BIDWELLS

Your ref: 115090
Our ref: Woodcock Close, Impington
DD: [redacted]
E: [redacted]
Date: 24/09/2026

Planning Policy
Greater Cambridge Planning
Via Email

Dear Sir / Madam,

REGULATION 19 - DRAFT GREATER CAMBRIDGE LOCAL PLAN CONSULTATION

LAND ADJACENT TO ST GEORGES WAY AND WOODCOCK CLOSE, IMPINGTON, CB24 9AF (HELAA SITE ID: 115090)

On behalf of our client, Chivers Farms Limited (hereafter "CFL"), we are responding to the Regulation 19 consultation on the emerging Greater Cambridge Local Plan (hereafter "the Plan").

This representation considers the wider spatial strategy proposed by the Council, before focusing on CFL's land interests on land adjacent to St Georges Way and Woodcock Close, Impington (hereafter "the Site") (HELAA Site ID: 115090) (**Appendix 1**).

Bidwells has a long history of promoting development sites for clients through Local Plans in Greater Cambridge.

We remain very concerned that the draft strategy for the Plan fails to allocate sufficient homes given the economic growth required in Greater Cambridge (Policy S/JH) and relies heavily on allocating significant dwelling numbers on a small number of very large sites (Policy S/DS). These sites rely on the timely provision of strategic scale infrastructure which must be in place before these sites can be delivered.

The proposed new strategic scale allocations we are particularly concerned about are the Cambourne North new settlement (13,000 dwellings) relying on a new railway station associated with East West Rail (hereafter "EWR") and complicated works to the A428. Grange Farm (4,500 dwellings) relies on works to the A505 and the complication of providing new residents with safe access to the proposed Cambridge South East Transport (hereafter "CSET") Phase 2 Guided Busway on the adjacent side of the A505.

The Plan requires these two sites to deliver 5,100 dwellings between them by 2045. We believe this is highly unlikely for reasons set out in this representation.

National Planning Policy Framework (NPPF) – Direction of Travel

We are aware that the Council will be preparing this Plan under the current Local Plan system, and therefore, the Plan will be examined against the 2024 NPPF. However, the new NPPF sets a clear direction of travel in the long term which we believe the Council should consider further as part of their development strategy.

A key matter is Policy HO6: Planning for a diverse mix of sites – retains the requirement for Council's to allocate at least 10% of the housing requirements in Local Plans on sites no larger than one hectare and

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introduces a further 10% on sites between one and two and a half hectares (unless strong reasons why this cannot be achieved). It also states that sites should be allocated to support and enhance the vitality of rural communities and enable villages to grow and thrive (similarly to NPPF 2024, paragraph 83).

The NPPF 2026 text is also supplemented by a document explaining the proposed changes and inviting responses to specific questions[1]. This document recognises the importance of these smaller sites as they tend to be built quicker, and allocating such sites will support small and medium-sized enterprise housebuilders (also see paragraph 73 of 2024 NPPF).

Proposed Extent of New Jobs and Homes: Policy S/JH

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

Policy S/JH sets out the level of objectively assessed needs in Greater Cambridge over the period 2024-2045 for jobs and homes. As drafted it proposes a minimum housing requirement of 48,069 homes between 2024 and 2045, equating to an average of 2,289 homes per annum.

Paragraph 62 of the NPPF 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").

Whilst we acknowledge that the Council plans 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.

Economics

On 23rd August 2024, Matthew Pennycook reaffirmed the Government's commitment to Cambridge stating; "*The economic growth of Cambridge has been a phenomenal success and we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy.*" Pennycook goes on to say; "*Greater Cambridge has a vital role to play in this Government's mission to kickstart economic growth."*

The Cambridge Growth Company was then established in 2024 to address barriers to growth and help unlock Greater Cambridge's full potential. In terms of approach, in October 2025, the Government announced its intention to consult on the case for a centrally led Development Corporation as one potential route for delivery. This was confirmed earlier this year and will take decision-making powers from next year.

The Cambridgeshire and Peterborough Combined Authority (CPCA) adopted its Local Growth Plan in 2025 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.

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

[1] Proposed reforms to the National Planning Policy Framework and other changes to the planning system – December 2025: National Planning Policy Framework: proposed reforms and other changes to the planning system

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.

Affordability

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.

Paragraph 20a of the Framework requires strategic policies to make sufficient provision for affordable housing. This is bolstered by PPG (2a-024) that requires Councils to consider how meeting affordable housing needs may be achieved by increasing the total number of homes being planned for. We can see no record of an assessment having been made.

The Council's Housing Needs of Specific Groups in Cambridge and South Cambridgeshire report[2] identifies the significant need for affordable housing of 1,636 affordable homes per annum across Greater Cambridge (see table 7.16).

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

Action

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.

The Proposed Greater Cambridge Development Strategy: Policy S/DS

Whilst in principle we do not object to the delivery of a large number of new homes at scale as set out in Policy S/DS. We consider that the overall approach is unsound and inconsistent with national policy as we set out below.

The speed at which these large, strategic developments (ie: North Cambourne and Grange Farm) can deliver homes is often far slower than the Council has envisaged historically. A review of historic Annual Monitoring Reports demonstrates that whilst some of the large strategic sites in the current Development Plan, may now be delivering at an appropriate rate, most sites came on stream several years later than anticipated, did not deliver as quickly once the first completions were achieved, and many still deliver less homes year on year than planned for.

As a result of the chosen development strategy, we have the following comments to make that demonstrate it is unsound:

[2] EBGCLPHNSGCSCDec25.pdf

- 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. 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 Finish at Appendix 2 considers sites of greater than 3,500 homes and provides evidence as to how the Council's approach is inappropriate.

- Windfalls have been included in the deliverable supply for years 1 – 5, contrary to the Framework and PPG.

- The 'lumping' together of rural centres, minor rural centres, group villages and infill villages from the settlement hierarchy (taken from Policy S/SH), as the locations with the lowest preference to deliver jobs and homes, clearly fails to distinguish between what may be highly sustainable locations in the rural area (ie: Histon and Impington) a Rural Centre-the highest of these categories (where there will be no limit on scheme size), and which is clearly capable of delivering an appropriate scale of development (ie: up to 50 dwelling sized sites as encouraged in the adopted Neighbourhood Plan).

- The proposed use of the Liverpool method to address historical backlog or shortfall in housing delivery is contrary to the preferred approach in PPG which explains that any shortfall should accrue from the base-date of a plan and added to the five-year requirement (Sedgefield approach). Whilst the PPG does allow the use of the Liverpool method it adds that this must be justified during the plan-making process. The Council's own evidence base states they consider a five-year land supply can be demonstrated under Sedgefield and resultingly there is no need to use the Liverpool method which suppresses housing delivery and therefore runs contrary to the government's ambition to significantly boost house building.

In taking such an approach, there is not sufficient flexibility or robustness in the development strategy.

The Council has not identified any new allocations for housing in the rural area which fails to support the vitality of the rural area and existing settlements (paragraphs 82 and 83 of the Framework). We believe that this decision, has been made in part, to avoid development in the Green Belt, and therefore fails to strike a more balanced approach to housing delivery and mix of housing across the Plan period.

Small and Medium Sized Sites

Small and medium sites such as this Site are key to a far more balance approach to housing. Paragraph 73 of the NPPF (December 2024) identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. They are also essential for small and medium enterprise housebuilders to deliver new homes whilst being built out relatively quickly.

The Plan does not propose to allocate any new housing sites to address this requirement, essentially because they consider:

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

We have two concerns with this approach which need to be considered and addressed by the next iteration of the plan.

A final point of note; whilst the Site is larger than 2.5ha and therefore exceeds the 2.5ha site area set in the NPPF for small sites, the Site area can easily be reduced slightly to meet the threshold without undermining the ability to deliver housing in this location.

Green Belt / Grey Belt

We welcome the Council's now reviewing the potential for Grey Belt sites, though still do not believe that this review has been appropriately considered as a development strategy through the Sustainability Appraisal.

The Site has been identified as a Grey Belt site under reference HI12 in the Green Belt Review, with development having low harm and the Site's weak Purpose D contribution. It is therefore clear that the Site is well placed to deliver homes to meet the identified increased need for new homes as part of a more balanced development strategy, and its release could be considered high up the Green Belt release hierarchy as set out in paragraph 148 for the Framework.

Windfall

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.

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.

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. 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[3] in section 2 considers windfall delivery between 2006 and 2024 and considers a windfall allowance of 425 dwellings per annum would be robust.

This section of the report sets out what it considers a 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 in reality, 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.

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, fails to realise that Greater Cambridge has not delivered more than 470 dwellings in a year from windfall since 2016 – 2017. Even if the Council uses 425 dwellings per annum for windfall over the previous seven years of data the average delivery has 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

[3] Cambridge Housing Delivery Study Addendum October 2025

that opportunities for brownfield redevelopment or residential sub-division can only continue to deliver so much housing across Greater Cambridge.

Vitality of the Rural Area

The Council suggests at 2.42 that allocations in the Rural Area would result in an overreliance on the private motor vehicle. However, this position overlooks several important factors:

- The spatial strategy proposed by the Council does not consider the unique characteristic of each of the settlements in the rural area individually, and their ability to grow to support the vitality of settlements and the viability of their services. This is a consequence of effectively grouping the whole rural area into one pot within Policy S/DS.
- The Council, as far as we can see, has not revisited their stance on releasing Green Belt in the villages, which they state they are 'protecting' despite several sites, including this one, now being designated as Grey Belt.
- Expanding the rural settlements would lead to increased viability / opportunities to improve sustainable transport opportunities (paragraphs 82 and 83 of the Framework).
- Whilst the Council does not readily allocate any new developments at the rural settlements, it is clear that the Council does not view all settlements in the rural area as being unsustainable. For instance, Policy S/SH – Settlement Hierarchy does not set a limit of the size of residential development within the defined extent of Rural Centres such as Histon and Impington subject to demonstrating adequate services and facilities exist.
- Some Rural Centres such as Impington and Histon are actually closer and as well served as the city in terms of access to large employment centres (ie: Science Park).

Policy S/SH effectively creates a juxtaposition whereby it is recognised that growth within Histon and Impington need not be constrained as it benefits from a high level of services, facilities and accessibility to the main urban area; yet in failing to allocate any sites, growth is basically constrained to the settlement boundaries where windfall opportunities are already restricted.

Failing to offer sufficient choice and flexibility

The focus upon large new settlements, urban redevelopment and SUEs 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. For instance, existing young residents of Histon and Impington may wish to buy a home in the settlement to be close to existing family for childcare which may not be possible should they have to move to other proposed allocations.

Local Housing Need

The adopted neighbourhood plan encourages sites of up to 50 dwellings and finds:

- That the third most important matter to local residents was the affordability of housing.
- The supply of affordable housing was considered the second most important in terms of need for improvement.

Despite this both the neighbourhood plan and emerging Local Plan fail to identify housing sites to meet the identified local need. Rather, it puts the onus entirely on windfall sites and exceptions sites which carry high risk for developers and therefore are not likely to come forward at scale. Additionally, windfall sites within the settlement not delivering 10 or more dwellings will not be required to deliver any affordable housing.

The proposed development strategy will only exacerbate the affordability issue in Histon and Impington, likely pushing young people out of their local communities away from their support networks. This may

also exacerbate the car dependence concerns the Council has by pushing these people further from Cambridge to seek cheaper housing in less well served areas (ie: rural East Cambridgeshire).

The Neighbourhood Plan also identifies that Histon and Impington's existing housing mix is:

- Made up of relatively high proportions of larger family houses
- Has comparatively limited provision of smaller homes
- Has a reliance on South Cambridgeshire's affordable housing evidence to identify affordable housing needs.

Housing and Economic Land Availability Assessment (HELAA) (2025) Response

The Site has been assigned 115090 in the latest HELAA. We have the following comments to make:

- **Landscape**: There are no updated 2025 or 2026 comments. It is disappointing there is no consideration of the Grey Belt position of the Site in the HELAA, following the Council's identification of it in their 2026 evidence base.
- **Ecology:** CFL has undertaken a Preliminary Ecological Appraisal ("PEA") which was undertaken by Red Ecology. The PEA demonstrated:
    - There are no overriding ecological reasons why the Site should not be developed.
    - The habitats on the Site are relatively unremarkable, consisting of common and widespread species.
    - Development would present an opportunity to establish new habitats of ecological and biodiversity interest, improving local connectivity and green infrastructure.
    - Limited further survey work is required to facilitate development.

Summary

This representation has set out the concerns we have in regard to the Plan being unsound, unjustified and not positively prepared. It does not plan for sufficient homes given the economic priority being focused upon Cambridge by both the government and Mayor.

Further, the development strategy is not considered to be robust, nor does it appropriately address small and medium sized sites, affordable housing or windfalls.

Allocating small and medium sized housing developments in sustainable locations such as at Histon and Impington would:

- Deliver homes more quickly;
- Provide certainty to small and medium enterprise housebuilders;
- Support the vitality of the rural area;
- Deliver affordable housing in areas with pressing need; and
- Offer greater flexibility for house buyers.

The Council is currently placing a lot of risk for housing delivery on a limited number of very large sites, and in particular the proposed large new allocations at Cambourne North and Grange Farm require the delivery of infrastructure at scale which is likely to delay their delivery. These delays have been experienced across many of the large strategic sites in Greater Cambridge in recent decades.

Instead, we suggest a more blended approach, with a more rational strategy to include sustainable rural development is considered, alongside a review by the Council of potential Grey Belt sites which then need consideration as part of a reasonable alternative in the Sustainability Appraisal.

Should you have any questions, please do not hesitate to get in touch.

Kind regards,



Gareth Pritchard
Partner