planning + development consultants

Our ref: KLW/JB/LP/24-048

24th September 2026

Dear Sirs,

Draft Greater Cambridge Local Plan: Regulation 19 publication - Land West of Duxford Road, Whittlesford, South Cambridgeshire, CB22 4NQ

Introduction

These representations have been prepared on behalf of our client, Croudace Homes, in response to the Draft Greater Cambridge Local Plan Regulation 19 publication, which is taking place from 3rd August 2026 – 25 September 2026.

Croudace Homes has a controlling interest (through option agreement) over two parcels of land to the west of Duxford Road, Whittlesford. The sites are linked by the footpath along Duxford Road, and together are being promoted for residential development of 300-350 new homes.

These representations respond to the relevant policies of the Local Plan, and comment on the soundness of each of these policies. They identify where modifications should be made to the Plan to make it sound. They conclude by requesting participation in the Local Plan Examination in respect of some policies in the Plan.

01892 750018 | enquiries@klw.co.uk | @KLWplanning

KLW Ltd.

Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA

klw.co.uk

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Policy S/JH – New Jobs and Homes

Based on the Government's standard methodology for calculating housing need (December 2024), policy S/JH identifies a requirement for 48,069 new homes in Greater Cambridgeshire between 2024 and 2045 (2,295 new homes per annum). Existing planned development is anticipated to deliver 38,378 new homes, with a net increase of 9,691 (620 homes per annum) required to be delivered by this Plan.

We welcome the fact that the Plan is making provision for its full housing requirement, using the Government's Standard Methodology. However, we consider that Policy S/JH is not sound because it does not make sufficient provision for housing needs for specific groups within South Cambridgeshire.

A Housing Needs of Specific Groups Update report for Greater Cambridge (HNSG Update, October 225) identifies that there is a need for 795 additional housing units with care and 1,015 additional housing units with support in South Cambridgeshire.

Paragraph 2.102 states that strategic sites provide an opportunity to deliver specialist housing in sustainable locations, and the Plan sets out how much of this housing will be delivered on the strategic sites. Only one strategic site is allocated for development in South Cambridgeshire: it is intended that 450 units of the 4,500 units planned at Grange Farm will provide specialist housing. However, only 2,550 of these new homes will be delivered during then plan period, and therefore it is assumed that proportionally, only 255 units of specialist housing will be delivered in the plan period.

Provision of this type of housing is not mentioned in relation to the other draft allocations in South Cambridgeshire, only that a criteria based policy (Policy H/SH) could make provision for this on other sites.

There is therefore a significant gap between identified need for specialist housing over the plan period, which comes to a total of 1,810 units in South Cambridgeshire, and the provision for these

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

housing units in this draft Plan of 255 units. We therefore consider that Policy S/JH is unsound because it is not positively prepared and does not meet the area's objectively assessed housing needs. This could be rectified by allocating additional sites in South Cambridgeshire of a sufficient scale to deliver specialist housing as part of its housing offer.

Development of Land west of Duxford Road, Whittlesford could include an element of housing for older persons/disabled care within the development. Residents would benefit from proximity to the village of Whittlesford, accessibility to Whittlesford Parkway mainline train station and living in new, energy efficient homes in an area which is flat and accessible, and with which they are familiar. Allocation of the site would contribute to the overall need in South Cambridgeshire and would help to make the plan sound.

Policy S/DS – Development Strategy

The plan proposes the allocation of strategic sites to deliver the majority of new homes over the plan period. In addition to the current supply, an additional 9,691 new homes are required to meet the housing need over the plan period from 2024 to 2045.

These are planned to be delivered at Cambridge East (3,950 new homes), Cambridge Biomedical Campus (1,000 homes for local workers), Eddington (2,250 new homes in plan period), at new settlements including Cambourne North (2,550 new homes), Land adjacent to Grange Farm (2,550 new homes) as well as significant numbers at Wellcome Genome Campus and Babraham Research Campus.

With the exception of Land at Grange Farm, all the proposed additional sites lie within or adjacent to Cambridge City; allocations in the rural southern cluster amount to 43 homes on Babraham Campus, 60 at Maarnford Farm Duxford, two allocations for a total of 140 dwellings in Melbourn and 65 units at Caldecote.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

We contend that the development strategy is not sound in three regards. Firstly, it places almost exclusive emphasis on the delivery of large, strategic sites. Figure 9 of the draft Local Plan confirms that the Greater Cambridge Plan intends that 44% of new housing over the plan period will be delivered in new settlements. This is a very high figure which makes the Plan heavily reliant on the delivery of strategic infrastructure, and reduces the flexibility and robustness of the spatial strategy to respond to changing circumstances and the validity of the housing market. The development strategy is entirely reliant on the successful delivery of these sites. If one or more were to fail, there is little flexibility in the Plan to ensure that the timely delivery of new homes continues, and no back up plan to deliver the homes through additional, smaller sites.

The Lichfields 'Start to Finish' study (3rd edition, March 2024) notes that:

'Sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling'.

In contrast, Table 3.1 of the report refers to build out times from validation of a planning application for 100-499 new homes, and notes that the median timeframe is five years but the lower quartile of the range is 2.6 years. In our experience this is overly optimistic and unrealistic – particularly given the current and foreseeable pressures on the economy and the now well documented slow down in housing delivery It is important to bear in mind too that these time frames are from the validation of a planning application; from allocation in a Regulation 19 plan such as the draft Greater Cambridge Local Plan Review, they will be considerably longer, to allow for the public consultation on draft Plans, and the Examination of the Plan.

Land at Duxford Road could be built out at the quicker end of this scale. This is for several reasons;

i. Because the site is mid sized, being promoted for up to 350 new homes;
ii. Because no major infrastructure is required; and
iii. As Croudace Homes is a developer with an option on the land, build out of this site would be able to begin far more quickly than on land managed by a promoter, who would need to sell the site to a developer following a planning approval.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

To address the almost exclusive focus on large, strategic sites, the policy could be made sound by the allocation of additional smaller sites for development. These sites would require significantly less infrastructure provision than the large, strategic sites, and could be brought forward in a timely manner. The addition of these sites would improve the flexibility of the spatial strategy and the robustness of the Plan and 'plug the gap' in any shortfalls in delivery through the strategic sites. An example of such a site is Land at Duxford Road, Whittlesford.

Secondly, the development strategy is unsound in its spatial distribution because it focuses development almost entirely within and adjacent to Cambridge City, and to the north, east and west of the city. With the exception of Grange Farm, there is very little housing proposed in South Cambridgeshire.

Figure 9 of the draft Plan confirms that the strategy provides only 15% of the new housing in rural areas, and yet rural areas comprise the majority of the area of the joint authority. The South Cambridgeshire website confirms that:

'Over 50% of the total population of the combined Greater Cambridge area (which includes both authorities) lives in the rural villages within South Cambridgeshire.'

To compare the strategy with previous plans, 30% of new homes were provided in rural areas under the Cambridgeshire and Peterborough Structure Plan 2003, and 23% under the adopted Local Plans. Ignoring the smaller settlements and not allocating sites adjacent to them removes the ability for these settlements to grow and thrive at a scale which is suitable for them. It results in under provision of infrastructure and affordable housing (which would benefit both new and existing residents) and of investment in community facilities and it reduces choice for people looking to buy houses. It also ignores market demand and the fact that many people do not want to live in large scale, new developments, but in smaller developments which are adjacent to an established community.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
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klw.co.uk

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Thirdly, the development strategy is unsound because it ignores the potential of sustainable, Green Belt sites to be allocated for development. Paragraph 148 of the NPPF 2024, under which this Plan is being examined, states that:

> *'Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'*

Currently the draft Plan only allocates two sites for release from the Green Belt and for economic development; Babraham Campus and Cambridge Science Park. In the context of the recent changes in national planning policy in August which identifies housing need as one of the very special circumstances which could justify release of land from the Green Belt, and the Government's agenda for housing growth, the strategy must now be amended to release more sites from the Green Belt.

Land at Duxford Road lies within the Green Belt, in a highly sustainable location, between Whittlesford village, the settlement of Whittlesford Bridge and Whittlesford Parkway Railway Station. Whittlesford is identified in the settlement hierarchy as a Group Village, which offers a range of shops, services and facilities. Whittlesford Parkway is a well connected railway station which offers frequent (half hourly) services to London and to Cambridge. With access to the range of services in Whittlesford village and the public transport connectivity provided by the train, Land at Duxford Road, Whittlesford lies in a highly sustainable location. We contend that it should be removed from the Green Belt, and allocated for residential development.

In summary, we contend that Policy S/DS as drafted is unsound on 3 counts:

- It places too much reliance on the delivery of large, strategic sites and as such the Plan is neither flexible to respond to changing circumstances, nor robust. In isolation, this is not the best option when compared to other, reasonable choices and is not justified.
- The spatial distribution of sites focuses on the Cambridge City area and does not deliver new homes in South Cambridgeshire. It does not therefore meet housing need across the District

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
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and provides for little investment in infrastructure, affordable housing or specialist housing in South Cambridgeshire.

- It ignores the potential of sustainable Green Belt sites to deliver housing in a locations where people have active travel choices and access to shops, services and facilities.

To address these concerns, the Plan should be amended to allocate Land at Duxford Road, Whittlesford for residential development. This would improve the flexibility of the Plan, increase investment in infrastructure, affordable housing and community facilities in South Cambridgeshire and deliver homes in a sustainable location with access to an established community with a range of services, and excellent public transport provision in the form of the train service to Cambridge, London and intervening stations.

Policy S/GB - Green Belt

Policy S/GB relates to the Cambridge Green Belt. It notes that 'New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework, and having regard to the Cambridge Green Belt purposes'.

We contend that the draft Plan has not properly considered release of land from the Green Belt when preparing the development strategy. All references to assessment of Green Belt contained in the Sustainability Appraisal (SA, LUC, July 2026) relate to an option called Edge of Cambridge: Green Belt.

At no point over the various iterations of the SA process, which started back in 2019, does there appear to have been a sustainability appraisal of the potential to release Green Belt land adjacent to smaller and sustainable settlements, which are not on the edge of Cambridge. This option could deliver smaller sites which do not contribute to Green Belt purposes, which are highly sustainable and which provide much needed housing and infrastructure across the South Cambridgeshire area.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

The NPPF 2024, against which the draft Plan is being examined, makes provision for releasing land from the Green Belt and allocating it for residential development, subject to a sequential test which gives priority to previously developed land, then considers grey belt which is not already developed, and then other Green Belt locations. Paragraph 148 of the NPPF notes that 'the need to promote sustainable patterns of development should determine whether a site's location is appropriate, with particular reference to paragraphs 110 and 115 of the Framework.'

NPPF paragraph 110 refers to limiting the need to travel and offering a genuine choice of transport modes. NPPF paragraph 115 seeks to ensure that sustainable transport modes are prioritised. Land at Duxford Road, Whittlesford lies in a highly sustainable location. It is within walking and cycling distance of Whittlesford Parkway Station, which provides 2 services in each direction per hour to Cambridge and to London Liverpool Street. Duxford Road, which forms the eastern boundary of the site, forms part of National Cycle Network (NCN) Route 11 which runs from Harlow in Essex to Kings Lynn in Norfolk. Duxford Road also forms part of LCWIP cycling route 3 between Sawston and Whittlesford Parkway/Duxford.

We accept that the Plan is not being examined under the new NPPF 2026, but note that this provides a clear direction of travel and emphasis on delivery of new homes in sustainable locations adjacent to well connected railway stations.

Bus stops on Duxford Road lie within 400m of the site and offer regular services to Heathfield, Hinxton and Saffron Walden. The site also lies within walking and cycling distance of the primary school in Whittlesford, and the local shops, pubs, community facilities and services in the village.

A highways technical note has demonstrated that safe and suitable access can be achieved, and that there are no significant impacts from development that require mitigation.

As such, land at Duxford Road, Whittlesford exemplifies the contribution which sustainable sites, released from the Green Belt, could make to housing delivery.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

Policy S/GB is unsound because the evidence on which it is based is not robust and it is not justified. It must be updated to acknowledge and plan positively for the delivery of grey belt sites. Land west of Duxford Road is one of these sites and should be allocated for development in the emerging Plan.

Greater Cambridge Green Belt assessment – Review following changes to National Policy and Guidance (LUC, July 2026)

The Council has carried out a review of its 2021 Green Belt assessment in the context of the introduction in national planning policy and practice of the principle of grey belt.

Instead of using the Government's Green Belt purposes as the basis of assessment of sites for their potential as grey belt land, the report uses the Cambridge Green Belt purposes, which are:

- Cambridge Purpose 1 - To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre - reflects the importance of limiting the size of the city to preserve a strong relationship between the historic core and the surrounding rural area.
- Cambridge Purpose 2 - To maintain and enhance the quality of its setting – considers the components of the land around the town that contribute to its historic setting, including views, green corridors penetrating into the City, designated sites and rural landscape character.
- Cambridge Purpose 3 - To prevent communities in the environs of Cambridge from merging into one another and with the city – addresses the need to limit development in order to preserve the transition between a rural hinterland of distinct villages and the historic city which forms part of Cambridge's special character.

The report notes that the Cambridge Green Belt purposes are considered to form elements of NPPF Purpose D. The LUC report states in paragraph 3.14 that:

'the city only has a Green Belt because of its historic character, so assessing the Cambridge purposes as a locally-specific application of NPPF Purpose D provides a more helpful structure for

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

the analysis of variations in the role of Green Belt land than an assessment against the other NPPF purposes.'

Paragraph 3.34 states that:

'The GCGBA considers all of the Cambridge Green Belt to form part of the city's setting, given that a contribution to that setting is the only reason for the Green Belt's existence;

Land at Duxford Road is assessed as three separate Green Belt parcels. Parcel WH13 (2.15ha) forms the northern most part of the site, adjacent to Whittlesford village. Parcel WH12 (2.3ha) forms the southern most part of the site, adjacent to existing residential development at Whittlesford Bridge. The majority of the site forms part of an extensive assessment parcel (WH10, 109.63ha). Parcels WH12 and 13 are identified in the report as provisional grey belt. The majority of the site is not identified as grey belt.

The report identifies that if the majority of the site between Whittlesford and Whittlesford Bridge were released from the Green Belt (WH10), the level of harm would be high and that the site's contribution to purpose D is strong. The level of harm associated with WH13 is classed as moderate, and the land is designated as provisional grey belt.

We contend that the methodology is flawed on several counts. Whittlesford is not a town, it is classed in the Council's own settlement hierarchy as a Group Village.

The site is at the very southern extent of the Cambridge Green Belt. The contribution it makes to Green Belt purposes must surely be assessed in the context of the neighbouring settlements, Whittlesford and Whittlesford Bridge, rather than any contribution it might make to the setting of Cambridge. It would be more reasonable to say that the southern edge of Cambridge is defined by Worts Causeway and by Hobson's Brook. These two features lie some 6.25km to the north of Whittlesford; it is hard to see how Land at Duxford Road, Whittlesford makes any meaningful contribution to the special character of Cambridge as a historic city.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
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Paragraph 1.3 states that the Cambridge Green Belt purposes are '*defined and long-established purposes of the Cambridge Green Belt. These represent a local application of the national Green Belt purposes set out in the National Planning Policy Framework'*.

Paragraph 3.17 goes further, asserting that '*all three Cambridge purposes form elements of NPPF Purpose D, targeting different aspects of the city's special character'*.

However, it is noted that these Cambridge Green Belt purposes were established before the introduction of the Green Belt PPG which defined, for the first time in national planning policy guidance, the process and criteria for the assessment of Green Belt land.

The Green Belt PPG specifically notes that Purpose D (to preserve the setting and special character of historic towns) 'relates to historic towns, not villages'. It also notes that assessment areas that contribute strongly to Purpose D are likely to '*make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town'*.

Assessment areas that contribute moderately to Purpose D are likely to be '*separated to some extent from historic aspects of the town by existing development or topography'* and/or '*not having an important visual, physical, or experiential relationship to historic aspects of the town'* With respect to Purpose B (to prevent neighbouring towns merging into one another), the PPG makes clear that this purpose '*relates to the merging of towns, not villages'*.

On the basis of the above, it is clear that Cambridge Purpose 3, which identifies the merging of villages as contributing to Purpose D, is in direct conflict with national planning policy and guidance. Moreover, the methodology used by LUC is an outlier in the context of other Green Belt assessments carried out in other Local Authority areas, where villages which are a considerable distance from towns, historic or otherwise, would be incapable of making any contribution to Purposes B or D.

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It is further noted that the Green Belt assessment findings for Parcel WH10 set out in the 2021 GCGBA identified a 'relatively significant' contribution to Cambridge Purpose 3 due to the following:

'There is a narrow gap between Whittlesford and Whittlesford Bridge. Urbanising development on Duxford Road reduces the gap but expansive open agricultural landscape maintains separation between the two settlements'.

With respect to Cambridge Purposes 1 and 2, the 2021 assessment identified 'Limited/No Contribution' and 'Relatively Limited' contributions respectively. The assessment concluded that the release of Parcel WH10 from the Green Belt would have a moderate impact on the Green Belt as it would:

- 'reduce the narrow gap between the two settlements.
- Increase urbanising containment and urbanising visual impact on land to the southwest from the settlement.
- weaken the strong boundary distinction of land to the west from the settlement.'

It is clear from the assessment findings and commentary that the primary reason for the attribution of a 'relatively significant' contribution to Cambridge Purpose 3, and the resulting strong contribution to NPPF Purpose D identified in the 2026 review, is the potential for the merging of two villages.

Furthermore, neither the 2021 GCGBA nor the 2026 review make any reference to Parcel WH10 contributing to the setting of Cambridge itself or preventing its coalescence with any other settlement.

A site-specific Green Belt Assessment in accordance with up-to-date Green Belt policy and guidance was carried out on behalf of Croudace Homes in January 2026 as part of the ongoing promotion of the site (comprising Green Belt Parcels WH10, WH12 and WH13) through the local plan process (Landscape, Visual & Green Belt Study, Land West of Duxford Road, Whittlesford – Finc Architects).

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk

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The assessment identified that the site does not contribute to Purpose B, as it does not lie adjacent or near to a town, with Cambridge lying approximately 6.5km north, and that the Site has no physical, visual or experiential relationship with the historic aspects of a town, and therefore makes no contribution to this purpose.

We contend that the methodology used in the Cambridge Green Belt assessment, which identifies the merging of villages as contributing to Purpose D, is in direct conflict with national planning policy and guidance. Moreover, the methodology used by LUC is an outlier in the context of other Green Belt assessments carried out in other Local Authority areas, where villages which are a considerable distance from towns, historic or otherwise, would be incapable of making any contribution to Purposes B or D.

As such, the evidence base on which the Plan is based is not consistent with national planning policy and guidance, and is unsound.

Policy S/AMC/WHD – Whittlesford Parkway Station Policy Area, Whittlesford Bridge Area of Major Change

We acknowledge and welcome the change which has been made since the Reg 18 draft Local Plan. Whittlesford Parkway was previously identified only as a policy area in the Regulation 18 consultation document, but is now identified as an allocation in the draft Plan. This represents significantly more positive planning for this area. However, we contend that the policy as written remains unsound.

Local Plan paragraph 3.4.54 acknowledges that:

'Whittlesford Parkway Station has good rail connections to both Cambridge and London, is close to the southern cluster research and employment centres and is predicted to see further growth in passengers in the coming years.'

It is noted that the policy contains a long list of infrastructure improvements which should be brought forward as part of a masterplan for the station area. These include proposed improvements to the

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk

Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

A505, improving connectivity between the station platforms, providing flood alleviation, station facility improvements and consideration of nearby designated heritage assets.

Together, these improvements represent a significant financial package, which would need to be funded as part of a wider re-development around the station. The policy does not include recognition that the masterplan is only likely to come forward in the context of planned development on a wider scale in the locality.

Although residential and commercial development is mentioned in sub para e) of the policy, the Plan does not allocate land nearby for commercial and residential uses which might help to deliver and incentivise the delivery of these infrastructure improvements. The red line is drawn tightly around the station and its environs. The policy is therefore currently unsound and should be amended to allocate land near the station for residential and commercial uses. Introducing a proportionate quantum of housing alongside the station will support the business uses and allocations and the station itself. This area needs to be considered more holistically.

Croudace Homes, Gonville and Caius College and the Pampisford Estate are all landowners in the vicinity of the station. The Greater Cambridge Partnership (GCP) Masterplan addendum report (January 2020) notes in paragraph 3.2.5 that the College and the Pampisford Estate have expressed a willingness to work with the GCP to explore the delivery of the masterplan and find integrated solutions which cater for all of the development opportunities emerging within the A505 corridor.

Croudace Homes would also be happy to work with the owners of the railway station and neighbouring land owners to deliver much needed, sustainably located housing alongside a package of infrastructure improvements as set out in the draft policy.

We note that the GCP report included a Whittlesford Conceptual Layout plan, which identified the potential for the delivery of a new car park between the A505 and Station Road west. Our clients would be happy to discuss appropriate and proportionate contributions to this car park, which could

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk

Registered in England and Wales No. 4996123 at the above address | VAT Reg No. 509 9595 95

support a draft allocation in the Local Plan and help to deliver this important piece of infrastructure for the station.

Development of the station area would be highly appropriate in the context of recent, draft guidance from Government on the principle of developing land within 800m of a well connected station for the provision of new homes. The area is flat and unencumbered!

Draft Policy S5 of the Government's NPPF consultation (December 2025) set out the presumption in favour of residential development, including on Green Belt sites, within reasonable walking distance (800m) of railway stations. It noted that development should be approved unless the benefits would be substantially outweighed by any adverse effects. The policy allowed for housing and mixed use development around railway stations, which offer high levels of connectivity. Such development should be limited to land physically well related to the station and within reasonable walking distance of it.

Draft NPPF Policy L3 provided criteria which define 'well-related' stations. These are train stations in the top 60 Travel to Work areas (as these are the most productive areas). The policy defines 'well-connected' train stations as those with 4 trains per hour, or two trains per hour in any one direction.

Whittlesford Parkway lies in one of the top 60 TTW areas. There are three trains each way in any one hour in the week, so the service at Whittlesford Parkway far exceeds the definition of 'well-connected.' The site has flat, easy access to the station on foot or by bicycle.

Much of the site Land at Duxford Road, Whittlesford lies within 800m of Whittlesford Parkway Railway Station and so the presumption in favour of residential development on this site applies.

Residential development in this area would also complement the significant employment provision which is being planned for. The 2019 permission for development of the Wellcome Genome Campus, creating 4,000 new jobs and 1,500 new homes will increase the local population and improve the viability of creating new links to the station. In addition, proposals for new employment sites at Unity

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
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Campus and the Babraham Campus and an aviation research park adjacent to Duxford will all increase the requirement for infrastructure improvements and connections to the station. The report notes that projections of the station's use have increased to 895,000 using the station by 2033.

As drafted, the policy is unsound because it is not based on robust evidence and cannot be justified. In order to be made sound, Policy S/AMC/WHD should be amended to:

- Acknowledge that the investment required to deliver the proposed improvements to Whittlesford Parkway Station and the surrounding area will need to be funded by an appropriate scale of residential and commercial development which lies within walking and cycling distance of the station;
- State that the principle of residential development close to the station would be acceptable, subject to the other criteria in the Local Plan;
- Make clear that landowners of neighbouring land are expected to work with the Greater Cambridge Partnership to deliver an holistic, joined up scheme which delivers housing and commercial development and funds the required improvements to Whittlesford Parkway.

Summary

Below, we provide a summary of the key points set out in these representations:

- Policy S/JH is not sound – it does not make sufficient provision for housing needs for specific groups, it is not positively prepared and it does not meet the area's objectively assessed need for specialist housing
- Policy S/DS is not sound:
    - It places too much reliance on the delivery of very large, strategic sites and as such the Plan is neither flexible to respond to changing circumstances, nor robust. As such it is not the best option when compared to other, reasonable choices and is not justified.
    - The spatial distribution of sites focuses on the Cambridge area and does not deliver new homes in South Cambridgeshire. It does not therefore meet housing need across

01892 750018 | enquiries@klw.co.uk | @KLWplanning
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the District and provides for little investment in infrastructure, affordable housing or specialist housing in South Cambridgeshire.

- It ignores the potential of sustainable Green Belt sites to deliver housing in a locations where people have active travel choices and access to shops, services and facilities.

- Policy S/GB is unsound because it is not consistent with national policy. It must be updated to acknowledge and plan positively for the delivery of grey belt sites. Land west of Duxford Road is one of these sites and should be allocated for development in the emerging Plan.
- Green Belt Review – The methodology used in the Cambridge Green Belt assessment, which identifies the merging of villages as contributing to Purpose D, is in direct conflict with national planning policy and guidance. The methodology used by LUC is an outlier in the context of other Green Belt assessments carried out in other Local Authority areas, where villages which are a considerable distance from towns, historic or otherwise, would be incapable of making any contribution to Purposes B or D. As such, the evidence base on which the Plan is based is not consistent with national planning policy and guidance, and is unsound.
- Policy S/AMC/WHD is not sound because it is not based on robust evidence and cannot be justified. In order to be made sound, Policy S/AMC/WHD should be amended to:
  - Acknowledge that the investment required to deliver the proposed improvements to Whittlesford Parkway Station and the surrounding area will need to be funded by an appropriate scale of residential and commercial development which lies within walking and cycling distance of the station;
  - State that the principle of residential development within 800m of the station would be acceptable, subject to the other criteria in the Local Plan;
  - Make clear that landowners of neighbouring land are expected to work with the Greater Cambridge Partnership to deliver an holistic, joined up scheme which delivers housing and commercial development and funds the required improvements to Whittlesford Parkway.

01892 750018 | enquiries@klw.co.uk | @KLWplanning
KLW Ltd.
Ridgers Barn, Bunny Lane, Tunbridge Wells, Kent, TN3 9HA
klw.co.uk
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I would be grateful if you would confirm safe and timely receipt of these representations. Croudace Homes request participation in the Local Plan Examination in respect of the above policies in the Plan.

Yours faithfully,

Lois Partridge

Associate Director

KLW Planning

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