

Greater Cambridge Local Plan 2024–2045

**Regulation 18 Consultation December 2025 –
January 2026**

Land at Branch Road and Long Road, Comberton

Representations on behalf of Beechwood Estates Ltd.

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Contents.

1. Introduction.....	1
2. A Sustainable Location.....	2
3. Landscape and Green Belt Matters.....	2
4. Flood Risk.....	3
5. Ecology.....	3
6. Access.....	3
7. Summary.....	4
8. Deliverability	4
9. Specific policies.....	5
Housing Need: Policy S/JH: New jobs and homes	5
Housing Supply: Policy S/DS: Development strategy	5
Policy S/SH: Settlement hierarchy and Policy S/DE: Defined development extents	7
Policy S/GB: The Cambridge Green Belt.....	8



1. Introduction

- 1.1. Our client, Beechwood Estates Ltd., supports the aims of the emerging Local Plan to minimise carbon emissions and reliance on the private car by creating thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure needed for Greater Cambridge. However, the Councils' strategy needs to allow for greater flexibility with a recognition of the role that Minor Rural Centres, and sites well-related to them can play in achieving these aims. Accordingly, the purpose of these representations is primarily to respond to the emerging Vision; Development Strategy; and Draft Allocations proposed by Greater Cambridge Local Plan (GCLP) Regulation 18 consultation.
- 1.2. Our client has been promoting their site 'Land at Branch Road and Long Road, Comberton' (Site ID ref: 115627 – HELAA Site ID ref: 40261) through previous call for sites as a logical and deliverable site to be allocated for a residential development of circa 120–130 dwellings. The site was first assessed by the Councils in 2021. And then again in 2025. Our client is hereby updated their Call for Sites submission and reaffirming the deliverability of the site. This latest submission also highlights the need for a revision to the green belt surrounding Comberton to support a site-specific policy that allocates our client's site for residential development in the emerging Local Plan.
- 1.3. The development of the site would deliver the following benefits:
 - Up to 130 dwellings including a range of different dwelling types in a sustainable location on the edge of a Minor Rural Centre
 - Provision of affordable housing, in accordance with the Councils' policies, to deliver a balanced community that would be well integrated into the scheme and enhance social cohesion whilst meeting some of the local housing needs of the village
 - An internal network of streets that would promote walking and cycling as the most appropriate means of travelling through the site and accessing nearby services and facilities
 - A flexible site with the ability to integrate SUDs into the design of any development to ensure that no new or existing properties would be at risk of flooding
 - Significant landscape buffers and open space that would accommodate play spaces, allotments, informal open space and walking routes for new and existing residents
 - Environmental enhancements that would deliver significant gains in biodiversity through the creation of new habitats on site and the enhancement of existing habitats
 - Creation of a defensible northern edge to the village through enhanced boundary planting that would limit views into the site from the surrounding green belt and ensure that the development of the site respected the wider landscape and village setting
- 1.4. The following sections respond to the previous HELAA appraisals of the site in the context of the changes to national planning policy that have been implemented and are proposed.

2. A Sustainable Location

- 2.1. By designating Comberton as a Minor Rural Centre it has been identified as one of the most sustainable rural settlements in the District with primary and secondary schools, shops and employment opportunities. All these services and facilities would be within cycling distance of our client's site.
- 2.2. Comberton already has good cycle connectivity with Cambridge being accessible by way of a largely off-road shared path through Barton. The cycle connectivity of Comberton is due to be enhanced once the Comberton Greenway is built out. As the Greenway includes a route to the east of Long Road, opposite our client's site, it would offer a viable alternative to the car for new residents to access Cambridge. As well as to access services and facilities within Comberton and the surrounding villages.
- 2.3. The allocation of our client's site would therefore support the aims of the established hierarchy of settlements by focusing growth on one of the more sustainable Minor Rural Centres in the district. One that in due course will benefit from excellent cycle connectivity with Cambridge and the surrounding villages.

3. Landscape and Green Belt Matters

- 3.1. The Councils' 2021 assessment of the landscape impact resulted in them maintaining their view that the development of our client's site would likely have a negative impact on the surrounding open and rural landscape character.
- 3.2. Notwithstanding, the Councils' previous assessments, the weight attached to the impact of development in the green belt has changed significantly since the 2021 assessment. Specifically, due to the 2024 changes to the NPPF and the introduction of 'grey belt' land as a concept for permitting development in sustainable locations on low-quality land within green belts.
- 3.3. Grey belt is defined in the NPPF as "land in the Green Belt comprising previously developed land and/or any other land that, in either case does not strongly contribute to any of purposes a), b) or d) in paragraph 143". Grey belt excludes land where the application of policies relating the areas or assets in footnote 7 would provide a strong reason for refusal.
- 3.4. An initial assessment of the site indicates that the site does not have a role in restricting sprawl of a large built-up area, preventing neighbouring towns merging into one another or preserving the setting and special character of a historic town. Based on these assessments, there is a strong argument that the site meets the definition of 'grey belt' with regards to the contribution it makes towards the purposes of the green belt.
- 3.5. Following a more detailed assessment, our client is confident that they can demonstrate that the site does not contribute strongly to any of purposes of green belt set out in the NPPF. As such, there is a high degree of probability that a successful argument could be made that the site comprises grey belt land.
- 3.6. Given the established boundary hedges around the perimeter of the site, and Branch Road to the north, the development of the site would result in a well-defined, defensible edge to village. The northern edge would include enhanced landscaping comprising areas of public open space and SUDs to keep built development away from the most sensitive part of the



site. As the landscaping matures, it would inevitably limit views of development on the site. The landscape mitigation that can be delivered on site, alongside an updated assessment of the sites contribution to the green belt, should mean that the impacts of development are not as significant as the Councils have previously stated.

4. Flood Risk

- 4.1. The most recent Flood Risk Officer's comments confirm that the site is wholly in Flood Zone 1. Limited areas of the site are identified as being at risk of surface water flooding. The limited impact of surface water flooding across parts of the site is a known constraint that would inform the layout of the site. Given the size of the site and the density of development proposed, there is the opportunity to deliver an integrated approach to water management with surface water drainage being managed close to its source. A SUDs network could be integrated into any layout in a way that would create amenity benefits, enhance biodiversity, and contribute to a network of high-quality green and blue spaces across the site for the benefit of new and existing residents. Development would inevitably be sequentially located within the site to avoid any homes or road infrastructure being located in areas of flood risk.

5. Ecology

- 5.1. The 2021 RAG Assessment of 'amber' for Biodiversity and Geodiversity appears to be based on the potential for increased pressure on nearby SSSIs. Given that the majority of the site comprises intensively farmed agricultural land, there should be no reason why through an enhancement of existing landscape features a significant increase in biodiversity could not be achieved. Through the provision of landscaped buffers there is also the opportunity to integrate a dog walking route around the perimeter of the site so that new and existing residents had a recreational route near their homes. Which could then mitigate any impacts upon nearby SSSIs. Whilst our client has concerns about the implications of the proposed blanket requirement of 20% BNG across all major developments proposed through draft Policy BG/BG, in the case of their site, it is likely that the Councils' aspiration for 20% BNG could be achieved and even exceeded.
- 5.2. Throughout the Councils' assessment of the site the Policy Officer has confirmed that the site is not part of a protected open space designation and that any impact of the proposed development could be reasonably mitigated or compensated. That remains the case.
- 5.3. In allocating the site for development there is the opportunity to secure the beneficial use of a site that is likely to be identified as grey belt land. The allocation could also secure environmental enhancements that would create a more defined, stronger northern boundary to this part of the village that would not cause harm to the openness of the adjacent land remaining in the green belt.

6. Access

- 6.1. In the 2025 assessment the Councils confirm that the site has adequate accessibility to key local services, transport and employment opportunities. Access to local services and employment opportunities will inevitably increase once the Greenway is built out.



- 6.2. The Site Access Officer confirms that the proposed site access is likely to be acceptable in principle subject to detailed design. Any access onto Long Road would inevitably include a safe crossing for pedestrians and cyclists to access the Greenway to the east of the road. Accordingly, there is no reason to believe that the creation of an acceptable access onto Long Road would represent a constraint to the development of the site.
- 6.3. All other technical matters related to ground contamination, air quality, noise, etc. are either identified as 'green' or 'amber' in previous assessments. There is no reason to believe that any of these matters would represent a constraint to the development of the site.

7. Summary

- 7.1. The development of our client's site would help support the vitality of Comberton through new homes in a location with access to services and facilities within the village. Importantly, they could be delivered early on in the plan period so that less reliance was needed on the early delivery of homes proposed through the increased reliance on strategic scale residential sites.
- 7.2. In this case, there is a strong argument that the development of our client's site offers an opportunity to deliver a holistic approach to the development of the parcel of land to the north of the village that will inevitably be developed in the future. Through taking a holistic approach to growth in this area, and the development of our client's site in particular, the Councils have the opportunity to create new landscaped boundary for the village. One that would define the green belt boundary by creating a defensible edge to the village.
- 7.3. Once further assessments have been carried out, it is likely that our client will be able to demonstrate that their site performs poorly against the purposes of green belt as set out in the NPPF. Since the site was originally promoted, in the early stages of the Local Plan process, the concept of grey belt has become part of national planning policy and is one of the means by which the government seeks to significantly boost the supply of homes in sustainable locations in accordance with paragraph 61 of the NPPF. This significant shift in the national policy to permit more development on sites like our client's means that the development strategy for the Greater Cambridge must be reassessed.
- 7.4. These changes warrant a further review and assessment of the acceptability of the site and the important role it can play in delivering new homes needed for the Greater Cambridge Area.

8. Deliverability

- 8.1. In terms of delivery, the estimated 60-month completion period, following allocation in an adopted Local Plan and the subsequent approval of all necessary planning applications, remains realistic.

9. Specific policies

Housing Need: Policy S/JH: New jobs and homes

- 9.1. The 'Greater Cambridge Employment and Housing Needs Updated 2024–2025 (September 2025)' has informed the housing needs for Greater Cambridge for the period 2024–2045. These needs and the assessment, which broadly aligns with the standard methodology, result in a strategy of 2,295 new homes being delivered per annum to achieve a minimum of 48,195 new homes over the plan period. Of these new homes the Councils' adopted Local Plans (2018) are anticipated to deliver around 37,865 homes by 2045. The additional 13,460 new homes are to be delivered through proposed allocations, heavily predicated on strategic sites, and windfalls sites. Whilst the projected figures would provide an appropriate buffer, there are concerns about the strategy that is being proposed to meet the identified needs and whether it is truly deliverable.
- 9.2. The government's growth aspirations for Greater Cambridge are well documented with the Cambridge Growth Company (CGC) being set up to promote and accelerate growth in the area. The CGC is yet to publish any plans for how it will deliver the government's growth aspirations and what levels of growth it is seeking to promote. It is clear that in order to deliver the growth needs for Greater Cambridge a balance is needed to ensure that delivery rates do not stall due to issues related to specific sites being delayed in their planning or build out phases. This has happened with a number of the sites identified in the 2018 Local Plans, which have failed to deliver the new homes anticipated when they were allocated. It is also clear that given the government's aspirations for Greater Cambridge there is a strong justification for adopting a higher growth scenario than envisioned in the emerging Local Plan. This would also have an implication for the number of new homes proposed to support this growth in locations where new jobs would be created.
- 9.3. Whilst the proposed allocations would deliver a five-year supply of housing, there should be aspiration for a more ambitious target to meet the government's growth targets. This can be achieved through the allocation of further sites on locations where changes to the NPPF make it inevitable that they will otherwise come forward as speculative applications.

Housing Supply: Policy S/DS: Development strategy

- 9.4. Our client supports the principle of focussing development in the most sustainable locations and note that this is identified 'as far as possible' in draft Policy S/DS (Development strategy). Due to site specific issues that may presently be unknown, it may not always be possible for sites allocated for being in the most sustainable locations to come forward. Therefore, the ability to accommodate the growth needs of the Greater Cambridge area around and within Cambridge itself and at the new settlements must be treated with a degree of caution. The emerging Local Plan needs to allow for greater flexibility for interim growth needs to be located on sites well-located to Minor Rural Centres. Such as at our client's site at Comberton. Without a more balanced approach to meeting future housing needs there is a risk that Greater Cambridge will fail to deliver the homes it needs within the plan period. Homes that are essential to support the economic growth aspirations of Greater Cambridge.
- 9.5. Paragraph 23 of the NPPF requires strategic policies to provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over

the plan period. In accordance with paragraph 77 d) of the NPPF, the Councils must make a realistic assessment of likely rates of delivery and take into account the lead-in times for large scale sites. Based on uncertainties surrounding the delivery of Cambridge East and the rate at which Eddington can be delivered, our client is concerned about the rate at which new homes can come forward in the short to medium term. This therefore leads our client to question the development strategy set out in the emerging Local Plan.

- 9.6. The strategy for growth in the emerging Local Plan is predicated on a higher percentage of new homes being delivered through new settlements and urban extensions than was the case with previous Local Plans (44% presently proposed compared to 23% in the adopted Local Plans and 18% in the previous Structure Plan). The withdrawal of funding to relocate the CWWTP and allow North East Cambridge to come forward highlights the risks with this strategy. Whilst the Councils' projections are not reliant on North East Cambridge, the strategy still relies on the delivery other strategic sites that have histories of failing to deliver.
- 9.7. Cambridge East is another site where any further development opportunities are predicated on a third party vacating the site. However, in this case the Councils are taking less of a precautionary approach. Given the well documented history of Marshalls' attempts to relocate their aerospace operations, and the recent announcement that they will not be moving to Cranfield, the projections for further homes on Cambridge East coming forward cannot be relied upon. The development of Marleigh and the land north of Cherry Hinton (Springstead Village) represent the maximum number of homes that can be delivered whilst the airport remains operational. The determination of the outline application for Marleigh (then known as Wing) highlighted the complexities of Marshall relocating its various businesses. Importantly, the cost implications of works to facilities the relocation of Marshall Group businesses triggered a viability review that reduced the percentage of affordable housing and prolonged the planning process. Until plans for the development of Cambridge East align with the commercial needs of Marshalls, the company is unlikely to relocate the airport.
- 9.8. Whilst further development at Eddington would maximise the development potential of the site, housing delivery has lagged behind other fringe sites. Outline planning permission was granted for North West Cambridge in February 2013 for a mixed use development including 3,000 homes. By the time the period had expired for the submission of reserved matters application for residential development, detailed plans for approximately 1,800 of these homes had been approved. Therefore, projections for increased housing delivery through the intensification of the site must be realistic and be based on empirical evidence of the historic build out rates of the site.
- 9.9. The significant delays in the grant of outline planning permission for Bourn Airfield demonstrates the complexities of strategic sites and the length of time they take to go through planning. The outline application was submitted in September 2018 but not approved until July 2024. Whilst this delay was not foreseen, it highlights the complexities of strategic sites in securing planning permissions. Which further highlights the need for a more sites that can add to the vitality and housing needs of Minor Rural Centres to be allocated for development to meet the interim housing needs of Greater Cambridge. Sites, such as our client's, that do not have the complexities of strategic sites.
- 9.10. Of the 13,463 homes identified for the period 2024-2045 only 205 of these would be accommodated in the rural area outside the southern cluster. Given the availability of sites

such as our client's, which can be delivered without the need for major infrastructure upgrade, more flexibility needs to be provided through further allocations to mitigate delays that are inevitable with strategic sites.

- 9.11. In January 2026 the Office for National Statistics released the quarterly figures for the monthly construction output statistics for Great Britain. Total construction output is estimated to have fallen by 1.1% in the three months to November 2025; this is the largest fall since March 2023 (1.4% fall). This latest report highlights the precarious situation that the construction industry is in with increasing material prices and decreasing numbers of people entering the industry. This adds further weight to the argument that a greater range of development sites are needed to meet future housing needs. Rather than relying on larger sites that may face more challenges in getting the volumes of materials and staff needed to maintain projected build out rates.
- 9.12. Without more flexibility and a greater balance between strategic and medium sized sites, the Councils risk failing to maintain a sufficient supply of new homes in the early years of the Local Plan. That could result in the inability to defend appeals for sites in less desirable and less sustainable locations than our client's site at Comberton.

Policy S/SH: Settlement hierarchy and Policy S/DE: Defined development extents

- 9.13. Focusing development only within the defined development extents of settlements is inconsistent with the proposed changes to the NPPF. The changes propose a more flexible approach to the location of development with weight given to sites that are well-related to existing settlements. If the Councils were to adopt a more flexible approach to the development of sites well-related to defined development extents, it would result in greater opportunities for the 6,976 new homes identified to come through on windfall sites to be delivered.
- 9.14. Defined development extents do not necessarily guard against incremental growth in unsustainable locations. Indeed, new homes in demonstrably sustainable locations can be restricted from coming forward due to locations being just outside defined development extents of highly sustainable settlements. Such as on the edges of Minor Rural Centres. Where any harm to the countryside can be mitigated through landscaping and design, such sites should not be restricted in coming forward if they can demonstrate sustainable development. The Councils' approach is not consistent with the proposed changes to the NPPF, which takes a more pragmatic approach to allowing appropriate development where it is well located to existing settlements. This is clearly the direction of travel that the government is taking to significantly boost the supply of new homes in accordance with paragraph 61 of the NPPF.

Recommended change: part 1 of Policy S/DE needs to be amended to read *"Development and redevelopment of unallocated land and buildings within defined development extents, and on land well-related to the defined development extents, (as shown on the Policies Map) will be permitted provided that:"*

Policy S/GB: The Cambridge Green Belt

- 9.15. The government's initial reforms of the NPPF in December 2024 included a modernisation of the way the green belt works. This included the consideration of development being permitted on low-quality green belt land that is identified as 'grey belt'. An initial assessment of our client's site at Comberton indicates that it is likely to be classed as grey belt, as it performs poorly against the purposes of green belt in the NPPF.
- 9.16. Given the importance of grey belt land in the government achieving its aim of significantly boosting the supply of new homes, greater flexibility is needed for more homes to come forward on sites that are well related to Minor Rural Centres.
- 9.17. In light of the significant changes to national policy with regards to development within the green belt, there is the need for the Councils to undertake a thorough green belt review as part of the Local Plan process. This is essential to ensure that the development strategy for Greater Cambridge is based on a sound assessment of the strategy allocating more sites nearer to Cambridge and new jobs. It is inconceivable that the development strategy for an area so tightly constrained by green belt is not supported by an up to date review of the green belt, and the contributions that land parcels within it make to its purposes.
- 9.18. Whilst Policy S/GB follows the themes of the NPPF there is one clear area of divergence. That is in criterion c), which seeks to "*prevent communities in the environs of Cambridge from merging into one another and with the city*". Criterion b) of paragraph 143 of the NPPF relates to preventing neighbouring 'towns' merging into one another. As the environs surrounding Cambridge are villages, draft Policy S/GB needs to be consistent with the NPPF.

Recommended change: criterion c), of Policy S/GB needs to be amended to read "*prevent communities in the environs of Cambridge from merging into one another and with the city.*"

Further recommendation: That a comprehensive review of the green belt be carried out to identify further sites for development in sustainable locations that can be delivered without harm to the purposes of land being designated as green belt.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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