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Date: 29/01/2026

Greater Cambridge Shared Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge CB23 6EA

Dear Planning Policy,

DRAFT GREATER CAMBRIDGE LOCAL PLAN 2024-2025

REGULATION 18 CONSULTATION DECEMBER 2025 – JANUARY 2026

LAND SOUTH OF RECTORY FARM, HARSTON (HEELA 2025 SITE ID: 115184)

These representations have been prepared by Bidwells LLP on behalf of Jesus College in response to the Draft Greater Cambridge Local Plan Regulation 18 consultation (2026). These representations relate to Land south of Rectory Farm, Harston (“the Site”) which is within the ownership of Jesus College. Please refer to **Appendix 1** for site location plan.

These representations follow those previously submitted to the March 2019 and March 2025 Call for Sites. Jesus College had also been promoting the Site through the, now made, Harston Neighbourhood Plan (October 2025), on the basis of being able to meet affordable housing need for Harston. The Site was considered as part of a Site Options and Assessment technical report (February 2024), prepared by AECOM as part of the supporting evidence base to the draft Neighbourhood Plan (Site reference H10). Appendix A of the report includes the Site Assessment Proformas. Site H10 was not considered appropriate for allocation in the Neighbourhood Plan due to its location within the Green Belt. It is worth noting however that the made version of the Neighbourhood Plan only allocates 16-18 dwellings, not all of which are definitely affordable, compared to the identified need of 42 affordable households in the Housing Needs Assessment and 32 affordable households in the Housing Needs Survey. Land to the south of Rectory Farm, Harston could therefore help meet local affordable housing need as part of a wider residential allocation within the Draft Greater Cambridge Local Plan.

Through the Council’s Housing and Economic Land Availability Assessment (HELAA) (2025) the Site was given the site reference 115184. The Site is also referenced as forming part of parcel HX11 within the Greater Cambridge Green Belt Assessment (2021).

This representation adds to the suite of submission material previously submitted and accounts for changes to the context of the Site, the emerging Greater Cambridge Local Plan and its supporting evidence base. This representation considers the relevant policies relating to the wider Development Strategy proposed in the Plan and the Rest of the rural area. It also addresses the red, amber and green



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(RAG) scores in the HELAA (2025) assigned to the Site to demonstrate that the site remains available, suitable and deliverable.

The remainder of this letter is set out as follows:

- Site Description
- Development Proposals
- Response to HELAA
- Response to the Draft Greater Cambridge Local Plan

The Site

The Site extends to circa 5.5 hectares and is located to the west of Cambridge Road (A10) and at the northern edge of Harston. It is currently in agricultural use. The Site lies immediately to the north of existing residential development along Cambridge Road/High Street and to the south of a farm track that leads to Rectory Farm. The site is bound by the Cambridge Road (A10) to the east and to the west lies agricultural land. The farm track that bounds the northern edge of the Site is also a Public Right of Way (PRoW) (119/2) that links Hauxton with Haslingfield to the west and Harston to the south.

The Site offers good access to community facilities and services in Harston including Harston and Newton County Primary school, a doctor's surgery, a post office, village hall, public houses and a convenience store. The Site is also well located with regards to the nearby Cambridge Discovery Campus, which benefits from outline planning permission being granted in 2024 (Ref: 23/03080/OUT) for around 343,188 sq ft of lab, office, mid-tech, and R&D manufacturing space and employing over 1000 new people. This site therefore offers an excellent opportunity for housing site to meet the local needs of new employees.

There is a bus stop along the site frontage, on both sides of the A10, serving north bound and southbound services through to Royston to the south, the Trumpington Park and Ride site and Cambridge to the north, as well as national express coach services to Gatwick airport. Foxton railway station is approximately 2.5m to the south which offers services to Cambridge (and beyond) and London. Furthermore, the A10 runs through the village, which is a strategic transport corridor within Greater Cambridge, where numerous transport improvements are planned to deliver a high-quality public transport corridor, including:

- Improved transport hub at Foxton railway station (3km from the site);
- Proposed improved transport interchange at Trumpington A10/M11 junction (3.2 km from the site);
- Park and ride site at Hauxton;
- Off road cycle links along the A10;
- Walking and cycling links to Melbourn and Bassingbourn Village Colleges.

In addition to the above, Harston falls within the 'Preferred route option' area of the proposed East-West rail alignment which would deliver faster and improved frequency of trains to Cambridge and in turn to London.

As such, the Site is well located to reduce the need to travel by car and can promote sustainable travel. Further public transport enhancements are also proposed that will improve connectivity to Harston by sustainable and active modes of transport.

Development Proposal

The Site comprises 5.54 Hectares, which, at a density of 30 dwellings per hectare as stipulated by the adopted Local Plan (Policy H/8), could deliver 166 dwellings over the plan period if the whole site was utilised.

Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in the next Local Plan period. With the right design, including a suitable layout and design concept, the proposed development on the site could be accommodated without having a significant impact on the surrounding landscape setting.

Response to HELAA 2025 – Site ID: 115184

The following sub-sections follow the Council's structure in the HELAA (2025) and seeks to address the scores and comments assigned to the Site by the Councils where necessary.

HELAA RAG RATING AND RESPONSE (2025)	PROPOSED RAG RATING AND RESPONSE
<p>Adopted Development Plan Policies (2025)</p> <p>Development of the site has some potential policy constraints, but these could be overcome through the planning application process</p>	<p>Jesus College welcome and agree with the continued position that whilst there are some policy constraints these are capable of being addressed via the planning application process</p>
<p>Flood Risk Assessment (2025)</p> <p>Flood Zone: Wholly in Flood Zone 1. Surface Water Flooding: 5% lies in a 1 in 30 year event, 4% lies in a 1 in 100 year event and 9% lies in a 1 in 1000 year event</p>	<p>The site is wholly within Flood Zone 1 (low risk of flooding). Whilst some of the site is subject to surface water flooding, this constraint is capable of being addressed via the planning application process. There is sufficient land to deliver an acceptable scheme, and the surface water can be appropriately addressed via a detail drainage strategy without impact to onsite or offsite flood risk.</p>
<p>Landscape Assessment (2025)</p> <p>The site is wholly within the greenbelt and prevents the amalgamation of Harston and Hauxton. Development of the site is not recommended primarily for this constraint. The site contributes to long views of the countryside between Harston and Hauxton which should be retained.</p>	<p>Whilst it is acknowledged that the Site falls within the Cambridge Green Belt and partly forms the gap between Harston and Hauxton, Paragraph 146 of the 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. Therefore whilst the Councils, drawing on their current evidence base, do not consider that their development needs alone provide the exceptional circumstances required to justify</p>

	removing land from the Green Belt, the further evidence referred to in these representations may well change the context within which the Councils need to consider the Plan and the potential release of Green Belt land.
Biodiversity and Geodiversity (2025) A development of the size and scale described would not provide any specific ecological risks to statutory or non-statutory designated sites. However, this does not remove the likelihood of protected and priority species being impacted, nor that a development of the type described would likely be eligible for mandatory biodiversity net gain.	Jesus College welcome and agree with the Councils RAG rating. The site is also capable of delivering a policy compliant level of Biodiversity Net Gain (BNG) on site as part of any future development proposals, thus enhancing the ecological value of the Site.
Policy (2025)	Jesus College welcome and agree with the Councils RAG rating. The site is not on protected open space designation and any impact of the proposed development could be reasonably mitigated or compensated.
Historic Environment Assessment (2025) Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.	Jesus College welcome and agree with the Councils RAG rating.
Archaeology (2025) The site is located on the eastern edge of the historic village. Previous investigations in the vicinity have identified archaeology relating to the Saxon and medieval settlement. Archaeological investigations would be necessary in advance of development.	Whilst there are some policy constraints these are capable of being addressed via the planning application process. Trial trenching to establish the archaeological value of the site could take place during the determination of a future application or secured via an appropriately worded condition
Accessibility (2025) Adequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.	Jesus College agree with the Amber RAG rating based upon the scoring system in the HELAA methodology
Site Access (2025) The site is acceptable in principle, subject to further detail and consultation. A significant level of infrastructure will be required outside the site	Jesus College welcome the 'in principle' support and details of site access and sustainable

<p>boundary to encourage more sustainable transport links. It is unclear whether these sustainable transport links can be achieved within the local available constraints.</p>	<p>transport links are capable of being addressed via the planning application process.</p>
<p>Transport and Roads (2025)</p> <p>Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.</p> <p>The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use. A Transport Assessment and a Travel Plan will be required.</p>	<p>Jesus College welcome the 'in principle' support and details of any necessary transport mitigation are capable of being addressed via the planning application process.</p>
<p>Noise, Vibration, Odour and Light Pollution (2025)</p> <p>The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration / odour / light pollution after careful site layout, design and mitigation</p>	<p>Jesus College welcome and agree that the Site can be made acceptable in all these terms subject to detailed design.</p>
<p>AQMA (Air Quality) Assessment (2025)</p> <p>Site does not lie within an AQMA. Minimal traffic impact on AQMA</p>	<p>Located outside any AQMA. Any impact on neighbouring AQMA could be mitigated through detailed design and would accompany a future application.</p>
<p>Contaminated Land (2025)</p> <p>Potential for historic contamination. The site is likely to be capable of being developed after appropriate mitigation or remediation of contamination / ground stability issues.</p>	<p>Contamination Reports and subsequent remediation scheme would accompany future application and appropriate remediation scheme secured via condition.</p>
<p>Overall Suitability Score</p>	<p>The above demonstrates the Site is a suitable location for development. Where constraints exist, these can be appropriately mitigated and Green Belt boundaries can be altered where an authority cannot meet its identified need for homes, commercial or other development through other means.</p>
<p>Available</p>	<p>The Site remains in single ownership and is available for development within the next 5 years</p>
<p>Achievable</p>	<p>The Site remains achievable and deliverable.</p>

Response to the Draft Greater Cambridge Local Plan

Policy S/JH : New Jobs and homes

Jesus College **object** to Policy S/JH.

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) (EHN), states 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 EHN, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The conclusion of the EHN is then based on the '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. It is also worth noting, at paragraph 3.62 of the EHN, it is acknowledged that the 'high' scenarios could be achieved or exceeded if there is a step change in infrastructure investment.

Greater Cambridge is one such location where there has indeed been a step change in infrastructure investment which heightens the urgency in increasing job creation and housing supply and justifies adopting a higher growth scenario. 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.*" Furthermore, the Cambridge Growth Company was 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 (backed by £400m funding). This is to be the subject of statutory consultation in 2026. It is anticipated that Cambridge Growth Company (CGC) will publish its own evidence base ahead of the formation of the Development Corporation, which whilst yet unknown it is expected that an ambitious growth target will be identified; likely to exceed that currently envisioned by the Councils for the Greater Cambridge Local Plan.

Furthermore, Greater Cambridgeshire has been, and continues to be, the location of strategic infrastructure investment that will continue to drive upwards increases in the need for new jobs and homes. This includes the proposed East West rail station as well as the proposed public transport improvements for the Cambourne to Cambridge corridor and the Cambridge Eastern Access corridor. The Cambridgeshire and Peterborough Local Growth Plan 2025 also identify priority growth sectors, and the need for further skills development.

The Employment and Housing Needs Update acknowledges a 'High' and 'High Sensitivity' scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This high level of growth is feasible in Cambridge and would support the Government's direction of travel. It is therefore important to recognise that higher-growth outcomes remain credible and should not be ruled out by policy. This requires revision to the proposed policy wording.

For these reasons, the Local Plan should consider utilising a more optimistic and realistic figure for job and housing numbers and include explicit support for higher-growth scenarios. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity.

It is requested that the Plan allocates additional sites in Greater Cambridge to directly respond to the higher growth potential and to increase the diversity of allocated sites to optimise delivery and growth potential. Land to the south of Rectory Farm, Harston can soundly assist in realising a greater and more appropriate level of growth in a sustainable way.

Policy S/DS: Development Strategy

Jesus College **object** to Policy S/DS.

Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge and sets out where the homes and jobs identified in Policy S/JH should be provided to meet the vision and strategic priorities of the Plan.

Firstly, as referred to in representations to Policy S/JH, the identified needs in the Plan are considered too conservative and do not reflect the growth agenda in national, regional and local contexts mandated by the incumbent Labour Government. In line with the Written Ministerial Statement made by Matthew Pennycook (Minister of State for Housing and Planning) on 23 October 2025 the ambition remains to 'supercharge growth' within the Oxford-Cambridge Corridor and realise the full potential of Greater Cambridge. Further it is anticipated that the Cambridge Growth Company (CGC) will publish its own evidence base ahead of the formation of a centrally-led Development Corporation (backed by £400m funding announced in October 2025), which, whilst yet unknown, it is expected that an ambitious growth target will be identified; likely to exceed that currently envisioned by the Councils. Collectively it remains apparent therefore that the Government have a continued agenda to deliver high levels of growth within Greater Cambridge and as such more optimistic and realistic figures for job and housing numbers are needed to support sustainable economic growth and productivity.

Secondly, the supporting text to Policy S/DS states, at paragraph 2.64, that '*drawing on our evidence and consultation feedback, we do not consider that our development needs alone provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt in this Local Plan, having regard to the identification of other sources of land supply that can meet needs sustainably without the need for Green Belt release*'. Paragraph 146 of the 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. Therefore whilst the Councils, drawing on their current evidence base, do not consider that their development needs alone provide the exceptional circumstances required to justify removing land from the Green Belt, the further evidence referred to above may well change the context within which the Councils need to consider the Plan and the potential release of Green Belt land.

Thirdly, whilst in principle a strategy of seeking to deliver a large number of new jobs and homes at scale within the Plan is supported, an over reliance on too few strategic sites, particularly those that require significant, costly infrastructure to unlock and deliver them, is not supported. Indeed, it is considered that Policy S/DS sets out such a strategy and relies too heavily on allocating significant levels of growth on

just a small number of very large sites. A number of these large sites rely on the timely provision of strategic scale infrastructure which must be in place before they can be constructed. For example, the Cambourne North new settlement (13,000 dwellings and 108,000 sqm employment floorspace) relies upon a new railway station and complicated works to the A428, and Land adjacent to A11 and A1307 at Grange Farm (6,000 dwellings and 35,000 sqm employment floorspace) relying on works to the A505. The draft Plan requires the two sites to deliver 5,100 dwellings between them by 2045. We believe this is highly unlikely.

In particular, the lack of housing allocations in the villages fails to support the delivery of homes to meet the local housing needs of the next generation during the plan period. Instead of being able to live locally, this forces newly forming households to relocate to the main settlements, new settlements, or elsewhere – often away from their existing family, community and support network. This leads to an increased need for travel within Greater Cambridge, often via private cars rather than public transport. It also results in population imbalance, with ageing populations in villages and a falling roll in primary schools – whilst the new settlements have predominantly young populations and significant pressure on services.

A combination of approaches to the distribution of spatial growth are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations and scale of new housing and employment development in the Greater Cambridge area. This is necessary to ensure that the Local Plan supports sustainable communities and sustainable patterns of growth. In addition to providing housing to support new jobs in Cambridge and the key employment growth sectors, the development strategy should take account of the needs and vitality of existing villages and the wider rural economy and make planned provision for them.

In many villages, there is a lack of brownfield land available within the 'defined development extents' to facilitate housing delivery in accordance with the approach set out in Draft Policy S/SH (Settlement hierarchy). Also, small windfall sites provide limited affordable housing to meet local needs. Hence, there should be specific land allocations for housing development in some of the rural villages, to promote genuinely sustainable growth and development – supporting the rural economy, promoting mixed and inclusive communities and ensuring the vitality and viability of local services. Additional small and medium sized sites coming forward in the first five years post adoption of the Plan would also provide the necessary flexibility and breadth of supply in the early stages of the plan period and ensure the Plan remains up to date. This is particularly important in light of the fact that the housing land supply across the plan period does not exceed 5.5 years.

Policy S/SH: Settlement hierarchy

Jesus College **object** to Policy S/SH.

The indicative maximum scheme sizes are not considered to be necessary for the Group villages. Windfall development that comes forward within these villages should be considered on the basis of the site and its context. Schemes should be encouraged to make an efficient and effective use of land whilst delivering housing development that is appropriate and helps in meeting the needs of the local community. Often small windfall sites (under the thresholds indicated from Group and Infill Villages) will provide limited or no affordable housing, exacerbating the situation for newly forming households who cannot meet their housing needs locally.

Policy S/GB: The Cambridge Green Belt

Jesus College **object** to Policy S/GB.

Although the Policy states that supporting evidence studies include the Greater Cambridge Green Belt Assessment (2021), it is understood 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.

Overall, it is considered that Draft Policy S/GB is not consistent with national policy, does not reflect a positively prepared plan and is not justified. Pertinent to ensuring the Plan is sound will require:

- The publication of a revised Green Belt Assessment to support the Local Plan
- A consideration of higher growth targets and subsequent review of the Green Belt / Grey Belt where necessary
- The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites.

Policy S/RRA: Site allocations in the rest of the rural area

Jesus College **object** to Policy S/RRA.

Whilst Jesus College support the principle of policy S/RRA in allocating sites for housing and employment in the rural area, the Draft Plan makes very few additional allocations in the rural area and Jesus College **objects** to this approach. This approach threatens the vitality of villages within the rural area and on the edge of Cambridge and stifles opportunities for further growth and supporting local services. As such, as referred to in representations to Policy S/DS, the Development Strategy should include for further allocations in the rural area to ensure that a sound spatial strategy is developed and delivered.

Sustainable development in rural areas makes an important contribution to ensuring the vitality of villages and supporting existing rural services and facilities. This approach is supported by the National Planning Policy Framework (NPPF), which at paragraph 83 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

Notwithstanding this clear direction in national policy, the Draft Local Plan makes very few additional allocations in the rural area. This approach threatens the vitality of villages within the rural area and stifles opportunities for further growth and supporting local services. The allocation of additional small sites in the rural area will also help to ensure that the housing supply for the Local Plan is balanced and robust, reducing the reliance on strategic sites and the limited allocations in villages.

The ability of new development to support rural communities is especially important given the loss of rural services experienced in recent years. The impact of these service losses on rural communities is accentuated when considering pre-existing low service levels compared to better served, urban areas.

The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Harston, whilst it is a relatively small village, it benefits from being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.

To fully support the rural area and develop a sound spatial strategy with a mixture of deliverable and suitable rural allocations, Land to the south of Rectory Farm, Harston should be identified as an allocation for residential development in the Plan, under Policy S/RRA.

Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to

meet the housing needs of Greater Cambridge in the next Local Plan period. With the right design, including a suitable layout and design concept, the proposed development on the site could be accommodated without having a significant impact on the surrounding landscape setting.

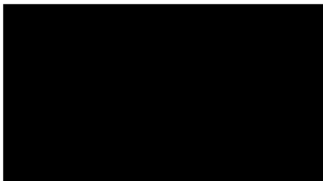
Summary

These representations have been submitted to supplement previous information submitted in support of the Site through previous Call for Sites and consultation submissions and the conclusions and findings remain correct. This submission has addressed and responded to the transformed policy context of the Site in terms of the emerging Draft Local Plan. Bidwells have identified the Draft Local Plan over relies on large strategic sites which have historically failed to start their delivery in a timely manner and then at much slower rates than the Council anticipated and relied upon. The absence of smaller sites in rural communities that can deliver early in the plan period to meet the acute housing need of Greater Cambridge is also considered a serious a flaw of the Draft Local Plan to achieve a sustainable spatial strategy.

The Site is highly sustainable and remains suitable, available and achievable for residential development to meet the growing housing needs of Harston which should be prioritised for allocation.

Should you require any further information regarding the Site or these representations please do not hesitate to contact me.

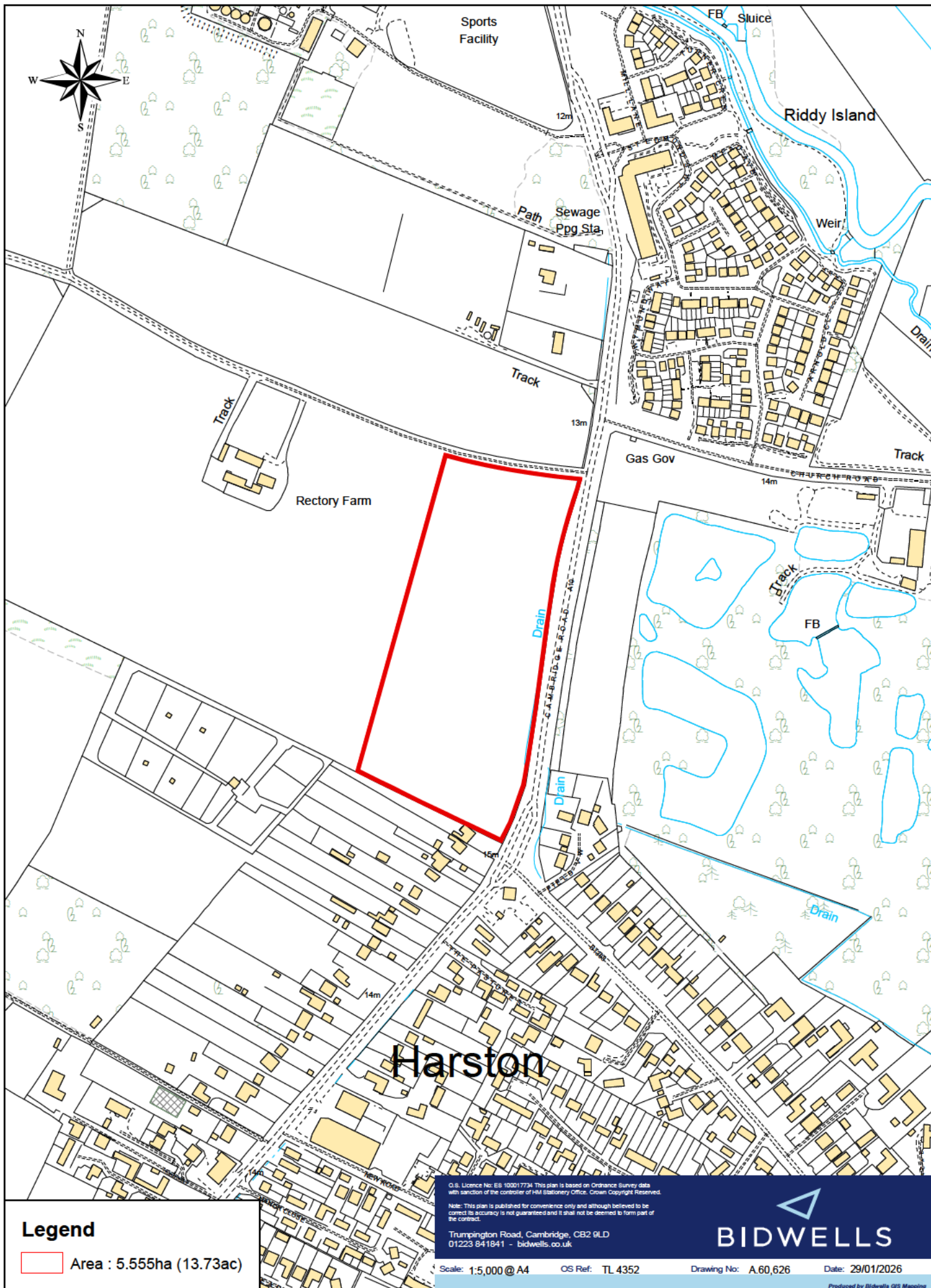
Kind regards




Appendix 1

Site Location Plan : Land to the south of Rectory Farm, Harston

Land at Rectory Farm, Harston



Legend

 Area : 5.555ha (13.73ac)

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