

30 January 2026  
CAPL/436380/NW/JB



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Dear Sir / Madam,

**RESPONSE TO GREATER CAMBRIDGE REGULATION 18 LOCAL PLAN CONSULTATION  
LAND SOUTH OF ST NEOTS ROAD AND WEST OF HOWELLS WAY, HARDWICK, CAMBRIDGESHIRE**

Savills (UK) Ltd is instructed by Pigeon to submit representations in response to the Greater Cambridge Local Plan Regulation 18 consultation for the continued promotion of Land West of Howells Way, Old St Neots Road, Hardwick, for residential development.

This stage of the Local Plan Review provides the opportunity to comment on the Draft Local Plan before it is considered further and finalised for the next stage (Regulation 19) which will be subject to further consultation in summer / autumn 2026 (as per the Local Development Scheme dated November 2025).

In its current form, the Draft Local Plan does not provide sufficient evidence to demonstrate that it would meet the tests of soundness as set out at Paragraph 36 of the NPPF (positively prepared, justified, effective, consistent with national policy) (December 2024; as amended February 2025). It is considered that the Council's Development Strategy is flawed and unsound such that it should be amended with further site allocations made for suitable, available, and deliverable sites in sustainable village locations.

**Pigeon**

Pigeon is a multi-disciplinary property company based in Bury St Edmunds and operating across the Eastern region and beyond which specialises in high quality landscape and design led sustainable development.

Pigeon has considerable experience and expertise in promoting successful, sustainable residential developments across Cambridgeshire; and are committed to delivering schemes in a timely fashion to bring to fruition much-needed homes that people want to live in.

**Land South of St Neots Road and West of Howells Way, Hardwick**

Land South of St Neots Road and West of Howells Way (The Site) has previously been promoted on behalf of Pigeon in response to the Call for Sites exercises in 2019 and 2025. The Site is being promoted again via the Greater Cambridge Local Plan Regulation 18 consultation to highlight the continued suitability and availability of the site as a whole. In particular, we wish to highlight the opportunity for further enhancement of Hardwick, especially in the context of the recent development immediately adjacent to the site to the east, as well as separate proposals for transport enhancements including East-West Rail and the Cambourne to Cambridge busway and active travel route.

The Site extends to circa. 6.7 hectares of paddock / scrub land on the western edge of Hardwick, adjoining Meridian Close and frontage residential development along this length of St Neots Road, approximately 8km to the west of Cambridge. The Site is situated beyond the Green Belt that surrounds Cambridge, and is well-related to the existing built form of Hardwick. The Site comprises generally flat land and the Site is well contained in landscape terms; with mature boundaries comprising hedgerow and belts of deciduous trees to the south, east, and west.





Immediately adjacent to the east is the Hill Residential scheme of 155 dwellings (known as Capstone Fields) which was granted outline planning permission in August 2018, and has subsequently been built out. To the southwest and south are extensive agricultural fields.

The Site is promoted for residential development of approximately 140 dwellings, public open space, and biodiversity enhancements with associated infrastructure. This Site represents a suitable opportunity to secure sustainable residential development comprising both market and affordable homes within the settlement of Harwick.

The Site is available now and can deliver from Year 1 of the new Local Plan once adopted.

Our response to the consultation seeks to inform the preparation of the Greater Cambridge Local Plan and are set out below in relation to specific policies / sections of the Local Plan.

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

The Regulation 18 Draft Local Plan sets out the development needs for Greater Cambridge; aiming to deliver 73,300 additional jobs and a minimum of 48,195 new homes across the period of 2024-2045.

Our client, Pigeon, objects to Draft Policy S/JH as currently proposed on the basis that the development needs identified do not reflect the major growth ambitions in and around Cambridge, in addition to an insufficient housing supply buffer that fails to provide flexibility and assurance of delivery.

For many years, Cambridge has proved a nationally and internationally significant intellectual hub centred around academic excellence, research and innovation. The UK Government has therefore continually emphasised its strong ambitions for Cambridge, both in terms of housing delivery and economic growth. The Case for Cambridge<sup>1</sup> (March 2024) sets out that the life sciences and healthcare industry in Cambridge alone employs nearly 23,000 people with a turnover of £9 billion, and that building 150,000 new homes by 2050 could add £6.4 billion to the economy.

The national focus on Cambridge is therefore clear. The establishment of the Cambridge Delivery Group in 2023 to drive forward the vision for Cambridge in collaboration with local partners, and the Cambridge Growth Company in 2024 to address barriers to growth and help unlock the area's full potential only further demonstrate the desire for growth in Cambridge.

Despite the strong growth agenda for Cambridge, it is considered that the housing targets proposed, as set out at Draft Policy S/JH, are not ambitious enough. It is noted that the Standard Method housing scenario is considered to represent the objectively assessed need in Greater Cambridge, as detailed within the Development Strategy Topic Paper<sup>2</sup> and the Greater Cambridge Employment and Housing Needs Update 2025<sup>3</sup>. Whilst it is welcomed that the revised Standard Method calculation identifies a significantly higher number of homes than the previous calculation (2,295 per annum rather than 1,769 per annum), this approach suggests that Greater Cambridge are content with pursuing only their minimum housing requirement.

Similarly, the Greater Cambridge Employment and Housing Needs Update 2025 identified that a central scenario is considered the most likely outcome for employment growth, rather than a higher scenario. This central scenario would see approximately 73,200 additional jobs in Greater Cambridge by 2045, as opposed to 90,900 additional jobs with the higher scenario. Paragraph 3.74 of the Development Strategy Topic Paper states that "this alternative was rejected as the higher jobs forecast could be possible, but is not the most likely

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[https://assets.publishing.service.gov.uk/media/65f1d8edff11704896615973/The\\_Case\\_for\\_Cambridge\\_March\\_2024.pdf](https://assets.publishing.service.gov.uk/media/65f1d8edff11704896615973/The_Case_for_Cambridge_March_2024.pdf)

<sup>2</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/TPGCLPDGCLPSTPDec25.pdf>

<sup>3</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/EBGCLPDGCEHNEUDec25.pdf>

future scenario. As such we do not consider that it represents our objectively assessed need, and would therefore not be a reasonable alternative”.

As shown in the table below, when compared to the First Proposals Draft, Greater Cambridge is now proposing 8.7% more homes on an annual basis. This is in the context of a Standard Method which has increased by almost 30% as outlined in the Consultation Strategy Topic Paper. At the same time, the latest Draft Plan proposes around 25% more jobs across the plan period, meaning there is an increasing disparity between the relatively ambitious jobs target and a less ambitious housing target.

**Table 1: Comparison of First Proposals and December 2025 Consultation Draft:**

	Homes Proposed	Annual Requirement	Versus Standard Method of...	Jobs
First Proposals (2021)	44,400 (or 48,840 incorporating the 10% buffer proposed)	2,111/annum	1,769 (+19% on the SM figure excl. buffer)	58,500 jobs
Regulation 18 December 2025	48,195 (or 51,328 incorporating the 6.5% buffer proposed)	2,295/annum	2,295 (+0% on the SM figure excl. buffer)	73,300 jobs
Difference in 2025 versus First Proposals	+8.5% (or 5% when incorporating the buffers proposed)	+8.7%	-	+25%

Our client, Pigeon, is disappointed to see that both proposed housing delivery and employment growth figures seem to adopt a safe position in only setting minimum targets despite the significant focus on Cambridge as a sustainable growth location. Supporting text to Draft Policy S/JH (Paragraph 2.8) even itself acknowledges *“the continuing strength of the nationally important Greater Cambridge economy”* which *“provides justification for exploring higher employment and related housing figures”*. It is proposed that Greater Cambridge should be planning for higher numbers of homes beyond the minimum Standard Method, and a higher number of jobs given the national level significance of Cambridge to the UK Economy.

Further to the need to aim beyond the mandatory housing target, the proposed buffer of 6.5% (excluding the relocation of the Cambridge Waste Water Treatment Plant) is not deemed sufficient to provide flexibility, assurance or security over housing delivery.

Specific comments on Appendix E: Housing trajectory and five year housing land supply calculation are detailed in a separate representation, however, a buffer as small as 6.5% offers little room for unforeseen delays or non-delivery of allocated sites, and presents the risk of being unable to demonstrate a five year housing land supply.

In Greater Cambridge, this is particularly prevalent given the strong focus on bringing forward existing commitments and proposing new strategic sites. The Regulation 18 Draft Local Plan identifies new strategic allocations including, but not limited to, Cambourne North (13,000 homes and 108,000sqm of employment space), Cambridge East (Airport site) (8,000 homes and employment land), Grange Farm (A11 / A1307) (6,000 homes and logistics space), and Wellcome Genome Campus (1,500 homes and expanded R&D facilities). This large dependency and somewhat overreliance on strategic sites could result in significant under delivery in the face of any challenges, particularly as many of these sites are subject to infrastructure delivery constraints.

To mitigate this approach and provide greater confidence in housing delivery across the district, Pigeon would suggest that a buffer of over 10% and preferably circa 15-20% above the Standard Method figure. Such a buffer would provide the authority with increased flexibility decreasing the potential for under delivery in light of any delays with the delivery of the large number of strategic sites / new settlements. This would therefore reduce the risk that Greater Cambridge are unable to demonstrate a five year housing land supply or that they would fail to meet the identified housing requirement for the Plan period in full with the danger that this could further hold back the local economy.

### **Policy S/DS: Development Strategy & Key Diagram**

Our client, Pigeon, objects to Draft Policy S/DS on the grounds that it is not positively prepared or justified when considered against the reasonable alternatives and evidence available.

Draft Policy S/DS sets out the proposed strategy for the pattern, scale, and design quality of growth across the district. The order of preference set out in Draft Policy S/DS is as follows:

- a) *“Within the Cambridge urban area;*
- b) *On the edge of Cambridge;*
- c) *At an expanded Cambourne;*
- d) *At other new settlements; and*
- e) *In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres”*

These categories provide a clear structure and a sustainable guide as to where development should be located within the district, which is generally supported by our client, Pigeon.

This development strategy places significant emphasis on strategic scale allocations for housing delivery, either carrying forward existing commitments from the adopted Plans or new settlements as identified in the emerging Local Plan. Of the 48,195 homes to be delivered across the period 2024 to 2045, circa 79% (37,865) are proposed to be delivered via currently planned development, including adopted allocations, existing permissions, and windfall allowance; a significant proportion of which comprise large strategic sites. The Regulation 18 Draft Local Plan also identifies new strategic allocations including, but not limited to, Cambourne North (13,000 homes and 108,000sqm of employment space), Cambridge East (Airport site) (8,000 homes and employment land), Grange Farm (A11 / A1307) (6,000 homes and logistics space), and Wellcome Genome Campus (1,500 homes and expanded R&D facilities).

The identification of new settlements alongside existing commitments highlights the clear approach adopted by Greater Cambridge to rely on strategic development in order to deliver housing across the district. Particularly, it is noted that these existing and new strategic scale allocations are proposed at Draft Policy S/DS point 2 to *“meet the majority of the development needs to 2045 and beyond”*.

Our client, Pigeon, appreciates that there is a need to identify strategic sites as they are capable of delivering large numbers of homes and making a meaningful contribution to meeting identified development needs. However, there appears to be an overreliance on strategic sites within the Draft Local Plan, which is not sufficiently flexible or sustainable. Placing significant dependence on strategic sites ultimately risks under delivery in the face of any challenges, particularly as many of these strategic sites are subject to infrastructure delivery constraints.

Indeed, it is evident from the Draft Plan that a total of 44% of the identified need is proposed to be delivered through new settlements, up from 23% in the 2018 Plans. The Plan therefore concentrates development on the New Settlements at the expense of every other location across Greater Cambridge. This position is summarised in Table 2 below. In contrast, there has been a decrease in the proportion of dwellings proposed to be delivered within the Rural Area (including through windfalls) – falling from 23% in the 2018 Plans, to just 16% in the proposed draft.

**Table 2: Table Summarising the Proposed Approach to Allocations**

	Adopted Local Plans	First Proposals	December 2025 Regulation 18 Draft	Percentage Point Difference versus Adopted Plans (and First Proposals)
Cambridge Urban Area (incl. Windfalls)	19%	20%	11%	-8 (-9)
Edge of Cambridge	35%	24%	29%	-6 (+5)
New Settlements	23%	38%	44%	+21 (+6)
Rural Area (incl. Windfalls)	23%	18%	16%	-7 (-2)

A more appropriate balance must therefore be struck between large strategic sites and smaller scale allocations across other settlements and existing village locations. It is recognised that Greater Cambridge “did not identify any additional sites that would not cause a level of harm...considered justified in the context of other available options” and that they “do not consider villages to be a reasonable option for meeting a substantive amount of our additional need for homes” (Development Strategy Topic Paper<sup>4</sup>, Paragraph 5.59).

Whilst it is acknowledged that villages are not able to meet a substantive amount of housing numbers, they still form a fundamental aspect of delivery and should therefore not be overlooked within the development strategy. As set out at Paragraph 83 of the NPPF (December 2024; as amended February 2025), housing should be located where it will enhance and maintain rural communities, and planning policies should identify opportunities where villages can grow and thrive. By seemingly overlooking rural locations for development, the development strategy risks undermining the vitality and sustainable growth of village settlements.

Supporting text (Paragraph 2.43) to Draft Policy S/DS sets out that 4,820 homes are to be delivered on sites of up to one hectare, in line with national planning policy which requires at least 10% of the overall housing requirement to be delivered on sites no larger than one hectare (Paragraph 73, NPPF, December 2024; as amended February 2025). Of the 48,195 homes to be delivered across 2024 to 2045, only 3.5% (1,694 homes) have been specifically identified. The remaining 6.5% are proposed to be delivered via windfall development, which again highlights the significant reliance on large strategic sites.

The role of small-to-medium sites is increasingly recognised by UK Government. In May 2025, the Government published a ‘Reforming Site Thresholds’ working paper<sup>5</sup>, which proposed a new definition of ‘medium’ development of 10-49 units and up to one hectare. The aim of this proposal was to simplify planning requirements for smaller scale development and ensure a more targeted and proportionate approach across different scales of development. This proposal reflects a shift at the national level, which should be better reflected within local policy to ensure that a range of deliverable sites are identified. It would therefore be prudent to diversify the housing trajectory to incorporate more small and medium allocations, which could contribute to ensuring a more robust housing supply across the plan period.

The need to consider rural locations for housing is particularly prevalent given the clear transport ambitions across the district, including a new travel route between Cambourne and Cambridge and a new travel hub at Scotland Farm as proposed by the Greater Cambridge Partnership, and continued discussions surrounding

<sup>4</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/TPGCLPDGCLPSTPDec25.pdf>

<sup>5</sup> <https://www.gov.uk/government/publications/planning-reform-working-paper-reforming-site-thresholds/planning-reform-working-paper-reforming-site-thresholds>

East-West Rail. These proposed schemes will enable better connectivity of surrounding settlements to Cambridge, and will provide sustainable commuting opportunities across the district. The commitment to deliver these enhanced transport schemes is welcomed, however, the decision not to allocate significant development in surrounding settlements is considerably misaligned.

From a delivery perspective, the new settlements proposed should be supported by additional smaller scale allocations across sustainable village locations to create a more balanced housing land supply which mitigates the risk of delayed delivery from the new settlements and would mean a wider range of housing needs across the whole area whilst also addressing the inadequate housing supply buffer previously referred to. Ultimately, this would ensure a more balanced and flexible development strategy that would give greater assurance of delivery.

### **Policy S/SH: Settlement Hierarchy**

Draft Policy S/SH sets out the groupings of settlements into categories that reflect their scale, characteristics, and sustainability. The settlement hierarchy is proposed to direct housing to the most sustainable locations and control windfall development in the least sustainable locations, and is as follows:

1. *Cambridge*
2. *Towns*
3. *Rural centres*
4. *Minor rural centres*
5. *Group villages*
6. *Infill villages*

Our client, Pigeon, objects to this draft policy, particularly in relation to the indicative limits on the scale of housing developments identified, which do not ensure the continued vitality of villages or recognise their sustainability in contributing to proportionate and controlled housing growth. As a result of the proposed hierarchy, Draft Policy S/SH is not considered to be positively prepared or justified.

As set out at Paragraph 83 of the NPPF (December 2024; as amended February 2025), housing should be located where it will enhance and maintain rural communities, and planning policies should identify opportunities where villages can grow and thrive. However, as currently drafted, Policy S/SH is hugely restrictive and risks undermining the vitality and sustainable growth of village settlements by placing somewhat arbitrary limits upon housing development.

In Minor Rural Centres, for example, an 'indicative' maximum of 30 dwellings will be supported. Similarly, in Group Villages, an 'indicative' maximum of 8 dwellings will be supported. In Group Villages, development may exceptionally consist of up to 15 dwellings, but only where this would make the best use of a single brownfield site. In Infill Villages, an 'indicative' maximum of 2 dwellings will be supported, and in very exceptional circumstances a slightly larger development of no more than 'about' 8 dwellings may be permitted.

Whilst all of these indicative housing limits are considered restrictive, the 8 dwelling limit in Group Villages is deemed particularly detrimental as it would prevent affordable housing delivery, which is typically only secured through schemes of 10 or more dwellings (as per the adopted Local Plans and Draft Policy H/AH).

Equally, whilst supporting text states that Group Villages are generally less sustainable with fewer services and facilities than Rural Centres and Minor Rural Centres, they are still able to support the daily requirements of their residents and as per Paragraph 83 of the NPPF (December 2024; as amended February 2025), provisions should be made to ensure that these village settlements can continue to grow, thrive, and support local communities.

As detailed within the Development Strategy Topic Paper<sup>6</sup>, concerns have been raised previously regarding the overly prescriptive policy approach which limits the potential for growth, especially in Group Villages. It is considered that these concerns still stand as the 'indicative' limits upon development will result in small, piecemeal development which will fail to ensure the continued vitality of rural communities.

These somewhat arbitrary limits are not justified nor consistent with national planning policy, and only restrict sustainable growth in villages rather than encouraging it.

### **Policy S/DE: Defined Settlement Limits**

Draft Policy S/DE defines the boundaries of settlements for planning purposes. Our client, Pigeon, objects to this policy in its current form as it is not positively prepared or justified due to the lack of flexibility.

Specifically in relation to Hardwick, the defined settlement limits, as illustrated on the Draft Policies Map, are considered to be overly rigid and do not accurately reflect the built-form. This is contrary to Draft Policy S/DE, of which supporting Paragraph 2.132 states that *“defined development extents define where policies for the built-up areas of settlements give way to policies for the countryside”*. This will be discussed further in relation to the Draft Policies Map, however to summarise, Pigeon contend that Greater Cambridge should review the defined settlement limits at Hardwick so that they better reflect the built form of the settlement.

Moreover, outside of defined development extents, Part 2 of Draft Policy S/DE states that by default, development will not be permitted except for:

- a) *“Allocations made within Made Neighbourhood Plans;*
- b) *Rural Exception sites meeting local need for affordable housing;*
- c) *Development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside; or*
- d) *Where development is supported by other policies in this plan.”*

It is considered that the wording at Part 2 is fairly restrictive and inflexible, and thus makes it challenging for windfall sites to come forward. This problem is exacerbated by the lack of residential allocations in village settlements. In its current form, this policy therefore does not support the sustainable development of well-related village settlements, such as Hardwick. As such, this policy is contrary to Paragraph 83 of the NPPF (December 2024; as amended February 2025) which aims to support the continued sustainable growth and vitality of rural communities.

Hardwick is considered to be a highly sustainable rural location. The settlement benefits from the following community facilities and services: Hardwick Primary School; Hardwick Play Park; Post Office / Convenience Store; and a series of local shops, hairdressers, a restaurant, a cafe, and a gym.

In terms of accessibility, Hardwick benefits from suitable access to Cambridge City Centre and the surrounding area. The village is currently served by a regular bus service, Stagecoach 4. This provides buses every 20 minutes from 6.12am until 8.12pm followed by a hourly evening service through Monday to Saturday running between Cambourne and Cambridge. There is a reduced service on Sundays. This bus service can be used for commuting and access to major retail and leisure destinations both in Cambourne and Cambridge. The Cambridge Rail Station has trains running to London, Ely, Peterborough, and by connection to the rest of the country.

The Greater Cambridge Partnership are currently proposing a new travel route between Cambourne and Cambridge, to include a bus route via Hardwick (amongst other locations); a new travel hub at Scotland Farm, Dry Drayton; and, a new path for walkers, cyclists and horse riders. The Scotland Farm travel hub is located circa. 450 metres from the site, across the A428. According to the Greater Cambridge Partnership, the Scotland Farm site will host 2,000 car parking spaces, 300 cycle parking spaces, a small building providing shelter, seating, passenger information, and toilets, and LED lighting will be integrated throughout the site. There is an

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<sup>6</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/TPGCLPDGCLPSTPDec25.pdf>

existing 'Local Cycle Route' to the north of the site, along St Neots Road.

Whilst no application has yet come forward for the East-West Rail, the proposed route is located within close proximity to the south of the site, and a new East-West Rail Station is proposed at Cambourne, less than 5km from Hardwick, approximately 15 minute cycle ride from the Site. The proposals for both East-West Rail and Cambourne to Cambridge will complement each other, providing more travel options for those travelling west of Cambridge; therefore enhancing existing accessibility of Hardwick.

Hardwick is also well positioned in relation to the existing highway network with links to the A428, and then beyond to the A1, A10, A14, and M11.

Given that Hardwick has a range of key local services and facilities, is easily accessible to Cambridge to the east, and is one of the focal locations for forthcoming major transport and infrastructure projects, it is considered that Hardwick can support additional residential development within the emerging plan period, specifically at Land South of St Neots Road and West of Howells Way, Hardwick.

Pigeon therefore contend that Greater Cambridge should update the Draft Policy wording to allow for greater flexibility in terms of development outside of defined boundaries where there is unmet local housing need, particularly when village settlements such as Hardwick provide suitable and appropriate opportunities for sustainable development. As a minimum, allowances should be made for development outside of, but adjacent to, settlement boundaries, to enable the continued sustainable growth and vitality of village settlements, as per Paragraph 83 (NPPF, December 2024; as amended February 2025).

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

Draft Policy S/RRA allocates specific sites within the rest of the rural area to meet the development needs across the district. Our client, Pigeon, objects on the basis that the housing allocations identified are insufficient to meet local housing needs in villages, and further, that it omits 'Land South of St Neots Road and West of Howells Way, Hardwick' for residential development.

It is considered that the housing allocations identified are not aligned with the settlement hierarchy in terms of distribution and scale of development. As mentioned elsewhere, there is a strong focus within the Draft Local Plan on the delivery of strategic sites. Whilst it is recognised that strategic sites are capable of delivering large numbers of homes and making a meaningful contribution to meeting identified development needs, the proposed allocations are somewhat top-heavy and concentrated at the higher tiers of the settlement hierarchy. This reliance on large strategic sites is not deemed sufficiently flexible or sustainable and placing significant dependence on such sites risks under delivery in the face of any challenges, particularly as many of these sites are subject to infrastructure delivery constraints.

A more appropriate balance must therefore be struck between large strategic sites and smaller scale allocations across other settlements and existing village locations. It is recognised that Greater Cambridge "*did not identify any additional sites that would not cause a level of harm...considered justified in the context of other available options*" and that they "*do not consider villages to be a reasonable option for meeting a substantive amount of our additional need for homes*" (Development Strategy Topic Paper<sup>7</sup>, Paragraph 5.59). Whilst it is acknowledged that villages are not able to meet a substantive amount of housing numbers, they still form a fundamental aspect of delivery and should therefore not be overlooked within the development strategy. As set out at Paragraph 83 of the NPPF (December 2024; as amended February 2025), housing should be located where it will enhance and maintain rural communities, and planning policies should identify opportunities where villages can grow and thrive. By seemingly overlooking rural locations for development, the development strategy risks undermining the vitality and sustainable growth of village settlements.

Land South of St Neots Road and West of Howells Way, Hardwick (The Site) is not allocated and is situated just outside of the defined development extent of Hardwick, but presents a logical extension to the village of

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<sup>7</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/TPGCLPDGCLPSTPDec25.pdf>

Hardwick that is suitable, available, and deliverable.

The Site has previously been promoted on behalf of Pigeon in response to the Call for Sites exercises in 2019 and 2025. The Site is being promoted again via the Greater Cambridge Local Plan Regulation 18 consultation to highlight the continued suitability and availability of the site as a whole. In particular, we wish to highlight the opportunity for further enhancement of Hardwick, especially in the context of the recent development immediately adjacent to the site to the east, as well as separate proposals for transport enhancements including East-West Rail and Cambourne to Cambridge travel route.

The Site extends to circa. 6.7 hectares of paddock / scrub land on the western edge of Hardwick, adjoining Meridian Close and frontage residential development along this length of St Neots Road, approximately 8km to the west of Cambridge. The Site is situated beyond the Green Belt that surrounds Cambridge, and is well-related to the existing built form of Hardwick. The Site comprises generally flat land and the Site is well contained in landscape terms; with mature boundaries comprising hedgerow and belts of deciduous trees to the south, east, and west.

Immediately adjacent to the east is the Hill Residential scheme of 155 dwellings at Capstone Fields which was granted outline planning permission in August 2018, and has subsequently been built out. This site is also located outside of the settlement boundary of Hardwick but was deemed to be an appropriate and sustainable development by the Council. Given the location of Land South of St Neots Road and West of Howells Way immediately adjacent to the built form of Hardwick, the existing services and facilities in the village, and the existing and proposed enhancements to public transport connectivity, it is considered that Hardwick can support further development to encourage sustainable and natural growth.

The Site is promoted for residential development of approximately 140 dwellings, public open space, and biodiversity enhancements with associated infrastructure. This Site represents a suitable opportunity to secure sustainable residential development comprising both market and affordable homes within the settlement of Hardwick.

The Site is available now and can deliver from Year 1 of the new Local Plan once adopted.

Below is an extract from the 2025 HELAA site assessments demonstrating how Land South of St Neots Road and West of Howells Way, Hardwick was assessed, alongside comments from the promotion team.

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Response
Adopted Development Plan Policies RAG (2025)	Amber	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.	<p>A planning application is being prepared in relation to the Land South of St Neots Road and West of Howells Way site. The application considers that the proposals provide for the delivery of much needed homes within the District, as well as demonstrating limited harms and showing compliance with local and national policy.</p> <p>On the basis that the planning submission is compliant with local and national policy, it is considered that the assessment should be updated to <b>Green</b>.</p>

Flood Risk RAG Assessment (2021)	Amber	<p>The site is within flood zone 2 (taking into account climate change) and / or is within an area at high, medium or low risk from surface water flooding.</p>	<p>The Site is located wholly in Flood Zone 1, which has the lowest probability of flooding. The Site also has very low chances of flooding from surface water.</p> <p>A Flood Risk Assessment has been prepared as part of the planning application which confirms this position.</p> <p>It is therefore considered that the HELAA assessment is inaccurate, and should be updated to <b>Green</b>.</p>
Landscape RAG Assessment (2025)	Amber	<p>A written, unillustrated landscape and visual appraisal has been submitted along with a proposed masterplan. The additional information does not change the RAG assessment. The location of the site on the edge of Hardwick and the open landscape to the south mean that previous comments on the requirements for landscape enhancements and mitigation still apply.</p> <p>Also of relevance are comments from 2023 and 2021:</p> <p>2023 – Additional comments reply to the previous assessment scoring. As previously noted, mitigation measures would need to be introduced to ensure development of the site does not have an adverse impact on the landscape character of the area. Therefore no change the RAG assessment of this site is proposed as additional landscape enhancements would be required to overcome development impacts.</p> <p>2021 – The key constraints are that the site is outside of the development, and not adjacent to it either where a village extension may be justified. The woodland adjacent to the site proposes an opportunity for neighbouring amenity space or pleasant views. Development to be sited close to the existing built area to maintain open views of the landscape. Landscape mitigation needed to minimise adverse impacts.</p>	<p>An updated Landscape and Visual Impact Assessment (LVIA) has been prepared to support the forthcoming planning application. This LVIA considers that the Site contributes partially to the local landscape character on the basis that the land is an open field and only some of its attributes are representative of local landscape character. At the same time, the Site is contained by woodland and existing residential development beyond the site boundaries and is influenced by urbanising features and land use, which temper the character at the settlement edge.</p> <p>In particular, the Hill Residential scheme of 155 dwellings (known as Capstone Fields) immediately adjacent to the site to the east was granted planning permission in August 2018 and has since been built out. It is considered that this scheme is situated within the same landscape context, and was deemed acceptable by the Council.</p> <p>The proposals for the Site incorporate significant green buffers along the southern and western boundaries helping to mitigate the landscape and visual impacts and assimilate development into the wider landscape. Landscape proposals will be developed in further detail as part of planning conditions on any approval.</p> <p>It is therefore considered that the assessment should be updated to <b>Green</b>.</p>
Biodiversity and Geodiversity RAG Assessment (2023)	Amber	<p>No additional information has been provided in relation to ecology impacts, mitigation and Biodiversity Net Gain</p>	<p>It is considered that this assessment is out of date.</p>

		<p>and therefore there is no change to the site assessment scoring.</p> <p>Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.</p> <p>Also of relevance are comments from 2021:</p> <p>All new housing developments will require assessment of increased visitor pressure on nearby SSSI. There are no apparent priority habitats within the site; however, there are grasslands, woodland areas, hedges, and wooded boundaries on site that are likely to have an ecological value. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find offsite compensation to comply with up-coming National legislation and developing local policies.</p> <p>Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.</p>	<p>Pigeon have conducted extensive technical investigations on the site. In accordance with legislative requirements, the proposed scheme will deliver a minimum of 10% biodiversity net gain.</p> <p>Full details of the proposed biodiversity enhancements will come forward at any Reserved Matters stage.</p> <p>A further assessment of this site is therefore required.</p>
Policy RAG Rating (2021)	Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	<p>The assessment is welcomed.</p> <p>It is deemed that there is no change on site that would alter this assessment, and therefore the assessment should remain <b>Green</b>.</p>
Historic Environment RAG Assessment (2023)	Green	The additional information has not changed the RAG rating which was green. There will be no detrimental impact on any heritage assets as there are none close to the site.	<p>The assessment is welcomed.</p> <p>It is deemed that there is no change on site that would alter this assessment, and therefore the assessment should remain <b>Green</b>.</p>
Archaeology RAG Assessment (2025)	Amber	<p>The assessment for the site remains unchanged as amber. Investigations will be necessary in advance of development.</p> <p>Also of relevance are comments from 2021:</p>	<p>Pigeon have commissioned the completion of a Desk-Based Heritage Statement. The report concludes that there are no heritage constraints that would preclude the site's proposed development, but it is anticipated that further archaeological works are required to establish the presence or absence of archaeological remains.</p>

		<p>Iron Age settlement recorded to the north of the site.</p>	<p>As per previous consultations with the County Council, further archaeological investigation should be undertaken following the grant of planning permission due to current site constraints.</p> <p>It is therefore deemed acceptable that the assessment is <b>Amber</b>.</p>
<p>Accessibility RAG Assessment (2025)</p>	<p>Amber</p>	<p>Adequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.</p>	<p>The assessment summary is welcomed. The Site is a highly sustainable location, readily accessible to a range of essential shops and services within Hardwick and beyond.</p> <p>In particular, we wish to highlight the opportunity for further enhancement of Hardwick, especially in the context of the recent development immediately adjacent to the site to the east, as well as separate proposals for transport enhancements including East-West Rail and the Cambourne to Cambridge busway and active travel route.</p> <p>Therefore, the RAG assessment should be updated to <b>Green</b>.</p>
<p>Site Access RAG Assessment (2023)</p>	<p>Red</p>	<p>Based on the new information provided, the site access assessment remains unchanged. The proposed site is unacceptable. If over 100 dwellings, two points of access are required to accord with the advice of the Cambridgeshire Fire and Rescue. Also, the red line drawing and access drawing are not consistent.</p>	<p>The assessment is out of date. The proposed vehicular access is to be located on St Neots Road. Pigeon have undertaken discussions with the Highway Authority that confirm that the incorporation of a 4m wide shared footway and cycleway adjoining the proposed access can be used for Emergency Access purposes and that accordingly, the proposed access arrangements are acceptable in principle.</p> <p>These proposals have also been discussed and agreed with the Fire and Rescue Service and Ambulance Service.</p> <p>A Transport Assessment has been drafted to support the forthcoming planning application, which sets out that the proposed access is capable of supporting two-way vehicle movements, in line with Cambridgeshire Highways Development Management (2023).</p> <p>This Transport Assessment also concludes that the proposed development is not considered to have a</p>

			<p>detrimental impact on the operation or safety of the local highway network.</p> <p>Please also find attached an updated access proposal plan, following discussion with the Highway Authority referenced above, showing emergency access arrangements.</p>
Transport and Roads RAG Assessment (2023)	Amber	<p>Based on the additional information provided there is no change to the assessment score as it will need to provide high quality local non motorised user routes linking C2C and Cambridge to Cambourne cycleway. There are also potential impacts on the A428 which may require mitigation.</p> <p>Also of relevance are comments from 2021:</p> <p>Any potential impact on the functioning of trunk roads and / or local roads could be reasonably mitigated.</p>	<p>The proposals provide enhanced footpath and cycle connections onto St Neots Road which would potentially link in with the proposed C2C footpaths to the north and ensuring integration with these proposed public transport and active travel enhancements.</p> <p>Other pedestrian and cycle routes are proposed within the site with potential to link with surrounding networks.</p> <p>This Transport Assessment also concludes that the proposed development is not considered to have detrimental impact on the operation or safety of the local highway network.</p>
Noise, Vibration, Odour and Light Pollution RAG Assessment (2023)	Amber	<p>New information provided has not changed the assessment. Detailed site specific assessments will be required for any future planning applications at this location.</p> <p>Also of relevance are comments from 2021:</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>Detailed technical work relating to noise, vibration, odour, and light pollution has been prepared in relation to the forthcoming planning application and identifies no significant issues subject to incorporation of standard mitigation including adherence to a CEMP during the construction phase.</p>
AQMA RAG Assessment (2023)	Green	<p>The additional information provided does not significantly affect air qualities issues or mitigation. Therefore the assessment of the site remains unchanged since the original assessment. The site does not lie within an AQMA and there will be minimal impact on AQMA.</p>	<p>The assessment is welcomed.</p> <p>It is deemed that there is no change on site that would alter this assessment, and therefore the assessment should remain <b>Green</b>.</p>
Contaminated Land RAG Assessment (2023)	Amber	<p>The additional information provided does not significantly affect environmental health issues or mitigation. Therefore the assessment of the site remains unchanged since the original assessment as this is a site</p>	<p>Based on the findings of a preliminary risk assessment, no significant contaminant sources have been identified. A Contaminated Land Assessment has been conducted which</p>

		previously in agricultural use with the potential for historic contamination and planning conditions will be required.	recommends that a Discovery Strategy is implemented during any development. It is anticipated that this can form the basis of a planning condition.
Available RAG	Amber		The Site is available now and can deliver new housing within the first 5 years of the new Local Plan being adopted. It is therefore considered that the assessment should be updated to <b>Green</b> .
Achievable RAG	Green		The assessment is welcomed. It is deemed that there is no change on site that would alter this assessment. The site is achievable and therefore the assessment should remain <b>Green</b> .

Pigeon therefore contend that the omission of Land South of St Neots Road and West of Howells Way fails to recognise Hardwick’s accessible location, good existing service provision, and both existing and proposed transport enhancements.

**Appendix E: Housing Trajectory**

The Regulation 18 Plan outlines how the Council intends to deliver a minimum of 48,195 new homes between 2024 and 2045. After reviewing the delivery assumptions in Figure E1 (‘Anticipated Completions 2024 - 2025’) of the Consultation Plan, Pigeon considers the projected delivery rates to be unrealistic.

Savills’ assessment of the current 5YHLS position in Greater Cambridge confirms that the Councils cannot demonstrate a five-year supply of housing land. The proposed trajectory in Appendix E of the consultation plan does not materially change this assessment. Accordingly, Savills’ view is that, if adopted as currently proposed, the Council will be unable to demonstrate a sufficient supply of housing land upon adoption of the new Plan. Savills estimate that the housing land supply upon adoption would likely be in the region of circa 4 years’, leaving Greater Cambridge open to speculative development to address the shortfall.

The projected shortfall is primarily due to unrealistic delivery assumptions at several key strategic sites. These include Northstowe, Waterbeach, and Bourn Airfield, and extend to other large allocations that lack clear evidence of delivery commencing within the five-year period.

To ensure that Greater Cambridge’s five-year housing land supply upon adoption is secure, the Councils should allocate further land for development, focusing on sites that do not require significant additional infrastructure before housing delivery can commence. In practice, this will mean allocating small-to-medium sized sites which can start to deliver early in the Plan period.

Pigeon considers that the site at Land South of St Neots Road, and West of Howells Way, Hardwick can deliver early in the Plan period to ensure a robust 5YHLS position.

Pigeon’s view is that the 6.5% housing supply buffer currently proposed on the housing requirement for the Plan period, upon which the allocations and trajectory are based, will result in Greater Cambridge being unable to demonstrate a five-year supply of housing land either upon or shortly after adoption and a risk to the delivery of the Plan’s overall housing requirement. With a limited housing supply buffer being provided, housing delivery is vulnerable to even minor slowdowns, such that a delayed planning application at a single site could subject

Greater Cambridge to the tilted balance in decision-making and affect the achievement of the Plan's housing requirement overall.

### **Inset Maps**

#### **Draft Greater Cambridge Local Plan Inset Map – Hardwick Harlton Harston**

Our client, Pigeon, objects to the proposed inset map for Hardwick on the basis that it does not allocate Land South of St Neots Road / West of Howells Way, Hardwick (Site ID: 115234 / HELAA Site ID: 40273) for residential allocation. Indeed, no residential allocations are proposed in Hardwick, despite the village being a demonstrably sustainable Group Village.

Equally, the defined settlement boundary, as illustrated on the inset map, is considered to be overly rigid and does not accurately reflect the built-form of Hardwick. The Draft Local Plan Policies Map is largely similar to the adopted South Cambridgeshire Policies Map. The main difference is that there is a safeguarded area now to the south of the Site for the proposed East-West Rail route. The other specific change with regards to the settlement boundary is the inclusion of the new development at Meridian Fields, at the southern edge of Hardwick. It is not clear why this development has been included within the defined settlement boundary, whilst Capstone Fields (immediately adjacent to the Site) and other residential built form along St Neots Road has been excluded.

This approach is contrary to Draft Policy S/DE, of which supporting Paragraph 2.132 states that "*defined development extents define where policies for the built-up areas of settlements give way to policies for the countryside*". Pigeon contend that Greater Cambridge should review the defined settlement limits at Hardwick so that they better reflect the actual built form of the settlement.

### **Summary**

Pigeon welcomes the consultation on the draft Regulation 18 Greater Cambridge Local Plan. However, Pigeon has some concerns regarding the draft Local Plan as outlined in these representations, specifically in relation to policies S/JH, S/DS, S/SH, S/DE, S/RRA along with Appendix E and the inset map for Hardwick.

Fundamentally, Pigeon considers that the draft Local Plan does not provide for enough new housing to fully address the extent of housing needs within Greater Cambridge that would support the planned growth of the local economy. As a result, it is considered that additional sites should be allocated for new housing, including at sustainable village locations within the Rural Area, particularly where this would align with planned improvements to public transport.

The Land South of St Neots Road / West of Howells Way, Hardwick is suitable, viable and available for development and should be allocated for a housing development of approximately 140 new homes in order to help meet this need.

I trust that these representations are in order and will be given due consideration by the Council prior to finalising the Draft Regulation 19 Local Plan. Should you seek any clarification on the comments made please do not hesitate to contact me. In any event, we would be grateful to receive an acknowledgement of their safe receipt.



Yours faithfully



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