council previously remain up to date and relevant to support this current representation:

- Initial Heritage Appraisal
- Ecology Report
- Flood Risk and Drainage Appraisal
- Highway Access Appraisal
- Vision and Delivery Document (Masterplanning)

A red line boundary plan, extending to approximately 4 hectares, is provided at Appendix 1.

Introduction

The Site has been previously promoted through the emerging Local Plan process.

The HELAA submission (Q4 2021, Site reference 40380) demonstrated the Site’s ability to accommodate residential development. The Council concluded that the Site was available and achievable but raised questions in relation to its suitability. These matters are discussed under the representations made to Policy S/LAC, later in this letter.



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These representations continue to promote the former Emmanuel College sports ground for residential led development, making efficient use of land in a highly sustainable location. A concept masterplan is shown at Appendix 2. Development of the Site has the potential to deliver significant public benefits through the preparation of a sensitively designed scheme, while also contributing to meeting Greater Cambridge's identified need for new homes and supporting continued economic growth.

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, forming part of the Local Plan evidence base, 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 must utilise more optimistic and realistic figures for job and housing numbers and include explicit support for higher-growth scenarios; and certainly not act against them by inferring any form of cap. 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 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.

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

Evidence from historic housing delivery on strategic sites across Greater Cambridge demonstrates a consistent pattern of over-optimism by the Planning Authority. Analysis of strategic allocations over the past two Local Plans indicates an average delay of approximately 4.1 years between the anticipated commencement of housing delivery and actual completions, alongside lower delivery rates than originally forecast (not accounting for some sites that have not commenced at all).

This persistent over-optimism is repeated in the emerging Local Plan. The combination of an over-reliance on a limited number of strategic sites and consistently optimistic delivery assumptions results in a development strategy that lacks resilience and is vulnerable to under-delivery.

As drafted, Policy S/DS fails to provide sufficient flexibility or contingency. 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.

Such an approach would be more consistent with the reformed NPPF (2026), which emphasises the effective use of land, the optimisation of development in well-connected locations, and the positive and effective delivery of housing. Without these changes, Policy S/DS risks being ineffective and not positively prepared, contrary to the tests of soundness.

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 reconsider land at Wilberforce Road, Cambridge for allocation in the Local Plan.

The HELAA submission (Site reference 40380) demonstrated the Site's ability to accommodate residential development. The HELAA (2025) stated; *'Development of the site has some potential policy constraints, but these could be overcome through the planning application process'*. The Council concluded that the Site was available and achievable, but raised questions in relation to its suitability.

When considering the HELAA (2025), the key concerns in relation to suitability are discussed below; (1) Landscape Comments, (2) Policy Officer Comments.

1. Landscape

HELAA Comment (based on 2021 feedback): The site is a large sports field, designated as Protected Open Space and located within a Conservation Area. The site forms part of a series of open landscapes within the city which contribute to the sense of openness and provide local views. In landscape terms, development of the site would cause harm to the local openness, character and views in this area, which would be unalterable and not possible to mitigate against.

College Response: Appendix 2 shows a concept masterplan. The concept recognises the existing green features on the site along with how the site is experienced within views from the Conservation Area. As such, development is only proposed to the north and west edges of the site, thereby leaving a large swathe of open space to the south east of the site facing onto Wilberforce Road. The concept layout is only an initial approach and is readily available to be refined through stakeholder engagement to ensure any development is of the appropriate scale and form to respect its setting.

2. Policy Officer

HELAA Comment (based on 2021 feedback): Site is a formal sports playing fields and is protected open space. Its loss will impact formal sports provision for the University of Cambridge.

College Response: The site has become redundant in the College's sports portfolio, with replacement facilities secured to the south of the City Centre. As a result, the site can be put forward to the Local Plan to secure a long-term beneficial and more effective use of land.

The Council make reference to the loss of the site and so having an impact on the University of Cambridge formal sports provision; however, the party that is best placed to assess that matter, is the College that own and operate the facility. It has replacement facilities and so there would be no reduction in the sports offer. The sports offer is very important as part of showing worldclass facilities to

attract the very best students; it is not in the interests of a College to diminish the quality of its sports facilities; hence this proposal only comes forward because the College has replacement facilities.

Furthermore, the land is currently private and fenced off. As part of a redevelopment of the site, a significant area of open space would become available for public enjoyment; as a notable and tangible benefit to the locality; an area that has limited open space that is readily accessible by the public. A matter of material weight to the assessment of the Protected Open Space; and a matter that could be included within any site allocation policy. Appendix 2 shows the broad area of public open space, which is substantial in size and would generate a public benefit against the existing facility which needs to be fenced off in its current use.

Land at Wilberforce Road should be considered for allocation in the Local Plan, providing a highly sustainable residential led development, maximising effective use of land with significant areas of publicly accessible open space.

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 BG/PO (Protecting Open Space)

The College objects to the proposed wording of Policy BG/PO and seeks a modification to ensure the policy allows for a balanced and proportionate assessment of development proposals affecting protected open space.

Policy BG/PO states that development "will not be permitted" where it would result in the loss of protected open space. This wording introduces a rigid presumption against development and removes the ability for decision-makers to apply a planning balance. In doing so, the policy goes beyond national policy, which requires any loss of open space to be assessed in the context of demonstrable need, alternative provision and the benefits of development, rather than resisted as a matter of principle.

As defined in the National Planning Policy Framework (NPPF) (2024), open space is land of public value which "offers opportunities for sport and recreation". While the Site is designated as open space within a conservation area, it is currently private land, is not publicly accessible, and does not provide opportunities for public sport or recreation. In functional terms, the Site does not operate as open space of public value as envisaged by national policy. This is inconsistent with the objectives of the supporting text to Policy BG/PO, which emphasises access to open space to support healthy communities and social interaction.

The Site is located within defined development extents and is not designated as Green Belt. National planning policy places particular emphasis on the effective use of land within sustainable and accessible locations to meet identified development needs. The application of an absolute restriction on development through Policy BG/PO, without regard to the Site's lack of public accessibility or contribution as open space, risks preventing sustainable development in locations where development is otherwise supported in principle. This runs counter to the direction of travel set out in the emerging reformed NPPF (2026), including Policy S4, which seeks to apply a presumption in favour of sustainable development within settlement boundaries.

It is not the College's intention to develop the entire Site. As shown in Appendix 2, any proposals would retain a meaningful proportion of the land as open space. This would secure publicly accessible open space where none currently exists. This would result in a clear qualitative improvement when compared to the existing situation, where the Site is private and provides no wider community benefit.

The Site is surplus to the College's requirements as a sports ground in this location. The College has alternative sports facilities available and operational to the south of the City Centre, capable of meeting its ongoing sports and educational needs. Redevelopment of the Site would therefore not result in any reduction in the quantity or quality of sports provision available to students.

In its current form, Policy BG/PO would operate to prevent the redevelopment of surplus, privately owned sports land within defined development extents, notwithstanding the absence of public access, the availability of replacement facilities, and the opportunity to deliver publicly accessible open space and other planning benefits. The policy therefore fails to respond to changes in land use demand and does not promote the effective use of land, contrary to Chapter 11 and paragraphs 124 and 127 of the NPPF (2024).

Requested Change to Policy BG/PO

- Policy BG/PO should be modified to clarify that development affecting protected open space may be permitted where:
 - the land is privately owned and provides limited or no public access or public recreational value;
 - replacement or enhanced publicly accessible open space is delivered that provides equal or greater quality, quantity and accessibility; and
 - the benefits of development, including the creation of publicly accessible open space and the efficient use of land within defined development extents, demonstrably outweigh the loss of the existing open land.

Such a modification would ensure Policy BG/PO is consistent with national policy, allows for a proportionate planning balance, and supports sustainable development while still protecting genuinely valuable and publicly accessible open space.

Policy GP/HE (Historic Environment)

The College object to the proposed wording of Policy GP/HE.

Part 2(b) is overly prescriptive and not fully consistent with national policy or the statutory framework for decision-making in the historic environment. The use of the word “must” risks precluding high-quality, sustainable development by implying an absolute requirement to conserve or enhance heritage assets in all circumstances, rather than allowing for a balanced planning judgement.

National policy and legislation require decision-makers to have special regard to the desirability of preserving heritage assets, while weighing this against the scale of harm, site context and public benefits.

Policy GP/HE should therefore be amended to adopt more proportionate wording that reflects this balanced approach, consistent with the NPPF 2024 and statutory duties.

Policy GP/HA (Designated Heritage Assets)

The College object to the proposed wording of Policy GP/HA.

The proposed policy wording does not allow for any harm to designated heritage assets and fails to recognise the balancing exercise required by both the National Planning Policy Framework (2024) and the Planning (Listed Buildings and Conservation Areas) Act 1990.

The statutory duties under Sections 66 and 72 of the 1990 Act require decision-makers to have special regard to the desirability of preserving the setting of listed buildings and special attention to preserving or enhancing the character or appearance of conservation areas. These duties do not impose an absolute prohibition on harm, but instead require any harm to be identified and weighed in the planning balance.

Similarly, the NPPF (2024) explicitly allows for harm to designated heritage assets where this is justified and outweighed by public benefits, through a structured assessment of significance, harm and justification. The proposed policy wording fails to reflect this approach and is therefore inconsistent with national policy and legislation.

The use of mandatory language in Part 2 of the policy - specifically the wording “proposals that affect designated heritage assets, including alterations and extensions, retrofit or new development must” - overstates the statutory and policy tests and removes the necessary scope for professional judgement and balancing.

Policy GP/HA should therefore be amended to reflect the statutory wording and the NPPF approach, replacing mandatory language with more proportionate wording that allows impacts on heritage significance to be assessed in the round, taking account of scale, context and public benefits in accordance with legislation and national policy.

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.

This representation highlights that it is not the intention of the College to develop the whole site, but rather to provide a significant area of public open space as part of the scheme, which will form a significant public benefit. The College has replacement facilities available and the repurposing of the site will not, in any way, decrease its sports offering (which is vitally important to the College).

Alongside, 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 site should be allocated at the next publication stage of the emerging Local Plan.

Land at Wilberforce Road is available in the next five years and within single ownership. It lies within walking and cycling distance of a plethora of services, facilities and jobs; further supported by being a short walk from a principal bus corridor served by several bus routes.

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 open space qualities of the site and area. The provision of always-available public open space in this part of the city is a significant public benefit from the proposals.

Emmanuel College look forward to working with Greater Cambridge and stakeholders to take forward a successful residential-led 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



Edward Jones
Principal Planner