Representation to Greater Cambridge Local Plan 2024-2045 – Regulation 19 Consultation
Granta Land Limited
Bidwells LLP
25 September 2026

BIDWELLS

REPRESENTATION TO GREATER CAMBRIDGE LOCAL PLAN 2024-2025 – REGULATION 19 CONSULTATION GRANTA LAND LIMITED

Table of Contents

1.0 Introduction 1

2.0 Response to the Greater Cambridge Local Plan Regulation 19 Consultation 2

3.0 Land Between Mingle Lane and Hinton Way, Stapleford & Response to the Housing and Economic Land Availability Assessment (2026) Response 14

4.0 Summary and Conclusion 19

Appendix 1
SITE LOCATION PLAN.

Appendix 2
LANDSCAPE AND VISUAL APPRAISAL, PREPARED BY PEGASUS

Appendix 3
TECHNICAL HIGHWAYS NOTE RESPONSE, PREPARED BY KMC

1.0 Introduction

1.1 This representation has been prepared on behalf of Granta Land Limited ("Granta"), in response to the Greater Cambridge Local Plan 2024-2045 – Regulation 19 Publication Version consultation (hereafter "the Plan").

1.2 This representation considers the wider spatial strategy proposed by the Council, specifically in relation to housing, before focusing on Granta's land interests on Land Between Mingle Lane and Hinton Way, Stapleford, Cambridgeshire (hereafter "the Site") (HELAA Site ID: 115189).

1.3 Alongside this representation, the following drawing and technical responses have been prepared and can be found as Appendices:

- Appendix 1 - Site Location Plan (ref: 1357_001 Rev V2).
- Appendix 2 – Landscape and Visual Appraisal, prepared by Pegasus (ref: 21st September 2026).
- Appendix 3 - Technical Highways Note Response, prepared by KMC (ref: 26107).

1.4 Bidwells has a long history of promoting development proposal sites through Local Plans across greater Cambridge. We have several concerns relating to the soundness of the proposed Plan, particularly the draft development strategy. In particular, as it fails to plan for sufficient homes over the Plan period and relies heavily on allocating significant housing in such a small number of very large sites. Further, these large sites rely on the timely provision of strategic scale infrastructure which must be in place before they can be delivered.

1.5 We are particularly concerned by the Council's reliance on the proposed strategic allocations at Cambourne North (13,000 dwellings) and Grange Farm (4,500 dwellings), both of which are dependent on the delivery of significant transport infrastructure. In particular, Cambourne North relies on a new East West Rail station and major improvements to the A428, whilst Grange Farm is dependent on upgrades to the A505 and the provision of safe and convenient access to the proposed Cambridge South East Transport (CSET) Phase 2 Guided Busway.

1.6 The Plan assumes that these two allocations will deliver approximately 5,100 dwellings by 2045, however, given their scale and reliance on strategic infrastructure, they will not deliver homes until the back-end of the plan-period.

1.7 Further, as set out in this representation, we consider this assumption to be optimistic given the scale of development proposed in two locations and delivery of the infrastructure required. Delays to infrastructure delivery would have a direct impact on housing delivery and could undermine the Council's housing trajectory.

2.0 Response to the Greater Cambridge Local Plan Regulation 19 Consultation

2.1 This section focuses specifically upon our response to the consultation Local Plan, setting out why the Plan as drafted is considered to be unsound, unjustified and not positively prepared, particularly in relation to its key overarching policies.

Policy S/JH: New jobs and homes

Overview

2.2 As drafted Granta object to Policy S/JH. The Policy is unsound, it is not positively prepared, not effective and inconsistent with national policy.

2.3 The Policy as drafted proposes a minimum housing requirement of 48,069 homes between 2024 and 2045, equating to an average of 2,289 homes per annum.

2.4 Paragraph 62 of the National Planning Policy Framework 2024 requires that the minimum number of homes needed is informed by a local housing need assessment conducted using the standard method set out in Planning Practice Guidance ("PPG").

2.5 Whilst we acknowledge that the Council seeks to plan for this minimum requirement, PPG (2a-040) is clear that authorities should consider the merits of planning for higher growth in excess of this minimum including for example to reflect economic growth aspirations.

Economic Growth as an Imperative

2.6 Greater Cambridge has been recognised by successive governments as one of the UK's most important economic growth opportunities, particularly as a global leader in life sciences, technology and research sectors.

2.7 Matthew Pennycook MP, Minister of State for Housing and Planning, identified that sustained economic growth is the only route to improving the prosperity of the country and living standards of working people. Identifying economic growth as the government's number one mission1.

2.8 His statement on realising the full potential of Greater Cambridge identifies that whilst the economic growth of Cambridge has been a phenomenal success, it has even greater potential beyond to contribute to an even greater extent to the national economy.

[1] Matthew Pennycook MP – Realising the Full Potential of Greater Cambridge: 31 October 2024 - Written statements - Written questions, answers and statements - UK Parliament

2.9 In 2024 the Cambridge Growth Company was established to ensure that Cambridge's full potential was unlocked by addressing barriers to growth. The Greater Cambridge Development Corporation ("GCDC") was established in 2026 with the purpose of achieving transformational economic growth building on work by the Growth Company.

2.10 The Cambridgeshire and Peterborough Combined Authority (CPCA) adopted its Local Growth Plan in 20252 with an ambition to ensure the local economy grows faster than any other region in the UK. This includes setting a mayoral target across the CPCA area of **tripling** the economy by 2050. The Growth Plan identifies this would require an increase in housing supply by 2035 of 15% and 54% by 2050. In Greater Cambridge this would result in a significant uplift in per annum housing delivery.

2.11 The Ministry of Housing, Communities and Local Government ("MHCLG") in 2025 commissioned Oxford Economics to explore the potential of the Greater Cambridge economy3. The resultant Case for Cambridge considered the benefits arising from the delivery of between 100,000 and 150,000 homes over the period 2024-50 in Greater Cambridge with greater benefits realised in the higher growth scenarios.

2.12 It is therefore clear that there are overriding economic imperatives which in planning to meet the minimum housing requirement of the standard method (48,069 homes) will only act to constrain economic growth, fail to contribute the most the area can to the national economy, fail to meet the government's number one priority for economic growth to raise living standards, and fail to meet the ambitions of the Mayor's Local Growth Plan. This is contrary to paragraph 86d of the Framework.

Unmet Need - Affordable Housing

2.13 It is well documented that with the success of Greater Cambridge has come pressing housing issues, this is particularly acute when considering the affordability of homes.

2.14 Paragraph 20a of the Framework requires strategic policies to make sufficient provision for affordable housing. This is bolstered by PPG (2a-024) that requires Council's to consider how meeting affordable housing needs may be achieved by increasing the total number of homes being planned for.

2.15 The Council's Housing Needs of Specific Groups in Cambridge and South Cambridgeshire report4 identifies that there is a significant need for affordable housing. It sets out a need for 1,636 affordable homes per annum across Greater Cambridge in Table 7.16.

2.16 This means that 71% of the housing requirement of standard method calculated 2,289 homes per annum needs to be delivered as affordable housing to meet this need in full. Clearly, this will not

[2] C220817 CPCA Prospectus
[3] Greater Cambridge: Growth Scenarios - GOV.UK
[4] EBGCLPHNSGCSCDec25.pdf

be achieved and therefore in accordance with guidance the Council should consider increased delivery of housing beyond the minimum to address the spiralling affordability issues across the area.

2.17 We have not identified any record of an assessment of this having been undertaken by the Council. Instead, the above report suggests that it would not be appropriate to undertake such an exercise (see paragraphs 7.57 – 7.72). Nor does the Council seek to address this point in their Development Strategy Topic Paper to support the Regulation 19 consultation5.

2.18 We suggest that this stance does not stand up to scrutiny and the reasoning for not considering it misunderstands supressed need entirely.

2.19 Therefore, there is a pressing need for affordable housing which, when planning for the minimum housing need, will not come close to being addressed in the Plan.

Action Required

2.20 As set out above, there are overriding economic growth and affordability reasons to plan for more homes above the minimum requirement of the standard method.

2.21 The Council continuing to pursue this position will clearly act to constrain the economic ambitions of the Local Growth Plan and government's ambition for economic growth, contrary to paragraph 86d of the Framework, and fails to make provision for sufficient affordable housing contrary to Paragraph 20a of the Framework.

2.22 Whilst we have identified a failure to appropriately consider how boosting housing beyond the minimum would improve affordability, the Council does set out why from an economic perspective they do not intend to plan for more homes above the minimum in the Development Strategy Topic Paper.

2.23 This is effectively reliant upon the Council's Employment and Housing Need Update (EHNU) (2025) which shows the minimum housing requirement being sufficient to address the most likely jobs forecast for the Plan period.

2.24 The fact that the Council is not planning for the level of growth necessary to support the economic ambitions of the Local Growth Plan, which align with the economic objectives of the government is underlined by the fact that the Employment and Housing Needs Update EHNU does not even consider the Oxford Cambridge Arc or the Local Growth Plan.

2.25 Rather, it has been developed on the basis of standard economic forecasts which are inevitably trend-based and so do not account for the economic potential of an area as is necessary to align with local and national economic ambitions.

[5] Topic cover - Development Strategy Topic

2.26 The EHNU draws its conclusions and jobs and housing needs from the 'central growth' scenario with the 'higher growth scenario' dismissed. However, it notes that the higher scenario could be achieved with a step change in investment.

2.27 Rightly the EHNU draws a relationship between job growth and housing need, on the basis that greater job growth in the region will generate a derived demand for housing, creating an interdependency between the two. The 'central growth scenario,' as outlined within the EHNU, builds in assumptions of slower periods of growth, contractions, and economic shocks. Inherently both the number of jobs and homes proposed within the Proposed Submission Plan are conservative rather than reflective of the full growth potential of the Greater Cambridge economy.

2.28 The Greater Cambridge Development Corporation is backed by £400 million of central government funding, and renewed commitment to delivery of growth in the Oxford – Cambridge Growth Corridor, there is clear rationale for the Authority to reasonably adopt a much higher high growth scenario.

2.29 The need for growth is further evidenced by national, regional and authority level investment in infrastructure including the new Cambridge South Railway Station providing direct connectivity between Cambridge Biomedical Campus (CBC) and London, the granting of the Cambourne to Cambridge busway and progression of Cambridge South East Transport (CSET) to inquiry later this year.

2.30 In a national context, the commitment to East West Rail establishes the area as one benefiting from continued investment in major transport infrastructure. Growth envisioned by Government is set to be realised and delivered by the Greater Cambridge Development Corporation set to deliver infrastructure first growth. We contend in order to ensure the Plan is found sound the unique nature of Cambridge and its projected capacity for growth must be realised within the emerging Local Plan as an imperative now, and not just wait for the Development Corporation to do so.

2.31 In our view, the following amendments need to be made to the Plan to ensure it is sound and positively prepared in regard to Policy S/JH:

- Prepare housing projections which align with the economic ambitions set out in the recently adopted CPCA Local Growth Plan as a minimum, which the CPCA suggest will necessitate a requirement of at least 59,409 homes but potentially substantially more.
- Consider the extent to which additional housing beyond the minimum would help to address the spiralling affordability issues in the area as required by national policy and guidance.

Policy S/DS: Development Strategy

2.32 As set out above, we believe that the Plan fails to address the need to boost housing beyond the minimum requirement of the standard method, and therefore the Development Strategy as a whole fails to sufficiently identify land to deliver the required homes to meet the challenges of economic growth and affordability.

2.33 That aside, the following comments are made on the proposed development strategy in isolation from the overall need to increase the number of homes being planned for.

2.34 Whilst we do not object to the principle of strategic growth, we object to Policy S/DS as currently drafted as it is unsound and inconsistent with national policy. This is for the reasons we set out below.

Inappropriate Delivery Trajectories

2.35 There are several sites identified in the Council's Housing Delivery Study Addendum 2026 Update that assumes they will consistently deliver 300 – 350 homes per annum over the Plan, which is highly unrealistic.

2.36 Whilst on strategic sites this might be achieved for short periods, it is not the case that this is consistently achieved in any evidenced way. In fact, Lichfield's Start to Finish6 at Appendix 2 considers sites of greater than 3,500 homes and provides evidence as to how the Council's approach is inappropriate.

2.37 This is important when considering:

- Northstowe: The Council assume delivery of 6,201 homes between 2025 and 2045 at the unprecedented delivery rate when considering Start to Finish.
- Cambridge East: The Council assumes delivery of 3,950 homes between 2032 and 2045 at the unprecedented delivery rate when considering Start to Finish.
- Waterbeach New Town: The Council assumes delivery of 5,629 homes between 2025 and 2045 at the unprecedented delivery rate when considering Start to Finish.

2.38 This is important as the Council are relying on these strategic sites to deliver at an inappropriate rate, whilst also seeking to put their eggs in an ever-smaller number of large strategic sites at a similar rate at the back-end of the Plan period.

2.39 It is expected that in applying a more reasonable delivery figure such as those in Start to Finish, the Council's supply would diminish by more than 3,000 homes over the Plan period when considering Northstowe, Cambridge East and Waterbeach New Town alone.

Sedgefield Vs Liverpool Approach

2.40 The Council is proposing to use the Liverpool method to address historical backlog or shortfall in housing delivery. This is contrary to the preferred approach in PPG which explains that any shortfall should accrue from the base-date of a plan and be added to the five-year requirement (Sedgefield approach).

2.41 However, the PPG does allow the use of the Liverpool method but adds that this must be justified during the plan-making process.

[6] LF66761 Start to Finish 3 (update) - Feb25.indd

2.42 The government preference for Sedgefield can be read as a key part of ensuring a significant boost to the delivery of homes.

2.43 Where there is an insufficient deliverable supply to meet needs, the Council simply should allocate additional deliverable sites, such as Granta's in Stapleford, rather than seeking to introduce a policy-mechanism such as the Liverpool approach which will only serve to impede the identification of additional sites to remedy the insufficient supply identified in the Plan through the disengagement of Policy S5(1)(j) of the new Framework.

2.44 The Council's Housing Delivery Addendum 2026 Update however states that the Council believe that a five-year land supply can be achieved through the Sedgefield method, even though it is proposing to use the Liverpool method. Clearly therefore there is no justifiable reason not to use the Sedgefield method.

2.45 For this reason, we believe that the proposal to use the Liverpool method is inconsistent with national guidance and not justified. In essence, the Plan fails to identify a sufficient supply of deliverable sites to meet housing needs early in the plan period, instead pursuing an unnecessary policy approach to reduce housing needs over the plan period, in pursuit of focusing housing delivery on an ever increasingly small pool of large strategic sites.

Windfall & Small and Medium Sized Sites

2.46 Paragraph 73 of the Framework stresses the importance of the inclusion of medium and small sized sites in order to meet the housing requirement of an Authority. They are also essential for SME housebuilders to deliver new homes whilst being built out relatively quickly by virtue of the often-minimal infrastructure requirements.

2.47 Whilst the Plan is not being examined against the 2026 Framework, it is important to recognise that this position has been strengthened in plan-making policy HO6: Planning for a diverse mix of sites which requires 10% of housing requirements to be met on sites no larger than one hectare and a further 10% on sites between one and two and half hectares, unless strong reasons exist not to. This also flows into the recognition that allocating such sites will support and enhance the vitality of rural communities and enable villages to grow and thrive. This aspiration is consistent with paragraphs 82 and 83 of the examining Framework (2024).

2.48 This is also explained in the proposed reforms of the National Planning Policy Framework and other changes to the planning system (December 2025)7 document.

2.49 The draft Local Plan does not propose to allocate any new housing sites to address this requirement, the rationale provided for this is that:

- It is challenging to identify a large number of small sites to meet the 10% requirement

[7] National Planning Policy Framework: proposed reforms and other changes to the planning system

- It would undermine the Council's development strategy and necessitates the release of Green Belt sites conflicting with the aim of protecting the Cambridge Green Belt as the larger and better served villages are located within the Green Belt.

2.50 The Housing Delivery Addendum Update (2026) argues that when accounting for windfall development of 4,953 dwellings coming forward on sites no larger than 1ha then 13.5% of homes over the plan period will be delivered on small sites.

2.51 Primarily relying upon windfall development to address as much of the 10% requirement as possible, does not help provide small and medium enterprise housebuilders with the certainty required to invest in delivering sites.

2.52 Across Greater Cambridge there has also been a general decline in the delivery of windfall sites over the years. The Greater Cambridge Housing Delivery Study Addendum Update (2026) in section 2 considers windfall delivery between 2006 and 2024 and argues a windfall allowance of 425 dwelling per annum would be robust.

2.53 This section of the report sets out what it considers to be the favourable policy which may assist the delivery of windfall sites in the future. However, it fails to identify why over time there has been a general trend downward on windfall sites, and whether, particularly in the South Cambridgeshire area there is now a lack of available sites to continue to deliver windfall at scale across the plan period.

2.54 For instance, it presents a data set as far back as 2006 – 2007 for windfall completions to find an average delivery rate of 470 dwellings per annum, but fails to realise that Greater Cambridge has not delivered more than 470 dwellings in a year from windfall since 2016 – 2017.

2.55 Even if the Council uses 425 dwelling per annum for windfall, over the previous seven years of data the average delivery has only been 395 dwellings per annum. As such, there needs to be greater certainty injected into small and medium sized sites by allocating these in the emerging Local Plan, to aid with confidence of being able to deliver such sites but also recognising that opportunities for brownfield redevelopment or residential sub-division can only continue to deliver so much housing across Greater Cambridge.

2.56 Further, The PPG (3-023) states that a windfall allowance forms part of the broad locations for growth which can be relied upon for years 6-15 rather than part of the specific sites which can be relied upon in years 1-5. Windfall allowance by its very nature does not comprise specific sites which are all that can be included as part of the deliverable supply in years 1-5 according to paragraph 72 of the NPPF.

2.57 The Housing Delivery Study Addendum 2026 Update however includes a windfall allowance of 1,562 homes in the period 2028-33 contrary to national policy and guidance. Without this the Housing Delivery Study Addendum 2026 Update identifies a plan period supply of 50,470 homes. This alone results in a headroom of just 5% over the plan period against the proposed insufficient housing requirement, which compounds the insufficiency of supply. This is even without our significant concerns raised above regarding delivery rates applied to strategic sites.

Lack of Flexibility and Choice

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

2.59 For instance, existing young residents of village settlements in South Cambridgeshire may wish to buy a home in the settlement to be close to existing family for childcare, or to remain within existing support networks, which may not be possible should they have to move to other proposed allocations.

2.60 The proposed development strategy's lack of commitment to delivering growth in sustainable settlements in the rural area such as Stapleford, risks exacerbating the affordability crisis in Greater Cambridge, likely pushing younger people out of their local communities and support networks. Reliance on strategic settlements outside of the Green Belt (and hence further away from Cambridge) is also likely to increase car dependency.

2.61 This runs contrary to paragraphs 73, 82 and 83 of the Framework.

Local Housing Need

2.62 Paragraphs 82 and 83 of the NPPF recognise that rural housing policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. It also recognises that this can contribute to sustainable development, helping to enhance or maintain the vitality of communities, and the need to identify opportunities for villages to grow and thrive.

2.63 Across Greater Cambridge there are several Neighbourhood Plan areas which identify a localised need for housing, without appropriate allocation of land to meet this need, and in many cases such as Stapleford, the settlements are surrounded by Green Belt.

2.64 Where these Neighbourhood Plans, and the Plan, fail to allocate sufficient land to meet this need, it has several knock on consequences, including but not limited to, spiralling affordability issues and pushing young people out of villages in the search of homes, away from families and support networks.

2.65 Objective 1 of the Stapleford and Great Shelford Neighbourhood Plan seeks to address identified housing and affordable housing needs. Whilst paragraphs 6.4 and 6.5 of the same plan identify consistent support for new homes in or around Great Shelford and Stapleford, of which 60% of residents were concerned about the affordability of, or access to, suitable housing in the community.

2.66 Evidence prepared for the Stapleford and Great Shelford Neighbourhood Plan, including the Stapleford and Great Shelford Housing Needs Assessment (AECOM, 2023, updated 2024), identifies a significant need for both affordable rented housing and affordable home ownership within the villages.

2.67 The Housing Needs Assessment highlights acute affordability pressures, with many local households unable to access even entry-level market housing without substantial financial support. The evidence demonstrates that there is a sizeable group of households who are unable to access home ownership despite being able to afford private rents, together with a clear need for additional affordable rented accommodation.

2.68 For instance, the Assessment estimates a requirement for approximately 17.4 affordable rented homes per annum within the neighbourhood area, equivalent to around 348 affordable homes over the period 2023 to 2043.

2.69 This provides compelling evidence of a substantial unmet local housing need for affordable provision let alone market housing.

2.70 Despite this clear and significant demand, both the Neighbourhood Plan and the emerging Local Plan fail to adequately address this pressing local need. Choosing to instead rely solely on windfall sites where very little opportunities exist and are further constrained by Green Belt tightly bordering the settlements.

2.71 A sound and effective development strategy should support the delivery of housing, including affordable housing, within sustainable villages where there is an identified local need and where residents have good access to services, employment opportunities and public transport.

2.72 Stapleford is a highly sustainable location and is well placed to accommodate additional growth. The allocation of suitable sites within Stapleford would assist in meeting both local and district-wide housing needs, provide greater choice for local residents, including younger households seeking to remain within the village, and contribute to the delivery of much-needed affordable housing.

2.73 Accordingly, the Local Plan should take a more positive approach towards the allocation of sites in sustainable villages such as Stapleford. It is not enough to consider the housing requirement in such a narrow way of being addressed in large baskets, there is a far more granular level of housing need at a very local level as evidenced in Stapleford. The current strategy, which relies heavily on a small number of strategic sites whilst constraining opportunities in sustainable settlements, is neither the most effective nor the most justified approach to meeting identified housing and affordable housing needs across Greater Cambridge.

Sustainability Appraisal

2.74 Paragraph 1.6 of the Sustainability Appraisal (2026) ('SA') states 'Developing options for a plan is an iterative process, involving a number of consultations with stakeholders and the public. The SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for the policies to be included in a plan.' These options are explained and their effects summarised in Chapter 4 of the full SA report.

2.75 Paragraph 2.10 of the SA states 'The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public

opinion, deliverability and conformity with national policy will also be taken into account by plan makers when selecting preferred options for their plan.'

2.76 It is clear that the proposed Development Strategy underpinning the Regulation 19 Local Plan is not a sufficiently robust development strategy which positively plans for housing delivery in the first 10 years of the plan period as the strategy relies very heavily on the deliverability of two very large strategic sites at Cambourne North and Grange Farm, between them accounting for 5,100 dwellings in the plan period which are very likely to be delayed due to the significant infrastructure required to deliver the housing numbers.

2.77 Indeed, in a site-specific sense Grange Farm represents a late allocation entry (due to the Cambridge Wastewater Treatment Works de-allocation) jumping the Green Belt into open countryside and which means poor public transport connectivity beyond the A11. Senior councillors have expressed concerns about the potentially very high number of car-generated trips expected due to the divorced nature of the site from the planned Travel Hub south of Babraham village. The Infrastructure Delivery Plan states a 'Shuttle / commuter services connecting Grange Farm to nearby campuses and railway stations will be essential' to service this site. It is further noted the Housing Delivery Study Addendum (2026) identifies Phase 2 of CSET is essential for the delivery of Grange Farm (3.2.66) and that the timescales for delivery and phasing are still being discussed and that the conclusion of these discussions will dictate where a full site build-out to align with typical assumptions can be achieved.

2.78 It is therefore considered the Development Strategy as currently proposed relies significantly on high risk assumptions. It should therefore be supplemented by deliverable sites early in the plan period which would also support the delivery and sustainability of key infrastructure, such as Granta's Stapleford site and how it supports CSET.

<u>Significant Site Infrastructure – CSET</u>

2.79 As set out elsewhere in this representation, the Local Plan's housing strategy is heavily reliant on a limited number of large strategic allocations, including the proposed Grange Farm new settlement.

2.80 The allocation is closely linked to the delivery of the CSET scheme, with the supporting policy and explanatory text identifying CSET Phase 2, the proposed travel hub and associated active travel infrastructure as key components in enabling the early phases of development.

2.81 The Council also envisages a future extension of CSET to Grange Farm, providing a high-quality public transport connection to Cambridge, the new travel hub and major employment destinations, including Granta Park. The enhanced connectivity with Cambridge Biomedical Campus and integration of CSET, has also been identified as being critical to reducing car dependency.

2.82 We support the principle of integrating new development with high-quality public transport infrastructure and agree that CSET has the potential to improve connectivity, reduce car dependency and support sustainable travel patterns. However, this also highlights the extent to which the delivery of the proposed strategic allocations is dependent upon the successful implementation of CSET and associated transport infrastructure.

2.83 We also believe that allocating sites along the CSET route, such as Granta's site at Stapleford would help support the viability case for it, by ensuring it maximises the opportunity for passenger numbers and the potential to deliver modal shift.

2.84 Should CSET be delayed, there would be a significant risk to the timely delivery of Grange Farm and consequently the soundness of the Plan itself.

2.85 This demonstrates the importance of ensuring that the Local Plan does not place undue reliance on a small number of strategic, infrastructure-led developments. A more balanced approach is required, incorporating a wider variety of allocations capable of delivering homes in the short to medium term and providing resilience should delays arise on strategic sites.

2.86 The same recognition afforded to strategic allocations as beneficiaries of the proposed CSET investment should also be applied to sites such as Granta's land at Stapleford. The Site is exceptionally well placed to benefit from the delivery of CSET Phase 2 and the proposed Sawston Greenway, which will strengthen walking and cycling connections between Stapleford, the DNA Path and the Cambridge Biomedical Campus.

2.87 By virtue of the approach of the local Plan, the Council accept that CSET will happen. The Council's development strategy clearly assumes that CSET will be delivered and that it will support significant levels of growth in the south-eastern corridor. In these circumstances, it is appropriate that the Council also considers the role that suitable Grey Belt sites can play in delivering housing in sustainable locations along the same transport corridor. The Site at Stapleford represents such an opportunity and should be assessed accordingly through the allocation process and any review of Grey Belt land.

2.88 Stapleford will benefit directly from two stops on the proposed CSET Phase 2 route, providing enhanced public transport connectivity to Cambridge and surrounding employment centres.

2.89 As part of the 'Development Strategy Topic Paper Appendix 18 Settlement Hierarchy', Appendix 7 'Transport Data' notes that Great Shelford and Stapleford ranks joint top, alongside the allocated site of Waterbeach, for points awarded for transport.

2.90 The Council's own evidence base recognises the strong transport credentials of Stapleford and Great Shelford, with the settlements ranking amongst the highest-scoring locations in the Settlement Hierarchy transport assessment. This demonstrates that Stapleford is a highly sustainable location for growth. The allocation of the Site would not only support the delivery of housing in a sustainable location but could also help maximise the benefits and patronage of the proposed CSET investment, further supporting its long-term viability and success.

Action Required

2.91 In order to address the concerns raised, the following changes to the Local Plan will be necessary:

- Reassess the plan period supply and deliverable supply to account for the fact that only specific sites rather than a windfall allowance can be included in years 1-5 as set out in paragraph 72a of the NPPF.

- Reassess the plan period supply and the deliverable supply to reflect realistic delivery rates at Northstowe, Cambridge East (airport) and Waterbeach New Town.

2.92 When considering above bullets, notwithstanding our significant concerns relating to Policy S/JH, it is clear that there is a shortfall in sufficient supply even against the minimum requirements, and woefully short when considering the need to build homes to achieve the growth aspirations of Cambridge and to address affordability issues. Therefore:

- To meet the economic and affordable needs for housing and to address the concerns with the supply identified the Council need to allocate more sites for new homes. Specifically, sites that can deliver homes early in the plan-period.
- The Council must use the Sedgefield rather than the Liverpool method to ensure there is a significant boost in housing supply rather than supressing the backlog.
- Critically, pursue a more balanced approach to housing allocations. There is no need for the Council to pursue such a narrow view on the mix of sites for housing. Sites such as Granta Land's at Stapleford are available, deliverable and suitable now to deliver homes, contributing to a more robust delivery trajectory, but also meeting localised, pressing housing need which cannot be met by just building large scale developments across the Greater Cambridge area.

Policy S/SH: Settlement Hierarchy

2.93 We welcome the recognition of Great Shelford and Stapleford as a rural centre, which will only become more sustainable as a location upon the delivery of CSET and its proposed stations in Stapleford.

2.94 It is important to note that the policy requirements do not limit growth on housing provided it is within the defined settlements and served by adequate services, facilities and infrastructure which are appropriate for the scale of development proposed.

2.95 Whilst in principle this sounds positive, as all settlements in the rural centres are constrained by Green Belt with very limited opportunities to grow outwardly, it means many of the windfall opportunities of tangible scale are likely to have been delivered. As such, the only meaningful way of delivering homes in such sustainable locations, is through the delivery of growth outward, favouring Grey Belt sites in the first instance.

Policy I/SI: Safeguarding Important Infrastructure

2.96 Granta do not object to the principle of a safeguarding policy. However, the policy area as set out within the draft Proposals Map is incorrect as far as it relates to Site Ref: 115189 and the Cambridge South East Transport scheme by virtue of the fact that it shows more land being safeguarded than is currently expressly required by the Greater Cambridge Partnership to deliver the project. The Proposals Map should be updated in liaison with the GCP to accurately reflect the area required for safeguarding of CSET before adoption of the plan.

2.97 Furthermore, the policy wording itself should be clearer that in relation to transport proposals the safeguarding area shown on the policies map is reflective of the current known area and may not be the final area that needs safeguarding. This is set out at paragraph 10.48 in the post-amble text but not properly captured in the policy itself.

3.0 Land Between Mingle Lane and Hinton Way, Stapleford & Response to the Housing and Economic Land Availability Assessment (2026) Response

Site Context

3.1 The Site (HELAA Site ID: 115189) is located on land east of Hinton Way, on the north-eastern edge of Stapleford, with Hinton Way forming the principal frontage to the west and existing residential areas located to the west and south.

3.2 The Site covers approximately 26.27 ha. It comprises agricultural fields of which approximately two thirds are currently managed grassland in accordance with a Sustainable Farming Incentive scheme and the other third is cropped.

3.3 The Site can be accessed by vehicles via private farm tracks off Hinton Way. Hinton Way also provides footways and therefore safe, walkable access to Shelford village centre and amenities, including schools, a health centre, shops, restaurants, and cafes. Furthermore, the Site is located in close proximity to Shelford Railway station which provides regular services to Cambridge South (4mins), Cambridge (9mins), Cambridge North (17mins) and London Liverpool St (1hr 15mins).

3.4 There are no Public Rights of Way (PRoW) on or adjacent to the Site boundary. The closest PRoW is a public footpath approximately 130 m west of the Site which provides a route off Hinton Way westwards to Macaulay Avenue.

3.5 The Site slopes gently upwards to the north and north-east towards the base of the chalk uplands, with the Gog Magog Hills, at approximately 75 metres Above Ordnance Datum (AOD), forming the nearest area of higher ground.

3.6 Within the emerging Local Plan, Stapleford is identified as a Rural Centre, reflecting its sustainability credentials and range of services and facilities. Great Shelford and Stapleford are two settlements that act as one centre. The settlements provide a sufficient range of shops and services and a village centre that is an important characteristic of a Rural Centre. The designated Neighbourhood Area has an identified housing requirement of 131 dwellings over the plan period.

3.7 It is important to recognise the wider context of the Site, which does not represent an isolated or remote rural location. Rather, it is located immediately adjacent to the existing built-up edge of Stapleford and is well connected to the settlement.

3.8 The Site benefits from direct access to the established highway network, together with existing pedestrian, cycle and public transport links, providing convenient access to local services, employment opportunities and sustainable transport infrastructure. As such, the Site occupies a highly sustainable location that is well suited to accommodating future housing growth. The Site occupies a highly sustainable location between Shelford Railway Station and the proposed Cambridge South East Transport (CSET) Phase 2 route.

3.9 The proposed CSET Phase 2 scheme comprises a new busway linking the Cambridge Biomedical Campus with a new travel hub at the A11/A1307 junction, together with enhanced active travel connections serving surrounding communities, including Stapleford and Great Shelford. The route currently passes through the northern part of the Site and, if delivered, would further enhance the accessibility credentials of the Site.

3.10 The site's proximity to both existing and proposed high-quality public transport infrastructure aligns with the strong national policy emphasis on directing residential development to locations within reasonable walking and cycling distance of well-connected public transport hubs.

3.11 Whilst the CSET proposals remain subject to the ongoing Transport and Works Act Order process, the scheme demonstrates the strategic transport role of this location and its suitability for accommodating sustainable growth. The Site is therefore particularly well placed to support residential development, providing future residents with access to a range of sustainable transport options and reducing reliance on the private car.

3.12 In the context of the emerging Local Plan, these locational advantages weigh strongly in favour of the Site and demonstrate that it represents a sustainable, accessible and deliverable opportunity for housing growth.

Housing and Economic Land Availability Assessment (HELAA) 2026 Response

3.13 The Site has been assigned Ref: 115189 in the latest HELAA. We have the following comments to make:

HELAA - Landscape and Green Belt

3.14 The HELAA (2026) records that the Site scores 'Red' for its landscape assessment meaning that development of the Site would have a significant negative impact which cannot be mitigated. This conclusion is unwarranted and entirely rejected by the Landscape and Visual Appraisal prepared by Pegasus available at **Appendix 2** of this representation.

3.15 The Appraisal sets out that the Site is not subject to any statutory or non-statutory landscape designations, historic woodland, tree preservation orders (TPOs), important countryside frontages or protected green spaces.

3.16 The Pegasus note clearly sets out why the Council's assessment of the Site is incorrect in insinuating its development would result in a 'sprawling expansion' of Stapleford, and demonstrates that the Site represents a modest infill to the settlement pattern, with the majority of the Site also being considered as Grey Belt. This assessment would only be strengthened by the delivery of CSET busway in the future as a strong defensible boundary and urbanising feature to the north of the Site.

HELAA – Flood Risk

3.17 The HELAA identifies the Site as being wholly within Flood Zone 1 and outside any climate change-adjusted fluvial flood risk area. It also records that approximately 1% of the Site is affected by surface water flood risk associated with the 1 in 1,000-year event.

3.18 A review of the mapped surface water flood risk data confirms that only a very limited proportion of the Site is affected. Based on the Site area of approximately 25.5ha, it is estimated that around 1.6% of the Site falls within the extent of the 1 in 1,000-year surface water flood event. This broadly aligns with the HELAA assessment and demonstrates that surface water flood risk is confined to a small part of the Site.

3.19 Consequently, flood risk does not represent a significant constraint to development and can be appropriately addressed through the design process and the incorporation of sustainable drainage measures.

HELAA – Ecology

3.20 The HELAA identifies the Site as having an Amber ecology rating on the basis that the scale of development may trigger the need for additional assessment in relation to statutory protected species, priority habitats, mitigation measures and Biodiversity Net Gain (BNG) requirements.

3.21 However, the Site is not covered by any statutory or non-statutory wildlife site designation and does not adjoin any land with statutory biological protection.

3.22 The closest statutory protected area that is accessible to the residents of Stapleford is the Roman Road Site of Special Scientific Interest (SSSI). This is a 12.4 hectare linear biological SSSI stretching from south-east Cambridge to Linton that occurs 3.01 km, at its closest accessible point, to the north-east of the Stapleford Site.

3.23 The Roman Road is a green lane with an unsurfaced bare ground public footpath and bridleway adjoined by narrow strips of chalk grassland with boundary hedgerows, scrub and pockets of woodland. Existing public use of the Roman Road is focused on the central bare ground footpath/bridleway with little evidence of trampling damage to adjoining chalk grassland habitats.

3.24 The greatest threat to the integrity of the Roman Road chalk grassland habitats is from naturally encroaching scrub as opposed to recreational pressure. In summary, the Roman Road SSSI is not particularly vulnerable to increased recreational pressure and, in any event, the presence of other more closely located unprotected recreational areas (e.g. Magog Down and Wandlebury Country Park) will ensure that adverse recreational pressures on the Roman Road SSSI is not significantly elevated as a result of the Stapleford development proposal.

3.25 The Stapleford Site itself is dominated by low biodiversity value agricultural habitats and supports relatively limited priority habitat and faunal species interest. Given the large extent of low value agricultural habitat, considerable opportunity exists within the Site to meet mandatory Biodiversity

Net Gain requirements and mitigate/compensate any loss or damage to existing priority habitats and species.

3.26 Consequently, the Site can be scored green in this regard.

HELAA – Heritage

3.27 The HELAA grading in respect to the historic environment outlined that the RAG score remains Amber because of the potential to impact the setting of the Grade II* St Andrew's Church and Stapleford Conservation Area. The potential for this could be 'at least partially mitigated through layout and careful landscaping'.

3.28 This has been considered and emerging development plans for the Site concentrate the built form towards Hinton Way (away from the Stapleford Conservation Area and listed buildings), with development density decreasing towards the eastern, southern and northern site boundaries, and no development proposed in the eastern and southern extents of the site area.

3.29 At the southern end, this space will act as a substantial landscape buffer (adjacent to the Stapleford Conservation Area boundary and Church of St Andrews), whilst that to the east will form an extension to the existing countryside park north of the Strawberry Fields development (ref. 22/04303/REM). These two areas will be linked by a green corridor which runs along the eastern edge of the site, thereby retaining long views across open landscape from the churchyard boundary and northern boundary of the Stapleford Conservation Area.

3.30 It is acknowledged that the existing open fields to the north of the Church of St Andrews and Stapleford Conservation Area form part of the setting of these designated heritage assets. The potential scale of impact has been reduced by the embedded mitigation. The landscape setback from the southern site boundary will maintain an open character in proximity of the church and conservation area, and with landscaping has potential to filter/screen the nearest built form at the southern end of the proposed development parcel. The setback together with the green corridor will sustain a visual connection from these heritage assets to the wider countryside and rising chalk downs to the north/north-east as part of the proposed development. Further landscaping and refinement of the layout can be explored to mitigate any residual heritage effects, which should be weighed against the public benefits of the proposals.

HELAA – Archaeology

3.31 A Desk Based Assessment (PCA 2026) has been undertaken for the Site, and identified low to medium potential for early prehistory, medium potential for the late prehistoric (Iron Age) and Roman periods, low potential for the early medieval period, medium potential for the medieval period and low to medium potential for the post-medieval period.

3.32 It also concluded that an appropriate archaeological investigation strategy would be required given the scale of the proposed development and the archaeological evidence recorded in the surrounding area.

3.33 A geophysical survey has also been undertaken (Magnitude Surveys 2026). This identified several anomalies of probable and possible archaeological origin, including possible Romano-British ditches in the north-western part of the site and possible curvilinear and rectilinear features in the southern part of the site. Other anomalies were interpreted as relating to former field boundaries, agricultural activity, the Second World War anti-tank ditch, possible extraction, and geological or superficial deposits.

3.34 An archaeological evaluation is currently underway, which will provide further site-specific evidence regarding the archaeological potential and significance of any remains present.

3.35 On the basis of the evidence available to date, there is nothing currently identified that would preclude development of the site, although the evaluation will provide further information to inform the archaeological assessment and any appropriate mitigation.

HELAA – Transport and Highways

3.36 **Appendix 3** contains a Highways Technical Note prepared by KMC. The note provides a detailed response to the HELAA comments under the 'Transport' heading, particularly subheadings 'Access' and 'Transport and Roads'.

3.37 Further, it provides an overview of the excellent sustainability credentials of the Site, in particular the multitude of options for active and public transport (both existing and proposed) including Shelford Train Station, CSET, the DNA Path and other active travel highways improvements including the Cambridge to Sawston Greenway. As such, the Site is extremely well placed to deliver homes in a manner consistent with the transport objectives of the NPPF 2024 and 2026 and the Plan's vision for new neighbourhoods that minimise reliance on the private car.

4.0 Summary and Conclusion

4.1 This representation has been prepared on behalf of Granta Land Limited in response to the Greater Cambridge Local Plan Regulation 19 consultation.

4.2 The representation has set out the concerns we have in regard to the Plan being unsound, unjustified and not positively prepared.

4.3 In particular, the concerns are:

- The Plan fails to plan for an appropriate number of homes for the economic growth required of Cambridge, nor does it address spiralling affordability issues across the area.
- The Plan applies inappropriate delivery rates to strategic sites and proposes the Liverpool method to address any future shortfall, contrary to national guidance and inadequately justified.
- The development strategy exacerbates the Council's over-reliance on strategic sites, which are infrastructure dependent. Whilst not objecting to strategic growth, the strategy lacks robustness and fails to meet other policy requirements or secure the vitality of the rural area.

4.4 As such, more sites must be allocated that can deliver early in the Plan period in sustainable locations, where they contribute positively to local need for housing, such as Granta's site in Stapleford.

4.5 The Plan must therefore be subject to modifications.

4.6 These representations also address the scores assigned to the Site (Ref: 115189) in the HELAA by the Council. In particular, it demonstrates some scores are unjustified, in particular regarding landscape and ecology. These must be taken into account in the future, if the Inspector is minded to require the Council to allocate more sites as part of the Examination process.

Prepared by

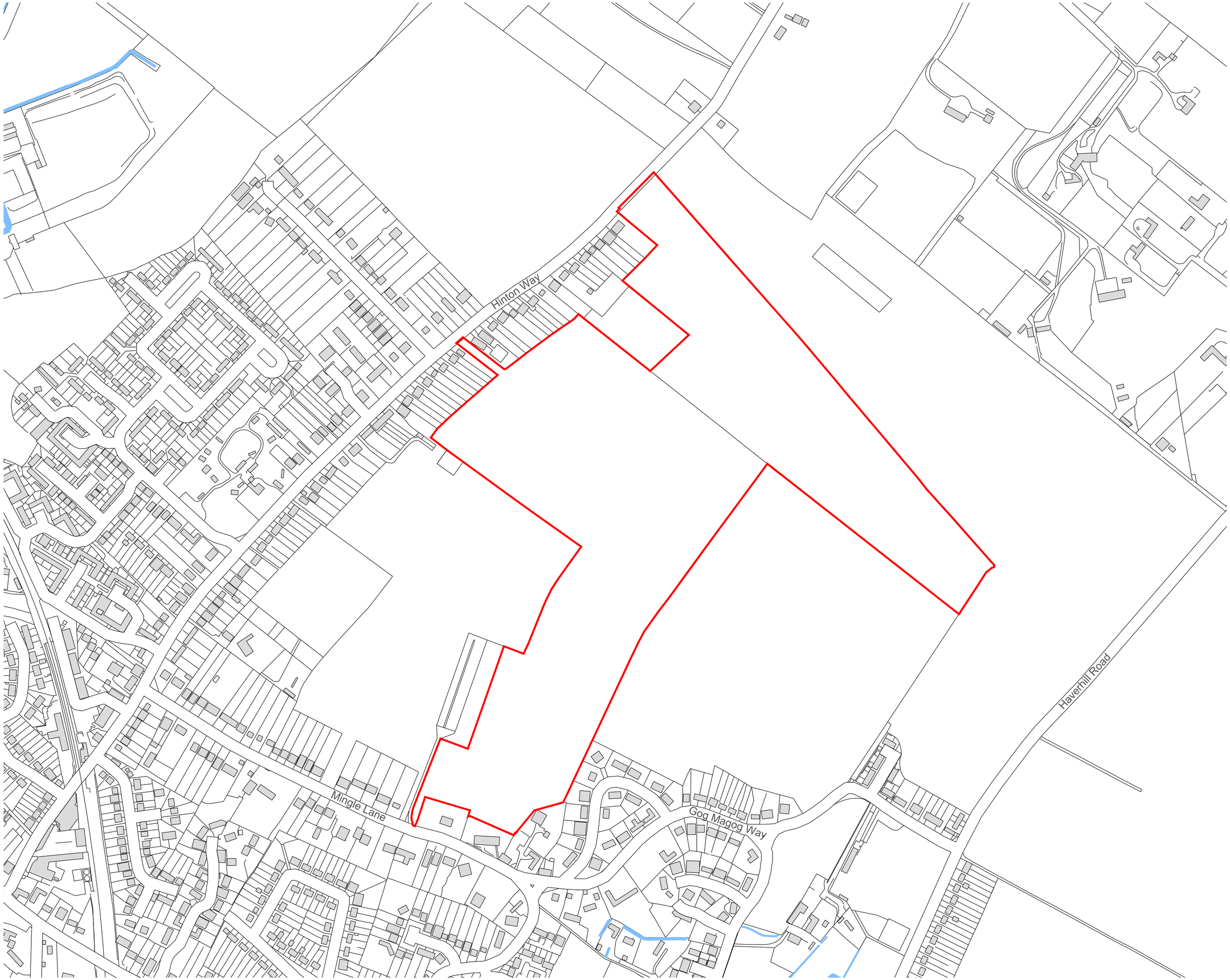
Signed on behalf of

Bidwells LLP	**Gareth Pritchard, Partner**	Date: 18/09/26

Reviewed by

Bidwells LLP	**Mike Jones, Partner**	Date: 25/09/26

APPENDIX 1
SITE LOCATION PLAN



Ordnance Survey, (c) Crown Copyright 2025. All rights reserved. Licence number 100022432

Site Boundary

N

METRES @ 1:2500 0 20 50 100

Project
Land North of Mingle Lane and East of Hinton Way, Stapleford

Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
23/01/2026	1:2,500 at A1	JL	JB

Project No	Drawing No	Revision
1357	001	V2

Mosaic

APPENDIX 2
LANDSCAPE AND VISUAL APPRAISAL, PREPARED BY PEGASUS

Landscape & Visual Appraisal

Project name:	**Land North of Mingle Lane and East of Hinton Way, Stapleford**
Author:	David Webster
Date:	21st September 2026
Project number:	P25-3066
Reference:	Landscape & Visual Appraisal

1. Introduction.

1.1. Pegasus Group have been commissioned by Granta Land Limited (the '**Promoter**') to prepare a Landscape & Visual Appraisal (an '**LVA**') in relation to Land North of Mingle Lane and East of Hinton Way, Stapleford, Cambridgeshire (the '**Site**'). This appraisal is intended to be included in representations to the draft Greater Cambridge Local Plan. The Site is located within the Green Belt.

1.2. The Promoter is working up a scheme for up to 400no. dwellings, along with accompanying access, parking areas, and landscaping including play space and SuDS areas (the '**Proposals**') that would be situated on land identified by the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA)[1] as **Site 115189** (please also refer to **Appendix A** of this report).

1.3. The HELAA records that the Site scores 'Red' for its landscape assessment 2026 meaning that development of the Site would have a significant negative impact which cannot be mitigated. **This conclusion is unwarranted and entirely rejected by this LVA**.

1.4. An initial desk-top study was carried out to review a range of published information relating to the Site and its context, landscape designations, published landscape character assessments and the accompanying guidance.

1.5. Subsequently, a Site visit was carried out in March 2026 to review the findings of the desktop study and to determine the visual influence of the Site.

1.6. This LVA continues to inform the design evolution of the Proposals. The identified landscape opportunities and constraints identified through the desktop review, field survey, and ongoing landscape assessment are therefore integral to any future development aspirations and will play a key role when considering the layout and design of built development, open space, green infrastructure and structural planting.

[1] *Greater Cambridge Housing and Economic Land Availability Assessment (HELAA)*

2. Planning Policy.

National Planning Policy Framework

2.1. The *National Planning Policy Framework* (NPPF)[2] was last updated in August 2026 and sets out the Government's planning policies for England, providing a framework within which local and neighbourhood plans are produced and is a material consideration in planning decisions.

2.2. It is understood that the emerging Local Plan has regard for both the recently superseded NPPF and the consultation draft of the NPPF. Nonetheless, the updated NPPF presents the Governments clear direction of travel in relation to plan making and decision taking.

2.3. **Policy DP3(1)** requires that the Proposed Development should 'respond' to its *"context (the history, character and features of their site and its setting)"* so that it integrates with and enhances its surroundings *"such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate …"*.

2.4. The latest revision to the NPPF introduces several landscape related policy updates. **Policy N2(1a)** specifically identifies landscape character as one of the environmental qualities of land to consider in development proposals. This is an important change in terminology. The December 2024 NPPF referred to the *"intrinsic character and beauty of the countryside"*. The new Framework goes further by expressly introducing the term 'landscape character' into the natural environment policy.

2.5. **Policy N2(1d)** requires that existing landscape features including trees, hedgerows and other natural features of visual, historic, or nature conservation value are specifically identified, alongside the role of appropriate landscaping when for integrating a development into its surroundings. This LVA has identified the existing landscape and other natural features, and any future landscape design work will ensure full compliance with Policy N2(1d).

2.6. **Policy N3** recognises the benefits of tree planting, with particular regard to biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment. The emerging proposals will include extensive native hedgerow and tree planting. These measures will effectively integrate the Proposals into the receiving landscape, reinforcing existing landscape features whilst also enhancing biodiversity. The new tree planting will be subject to long-term management and maintenance. On this basis, the proposals are considered to fully comply with the requirements of Policy N3.

2.7. **Policy N4** includes specific policy for National Parks, National Landscapes and the Broads, recognising the importance of conserving and enhancing their natural beauty. It also expressly addresses development within their setting, requiring proposals to be sensitively

[2] National Planning Policy Framework - GOV.UK

located and designed to avoid or minimise adverse impacts. The Site is not located within a Protected Landscape or the setting of a Protected Landscape, so this policy does not apply.

2.8. Green infrastructure features heavily in the new NPPF, as it did previously; however, there is now a strong emphasis on its provision and multifunctional role. The starting point is the Glossary definition:

> *"Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. It includes parks and gardens, green spaces, green corridors such as rivers and canals, sustainable drainage systems, features for species, street trees and community orchards."*

2.9. And the importance of green infrastructure is reflected throughout, including policies:

- **Policy PM13**: Setting standards identifies green infrastructure among the standards where plans should reflect local characteristics.

- **Chapter 5** – Meeting the challenge of climate change, **Policy CC1** requires plans to identify opportunities for green infrastructure and nature-based solutions to safeguard and improve carbon storage and support nature recovery and resilience, taking account of Local Nature Recovery Strategies. Green infrastructure and suitable tree planting also feature as measures to minimise overheating risk.

- **Chapter 14** – Achieving well-designed places, **Policy DP3** says development should incorporate and connect a network of high-quality, accessible, multifunctional green infrastructure. Its purposes include recreation and healthy living, strengthening habitats, climate resilience, improving air and water quality, maintaining tree cover, and incorporating sustainable drainage. The emphasis on multifunctionality is significant: green infrastructure is expected to perform environmental, climatic, ecological, recreational, and health functions.

- **Chapter 19** – Conserving and enhancing the natural environment reinforces the approach. **Policy N1** requires development plans to set standards for green infrastructure provision, drawing on Natural England's Green Infrastructure Standards for England. **Policy N2** promotes green infrastructure and nature-based solutions to secure multiple benefits, including biodiversity, surface-water and pollution management, climate-change mitigation and adaptation, and recreation.

Adopted Development Plan

2.10. The relevant elements of the adopted Development Plan are the South Cambridgeshire Local Plan[3] (September 2018) and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021)[4]. The following policies are considered relevant:

Policy.	Summary.
Policy S/3	**Presumption of Favour of Sustainable Development** *The Council will ensure that development proposals will take a positive approach that reflects the presumption in favour of sustainable development …*
Policy S/4	**Cambridge Green Belt** *A Green Belt will be maintained around Cambridge that will define the extent of the urban area …*
Policy CC/8	**Sustainable Drainage Systems** *Development proposals must incorporate sustainable surface water drainage systems (SuDS) appropriate to the nature of the Site …*
Policy HQ/1	**Design Principles** *All new development must be of high quality design, with a clear vision as to the positive contribution the development will make to its local and wider context …*
Policy NH/2	**Protecting and Enhancing Landscape Character** *Development must respect and retain or enhance the local character and distinctiveness of the local landscape …*
Policy NH/4	**Biodiversity** *… New development must aim to maintain, enhance, restore or add to biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape …*
Policy NH/6	**Green Infrastructure** *All development proposals should seek to conserve and enhance green infrastructure within the district …*
Policy NH/8	**Mitigating the Impact of Development In and Adjoining the Green Belt** *Any development proposals within the Green Belt must be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt …*
Policy SC/7	**Outdoor Play Space, Informal Open Space and New Developments** *All housing developments will contribute towards Outdoor Playing Space (including children's play space and formal outdoor sports facilities), and Informal Open Space to meet the need generated by the development …*

Table 1: Relevant landscape planning policies

[3] South Cambridgeshire Local Plan (adopted September 2018)

[4] Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021)

1.1. The Proposals Maps associated with the above Plans indicate the following about the Site:

- The Site is washed over by the Green Belt;
- The Site's southern/western boundaries are located adjacent to the defined village development framework boundaries for Stapleford/Great Shelford respectively;
- The Site's southern boundary adjoins the Stapleford Conservation Area; and
- The Site is washed over by Cambridge Southern Fringe Area Action Plan; however, it is acknowledged that this Area Action Plan will no longer be part of the development plan when the new Local Plan is adopted.

2.11. The Council is also preparing The Greater Cambridge Emerging Local Plan over the next plan period (2024-2045), while not yet adopted, it forms an important material consideration, particularly where it updates evidence relating to landscape character and value. The following emerging policies are considered relevant:

Policy.	Summary.
Policy BG/BG	**Biodiversity and geodiversity** *All development must deliver statutory biodiversity net gain (BNG), providing a minimum of 10% BNG against the baseline, unless exempt under the Environment Act 2021, to be provided on-site in line with guidance.*
Policy BG/GI	**Green infrastructure** *All development proposals must demonstrate how they protect and enhance green infrastructure appropriate to the development's scale and location.*
Policy GP/QP	**Establishing high quality landscape and public realm** *Development proposals are required to deliver high quality landscape and public realm by (a) Enabling local communities … (b) Enhancing connectivity … (c) Responding to climate change … (d) Integrating with local character … (e) Being accessible to all … (f) Promoting health and wellbeing.*
Policy GP/LC	**Protection, conservation and enhancement of landscape character** *All new development proposals must (a) Protect, conserve and enhance the local landscape character as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents …*
Policy GP/HE	**Historic environment** *All development proposals that have the potential to impact heritage assets or their setting must be supported by a Heritage Statements Impact Assessment …*

Table 2: Relevant emerging landscape planning policies

Stapleford & Great Shelford Neighbourhood Plan

2.12. The Site lies within the Stapleford and Great Shelford Neighbourhood Plan[5] area. The plan was formally 'made' in October 2025. Policies relevant to this assessment are set out below:

Policy.	Summary.
Policy S&GS 6	**Development and design in Stapleford and Great Shelford** *States among other things that development proposals should be informed by the Stapleford and Great Shelford Design Guidance and Codes, and where development occurs on the settlement edge, should provide a soft and natural edge to the settlement, sitting comfortably within the surrounding landscape. It should also improve visual and physical connections to the landscape.*
Policy S&GS 11	**Trees and Development** *States amongst other things that trees and hedgerows of good arboricultural value should be retained as an integral part of the design of any development and any replacement trees should be planted at a suitable size to compensate for the removed trees.*
Policy S&GS 12	**Protecting and Enhancing Stapleford and Great Shelford's Landscape Character** *States amongst other things that development proposals should (a) retain or enhance existing features of value within the site; (b) respect the identity of Stapleford and Great Shelford as two villages distinct and separate from the City of Cambridge; (c) be in accordance with the characteristics found in each landscape character area.*
Policy S&GS 13	**Important Countryside Frontage** *A very small part of the Site adjoins the identified frontage, where land has a strong countryside character because it either penetrates or sweeps into the built-up area and provides a significant connection between the street scene and the surrounding rural area, or provides an important rural break between two nearby but detached parts of the development framework.*
Policy S&GS 20	**Delivering Stapleford and Great Shelford's Improved Landscape Area** *States that opportunities will be sought to implement countryside enhancement measures within the Improved Landscape Area that washes over the Site.*

Table 3: Relevant Neighbourhood Plan policies

2.13. In relation to the Proposals, any future planning application will be accompanied by a Landscape and Visual Impact Assessment (LVIA) that will consider such matters as the landscape features and character of the Site and its surroundings, together with important views and general visual amenity.

2.14. At this early stage, it is clear that the Proposals could be delivered in a manner that fully complies with the requirements of the NPPF, existing Local Plan policies, emerging Local Plan policies, and Neighbourhood Plan policies. In particular, the proposals will be guided by the

[5] *Stapleford and Great Shelford Neighbourhood Plan (2025)*

Stapleford and Great Shelford Design Guidance and Codes [6] and where applicable the Stapleford Conservation Area Character Appraisal[7]. The Proposals will contribute to local distinctiveness by reflecting, respecting and complementing existing positive built and natural (e.g. trees, hedgerows and ponds) attributes in Stapleford.

2.15. The Proposals will retain or enhance existing features of value within the site and work within the context of existing features of value in the wider surroundings to respect the identity of Stapleford, acknowledged as distinct and separate from Cambridge. The Proposals will be fully in accordance with the characteristics identified by the Stapleford & Great Shelford Landscape Character Assessment[8]. The Proposals will also take any reasonable opportunities to implement the countryside enhancement measures described under Policy S&GS 20.

3. Green Belt Appraisal.

3.1. The recently superseded 2024 NPPF and the updated 2026 version of the NPPF reiterate that the Government attaches great importance to Green Belts, stating that: *"The objective of Green Belt policy, as set out in this chapter, is to prevent urban sprawl by keeping land permanently open. The government attaches great importance to Green Belts, the essential features of which are their openness and permanence."*

Grey Belt

3.2. When introducing the Grey Belt in December 2024, the Government was clear that the change was to be interpreted as a new strategic approach to Green Belt land designation and release. In the first instance, it required local authorities to use the local plan process to adopt a 'sequential approach', considering brownfield land, then Grey Belt land, and only then higher performing Green Belt land. The Government fully expects developers to bring forward proposals on low-performing Grey Belt land outside of the plan process, with higher performing land protected from this form of release.

3.3. As the Secretary of State for Housing and Planning made clear in a Parliamentary Statement (27th February 2025) with author's emphasis:

> *"We are clear that development must look to brownfield first, prioritising the development of previously used land wherever possible. However, we know brownfield development alone will not be enough to meet our housing need. That is why the revised National Planning Policy Framework (NPPF) published in December 2024 included a new approach to the Green Belt, prioritising the release of lower quality grey belt land within it…"*

3.4. The NPPF originally defined the 'Grey Belt' as: *"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land*

[6] *Stapleford and Great Shelford Design Guidance and Codes (2023)*
[7] *Stapleford Conservation Area Appraisal (2021)*
[8] *Stapleford & Great Shelford Landscape Character Assessment (2019)*

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 the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

3.5. The recently updated NPPF drops the reference to footnote 7 in the latest definition of Grey Belt; however, it is clear from the HELAA assessment for the Site that there are no such constraints that would provide a strong reason for refusing or restricting development.

3.6. The Site is identified in the Greater Cambridge Green Belt Assessment (GCGBA, 2026)[9] as comprising parts of assessment **Parcels GS8B** and **GS9**:

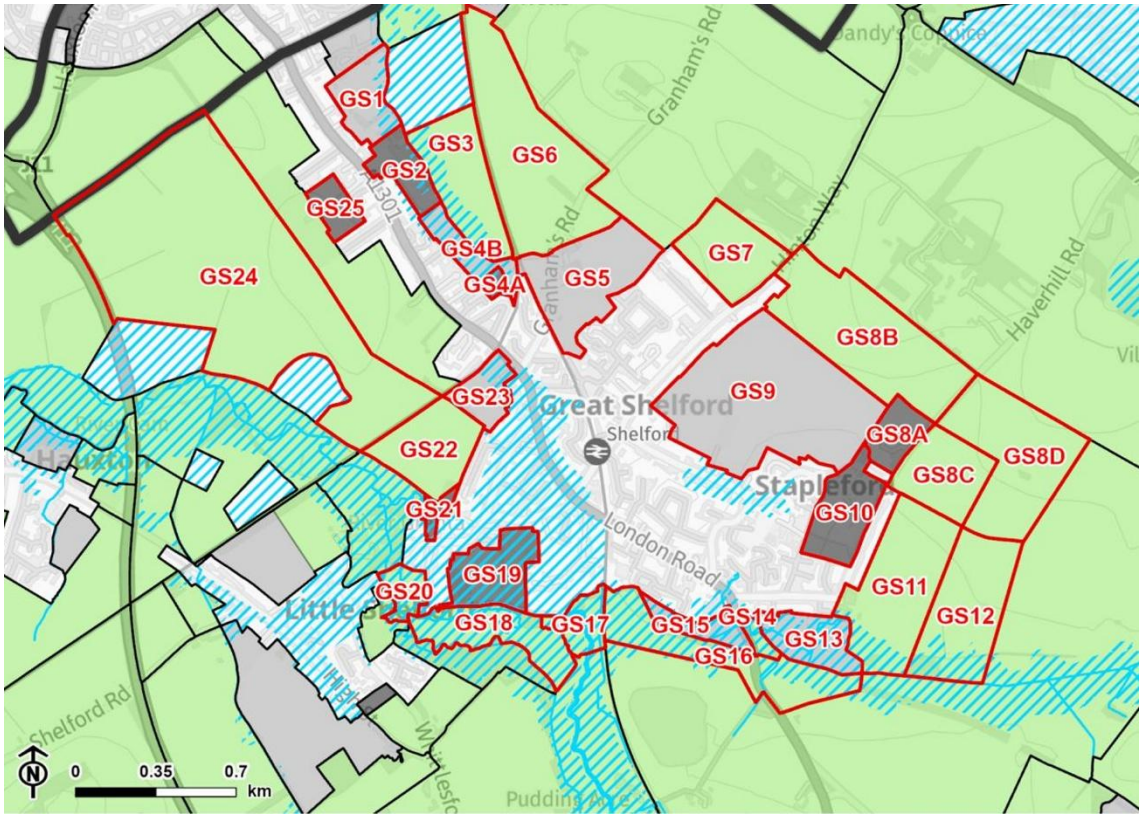


Figure 1: Extract from the Greater Cambridge Green Belt Assessment (2026)

3.7. The assessment concludes that Parcel GS8B makes a 'Strong' contribution to Purpose D, whilst Parcel GS9 makes a 'Moderate' contribution to this purpose and therefore can potentially be considered as Grey Belt land.

Purpose (a): to check the unrestricted sprawl of large built-up areas

3.8. Paragraph 3 of Appendix E of the NPPF states that villages should not be considered large built-up areas.

[9] *Greater Cambridge Green Belt Assessment (2026)*

3.9. Stapleford and Great Shelford are acknowledged within the adopted Local Plan and Neighbourhood Plans to be highly sustainable villages. The Proposals represent the sustainable extension of a village, not a large built-up area, being enclosed by existing built form to the south, east and west and a committed countryside park to the north, creating strong defensible boundaries. Should the CSET busway be approved then this will introduce a further significant urbanising feature within the landscape to the north of the Site.

3.10. Overall, the Site makes a **Weak** / **No** contribution to Purpose (a).

Purpose (b): to prevent neighbouring towns merging into one another

3.11. Paragraph 4 of Appendix E of the NPPF makes clear that this purpose relates to the merging of towns, not villages.

3.12. The Site does not form a gap between any towns, and its development will not result in the merging of neighbouring towns. Moreover, the villages of Stapleford and Great Shelford have already merged with no physical differentiation now between them.

3.13. Overall, the Site makes a **Weak** / **No** contribution to Purpose (b).

Purpose (d): to preserve the setting and special character of historic towns

3.14. The GCGBA represents an evolution of the previously applied methodology, explicitly stating (at Paragraph 3.17) that Cambridge *"only has a Green Belt because of its historic character and all three Cambridge purposes form elements of NPPF Purpose D, targeting different aspects of the city's special character … "* (author's emphasis).

3.15. On that basis, the GCGBA considers the contribution to the three Cambridge Green Belt purposes and impact of development/release on remaining Green Belt in combination in order to arrive at an overall harm rating to Purpose (d) only.

3.16. At Paragraph 3.34, the GCGBA argues that the scope of analysis undertaken, structured around the three Cambridge purposes which reflect aspects of Cambridge's special character, is consistent with the PPG guidance on assessing NPPF Purpose (d):

- The analysis takes into consideration the influence of existing development when assessing contribution;
- The assessment 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; and
- The analysis of contribution to the three Cambridge purposes and the assessment of the impact that development would have on those purposes have been considered in combination to arrive at an overall harm rating that reflects the extent of contribution to Purpose (d).

3.17. Paragraph 5 of Appendix E of the NPPF states that land making a 'Strong' contribution to this purpose is likely to be free of existing development and include **all** of the following features:

- form part of the setting of the historic town; and
- 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.

3.18. The Site adjoins the villages of Stapleford and Great Shelford and therefore does not form part of the setting of Cambridge.

3.19. It is simply not credible to argue that the Site makes a 'Considerable' contribution to the special character of Cambridge. The NPPF makes clear that this level of contribution would only be expected if the Site was 'within', 'adjacent to' or 'of significant visual importance to the historic aspects of' Cambridge. There is no intervisibility between the Site and Cambridge. The separation between the Site and Cambridge severely restricts any visual, physical, or experiential connection to the historic aspects of the town.

3.20. It is also important to recognise that the Site only partially extends into the lower lying land within Parcel GS8B, an area that is largely contained by existing residential development along Hinton Way. This distinguishes the northern part of the Site from the more elevated parts of Parcel GS8B, which has the potential for more wide ranging views.

3.21. On this basis, the Site only makes a **Weak** / **No** contribution to Purpose (d). The GCGBA overstates the contributions made by Parcels GS8B and GS9. When considered in the round, the Site (in its entirety) meets the requirements to be considered Grey Belt land.

4. Landscape & Visual Appraisal.

4.1. The Site extends to approximately 26.27 hectares and comprises two arable fields to the north of the villages of Stapleford and Great Shelford. The Site is bound to the north by the 'countryside park' delivered as part of the recently constructed Strawberry Fields care village (ref: 20/02929/OUT); to the east by the care village itself and residential dwellings at Chalk Hill (off Gog Magog Way); to the south by residential dwellings to the north of Gog Magog Way, Dukes Meadow and Mingle Lane, and to the west by residential dwellings to the east of Hinton Way.

4.2. The Site is therefore contained on three sides by existing development, and should the CSET busway be approved then this will introduce a further containment and a significant urbanising feature within the landscape to the north of the Site.

4.3. The landform rises from the Granta Valley to the south which is generally located below the 20m contour up to the Gog Magog Chalk Hills to the north where the maximum elevation is circa 74m AOD at Magog Down and Wandlebury Ring. There are intervening areas of higher ground and chalk hills near the Site – i.e. at Fox Hill above the 50m contour, at Clarke's Hill above the 45m contour, and at Little Trees Hill above the 70m contour.

4.4. The land use within the Site and surrounding area comprises a number of large rectilinear arable fields which extend onto both the chalk landscape that rises upwards to the north-east and within the Granta Valley to the south-east. The fields are bound by native hedgerows which are typically clipped at c 1.5-2.5m in height. There are few hedgerow trees. In places the field boundaries are unmarked with no hedgerows which creates a larger and more open scale to the landscape – i.e. to the south-east of Haverhill Road. The arable fields typically extend up to the edge of Stapleford, where the settlement edge demonstrates a soft vegetated edge resulting from the numerous trees and hedges in back gardens that address the surrounding landscape.

4.5. Woodland and tree cover is concentrated around the chalk hills as typified at Wandlebury, Fox Hill and Clarke's Hill. These include shelter belts and hilltop copses. In the case of Fox Hill and Clarke's Hill the tree cover is also associated with a small number of larger properties set in mature gardens, including tree avenues and established formal gardens – i.e. those at Middlefield, Hillstead and The Uplands.

4.6. The village of Stapleford primarily comprises residential development, including a number of individual detached properties both within the historic core of the village (i.e. along Mingle Lane and Gog Magog Way) and also as linear ribbon development spreading north along Hinton Way. The southern boundary of the Site adjoins the Stapleford Conservation Area that covers the historic core of the village and includes the Grade II* Listed Church of St Andrew and its churchyard that also adjoin the Site's southern boundary. Stapleford Cemetery is located in a detached position from the village, adjoining the south-western corner of the Site, and is accessed along a narrow single-track road. There are a number of trees around the perimeter of the cemetery which contain and filter views to the arable landscape beyond.

Landscape Character

4.7. Overall, the Site reflects many of the key characteristics of the relevant published landscape character assessments at a National and Local level. The Site is located within **NCA 87: East Anglian Chalk**, described as a visually simple and uninterrupted landscape, comprising smooth, rolling chalkland hills and with generally large regular fields with low hawthorn hedges, few trees and expansive views to the north. Cambridge and its commuter villages are noted to have grown rapidly over the last 50 years.

4.8. At a District level, the Site lies within **LCT3: Lowland Farmlands**[10] described as being a *"well settled landscape with a relatively dense rural settlement pattern comprising large and small villages and outlying farmsteads"*. At a finer level of granularity, the Site is located within **LCA 3D: Cam & Granta Tributaries Lowlands Farmlands** distinguished by its wooded appearance, which makes it more visually enclosed than the other Lowland Farmlands, and by the relatively built up and suburban character of its villages.

[10] *Greater Cambridge Landscape Character Assessment (February 2021)*

4.9. The overarching landscape guidance for LCT3 is to *"conserve the tranquil, rural landscape with its network of scattered small woodlands, surviving moated sites and dispersed pattern of rural villages and to strengthen its character through measures to minimise the urbanising influence of large villages, new settlement and transport routes. Enhancements to woodland and linking vegetation features should also be encouraged to retain or enhance biodiversity and visual character"*.

4.10. The relevant guidance for integrating development into the landscape includes, but is not limited to:

- Conserve the historic villages through avoidance of ribbon development and coalescence with nearby settlement;
- Manage the scale, siting and design of settlement expansion to avoid incongruous development in the rural landscape;
- Maintain the distinctive settlement pattern of the area and its local context;
- Ensure density and pattern of new developments reflect that of existing villages and hamlets;
- Avoid backland and cul-de-sac developments where possible;
- Ensure buildings are arranged in continuous frontages within village cores and are arranged in loose knit patterns facing the street on more peripheral sites;
- Ensure new developments are integrated with sufficient space for garden and street tree planting where applicable;
- Take opportunities to create new village greens and/or wildlife areas within new developments; and
- Ensure new developments reflect the form, scale and proportions of the existing vernacular buildings of the area and pick up on traditional local building styles, height, materials, colours and textures.

4.11. In addition to the generic landscape guidelines for this landscape character type, the following guidelines are specific to the Cam & Granta Tributaries Lowlands Farmlands:

- Ensure development enhances existing landscape features, creates links between villages and recreational assets and is in keeping with the rural character;
- Conserve and manage woodland to maintain a visually enclosed character and separation; and
- Conserve parkland and enhance the specific features that give character and its context within the wider landscape in areas where it has been fragmented.

4.12. At a Local level, the Stapleford and Great Shelford Landscape Character Assessment identifies the northern part of the Site as within **LCA A2: Stapleford Arable Hills** and the southern part within **LCA B3: Mingle Lane and Hinton Way Arable Lowland**:

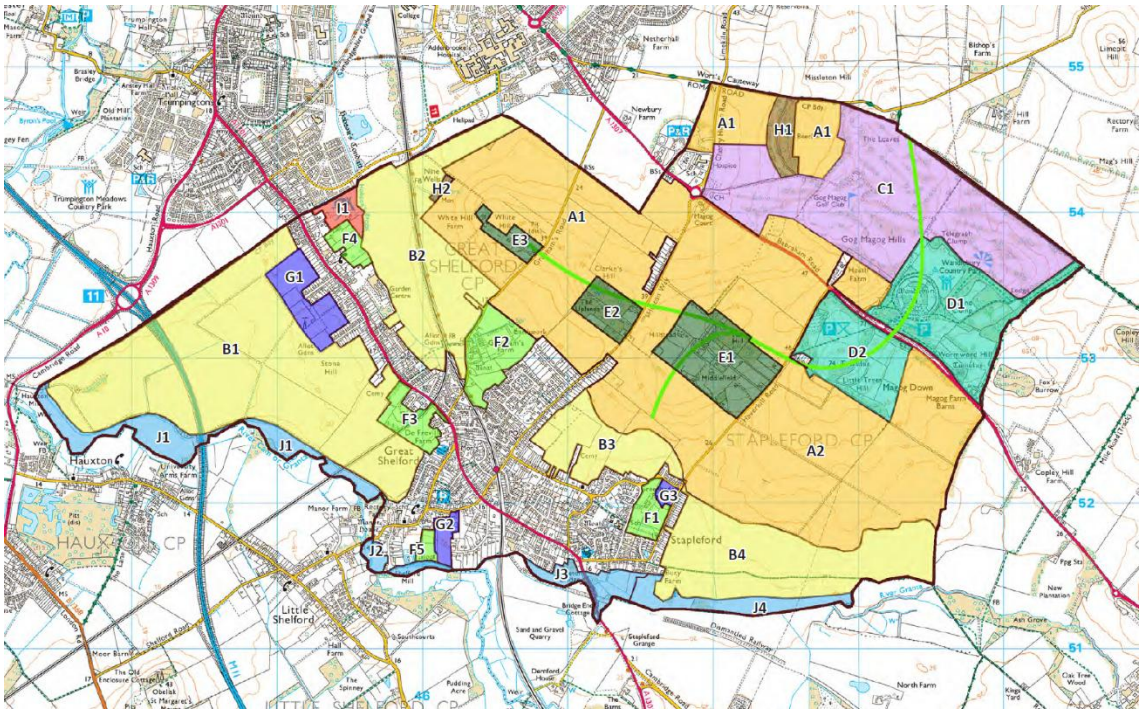


Figure 1: Extract from the Greater Cambridge Green Belt Assessment (2026)

4.13. LCA A2 is described as *"visually sensitive due to the open nature of the area and the high ground. The lack of a hedgerow along the east of Haverhill Road allows for panoramic countryside views and good views to Little Trees Hill at Magog Down which is a local landmark"*. The suggested landscape planning guidelines include the conservation of key views and improved access from Stapleford to Magog Down.

4.14. LCA B3 is described as *"visually contained on three sides by almost continuous housing on Mingle Lane, Hinton Way and Gog Magog Avenue and defined to the north by weak hedgerows and the rising ground of the chalk hills. This area is not readily visible from the village"*. The suggested landscape planning guidelines include the preservation of important public views into the countryside and the potential for a circular route between Hinton Way and Mingle Lane/Gog Magog Drive as part of southern fringe enhancements.

Visual Amenity

4.15. There are few public footpaths and bridleways in the locality and none passing through the Site. Approximately 1km to the north-east of the Site, Magog Down offers wider public accessibility and partial views towards the Site are available from the North Down, and in particular from the top of Little Trees Hill. From this higher ground, the recently delivered Strawberry Fields care village forms a noticeable component within wider panoramic views and serves to partially screen the eastern part of the Site, whilst the western parts of the Site are largely obscured by hilltop woodland at Fox Hill.

4.16. Overall, the Site is very well-contained by existing built form and vegetation, and there are very few opportunities to observe the Site from the surrounding countryside. Road users in the locality have little perception of the Site given the extent of roadside vegetation and residential development around the Site perimeter. There are occasional gaps between dwellings along Gog Magog Way and Mingle Lane that allow glimpsed views into the Site.

4.17. A selection of representative viewpoints has been made following consideration of the Screened Zone of Theoretical Visibility (SZTV) analysis that illustrates the potential 'worst case' intervisibility with the surrounding area (please refer to **Appendix B**: **SZTV**). The true extent of this intervisibility has subsequently been verified through site visits during which a number of representative viewpoints have been selected (and overlaid on the SZTV). The views from these viewpoints are included at **Appendix C**: **Representative Views**.

4.18. A summary of the relevant visual receptor sensitivity is set out in **Table 1** (below):

Receptor	Value	Susceptibility	Sensitivity
Viewpoint 01 Recreational users of Magog Down	High	High	High
Viewpoint 02 Users of Haverhill Road	Medium	Medium	Medium
Viewpoint 03 Users of Public Bridleway 212/2	Medium	High	Medium - High
Viewpoint 04 Users of Stapleford Recreation Ground	Medium	Medium	Medium
Viewpoint 05 Residents of Strawberry Fields	Medium	High	Medium - High
Viewpoint 06 Users of Gog Magog Way	Medium	Medium	Medium
Viewpoint 07 Residents of Stapleford	Medium	High	Medium - High
Viewpoint 08 Visitors to Church of St Andrew	Medium	High	Medium - High
Viewpoint 09 Visitors to Stapleford Cemetery	Medium	High	Medium - High
Viewpoint 10 Users of Mingle Lane	Medium	Medium	Medium
Viewpoint 11 Users of Hinton Way	Medium	Medium	Medium
Viewpoint 12 Users of Granham's Road	Medium	Medium	Medium

Table 1: Summary of visual receptor sensitivity

4.19. Overall, the Site is visually well-contained on three sides by almost continuous housing on Mingle Lane, Hinton Way and Gog Magog Avenue. As noted by the Stapleford and Great Shelford Landscape Character Assessment, the majority of the Site is not readily visible from the village. From Hinton Way it is screened by the intervening topography and from Haverhill Road the hedgerows screen views into the Site.

4.20. Internally, the character of the Site is open and there are long views from one gap in the built frontage on Mingle Lane over the area towards Fox Hill and from a gap on Gog Magog Avenue. There are extensive views from the cemetery. Given the poor relationship between the village and the countryside these limited public views are considered very important.

4.21. The Proposals place an emphasis on the maintenance of important views from the cemetery, Mingle Lane and Gog Magog Avenue through the use of view corridors and the introduction of a substantial landscape buffer along the interface with Stapleford.

4.22. Whilst there is a limited degree of inter-visibility from the southern edge of Magog Down, the Site forms only a small component of these views, which are framed and screened by intervening vegetation and the recently completed retirement village. Views toward the Site from Public Bridleway 212/2 to the south-east of the Site are also screened by the retirement village.

5. Summary.

5.1. The Site is not subject to any statutory or non-statutory landscape designations, historic woodland, tree preservation orders (TPOs), important countryside frontages, or protected green spaces. The Greater Cambridge Green Belt Assessment concludes that the majority of the Site is potentially Grey Belt. It is the Promoter's case that the entirety of the Site is Grey Belt land.

5.2. As part of the evidence base to the Local Plan, the HELAA records a score of 'Red' for the Site's landscape assessment:

> *"Having considered the submitted information, the site assessment remains Red. Concerns remain regarding effects on the rural character of the village setting, and visual effects of development of this scale in this location, particularly on rising land towards the Gog Magog Hills. The site lies in a pocket of rural land and Green Belt. To the north east, the land begins to rise towards the Gog Magog Hills, and visibility would be of concern. Development would irreversibly harm this rural character and would also isolate the field to the southwest, creating a sprawling expansion to Stapleford and Great Shelford."*

5.3. A score of Red means that development of the Site would have a significant negative impact which cannot be mitigated. This conclusion is rejected as it is clear that the Site's containment on three sides by almost continuous housing on Mingle Lane, Hinton Way and Gog Magog Avenue would clearly not result in 'sprawling expansion' of Stapleford, but rather a modest infill to the existing settlement pattern.

5.4. The Site rises to the north; however, important views from Stapleford looking towards the ridgeline can be maintained through the retention of view corridors. Existing views from Magog Down and Public Bridleway 212/2 to the south-east of the Site would also be retained.

5.5. As noted in Great Places Topic Paper (2021)[11] *"new development can provide opportunities to enhance the landscape, such as improving the edges of settlements. The edges of Cambridge and the villages are an important area of transition which require sensitive landscaping to protect the setting of the settlements and to provide a well-defined edge which respects townscape and the countryside beyond"* (p.25).

5.6. The Proposals demonstrate how the Site could be developed to deliver new homes on the lower-lying land within the Site, in keeping with National, Regional and Local guidance, in particular the Stapleford and Great Shelford Landscape Character Assessment.

5.7. Development would extend no further north than existing built form along Hinton Way and the northern edge of Strawberry Fields, following the landform within the Site to avoid areas of higher ground. The new settlement edge would be delivered to sensitively address the wider landscape, in particular a substantial area of public open space (POS) proposed for the northern edge of the Site. The suggested landscape planning guidance within the Local landscape character assessment could be integrated into the emerging layout.

5.8. To the south, another large area of POS would be included to protect the setting of both the Conservation Area and St Andrew's Church. This landscape buffer would ensure that Conservation Area maintains its rural setting and would allow for a stronger relationship with Stapleford Cemetery. A wide viewing corridor would also be introduced to maintain existing longer views from the churchyard looking northwards towards the rising chalkland, and the property at Hillstead. Views from Magog Down would not materially change.

5.9. Additional sightlines and pedestrian/cycle routes would be included where there are existing gaps between dwellings on Gog Magog Way and Mingle Lane. The proposed development parcels within the Site would be shaped by these routes, creating opportunities for new green corridors, avenues, and other publicly accessible places within the Site.

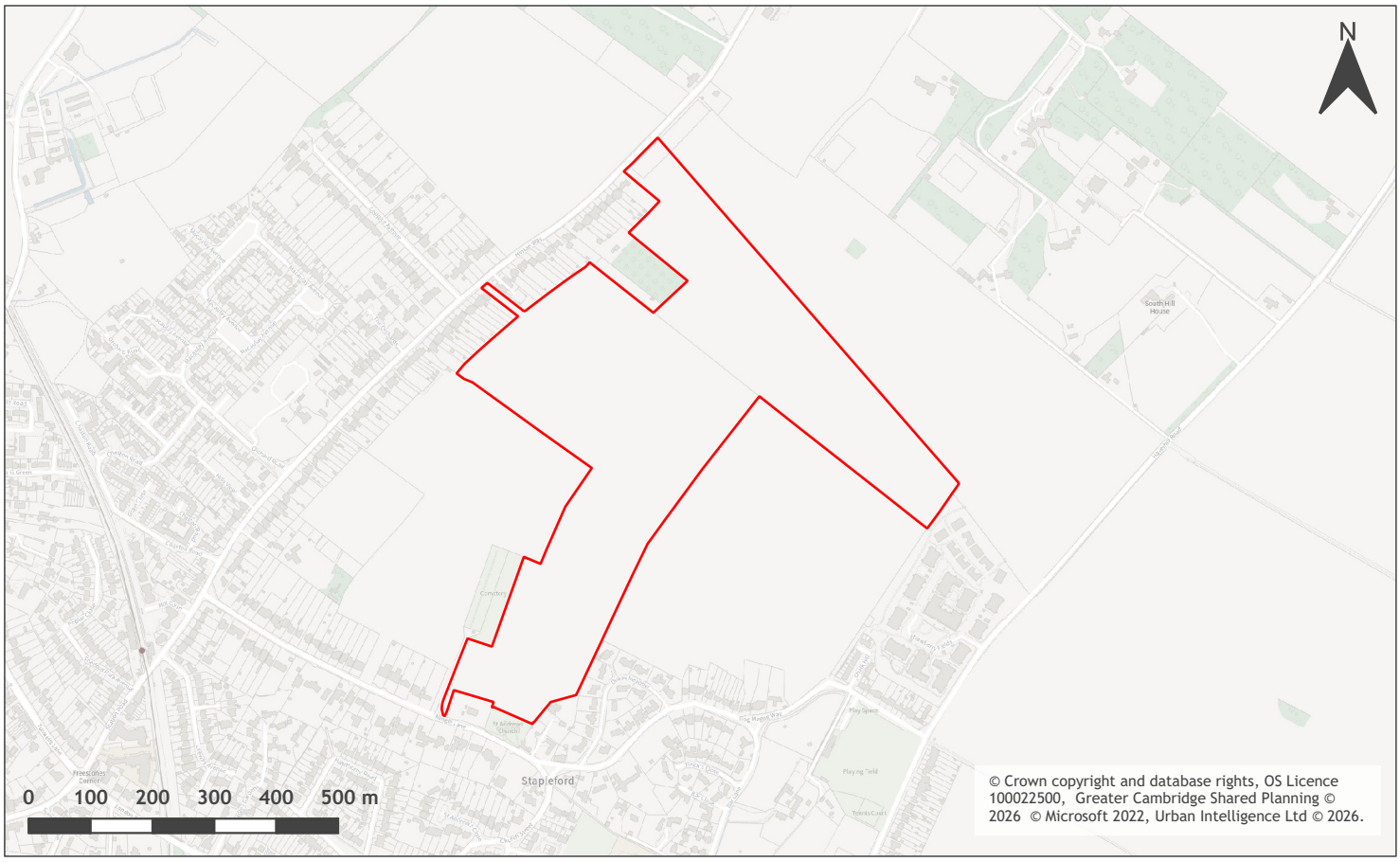
[11] *Greater Cambridge Great Places Topic Paper (2021)*

Appendices.

- **Appendix A**: Extract from Greater Cambridge HELAA - Site 115189
- **Appendix B**: Screened Zone of Theoretical Visibility (SZTV) Plan – with Representative Viewpoints
- **Appendix C**: Representative Views

Appendix A.

Land North of Mingle Lane and East of Hinton Way, Stapleford, Cambridgeshire



A map of Land North of Mingle Lane and East of Hinton Way, Stapleford, Cambridgeshire

Site information	-
Site ID	115189
HELAA Site ID	200771
Suitable Site Area (ha)	26.28
Ward/Parish	Shelford
Greenfield or Previously Developed?	Greenfield
Category of site	Integrating homes and jobs - Southern Cluster
Category of settlement	Within or adjacent to rural centre
Current use(s)	Agricultural Land / Building
Proposed development	Residential
Proposed employment floorspace (m2)	0
Proposed residential capacity	425-525
Suitability	-
Adopted Development Plan Policies RAG 2026	Amber

Adopted Development Plan Policies Comment 2026	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.
Flood Risk RAG Assessment 2026	Amber
Flood Risk Officer Comment 2026	Flood Zones: Site is wholly within Flood Zone 1. Climate Change: Site is not within a climate-change-adjusted flood zone. Surface Water: 1% lies in a 1-in-1,000-year event.
Flood Risk RAG Assessment 2025	Amber
Flood Risk Officer Comment 2025	Flood zone: Wholly in Flood Zone 1; Surface water flooding: 1% lies in a 1 in 1000 year event
Flood Risk RAG Assessment 2023	
Flood Risk Officer Comment 2023	
Flood Risk RAG Assessment 2021	
Flood Risk Officer Comment 2021	
Landscape RAG Assessment 2026	Red
Landscape Comment 2026	Having considered the submitted information, the site assessment remains Red. Concerns remain regarding effects on the rural character of the village setting, and visual effects of development of this scale in this location, particularly on rising land towards the Gog Magog Hills. The site lies in a pocket of rural land and Green Belt. To the north east, the land begins to rise towards the Gog Magog Hills and visibility would be of concern. Development would irreversibly harm this rural character and would also isolate the field to the southwest, creating a sprawling expansion to Stapleford and Great Shelford.
Landscape RAG Assessment 2025	Red
Landscape Comment 2025	Having considered the submitted information, the site has been scored Red. The site lies in a pocket of rural land and Green Belt. Development would irreversibly harm this rural character. To the north east, the land begins to rise towards the Gog Magog Hills and visibility would be of concern. Development would also isolate the field to the southwest and create a sprawling expansion to Stapleford and Great Shelford.
Landscape RAG Assessment 2023	
Landscape Comment 2023	
Landscape RAG Assessment 2021	
Landscape Comment 2021	
Biodiversity and Geodiversity RAG Assessment 2026	Amber

Biodiversity and Geodiversity Officer Comments 2026	Having considered the updated site details, the assessment rating remains Amber. Development of the size and scale described would likely meet the criteria set out by Natural England that would raise concerns regarding impacts to statutory protected sites. This includes increases in recreational pressure on nearby statutory protected sites. The proposed site may contain priority habitat which will require assessment and possible compensation if removed. Where there is a likelihood of protected and priority species being impacted a full assessment must be undertaken. A development of the type described would likely be eligible for mandatory biodiversity net gain requirements.
Biodiversity and Geodiversity Guideline Comments 2026	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.
Biodiversity and Geodiversity RAG Assessment 2025	Amber
Biodiversity and Geodiversity Officer Comments 2025	All new housing developments will require assessment of increased visitor pressure on nearby SSSI and may require a NE consult. There are no apparent priority habitats within the site; however, there are grasslands, hedges, and wooded boundaries on site that are likely to have ecological value. A development of the type described would likely be eligible for mandatory biodiversity net gains.
Biodiversity and Geodiversity Guideline Comments 2025	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.
Biodiversity and Geodiversity RAG Assessment 2023	
Biodiversity and Geodiversity Officer Comments 2023	
Biodiversity and Geodiversity Guideline Comments 2023	
Biodiversity and Geodiversity RAG Assessment 2021	
Biodiversity and Geodiversity Officer Comments 2021	
Biodiversity and Geodiversity Guideline Comments 2021	
Policy RAG Rating 2026	Green
Policy Officer Comment 2026	The site is wholly outside of protected open space. Detrimental open space impacts are not anticipated.
Policy RAG Rating 2025	Amber
Policy Officer Comment 2025	Site is not on a protected open space designation, however there is a protected open space designation on the periphery of the site. Development of the site may have a detrimental impact on the peripheral open space designation, but the impact could be reasonably mitigated or compensated. Within 50m of Protected Open Space.

Policy RAG Rating 2023	
Policy Officer Comment 2023	
Policy RAG Rating 2021	
Policy Officer Comments 2021	
Historic Environment RAG Assessment 2026	Amber
Historic Environment Comments 2026	The additional information has been assessed and the RAG score remains Amber because development of the site has the potential to adversely impact the setting of St Andrew's Church (grade II*) and the Stapleford Conservation Area which have an important open outlook to the north. The impact could be at least partially mitigated through layout and careful landscaping.
Historic Environment RAG Assessment 2025	Amber
Historic Environment Comments 2025	Development of the site has the potential to adversely impact the setting of St Andrew's Church (grade II*) and the Stapleford Conservation Area which have an important open outlook to the north. The impact could be at least partially mitigated through layout and landscaping.
Historic Environment RAG Assessment 2023	
Historic Environment Comments 2023	
Historic Environment RAG Assessment 2021	
Historic Environment Comments 2021	
Archaeology RAG Assessment 2026	Amber
Archaeology Officer Comment 2026	Having considered the updated information submitted, the site assessment remains the same. The site has potential for archaeological assets of late prehistoric, Roman and medieval date. Further information would be necessary to determine the suitability of this site for development.
Archaeology RAG Assessment 2025	Amber
Archaeology Officer Comment 2025	The site has potential for archaeological assets of late prehistoric, Roman and medieval date. Further informaiton would be necessary to determine the suitability of this site for development.
Archaeology RAG Assessment 2023	
Archaeology Officer Comment 2023	
Archaeology RAG Assessment 2021	
Archaeology Officer Comment 2021	
Accessibility RAG Assessment	Green

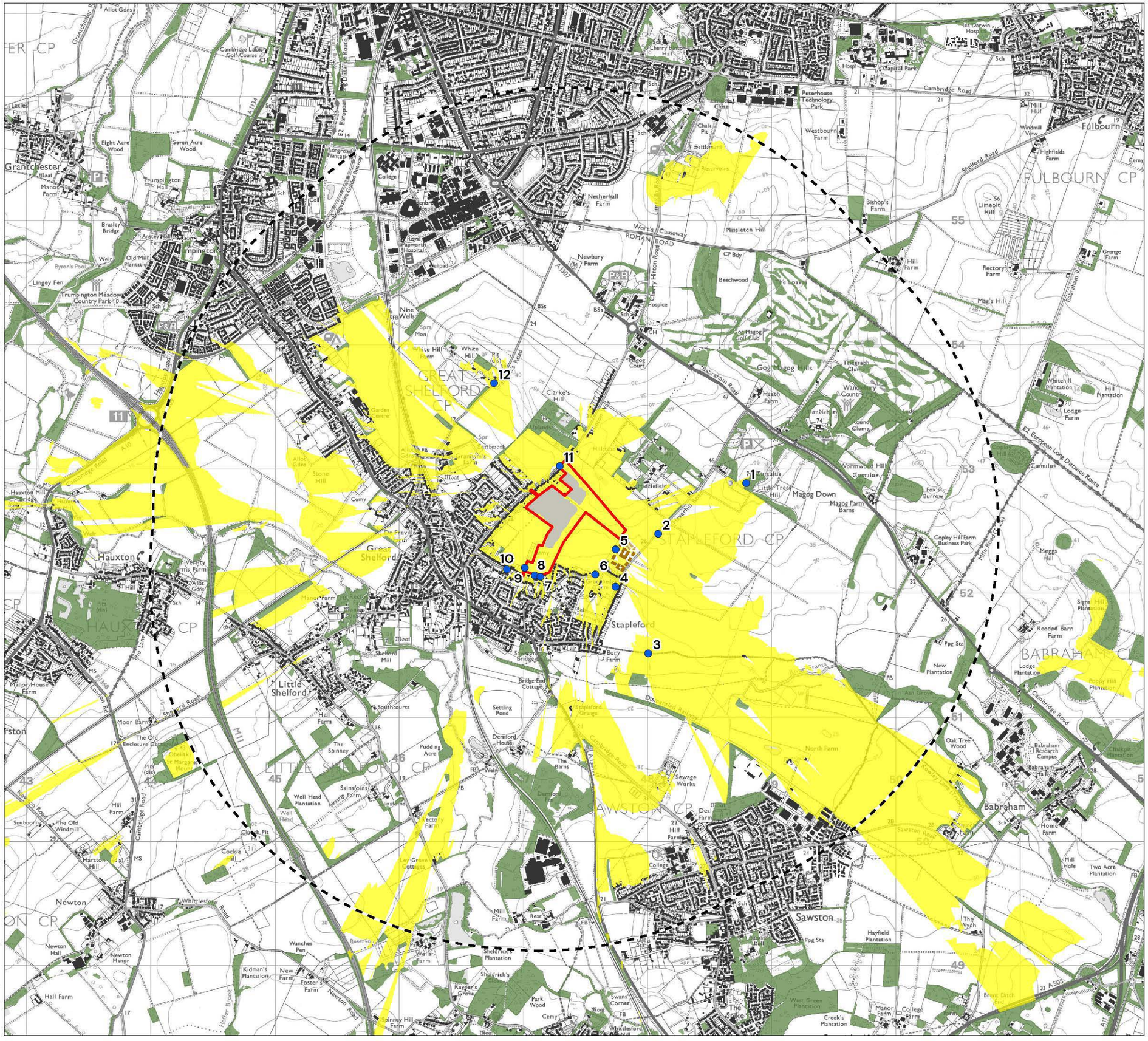
Accessibility Comment	Good accessibility to key local services, transport, and employment opportunities.
Site Access RAG Assessment 2026	Amber
Site Access Officer Comment 2026	Having considered the updated site submission details, the assessment score remains amber. The proposed site is acceptable in principle subject to detailed design and consultation.
Site Access RAG Assessment 2025	Amber
Site Access Officer Comment 2025	Based on the new information provided, the site has been scored as Amber. The site is acceptable in principle, subject to greater detail and consultation.
Site Access RAG Assessment 2023	
Site Access Officer Comment 2023	
Site Access RAG Assessment 2021	
Site Access Officer Comment 2021	
Transport and Roads RAG Assessment 2026	Amber
Transport and Roads Guideline Comments 2026	Having considered the updated site information, the site assessment rating remains amber. The development of this site will likely have a detrimental impact on the surrounding highway network if not mitigated. Any potential impact on the functioning of trunk roads and/or local roads will need to be mitigated. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use.
Transport and Roads RAG Assessment 2025	Amber
Transport and Roads Guideline Comments 2025	Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use. A Transport Assessment and a Travel Plan will be required. A vehicle trip budget for the development of this site is also expected to be required.
Transport and Roads RAG Assessment 2023	
Transport and Roads Guideline Comments 2023	
Transport and Roads RAG Assessment 2021	
Transport and Roads Guideline Comments 2021	
Noise, Vibration, Odour and Light Pollution RAG Assessment 2026	Green

Noise, Vibration, Odour and Light Pollution Guideline Comments 2026	Having considered the updated site submission details and context, the assessment has been amended to green. 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.
Noise, Vibration, Odour and Light Pollution RAG Assessment 2025	Amber
Noise, Vibration, Odour and Light Pollution Guideline Comments 2025	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
Noise, Vibration, Odour and Light Pollution RAG Assessment 2023	
Noise, Vibration, Odour and Light Pollution Guideline Comments 2023	
Noise, Vibration, Odour and Light Pollution RAG Assessment 2021	
Noise, Vibration, Odour and Light Pollution Guideline Comments 2021	
AQMA RAG Assessment 2026	Amber
Air Quality Officer Comment 2026	Based on the additional information provided, the site remains amber due to the quantum of development proposed and the potential adverse impact on air quality.
AQMA RAG Assessment 2025	Amber
Air Quality Officer Comment 2025	The site has been scored as Amber based on the new information provided. Given the size of the site and the number of units proposed, inherent/intrinsic designed-in air quality mitigation measures may be necessary to offset impacts on designated Air Quality Management Areas (AQMAs).
AQMA RAG Assessment 2023	
Air Quality Officer Comment 2023	
AQMA RAG Assessment 2021	
Air Quality Officer Comment 2021	
Contaminated Land RAG Assessment 2026	Amber
Contaminated Land Officer Comments 2026	Having considered the additional information, the site assessment remains amber as it comprises previous agricultural land use. Potential for historic contamination, conditions required.
Contaminated Land RAG Assessment 2025	Amber
Contaminated Land Officer Comments 2025	Previous agricultural land use. Potential for historic contamination, conditions required.

Contaminated Land RAG Assessment 2023	
Contaminated Land Officer Comments 2023	
Contaminated Land RAG Assessment 2021	
Contaminated Land Officer Comments 2021	
Overall Suitability Score	**Red**
Further constraints	-
Agricultural Land Classification Grade 1 (% overlap)	0
Agricultural Land Classification Grade 2 (% overlap)	58.37
Agricultural Land Classification Grade 3 (% overlap)	28.30
Agricultural Land Classification Grade 4 (% overlap)	0
Agricultural Land Classification Non Agricultural (% overlap)	0
Agricultural Land Classification Urban (% overlap)	13.33
Source Protection Zone (% overlap)	0
Highways England Zones	M11 North
Available	-
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The site was submitted by the landowner and/or site promoter who has confirmed that the site is available for development in the timescales indicated.
Are there known legal or ownership impediments to development?	No
Is there planning permission to develop the site?	No relevant recent planning history
When will the site be available for development?	0 to 5 years
Available RAG	**Green**
Achievable	-
Is there a reasonable prospect that the site will be developed?	The land has been promoted by the landowner and or developer and is known to be available for development. The site has a low existing use value and development is likely to be economically viable
Achievable RAG	**Green**

Capacity	-
Prevailing Density (weighted) (dwellings per ha)	30
Residential capacity at prevailing density	394
Estimated employment space (m2)	0
Estimated start date	0-5 Years
Estimated annual build-out rate (pa)	50-86
Development completion timescales (years)	11-15 years

Appendix B.



All Intellectual Property Rights (including but not limited to copyright) subsisting in or arising out of this drawing and the building works depicted are owned by Pegasus Planning Group Ltd (Pegasus Group) and may not be copied, adapted, disseminated, redistributed, reproduced and/or otherwise used without a written licence. Pegasus Group accepts no liability for any use of this drawing other than for its original purpose and by the original client except in circumstances where approval for use has been provided by Pegasus Group in writing. Use only written dimensions. Drawing prepared for planning application purposes only. Do not scale (or use) for construction, areas or any other purpose. Any queries to be reported to Pegasus Group for clarification. Copyright © Pegasus Planning Group Limited 2026. Use of this drawing is subject to the Terms & Conditions available @ pegasusgroup.co.uk © Crown copyright and database rights 2026 Ordnance Survey AC0000808122.

KEY

- Site Boundary
- 3km Study Area
- Retirement Village Building 7m
- Retirement Village Building 12m
- OS OpenMap Local Buildings
- OS OpenMap Local Woodland
- Proposed Development - 9m Development Height
- Screened Zone of Theoretical Visibility
- Viewpoint Locations

Screened ZTV Production Information:

DTM data used in calculations is OS Terrain 5 that has been combined with OS Open Map Local data for woodland and buildings to create a Digital Surface Model (DSM).

Indicative woodland and building heights are modelled at 15m and 8m respectively.

Viewer height set at 1.7m (in accordance with para 6.11 of GLVIA Third Edition).

Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development may be visible from, assuming 100% atmospheric visibility, and includes the screening effect from vegetation and buildings, based on the assumptions stated above.

REV	DATE	DESCRIPTION
-	-	-

SCREENED ZONE OF THEORETICAL VISIBILITY

LAND NORTH OF MINGLE LANE, STAPLEFORD

GRANTA LAND LTD

DATE	SCALE	DRAWN	APPROVED
21/08/2026	1:30,000@A3	EN/CS	DW

SHEET	REV	N	0	0.5 KM
-	C			

DRAWING NUMBER
P25_3066_EN_03

PEGASUS GROUP

Appendix C.

APPENDIX 3
TECHNICAL HIGHWAYS NOTE RESPONSE, PREPARED BY KMC

Technical Note

Project Name	Land East of Hinton Way, Granta Land
Subject	Local Plan Reps
Reference	26107
Date	September 2026

1 Introduction

1.1.1 KMC are appointed by Granta Land in relation to emerging proposals at the Land East of Hinton Way, Stapleford, for up to 400 homes. The Greater Cambridge Shared Planning Service is currently running a Regulation 19 consultation regarding the draft Greater Cambridge Local Plan. As part of this, the site at Hinton Way has been promoted to the plan making process and, with this, an assessment of the site's merits and credentials has been made within the Greater Cambridge Housing and Economic Land availability Assessment (HELAA).

1.1.2 The HELAA provides the following comments under the transport subheading 'access':

"Having considered the updated site submission details, the assessment score remains amber. The proposed site is acceptable in principle subject to detailed design and consultation."

1.1.3 The HELAA also provides the following comment under the subheading 'transport and roads':

"Having considered the updated site information, the site assessment rating remains amber. The development of this site will likely have a detrimental impact on the surrounding highway network if not mitigated. Any potential impact on the functioning of trunk roads and/or local roads will need to be mitigated. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use."

1.1.4 This note has been prepared to respond to the HELAA transport comments and to set out the transport case for the site in the context of the Local Plan consultation process.

2 Access

2.1.1 The primary access to the proposed site will be taken from Hinton Way. The access will be constructed to adoptable standards with visibility splays of 2.4m x 43m in accordance with Manual for Streets (MfS) guidance for a 30mph road. The access junction will include a carriageway accommodating two-way vehicle movements, and a 2m wide footway on both sides of the road, ensuring safe pedestrian access and connectivity to the existing footways on Hinton Way. The design accords with Cambridgeshire Highways Development Management General Principles for Development.

Registered Company: 14000918
Registered Company Address: Unit 6, Gwydir Enterprise Centre, Gwydir Street, Cambridge, CB1 2LG

2.1.2 The primary access design has been designed as being able to be a shared access for the development and for the Great Shelford Cambridge South East Transport (CSET) stop on Hinton Way. This has been achieved through coordination and engagement with the Greater Cambridge Partnership (GCP) to ensure that the access arrangements work for both schemes in combination and, if required, in isolation.

2.1.3 As this access already forms part of the wider CSET TWAO submission, design and delivery scrutiny has already been undertaken by the relevant stakeholders and thus confidence over acceptability can be considered high. At this stage of design, all agreements with the GCP are in place and there is no impediment to delivery.

2.1.4 The layout of the proposed primary access can be found in **Appendix A**.

2.1.5 A secondary point of access is also proposed from Hinton Way further south towards the village. A secondary point of access is deemed beneficial given the development would be more than 200 dwellings and, the provision of a secondary access is therefore consistent with the principles set out within Cambridgeshire Highways Development Management General Principles for Development.

2.1.6 The proposed secondary access would provide appropriate network resilience, assist with the distribution of traffic movements, and ensure that the site can be served safely and effectively by emergency, refuse and servicing vehicles. The secondary access would also be designed to adoptable standards, with appropriate visibility splays and pedestrian infrastructure provided to tie into the existing and proposed footway network on Hinton Way.

2.1.7 The accesses proposed, the design work undertaken, and the coordination with the GCP all demonstrate that the site can provide safe and suitable access by all modes, including general traffic, pedestrians, cyclists, public transport users, emergency vehicles, refuse vehicles and servicing vehicles.

3 Transport and Roads

3.1.1 The HELAA comments in respect of Transport and Roads can be distilled down to two points:

- The development of this site 'will likely have a detrimental impact on the surrounding highway network if not mitigated', and
- The development 'would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use'.

3.1.2 The ability to mitigate the transport impacts from development, substantially relates to a site's location and therefore its relationship to services, facilities and public transport services. This site benefits significantly from these foundational considerations (see figures 4.1, 4.2 and 4.3 below) and thus any mitigation package will ensure that there will be no unacceptable impact on highway safety, or any likelihood that the residual cumulative impacts on the road network, following mitigation, would be severe.

3.1.3 To further understand likely impact, a high-level trip generation forecast has been undertaken using the TRICS database to obtain trip rates for the proposed land uses. The forecast trip generation should be treated as a robust worst-case assessment at this stage of the plan-making process.

3.1.4 The trip generation exercise using TRICS indicates that 204 two-way vehicle movements in the morning peak hour and 181 in the afternoon may occur. Of these trips, circa 75% of vehicle movements are expected to be to or from the north towards the A1307 rather than south towards Great Shelford and Stapleford. This split is consistent with observed traffic flows and the and the agreements reached in the adjacent planning application (ref: 26/00610/OUT). It is also expected that the resulting vehicular trip generation would be lower than the forecast set out above, particularly once the site's sustainable transport opportunities and the effects of committed and emerging schemes such as CSET and the Sawston Greenway are considered.

3.1.5 The trip distribution is important when considering the potential impact of the proposed development, as it indicates that the majority of vehicle movements are likely to route towards the A1307 rather than over the level crossing and through the centre of Great Shelford or Stapleford where increased sensitivity exists.

3.1.6 Given the forecasts and the distribution of these trips, the development is therefore expected to not result in any unacceptable impact on the highway network once further mitigations are accounted for. At the planning application stage, the trip generation and distribution would be tested through a Transport Assessment, including proportionate assessment of relevant local road and trunk road junctions. Where any specific capacity, safety or operational issues are identified, these would be capable of being addressed through an appropriate package of mitigation measures, including detailed access design, junction improvements where necessary, travel planning, active travel improvements and public transport measures.

3.1.7 As stated in 3.1.2, the potential to meaningfully mitigate impacts from development will often relate to the proximity of the site to existing or committed transport facilities and services. This site therefore has a substantial opportunity to reduce the vehicle impact further and encourage active travel and public transport use given the proximity of Shelford Railway Station, the Sawston Greenway, NCR 11, Bus Stops on Hinton Way and CSET. In this regard, the site is better located than almost all other locations in Greater Cambridge in terms of existing and planned active travel and public transport options and these are further expanded upon below as part of the site's Transport Strategy & Approach.

3.1.8 The HELAA comment therefore identifies matters that will require further assessment and mitigation through the planning application process, rather than any fundamental transport constraint.

4 Transport Strategy & Approach

4.1 Policy Considerations

4.1.1 As referenced in Section 3, the site has numerous sustainable transport credentials, and the mitigation package will naturally seek to leverage these credentials to mitigate any impacts arising. This section of the note therefore highlights these credentials and why they are deemed material to plan making.

4.1.2 The emerging Plan will be assessed against the **National Planning Policy Framework** 2024 (NPPF 2024). Paragraph 110 of the NPPF 2024 advises that developments should be focused on *"locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes"* and should be taken into account during the plan making process.

4.1.3 However, it is important to note that the National Planning Policy Framework was updated in August 2026 (NPPF 2026) which is the most fundamental change since it was introduced in 2012. It is now laid out in clear thematic chapters with dedicated plan-making and decision-making policies.

4.1.4 Whilst the emerging Local Plan will be examined against the plan-making policies of the NPPF 2024, policies will still need to ensure they are not materially inconsistent with the decision-taking policies of the NPPF 2026, or they will be afforded very limited weight.

4.1.5 The NPPF 2026 is important to recognise as it signals a significant step-change in national policy towards a default strong tilt in favour of new homes within a 'reasonable walking distance' of a 'well-connected station'.

4.1.6 The NPPF defines a well-connected station as a railway station, underground, tram or light rail stop located within a top 80 Travel to Work Area by Gross Value Added and served, or with a reasonable prospect of being served, throughout the daytime by at least four trains or trams per hour overall, or at least two trains or trams per hour in any one direction.

4.1.7 Shelford Railway Station is located within a relevant Travel to Work Area and provides regular services towards Cambridge South, Cambridge, Cambridge North, Ely and London Liverpool Street. The principal point for further consideration is therefore whether the station meets, or has a reasonable prospect of meeting1, the relevant service frequency requirement throughout the daytime.

4.1.8 The NPPF 2026 defines reasonable walking distance as being around 800m or around 10 minutes' walk time where topography, route availability and quality, or physical barriers would affect walking. The use of the word "around" is important and indicates that the test should not

[1] Annex B: Glossary - within a top 80 Travel to Work Area located partially or fully within England by Gross Value Added (GVA)72 and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by at least four trains or trams per hour overall, or at least two trains or trams per hour in any one direction.

be applied as a rigid cut-off without regard to local circumstances. In relation to the proposed site, Shelford Railway Station is between 500m and 1.2km from the site at its nearest and furthest point respectively and the walking environment is generally flat with direct, safe walking and cycling routes.

4.1.9 Whilst the NPPF defines a 'reasonable walking distance' it does not mention cycling. A 1.2km distance equates to less than a 5-minute cycle ride and in an area such as Cambridge, which has the highest level of cycling of any city or town in the UK, it is, in real terms, impossible to ignore.

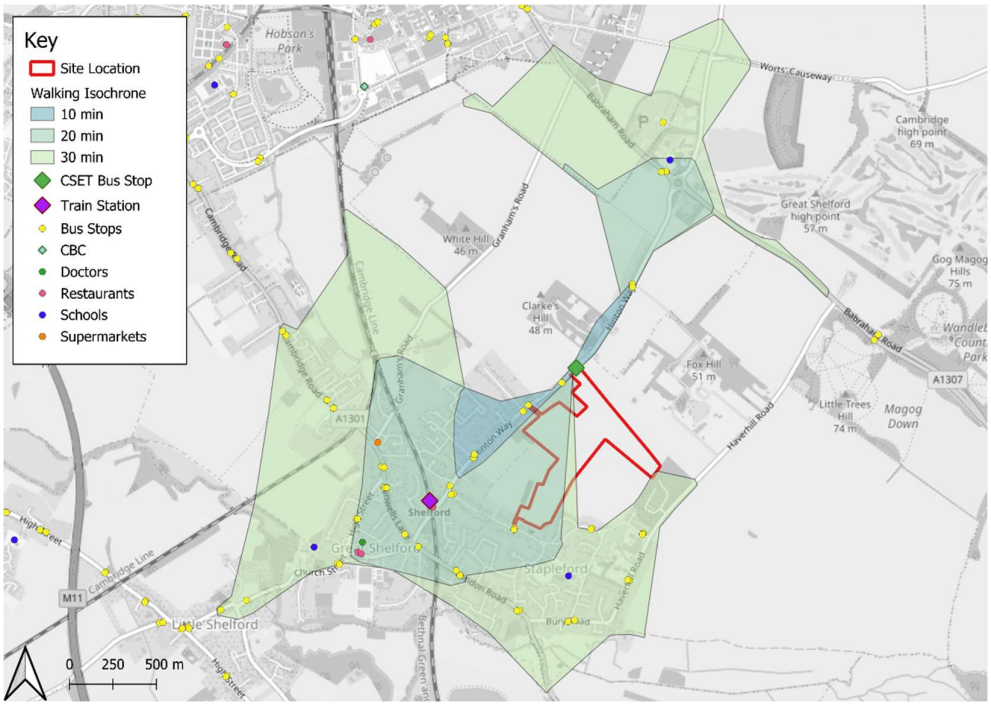
4.1.10 Whilst the nuances of the NPPF changes will take time to 'bed in', the policy direction and intention is clear – development sites that benefit from good access to railway stations will be viewed favourably given their ability to support sustainable patterns of movement. This will be further supported by the planned CSET as it proposes to provide a stop immediately adjacent to the proposed development.

4.2 Pedestrian Connectivity

4.2.1 To the north of the site's primary access (with CSET) a footway is present on the northern side of the road. South of the access, 2m wide footways are present on both sides of the road extending south towards the villages of Great Shelford and Stapleford. These footways provide safe connections to key community facilities such as Great and Little Shelford C of E Primary School, a range of local amenities, and local transport links including the DNA path leading to Cambridge Biomedical Campus and as mentioned, Shelford Railway Station.

4.2.2 **Figure 4.1** below provides the 10, 20 and 30-minute walking isochrones from the site. This demonstrates that within a 10-minute walking distance from the site there are a number of bus stops that can be accessed by residents. Within a 20 and 30-minute walking distance of the site a number of key day-to-day facilities and amenities are accessible including several schools, a supermarket, a doctor's surgery, public transport services (including Shelford Railway Station), and a number of local restaurants.

Figure 4.1 – 10, 20, and 30-Minute Walking Isochrone

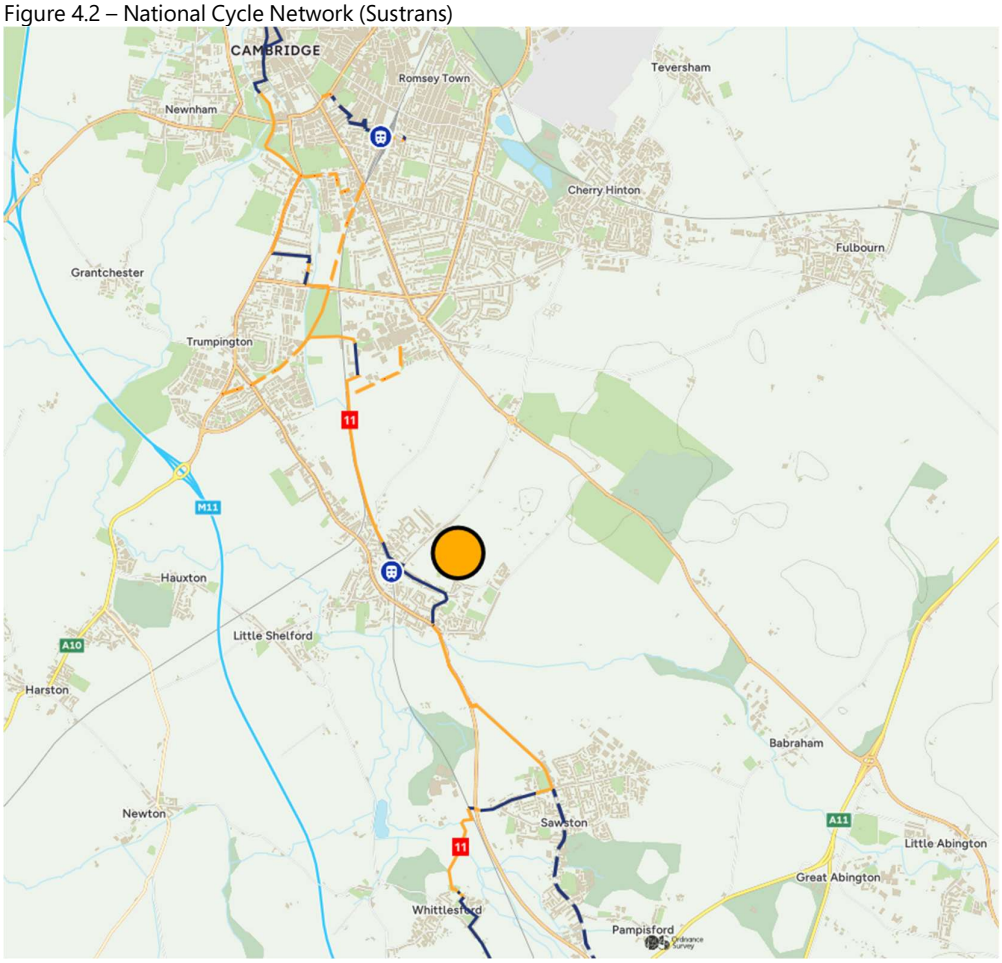


4.2.3 The walking distance should also be considered alongside the proposed CSET stop on Hinton Way. The CSET stop would be located on the northern boundary of the proposed development and would be intended to serve both the proposed site and existing communities in Great Shelford and Stapleford. The walking distance from parts of those existing settlements to the proposed CSET stop is comparable to, and in some cases greater than, the walking distance between the northern part of the site and Shelford Railway Station. Therefore, if this level of walking and cycling access is considered appropriate in the context of accessing CSET, then the comparable relationship between the proposed site and Shelford Railway Station should also be considered acceptable. These two strategic transport facilities within easy walking distance make the site a unique transport proposition which will form part of the mitigation package / benefits of the site.

4.3 Cycling Connectivity

4.3.1 The local cycle network infrastructure in close proximity to the site is of good quality. To the west of the site, National Cycle Route 11 provides a continuous link to Cambridge to the north, and to Sawston, Whittlesford and Duxford to the south. The route comprises a segregated shared path which runs adjacent to the existing railway tracks and towards Cambridge, as well as cycle routes through quiet residential areas. **Figure 4.2** shows the national cycle network in the vicinity of the site.

Figure 4.2 – National Cycle Network (Sustrans)

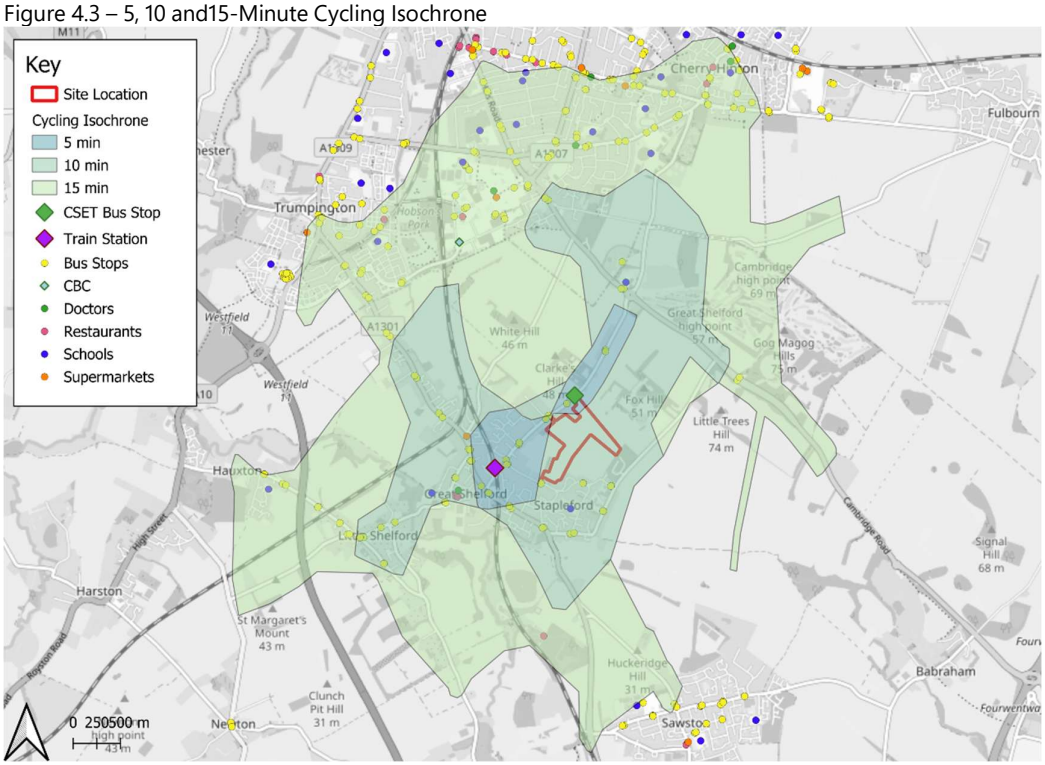


4.3.2 In addition to the existing cycling infrastructure set out above, the proposed Sawston Greenway route will follow the National Cycle Route 11 north of Sawston into Stapleford at Church Street and along Mingle Lane, crossing Station Road on Chaston Road before joining the DNA path at Graham's Road and into Francis Crick Avenue in the Cambridge Biomedical Campus. Finally, the route will finish through Robinson Way and Long Road Sixth Form College.

4.3.3 The Sawston Greenway will materially improve the quality and attractiveness of the local cycle network by providing a coherent route between Sawston, Stapleford, Great Shelford and Cambridge, including onward connections to the Cambridge Biomedical Campus. The Greenway will therefore provide future residents with access to a high-quality cycling corridor for both local trips and longer journeys towards Cambridge.

4.3.4 Figure **4.3** shows the 5, 10 and 15-minute cycle isochrone from the site.

Figure 4.3 – 5, 10 and15-Minute Cycling Isochrone



4.3.5 **Figure 4.3** above shows that, within a 5 and 10-minute cycling distance, a number of day-to-day facilities and amenities can be accessed including several schools and Shelford Railway Station. Within a 15-minute cycling distance, the southern fringe of Cambridge can be reached which includes the Cambridge Biomedical Campus & Addenbrooke's Hospital and the many thousands of existing and new jobs which will be created through the allocation of expansion land within the emerging Greater Cambridge Local Plan.

4.3.6 In addition to the Sawston Greenway / National Cycle Route 11, the CSET scheme will include a dedicated walking, wheeling and cycling route alongside the proposed busway. The combination of the Sawston Greenway and the active travel route delivered as part of CSET would give future residents a choice of high-quality walking and cycling routes to Cambridge, the Biomedical Campus, Sawston, Stapleford and Great Shelford. This would provide the site with two complementary high-quality active travel corridors: one via the Sawston Greenway / National Cycle Route 11 corridor, and one via the CSET active travel route. This represents a remarkably strong active travel context which will assist in reducing reliance on private car use.

4.4 Public Transport

4.4.1 The site is already well served by public transport, with bus stops located on Hinton Road directly outside of the proposed site access served by the 17 and Tiger 3 services. The Tiger 3 bus provides a regular service (1 per hour) between Fulbourn and Grantchester Bridle Way, the 17 bus provides a service between Guilden Morden and Cambridge approximately four times per day. In addition to this, bus services such as the 7 route at the Woollards Lane bus stop provide more frequent services to Cambridge and surrounding areas.

4.4.2 In addition to this, and as previously set out, the site is located in close proximity to Shelford Railway Station. The station provides access to regular rail services towards Cambridge South, Cambridge, Cambridge North, Ely and London Liverpool Street. A future station at Cambridge East increases the importance of rail access in the Cambridge region.

4.4.3 The Cambridge South East Transport (CSET): Phase 2 project is a new proposed public transport route between Cambridge South Railway Station and a new strategic Travel Hub adjacent to the A11. The scheme includes a range of new travel infrastructure, including a busway, travel hub, and walking, cycling and wheeling path. The proposed busway is set to provide a service every 10 minutes between the travel hub near the A11 and Cambridge Biomedical Campus via Sawston, Stapleford and Great Shelford. The busway will also incorporate a dedicated walking, wheeling and cycling path alongside it.

4.4.4 CSET should therefore be considered as more than a conventional local bus service as it would function as a high-quality, bus rapid transit-style corridor, combining frequent services, purpose-built infrastructure, a direct route to Cambridge South Railway Station and the Cambridge Biomedical Campus. This would provide future residents with access to a strategic sustainable transport corridor immediately adjacent to the site. It is likely that CSET will become a foundational scheme for any Greater Cambridge Mass Rapid Transit network which is being considered by the Cambridge Development Corporation and Cambridge & Peterborough Combined Authority.

4.4.5 The proposed development has the potential to improve wider access to CSET. Pedestrian and cycle routes through the site would provide more direct, attractive and legible connections to the proposed CSET stop on Hinton Way, improving permeability for existing residents to CSET.

4.4.6 The site should therefore be viewed not only as benefiting from the delivery of CSET, but also as contributing to reducing barriers and improving access to it. The development will therefore encourage active travel and public transport use, as the site would support improved access to a strategic sustainable transport corridor for future residents and existing residents in the surrounding area.

4.5 DfT Connectivity Tool

4.5.1 The DfT Connectivity Tool has been used to provide an evidence-based assessment of the site's accessibility and connectivity to key destinations and services. The tool combines transport and land use data to generate a connectivity score that reflects the ability of people to access employment, education, healthcare, retail, leisure and other everyday destinations by a range of transport modes, including walking, cycling, public transport and private vehicle travel. Connectivity scores are calculated for individual 100m by 100m grid squares across England and Wales using a nationally consistent methodology, allowing comparisons to be made between locations.

4.5.2 Connectivity scores range from 0 to 100, with higher scores indicating that a location is better connected relative to other locations across England and Wales. The score should therefore be interpreted as a comparative measure rather than an absolute assessment of accessibility and is

intended to be considered alongside site-specific characteristics and local evidence. The tool therefore provides a useful indication of the relative accessibility of a site and the extent to which future occupants may be able to access a range of services and facilities by sustainable transport modes.

4.5.3 As part of the assessment, CSET has been added into the Connectivity Tool. The connectivity score for the proposed site has been taken from the proposed points of access from Hinton Way. The primary access score of 49 currently is improved to 57 with CSET and the secondary access improves from 52 to 59. This demonstrates an improvement in connectivity compared with the baseline scenario where the CSET route was not included within the Connectivity Assessment Tool. The Greater Cambridge Transport Strategy has set a target DfT score of between 20-60 for the Land adjacent to A11 and A1307 at Grange Farm (S/GF), also in South Cambridgeshire. With CSET, the proposed development achieves a score at the upper end target for a nearby strategic site which forms foundation allocation within the Emerging Local Plan.

4.5.4 The score reflects the site's baseline access to a range of destinations by different transport modes and demonstrates that the site currently benefits from a reasonable level of accessibility. Importantly, the improved score with CSET included demonstrates that the site's connectivity is not static and will improve as planned sustainable transport infrastructure is delivered.

5 Summary and Conclusion

5.1.1 The HELAA confirms that the site is acceptable in principle in access terms, subject to detailed design and consultation. The evidence in this note goes further as it demonstrates that safe access is deliverable, highway impacts can be mitigated, and the site is exceptionally well placed to support sustainable travel.

5.1.2 Two safe, suitable and adoptable accesses can be delivered from Hinton Way, with appropriate visibility, pedestrian provision and connections to the surrounding network. The primary access has been coordinated with the GCP and CSET proposals, while the secondary access provides resilience and accords with Cambridgeshire guidance for developments of this scale. There is no identified impediment to delivering robust access arrangements.

5.1.3 The site also aligns strongly with the clear direction of national policy where growth should be focused in locations with ready access to well-connected stations and high-quality sustainable transport. Shelford Railway Station is within easy walking and cycling reach, providing direct connections to Cambridge South, Cambridge, Cambridge North, Ely and London Liverpool Street.

5.1.4 This is not an isolated, car-dependent location. Schools, shops, bus stops and the railway station are accessible on foot or by cycle; National Cycle Route 11 already provides a high-quality link towards Cambridge and Sawston; and the site is physically well related to Great Shelford and Stapleford.

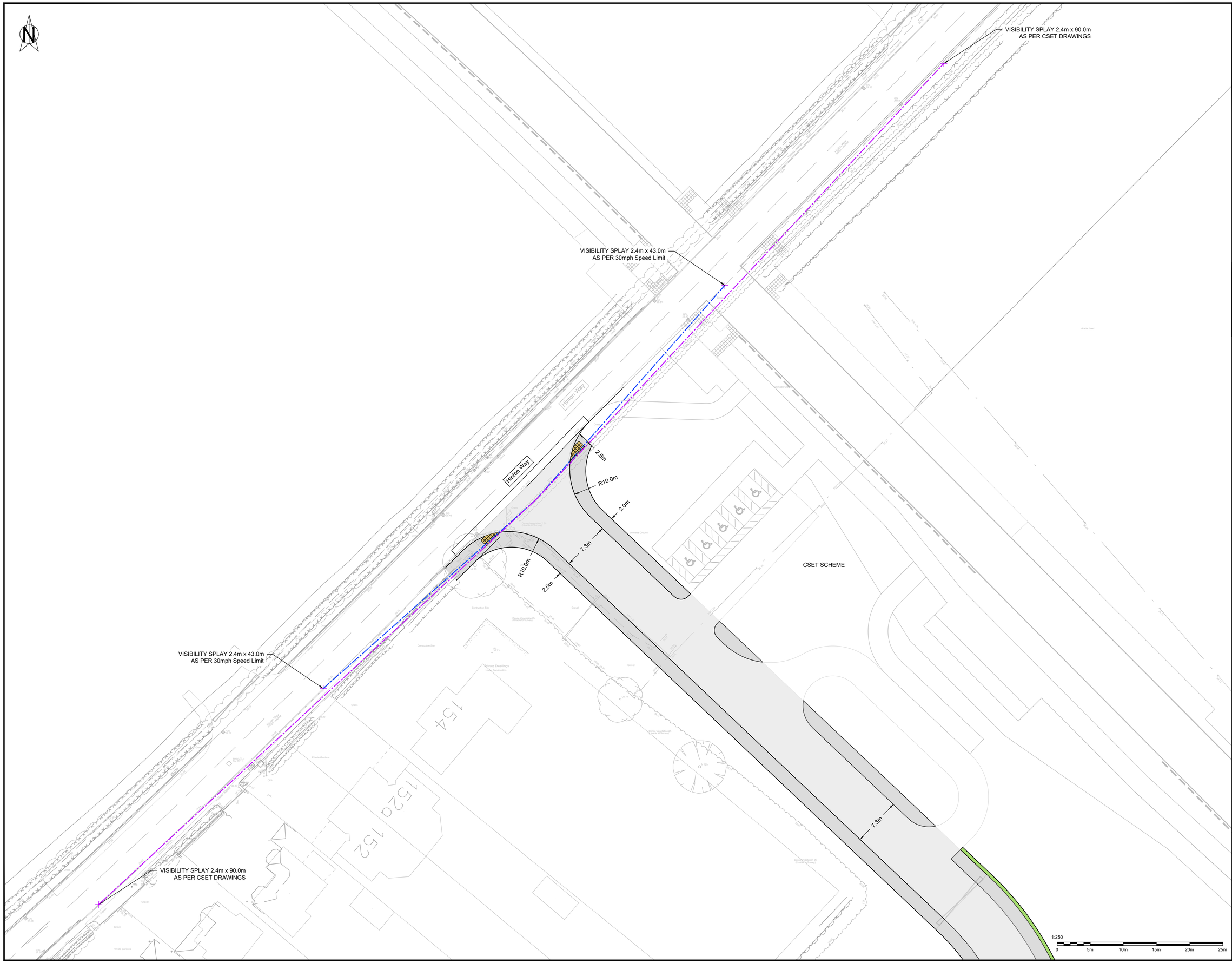
5.1.5 The planned future transport offer is stronger still. CSET would place a frequent, bus rapid transit-style service and a parallel walking, wheeling and cycling route immediately beside the site, connecting directly to Cambridge South Railway Station and the Cambridge Biomedical Campus. Together with the Sawston Greenway, this would give residents an unusually strong choice of sustainable routes from the outset.

5.1.6 The development would not simply benefit from this network; it would help unlock it. Direct, legible walking and cycling routes through the site would improve access to the proposed CSET Hinton Way stop and strengthen local permeability for both new and existing residents. The DfT Connectivity Tool reinforces this case, with CSET increasing the site's access scores from 49 to 57 and from 52 to 59—towards the upper end of the benchmark used by the Council for a nearby strategic site allocation.

5.1.7 The initial TRICS assessment is deliberately robust and does not yet reflect the trip-reducing effects of CSET, the Sawston Greenway, enhanced permeability or a site-specific Travel Plan. It forecasts 204 two-way vehicle movements in the morning peak and 181 in the evening peak, with around 75% expected to route north towards the A1307 rather than through Great Shelford and Stapleford. Detailed effects will be tested through a Transport Assessment and addressed through proportionate and targeted mitigation and at this stage they do not represent a fundamental constraint to allocation.

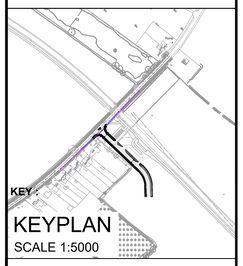
5.1.8 The transport case for allocation is compelling. The site is accessible, deliverable and exceptionally well connected to existing and planned sustainable transport. Every matter raised by the HELAA is capable of resolution through established design, assessment and mitigation processes. The site should therefore be afforded substantial positive weight and taken forward as a sustainable location for growth in the Greater Cambridge Local Plan.

Appendix A – Primary Access Design (Consistent with CSET Proposals)



NOTES:

1. (C) This drawing is copyright.
2. All dimensions to be checked on site.
3. Do not scale from this drawing; only figured dimensions are to be worked from.
4. Any discrepancies must be reported immediately before proceeding.
5. This drawing to be read & printed in colour.
6. Ordnance Survey, (c) Crown Copyright 2026. All rights reserved. Licence number 100022432.
7. Refer to Haydens tree condition survey drawing 12578-D-CP for tree condition & quality report.



KEYPLAN
SCALE 1:5000

VISIBILITY SPLAY
CARRIAGEWAY
FOOTWAY
TACTILE PAVING

REV	DATE	DESCRIPTION	DRN	CHKD	APRD
P02	2026.09.24	Issued for information	CS	CS	OW
P01	2026.09.10	Issued for information	CS	CS	OW

Issue Status

- [ ] CONCEPT
- [x] PRELIMINARY
- [ ] TENDER
- [ ] CONSTRUCTION
- [ ] AS BUILT
- [ ] H&S FILE ISSUE

Client
Granta Land

Project
Hinton Way,
Granta Land

Drawing Title
Proposed Access - Option 3

Scale @ A1	Drwn	Chkd
1:250	CS	CS
	Aprd OW	Date Sept 2026

Drawing Ref
26107-KMC-XX-XX-DR-CH-0103

Rev
P02

kmc
transport planning

BIDWELLS

Bidwells is a trading name of Bidwells LLP,
a limited liability partnership, registered in
England and Wales with number OC344553.
Registered office: Bidwell House,
Trumpington Road, Cambridge CB2 9LD