

Your ref: 115896  
Our ref: Land North of Mill Lane Sawston  
DD: [REDACTED]  
E: [REDACTED]  
Date: 29/01/2026

Planning Policy  
Greater Cambridge Planning

Dear Sir / Madam,

**REG 18-DRAFT GREATER CAMBRIDGE LOCAL PLAN CONSULTATION - LAND NORTH OF MILL LANE, SAWSTON, CB22 3BY (HELAA SITE ID: 115896)**

**DRAFT POLICY S/DS – OBJECTION**

On behalf of our client, Northwest Biotherapeutics Capital Limited (hereafter “NWBio”), we are responding to the Regulation 18 consultation on the emerging Greater Cambridge Local Plan (hereafter “the Plan”). This representation considers the wider draft spatial strategy proposed by the Council, before focusing on NWBio’s land interests on land north of Mill Lane, Sawston CB22 3BY (hereafter “the Site”) (HELAA Site ID: 115896).

Bidwells has a long history of promoting development proposal sites for clients through Local Plans in Cambridge and South Cambridgeshire. Given this experience we are very concerned that the draft strategy for the Plan (Policy S/DS) relies very heavily on allocating significant dwelling numbers on a small number of very large sites. These sites rely on the timely provision of strategic scale infrastructure which must be in place before these sites can be delivered.

The proposed new strategic scale allocations we are particularly concerned about are the Cambourne North new settlement (13,000 dwellings) relying on a new railway station associated with East West Rail (hereafter “EWR”) and complicated works to the A428. Grange Farm (6,000 dwellings) relies on works to the A505 and the complication of providing new residents with safe access to the proposed Cambridge South East Transport (hereafter “CSET”) Phase 2 Guided Busway Travel Hub on the adjacent side of the A505.

The draft Plan requires these two sites to deliver 5,100 dwellings between them by 2045. We believe this is highly unlikely for reasons set out in this representation.

**National Planning Policy Framework (NPPF) – Direction of Travel**

We are aware that the Councils will be preparing this Joint Plan under the current Local Plan system, rather than the new system to be introduced early this year under the Levelling Up and Regeneration Act; and therefore, the Plan will be examined against the 2024 NPPF.

However, the draft NPPF consultation running until March 2026 sets a clear direction of travel in the long term which we believe the Council should consider further prior to the Regulation 19 local plan consultation scheduled for Summer/Autumn 2026.

Some of the key matters in relation to this Site are:



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- Policy GB2: Assessing existing Green Belt land - at limb 3, requires the preparation of local plans to be informed by an assessment which identifies Green Belt and informs any Green Belt boundary alterations.
- Policy HO6: Planning for a diverse mix of sites – states that sites should be allocated to support and enhance the vitality of rural communities and enable villages to grow and thrive (similar to NPPF 2024, paragraph 83).

The draft NPPF text is also supplemented by a document explaining the proposed changes and inviting responses to specific questions<sup>1</sup>.

## **The Proposed Greater Cambridge Spatial Strategy**

### Overview

Whilst in principle we do not object to the principle of seeking to deliver a large number of new homes at scale, we consider that this approach sets the draft local plan on a path of over-reliance on these sites which is problematic for the following reasons:

- The speed at which these developments can deliver homes is often far slower than the Councils have envisaged historically. A review of historic Annual Monitoring Reports demonstrates that the large strategic sites in the current Development Plan, may now be delivering at an appropriate rate, however they came on stream several years later than anticipated.
- The Councils have not identified any new allocations for housing in the rural area which fails to support the vitality of the rural area and existing settlements. We believe that this decision, has been made in part, to avoid development in the Green Belt, and therefore fails to strike a more balanced approach to housing delivery across the Plan period.
- The 'lumping' together of rural centres, minor rural centres, group villages and infill villages from the settlement hierarchy (taken from Policy S/SH), effectively as the locations with the lowest preference to deliver jobs and homes, clearly fails to distinguish between what may be highly sustainable locations in the rural area (ie: Sawston) a Rural Centre the highest of these categories (where there will be no limit on scheme size), and which is clearly capable of delivering an appropriate scale of development.

### Green Belt and Grey Belt

The *Development Strategy Topic Paper (2025)* states GCSP consider the identified need for 73,300 jobs and 48,195 new homes across the plan period can be delivered without necessitating the allocation or release of Green Belt land within the authority area, though given the fundamental changes to national policy and guidance regarding the Green Belt since the LUC Green Belt Assessment (2021) we now understand that a revised Green Belt Assessment will be completed and published after the Regulation 18 Consultation closes. It is argued the revised Green Belt Assessment should have informed the Draft Local Plan and been published as part of and the Regulation 18 Consultation.

The Councils have not committed to undertake a review of potential Grey Belt sites and their development potential as an alternative spatial strategy, which is apparent in the October 2025 Sustainability Appraisal. Whilst there is no absolute requirement to review Grey Belt sites in the NPPF 2024 as part of plan-making, it would be prudent to consider this as an alternative, as it may not be as simple in policy terms to assign the same importance to all Green Belt given the biggest policy change to it in several decades.

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<sup>1</sup> Proposed reforms to the National Planning Policy Framework and other changes to the planning system – December 2025: [National Planning Policy Framework: proposed reforms and other changes to the planning system](#)

Bidwells understand that GCSP's consultants (LDA) are currently considering the process of examining Grey Belt issues and possibly Grey Belt sites across Greater Cambridge. Officers have stated at various committees that Grey Belt sites are not required to accommodate housing allocations and the Draft Local Plan 'is not configured for this'. However, the fact LDA are considering an assessment of Grey Belt suggests the Draft Local Plan does need to cover this important issue given the increasing importance of Grey Belt policy in the current NPPF (2024) and the Consultation Draft (2025).

The majority of the Site is within the Cambridgeshire Green Belt and is predominately undeveloped land. The current Green Belt Assessment which underpins the Council's evidence base is dated 2021 which pre-dates the introduction of Grey Belt in planning policy.

Paragraph 146 (NPPF, 2024) identifies that one of the exceptional circumstances in which Green Belt boundaries can be altered is where an authority cannot meet its identified need for homes, commercial or other development through other means. It is therefore noted that GCSP may require a further Green Belt review and consider the additional release of land from the Green Belt to accommodate a higher growth scenario should the Council not be able to accommodate additional growth on non-Green Belt sites.

Greater Cambridge's Green Belt Assessment (2021) identifies variations in openness and the extent to which land contributes to the purpose of Green Belt and uses this information to determine the potential harm to those purposes of releasing Green Belt land. The approach to the assessment differs from that in the NPPF Green Belt purposes (though we note that this has previously been accepted by Inspectors), the 'Cambridge Purposes' are:

- Cambridge Purpose 1: Preserved the unique character of Cambridge as a compact, dynamic city with thriving historic centre (NPPF purpose 1).
- Cambridge Purpose 2: Maintain and enhance the quality of its setting (NPPF purpose 4, and closely related to purpose 3).
- Cambridge Purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city (NPPF purpose 2).

The assessment rates sites against the expected harm to the Green Belt, should it be released for development, using a 5-point scale.

Whilst we note the assessment has been accepted before, and that this Plan will be assessed under the December 2024 NPPF, the Councils ought to consider the direction of travel in the emerging NPPF. The current NPPF consultation includes a requirement to assess Green Belt boundaries in Local Plans in accordance with the process contained at Annex E (see policy GB2: Assessing existing Green Belt Land).

Within the 2021 study, the Site was assessed under parcels SA20 and SA21 and was found to have the following contributions to the Cambridge Purposes:

SA20:

- Purpose 1: No contribution to preserving Cambridge's character;
- Purpose 2: A moderate contribution to maintaining and enhancing the quality of Cambridge's setting;
- Purpose 3: Relatively limited contribution to preventing merging of communities with one another and with the city.

SA21:

- Purpose 1: No contribution to preserving Cambridge's character;
- Purpose 2: A limited contribution to maintaining and enhancing the quality of Cambridge's setting;
- Purpose 3: Moderate contribution to preventing merging of communities with one another and with the city.

It was concluded that the additional impact on the Green Belt from the release of the parcel would be negligible and the harm resulting from its release would be moderate for parcel SA20 low for parcel SA21.

Since the 2021 study, the Government introduced the concept of Grey Belt in the December 2024 NPPF with the purpose of allowing development on poorly performing pieces of Green Belt, which otherwise would have been restricted to demonstrating very special circumstances.

The Site is considered to have the potential to qualify intrinsically as Grey Belt land. Based upon the Council's own Green Belt evidence base, the Site clearly does not strongly contribute to NPPF Green Belt purposes a), b) and d), nor does it have any footnote 7 policies that would form a strong reason for refusing development. Development would also clearly not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the Plan area.

Sawston is defined as a rural centre and the Site being adjacent to the settlement framework and in close proximity to the Village College and Sawston Business Park means it is clearly in a sustainable location. Sawston falls within the draft policy area S/RSC (Rural Southern Cluster) noted to be home to a range of major business parks with world-leading facilities and excellent and improving public transport links.

### Windfall Sites

Primarily relying upon windfall development to address as much of the 10% requirement as possible, does not help provide smaller enterprise housebuilders with the certainty required to invest in delivering sites. Across Greater Cambridge there has also been a general decline in the delivery of windfall sites over the years.

The Greater Cambridge Housing Delivery Study Addendum<sup>2</sup> in section 2 considers windfall delivery between 2006 and 2024, and consider a windfall allowance for 425 dwelling per annum would be robust. The section of the report sets out what it considers the favourable policy which may assist the delivery of windfall sites in the future. However, it fails to identify why over time there has been a general trend downward on windfall sites, and whether in reality, particularly in the South Cambridgeshire area there is now a lack of available sites to continue to deliver windfall at scale across the plan period.

For instance, it presents a data set as far back as 2006 – 2007 for windfall completions to find an average delivery rate of 470 dwellings per annum, fails to realise that Greater Cambridge has not delivered more than 470 dwellings in a year from windfall since 2016 – 2017. Even if the Council uses 425 dwelling per annum for windfall over the previous seven years of data the average delivery has been 395 dwellings per annum.

As such, there needs to be greater certainty injected into a variety of sized sites by allocating these in the emerging Local Plan, to aid with confidence of being able to deliver such sites.

### Vitality of the Rural Area

The Council suggests at 2.44 that allocations in the Rural Area would result in an overreliance on the private motor vehicle. However, this position overlooks several important factors:

- The spatial strategy proposed in the draft plan does not consider the unique characteristic of each of the settlements in the rural area individually, and their ability to grow to support the vitality of settlements and the viability of their services. This is a consequence of effectively grouping the whole rural area into one pot within Policy S/DS.
- Expanding the rural settlements may potentially lead to increased viability / opportunities to improve sustainable transport opportunities.

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<sup>2</sup> [Cambridge Housing Delivery Study Addendum October 2025](#)

- Whilst the plan does not readily allocate any new developments at the rural settlements, it is clear that the plan does not view all settlements in the rural area as being unsustainable. For instance, Policy S/SH – Settlement Hierarchy does not set a limit of the size of residential development within the defined extent of Rural Centres such as Sawston subject to demonstrating adequate services and facilities exist.

Policy S/SH effectively creates a juxtaposition whereby it is recognised that growth within Sawston need not be constrained as it benefits from a high level of services, facilities and accessibility to the main urban area; yet in failing to allocate any sites, growth is basically constrained to the settlement boundaries where windfall opportunities are restricted.

#### Failing to Offer Sufficient Choice and Flexibility

The focus upon large new settlements, urban redevelopment and SUEs fails to properly consider the need to offer sufficient choice and flexibility to perspective homeowners. Not all perspective purchasers will be able to, or wish to buy, in these locations.

The proposed development strategy will only exacerbate the affordability issue in Sawston, likely pushing young people out of their local communities away from their support networks. This may also exacerbate the car dependence concerns the Councils have by pushing these people further from Cambridge to seek cheaper housing in less well served areas (ie: rural East Cambridgeshire).

#### **Housing and Economic Land Availability Assessment (HELAA) Response**

The Site has been assigned 115896 in the latest HELAA. We have the following comments to make:

- Flood Risk: Whilst the Site has pockets of surface water flood risk these can easily be designed out through the development process. As such, there is no reason why the Site could not score green in this regard.
- Landscape: The Site is still assigned as red from 2023 with no update. It is disappointing there is no consideration of Grey Belt potential on this Site and across the wider council area.
- Site Access: Additional highways technical work has been undertaken since the last call for sites to demonstrate adequate access into the site. The score should be updated to amber at the very least.
- Transport and Roads: The Site is still assigned an amber from 2021 with no update. The score should be upgraded to green as the proposals would not have a detrimental impact on local or trunk roads given the scale of development.
- Available: The Council is accepting that there are no issues around landownership or delivery period.

#### **Summary**

Whilst we do not object to the principle of allocating large new housing developments, we object strongly to the failure to balance this approach with a more diverse approach to housing delivery across Greater Cambridge in the emerging Local Plan. Allocating sites for housing developments in sustainable locations such as Sawston would:

- Deliver homes more quickly and in the first half of the plan period;
- Provide certainty to smaller housebuilders;
- Support the vitality of the rural area;
- Delivery affordable housing in areas with pressing need; and
- Offer greater flexibility for house buyers.

The draft plan is currently placing a lot of risk for housing delivery in a limited number of very large pots, and in particular the proposed large new allocations at Cambourne North and Grange Farm require the

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delivery of infrastructure at scale which is likely to delay their delivery. These delays have been experienced across many of the large strategic sites in Greater Cambridge in recent decades.

Instead, we suggest a more blended approach, with a more rational approach to sustainable rural development is considered, alongside a review by the Council of potential Grey Belt sites.

Bidwells has prepared a report on the on the issues with delivery of large scale housing sites. Please see this attached to this representation in support.

An updated Call for Sites (CfS) submission has been prepared and submitted to the Council alongside this representation as part of the Draft GCLP consultation. The submission provides a comprehensive and robust package of supporting information to assist the Council in its assessment of the site's suitability, availability and deliverability.

The Call for Sites submission contains:

- Full Green Belt Assessment for the site demonstrating its relationship to the Green Belt and its contribution against the relevant assessment criteria
- Highways technical information addressing access, capacity and the potential impact on the local highway network
- NWBio intent statement evidencing future investment in Cambridge and the availability of the site for development and its sustainable relationship with NWBio's Research Centre (employment) on Sawston Business Park
- Location Plan

Should you have any questions, please do not hesitate to get in touch.

Kind regards,

**Sophia Nitschke**

Senior Planner

# Land North of Mill Lane, Sawston

