24 September 2026

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VIA EMAIL ONLY TO: localplan@greatercambridgeplanning.org

Dear Sir/Madam,

Proposed Submission – Greater Cambridge Proposed Submission Local Plan (Regulation 19) Consultation

Representations on behalf of Pigeon and the Landowners – Land South of St Neots Road, Hardwick

Savills (UK) Ltd are instructed by our clients, Pigeon, to make representations as part of the Proposed Submission Greater Cambridge Local plan (Regulation 19) Consultation on behalf of Pigeon and the Landowners.

These representations primarily relate to Land South of St Neots Road, Hardwick (Site ID 115234; HELAA ID 40273) which Pigeon have consistently promoted for residential development, most recently at the Regulation 18.3 Consultation which was held between December 2025 and January 2026. Since then, Pigeon has continued to progress the technical and masterplanning work for the site, which culminated in an Outline Planning Application which was submitted in March 2026 (26/01263/OUT).

These further representations build on the Regulation 18 representations, and raise a number of issues of soundness with various policies within the Proposed Submission Plan, including:

- Policy S/JH – New Jobs and Homes
- Policy S/DS – Development Strategy & Key Diagram (Figure 4 and Figure 5)
- Policy S/SH – Settlement Hierarchy
- Policy S/DE – Defined Settlement Extents
- Appendix D – 5YHLS and Housing Trajectory
- Policy S/RRA – Site Allocations in the Rest of the Rural Area
- Inset Map for Hardwick

We attach Pigeon's individual comments in relation to the Policies outlined above. Comments have also been submitted online through the Council's consultation portal.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024, which requires that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether or not they are sound. Plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent** with national policy.

These representations are therefore made with regard to the above tests.

Conclusion

We trust that the submitted representations are all in order and hope that Pigeon's representations will be given due consideration by the Inspector(s) as part of the forthcoming Local Plan Examination.

Please do not hesitate to contact me if you have any questions regarding these representations, or should you require any further information.

Yours faithfully,

[redacted]

Neil Waterson
BA (Hons) DipTP MRTPI
Director, Planning

cc. Kimberley Kaddish, Pigeon
Enc: Representations to Policies S/JH, S/DS, S/SH, S/DE, S/RRA, Appendix D, Inset Map for Hardwick.

Policy S/JH: New Jobs and Homes

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Pigeon object to Draft Policy S/JH on the basis that the proposed requirement for new homes is insufficient to meet the real-world need in and around Cambridge and fails to correct the existing imbalance between jobs and homes within the District.

Accordingly, Pigeon considers that **the Policy is unsound on the basis that it is not positively prepared, justified, effective nor consistent with national policy**.

For many years, Cambridge has proved a nationally and internationally significant knowledge-intensive employment hub. The UK Government, of both Conservative and Labour administrations, has consistently emphasised its strong ambitions for Cambridge, both in terms of housing delivery and economic growth. The Case for Cambridge[1] (March 2024) sets out that the life sciences and healthcare industry in Cambridge alone employs nearly 23,000 people with a turnover of £9 billion, and that building 150,000 new homes by 2050 could add £6.4 billion to the economy.

The Proposed Submission Local Plan aims only to meet the minimum housing need between 2024-2045 of 48,069 new homes but is seeking to meet a more aspirational job target of a minimum of 73,300 jobs. Pigeon support the increase in jobs being planned for in the Proposed Submission Local Plan to around 73,300 additional jobs, up from the 66,600 jobs referenced in the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023 and the 58,500 included in the Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021). Whilst the planned jobs growth is therefore heading in the right direction to meet the economic potential of the Greater Cambridge economy, Pigeon contends that the same is not true of the planed housing growth and that the housing requirement is insufficient.

The Proposed Submission Local Plan proposes around 25% more jobs across the plan period than the First Proposals version of the Plan, with less than 9% more housing, despite an increase of around 30% in the Standard Method figure since then. As a result, there is a growing disparity between the proposed jobs and housing targets.

Pigeon contends that Greater Cambridge must plan for a higher level of housing delivery to support planned jobs growth and begin to redress the imbalance between homes and jobs that has been holding back the local economy, as any other strategy jeopardises the continued economic success of Greater Cambridge.

The UK Government regard the Growth of Greater Cambridge as nationally important. The Government has issued statements outlining wide-ranging support for housing growth across the country. A July 2024 Ministerial Statement on 'Building the Homes We Need'[2] noted the following: "*Nowhere is decisive reform needed more urgently than in housing. We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home*."

[1] https://assets.publishing.service.gov.uk/media/65f1d8edff11704896615973 /The_Case_for_Cambridge_March_2024.pdf
[2] https://questions-statements.parliament.uk/written-statements/detail/2024-07-30/hcws48

Further, on the 23rd of August 2024, Matthew Pennycook (Minister of State for Housing and Planning) sent a letter[3] to local leaders to reiterate that Cambridge is central to the Government's priorities. The letter states: *"We believe that the recent focus on Cambridge and its untapped economic potential are entirely warranted…", "While I recognise that in recent years much has been delivered, there remain significant barriers to realising the area's full potential. The Deputy Prime Minister and I are determined to help remove them and overcome the issues that have held up planned development for essential housing and laboratory space."*

It is therefore clearly the intention of the UK Government to support significant economic growth in the Greater Cambridge area, and to facilitate this through the delivery of housing to tackle existing housing shortages and affordability constraints that have proved a barrier to the growth of the Greater Cambridge economy to enable the area to fulfil its full economic potential.

In this vein, the Government have established the Greater Cambridge Development Corporation which is tasked with delivering "transformational economic growth". Notwithstanding the emerging structure, it is understood that the Development Corporation will only have decision making powers over strategic sites. Accordingly, villages such as Hardwick are not likely to see a significant increase in development as a result of the emerging structure. Pigeon is of the view that in order to accommodate a fair-share of this increased growth, the villages of the district must plan for higher numbers than currently proposed. The alternative is an increasingly polarised development strategy, with even greater proportions of housing delivery in the New Settlements, and a diminishing few on small-to-medium sites in the more sustainable villages within South Cambridgeshire District.

The Councils' evidence[4] confirms that "a critical assumption informing the relationship between the number of jobs and homes - is imperfect." The reliance upon the 2011 Census data is understood, given the impact of Covid-19 on the 2021 data, however Pigeon contend that it is not robust to use the Census 2011 commuting assumptions, as the basis for justifying the housing requirement as these previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. This under-delivery versus employment growth is evidenced in the relatively low housing-to-jobs ratio of 0.63 – significantly below both the regional and national averages.

The Councils' Development Strategy Topic Paper[5] (August 2026 - September 2026) makes no reference to commuting, despite this clearly being a key assumption of the strategy being pursued. Further, the Councils' Consultation Statement[6] Appendix 6: Response to Representations - Development Strategy states "Regarding commuting assumptions, the 2011 Census is used in the EHNU 2025, considering the issues at the time of the 2021 Census (pandemic enforced work from home). As a result, this means the Greater Cambridge economic modelling assumes a greater draw from other areas than the 2021 Census implies. This is the same approach taken as in previous iterations of the work. The Plan's Standard Method requirement already incorporates an uplift for affordability in its calculation; therefore, further uplifts are not considered suitable." Those previous iterations of the work were not sound, and taking the same approach now remains unsound.

The Government's Case for Cambridge report (March 2024) already identifies that economic growth in the Greater Cambridge City region is being held back by a lack of adequate housing supply relative to demand. The strategy proposed does nothing to correct this fact and address the Government's aspirations for the area.

Pigeon therefore contends that **the Policy is unsound as it is not positively prepared, justified, effective nor consistent with national policy**.

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[3]https://assets.publishing.service.gov.uk/media/66cdf3f68e33f28aae7e1f67/housing-minister-letter-to-greater-cambridge leaders.pdf

[4] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/TPGCLPDGCLPSTPDec25.pdf

[5] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-08/PSDSTP2026_0.pdf

[6] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-08/Appendix 6_Response to Representations_Development Strategy.pdf

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

The proposed housing target should be increased to fully align with the proposed job target, and to begin to address the historical imbalance in commuting patterns to ensure a more balanced and sustainable approach to planned housing and jobs growth that enables the continued economic success of Greater Cambridge. As a minimum, the housing requirement should reflect the higher housing growth scenarios considered through the Sustainability Appraisal process of circa 56,000 new homes over the Plan period. Additional housing allocations should to be made to address the increased requirement including allocations across the sustainable villages of the District.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Policy S/DS: Development Strategy and Key Diagram

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Pigeon object to Policy S/DS 'Development Strategy' along with the associated Key Diagram as it is considered that the **draft Policy is unsound on the basis that it is not positively prepared, justified or effective or consistent with national policy** in meeting the future development needs of Greater Cambridge.

Draft Policy S/DS states that, as far as possible, housing and jobs needs will be met in order of preference as follows: (a) within the Cambridge Urban Area, (b) on the edge of Cambridge, (c) at an expanded Cambourne, (d) at other new settlements; and finally (e) in the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres. The order of preference has been determined in recognition of the sustainability of these locations and is considered to be broadly logical.

However, Pigeon considers that the proposed Development Strategy is flawed and unsound for three key reasons:

1. Firstly, the Proposed Submission Local Plan is not planning for a sufficient number of new homes, both in terms of the overall housing requirement (as identified in Policy S/JH) and in terms of the level of supply, including an appropriate housing supply buffer, to meet the housing requirement.
2. The proportion of the housing supply to be delivered at the New Settlements in the Plan Period is considered to be excessive and puts the effective delivery of the required number of homes at risk whilst failing to address housing need both within Cambridge City and within the Rural Area.
3. The Strategy does not allow for sufficient and proportionate growth in the Rural Area including sustainable Group Villages where these would benefit from existing or planned strategic transport infrastructure.

We address these points in turn.

Number of New Homes.

Pigeon's concerns in relation to the number of new homes being planned for are set out in detail within our separate representations to Policy S/JH. Concerns regarding the adequacy of the housing supply and buffer are addressed further below.

Reliance on New Settlements

The Plan's Development Strategy is increasingly reliant on the delivery of a series of New Settlements which together account for nearly half (44%) of the proposed housing supply over the Plan period, compared to just 23% in the Adopted 2018 Plans. In contrast, the proportion of housing growth to be directed to villages in the Rural Area has decreased significantly from 23% of new housing in the Adopted Local Plan to 15% of new housing in the emerging Plan, a reduction of 8% of the overall supply and circa 40% in individual terms. The Plan therefore concentrates development on the New Settlements at the expense of every other location across Greater Cambridge and the Development Strategy is therefore becoming increasingly reliant on housing being delivered at scale in the various existing and proposed New Settlements to meet the area's needs.

Pigeon acknowledges the role of the New Settlements in helping to provide for the longer term growth needs of the area in a way which can support planned infrastructure growth and deliver housing at a large-scale. However, Pigeon consider that these New Settlements must be supported by more small-and-medium sized sites in the more sustainable villages of the District in order to provide a more balanced, flexible and resilient supply of housing sites which can meet a wider range of housing needs and supplement delivery at the strategic sites. A more appropriate balance must therefore be struck between large strategic sites and smaller scale allocations across other settlements and existing village locations to meet local needs, provide greater housing choice and flexibility and provide a more robust and deliverable housing supply.

Moreover, the reliance on New Settlements and other strategic sites in Greater Cambridge does though lead to the conclusion that Greater Cambridge must adopt a more substantial housing supply buffer than the contended 8.2% currently proposed. A higher buffer would provide the necessary flexibility of delivery and ensure a robustness of supply in accordance with the intentions of the NPPF.

The current buffer is insufficient and fails to recognise the delivery challenges which have historically held back early delivery on the large-scale strategic sites within Greater Cambridge, including, for example, Bourn Airfield, which has a capped delivery of 500-units until the C2C busway becomes operational.

As a result, Greater Cambridge should employ a housing land supply buffer certainly over 10% and we would suggest circa 15-20% above the identified requirement which, for the reasons set out under the Policy S/JH: New Jobs and Homes heading above, also needs to be higher than the Standard Methodology figure.

The Greater Cambridge Shared Planning Service Housing Delivery Study Addendum 2026 Update includes a Trajectory for the Proposed Submission Local Plan as its Appendix A.1 with Five-year housing land supply calculations at A.2. This assumes the Local Plan is adopted in the 2028/29 monitoring year, and the first five-year housing land supply calculation period is 1st April 2028 to 30th April 2033. Even by the Councils' own calculations, the land supply would only be 5.03 years (Sedgefield method) / 5.47 (Liverpool method) and remains below 6 years until 2034/35 (Sedgefield method) / 2035/36 (Liverpool method).

Notwithstanding the Councils' recent publication of their Housing Trajectory and Housing Land Supply Report Addendum, Savills estimate that the Councils are currently unable to demonstrate a five-year housing land supply whether this is calculated on a joint or individual basis. This is largely as a result of the lack of progress with the delivery of the strategic sites on the Cambridge Fringe and at New Settlement sites which the Adopted Plans rely upon for the majority of delivery in the later stages of the Plan period.

From a delivery perspective, and to provide more resilience to the supply, the New Settlement allocations should be supported by additional allocations in the sustainable settlements of the District, including Pigeon's site at Land South of St Neots Road, Hardwick. A medium-scale site of the scale proposed at St Neots Road would help to improve the planned buffer whilst mitigating the risk of further slowdowns, whilst ensuring a balanced supply.

It is therefore evident that the land supply is fragile even by the Councils' own calculations, and any delay to the delivery of the newly allocated sites, or the pace of delivery on the previous allocations, could mean the Council falling below the required 5 years. Additional identified supply through small and medium sized sites coming forward in the first five years post adoption would provide the necessary contingency to ensure the five-year supply is maintained, and the plan remains up to date.

Supporting the Vitality and Viability of Villages in South Cambridgeshire

Greater Cambridge has allocated very few small-to-medium-sized sites as a total proportion of the overall need. Paragraph 2.43 of the Draft Plan confirms the Councils have identified specific allocations for **just 3.5%** of the total housing need. The remaining 6.5% to make up the minimum 10% requirement outlined in Paragraph 73 of the NPPF are proposed to be met through windfall development.

It is noted from the Development Strategy Topic Paper, Paragraph 5.59, that Greater Cambridge *"did not identify any additional sites that would not cause a level of harm…considered justified in the context of other available options"* and that they *"do not consider villages to be a reasonable option for meeting a substantive amount of our additional need for homes".*

Whilst it is accepted that the scale of housing growth to be directed to the villages will need to be appropriate and proportionate, given that South Cambridgeshire has no towns and is entirely made up of villages of different scales and levels of service provision it is considered that this sweeping, generalised statement fails to reflect the reality of the District's geography and to adequately reflect the different needs and potential of the large number of villages across the District. In particular, it fails to reflect that a number of these villages currently offer a better range of services and facilities than currently on offer in the New Settlements of Northstowe and Waterbeach and the fact that villages such as Hardwick will benefit from new strategic transport infrastructure that will provide excellent transport accessibility with development along these transport corridors helping to support the viability of those transport services.

Pigeon also disputes the Councils' contention that the development of all of these village sites would cause unjustified harm. As shown within Pigeon's separate representations to Policy S/RRA, the development of their site at St Neots Road, Hardwick would not lead to any material harm and would be highly sustainable.

It is considered that the District's villages still have the potential to perform an important role in accommodating similar scales of growth to those in the Adopted Local Plan and should therefore not be overlooked within the Development Strategy. The reduction in planned housing growth in the villages now proposed within the emerging Local Plan fails to adequately address the needs of the Rural Area and is considered to be unjustified and unsound.

As set out at Paragraph 83 of the NPPF (December 2024; as amended February 2025), housing should be located where it will enhance and maintain rural communities, and planning policies should identify opportunities where villages can grow and thrive. By seemingly overlooking rural locations for new housing development, the Development Strategy risks undermining the vitality and sustainable growth of village settlements, failing to address local affordable housing needs and failing to provide housing choice and opportunities for those living in the rural area who wish to find a new home within their communities rather than in a New Settlement.

The rural areas of South Cambridgeshire are ageing rapidly, Cambridgeshire Insight estimate that the greatest increase in population will be in the elderly population, with a 55% increase in the 80-84 age population and a 45% increase in the over 85s. This rapid aging is a challenge to villages which do not see any growth, and risks jeopardising the ongoing provision of key services including rural schools and local shops which risks jeopardising continued provision of one of the key features which make them sustainable locations to live.

The role of small-to-medium sized sites is increasingly recognised by the Government. In May 2025, the UK Government published a working paper entitled *Reforming Site Thresholds*. The working paper is presented as a key reform to significantly increase housebuilding. The Paper proposed a streamlined process for medium scale sites of between 10-49 units up to 1 hectare. The Paper states that the Government sees Medium size sites as "*vital to diversifying our housing market and delivering the homes our communities need*".

Whilst the working paper is not necessarily a material consideration in the Plan making process, it gives an insight into the Government's thinking and direction of travel. Indeed, since the working paper, the Government has sought to double-down on this approach and the December 2025 NPPF consultation proposes to increase the size limit up to 2.5ha. The streamlined process signals the Government's clear intention to encourage more medium sized sites to come forward.

With consideration to the above, it is considered necessary to diversify the housing supply within the Plan by incorporating additional sites in the more sustainable villages in the Rural Area including more small and medium sized site allocations. In light of the clear steer from the Government to focus on small and medium sites, as well as the contribution these sites can make to ensuring a more robust and deliverable supply of

housing across the plan period, it is considered that the Plan should be amended to include further site allocations at sustainable village locations including additional small and medium site allocations.

Pigeon considers that proportionate growth within sustainable villages within South Cambridgeshire is therefore essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities and address local housing needs. This would ensure consistency with national policy, as outlined in HO6 of the NPPF 2026. Suitable sites in sustainable village locations are also necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

In failing to consider sites in many of the sustainable village locations across the District, the Plan risks the following:

- Failure to adequately address local affordable and market housing needs in these villages.
- Failure to support the vitality and associated loss of services and facilities in the villages including Hardwick.
- Failure to allocate sufficient small-and-medium sites in the housing supply in accordance with National Policy and to ensure robust delivery across the plan period.
- Failure to capitalise upon already committed and funded transport enhancements, including C2C Busway and East West Rail on the A428 corridor.

For the reasons outlined above, it is considered that the **Policy S/DS is unsound on the basis that it is not positively prepared, justified or effective or consistent with national policy**

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

The Development Strategy should be amended to provide for an increased level of housing provision in accordance with Pigeon's representations to Policy S/JH. As part of this, additional suitable deliverable sites should be allocated including at sustainable village locations in the Rural Area. This should include Land South of St Neots Road, Hardwick, in recognition of its sustainable location close to the planned C2C busway and its suitability, availability and deliverability for new Housing.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Policy S/SH: Settlement Hierarchy

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

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

Whilst the broad objective of this policy is supported, Pigeon object to Policy S/SH as proposed in the Regulation 19 Plan and consider that it is **not positively prepared, justified, effective or consistent with national policy and is therefore unsound.**

Policy S/SH currently restricts Group Villages to "an indicative maximum scheme size of 8 dwellings" with up to 15 in 'exceptional' circumstances. As mandatory Affordable Housing provision is only triggered on Major sites, the Council are relying exclusively on goodwill and rural exceptions sites to meet affordable housing needs, which is not considered a robust approach to meeting the affordable housing needs of the District's villages.

These arbitrary indicative limits on the scale of housing developments set out by the Draft Policy have not been properly justified. They are unlikely to ensure the continued vitality of the villages and do not recognise their individual needs or the sustainability for proportionate and controlled housing growth. As a result of the proposed hierarchy, the policy is not considered to be positively prepared or justified, as it will result in unmet housing needs across the villages of the District. It is therefore considered to be unsound.

It is acknowledged that Cambridge is constrained by a lack of available sites, however, as outlined elsewhere in Pigeon's representations to Policy S/DS, the majority of development is proposed to be directed to the New Settlements (the third tier). This overlooks sustainable village locations, where there is capacity to provide additional housing and employment land which could come forward in advance of the strategic New Settlement sites and support a more balanced, robust and deliverable housing supply.

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

A controlled and proportional level of growth is the best way to ensure the continued vitality of rural villages. In this context, Paragraph 82 of the NPPF confirms that in rural areas, "planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs", whilst Paragraph 83 states that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". The current Draft Plan is not considered to sufficiently address local needs or circumstances and is therefore not in accordance with national policy.

Whilst it is acknowledged that the Plan will be examined under the December 2024 NPPF, it is important to have regard to Annex A of the August 2026 NPPF which states that "development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight". In this regard, Pigeon contend that the blanket, arbitrary and unjustified

numerical limits on residential development within and adjoining settlements are inconsistent with national policy.

The 2026 NPPF includes Policy S4, which establishes a presumption in favour of development within settlements. Further, S5 establishes a similar framework for determining developments outside settlements. Neither S4, nor S5 of the NPPF include any reference to limiting or restricting development inside villages, and on the contrary the NPPF actively promotes, in Policy L3, the optimisation of site capacity through higher densities in appropriate locations. An arbitrary limit of 8 dwellings in Group Villages and 30 in Minor Rural Centres, irrespective of the level of existing and planned infrastructure in the particular settlement, is not considered to accord with this aim and so is not in accordance with National Policy.

Whilst supporting text states that Group Villages are generally less sustainable with fewer services and facilities than Rural Centres and Minor Rural Centres, they are able to support the daily requirements of their residents and as per Paragraph 83 of the NPPF 2024 (Policy HO6 of the NPPF 2026), provisions should be made to ensure that these village settlements can continue to grow, thrive, and support local communities. Moreover, the identification of Group Villages does not take full account of planned transport infrastructure of accessibility to jobs by sustainable modes that also affects whether individual settlements are or will become sustainable locations for growth.

Sites should preferably be brought forward through the plan-led process, however if not, policies such as Policy S/SH should be sufficiently flexible to ensure that justified and proportionate development can come forward.

Accordingly, the arbitrary numerical limits on development expressed in the hierarchy are unsound as they are not justified, effective or consistent with national policy and would only attract 'very limited weight' following adoption of the Plan. **It is therefore considered that the restrictions on the scale of growth at different levels of the settlement hierarchy should be deleted**.

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

The arbitrary restrictions on the scale of growth at different levels of the settlement hierarchy should be deleted, in favour of wording which mirrors the NPPF 2026.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Policy S/DE: Defined Settlement Extents

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Pigeon **object** to Draft Policy S/DE and considers that **it is unsound** due to the lack of flexibility in the policy and on the grounds that as a result it is **not justified nor consistent with National Policy**.

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

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

This Policy wording is virtually identical to that of South Cambridgeshire's Local Plan 2018. However, since adoption of the 2018 Plan, the national policy position has evolved significantly. The 2026 NPPF includes Policy S5, which establishes a framework for determining developments outside settlements. Part 2 of S/DE is considered to be significantly more restrictive than Policy S5 of the 2026 NPPF.

Whilst it is acknowledged that the Draft Plan will be examined under the December 2024 NPPF, it is important to have regard to Annex A of the August 2026 NPPF which states that "development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight".

Accordingly, Pigeon contends that the current draft of S/DE is unsound as it is not consistent with national policy and as such will only attract 'very limited weight' following adoption. The impacts of the draft Policy upon potential windfall sites of this are compounded by the lack of residential allocations across many the sustainable villages of the district (as referenced in the wider Pigeon representations). As a result, there is a substantial risk that over the next plan period, many of the villages will see their populations stagnate or even decline, with little-to-no affordable housing delivered across the period, placing unnecessary strain on local services and affordability.

It is considered that the inflexibility of this policy will make achieving the neighbourhood housing need outlined in Appendix D difficult to achieve in reality. Flexibility would also aid in ensuring Greater Cambridge's housing delivery can maintain a sufficient 5-year supply across the Local Plan period.

Accordingly, Pigeon contend that the current draft of S/DE is unsound as it is not consistent with national policy.

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

Pigeon considers that Part 2 of Policy S/DE should be deleted. Pigeon considers that the proposed Policy wording should be amended to allow for development outside the defined settlement boundaries where there is an evidenced unmet local need for housing and sites are well related to the settlement, in compliance with S/DE. This will ensure that Policy S/DE is consistent with national policy within Policy S5 and GB6, GB7 and GB8 of the NPPF following adoption.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Appendix D – 5YHLS and Housing Trajectory

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Notwithstanding Cambridge's recent Greater Cambridge Housing Trajectory and Housing Land Supply Report - Addendum (September 2026), Savills consider the Councils are currently unable to demonstrate a 5-year housing land supply.

The Regulation 19 Proposed Submission Local Plan outlines how the Council intends to deliver a minimum of 48,195 new homes between 2024 and 2045. After reviewing the delivery assumptions in Figure D1 ('Anticipated Completions 2024 - 2025') of the Proposed Submission Plan, Pigeon considers the projected delivery rates to be unrealistic

By the Council's own admission, the Housing Land Supply position will be marginal upon adoption (5.03 years (Sedgefield method) / 5.47 (Liverpool method) and will remain below 6 years until 2034/35 (Sedgefield method) / 2035/36 (Liverpool method).

We would also emphasise that the PPG [Paragraph 68-031] is clear that the Sedgefield method should be utilised for calculating the 5-year housing land supply position unless justified otherwise. The Council has provided no clear justification as to why the Liverpool method should be used for calculating the housing land supply position and accordingly the Sedgefield method should be used in accordance with National policy. On this basis, the Council's 5-year housing land supply would be extremely marginal and at risk from any delays in major sites coming forward.

Pigeon contends that this marginal position and the vulnerability to delays affecting their 5-year housing land supply further is a direct result of the over-reliance upon large-scale strategic sites in New Settlements, and a distinct lack of small-and-medium sites to provide early and more flexible delivery over the Plan period.

It is therefore evident that the housing land supply is fragile even by the Councils' own calculations, and any delay to the delivery of the newly allocated large and strategic scale sites, or the pace of delivery on the previous strategic site allocations, could mean the Council falling below the required 5 years of deliverable housing land.

The allocation of Sites, such as Land South of St Neots Road, Hardwick, would help to support the Council's housing supply position by providing delivery early in the plan period.

Pigeon therefore considers the Housing Trajectory at Appendix D is unsound on the basis that the housing land supply within the Draft Plan includes insufficient small-and-medium sites, with too great a reliance upon large scale new settlements. As a result, the Housing Trajectory and associated housing supply **is not considered positively prepared, justified, effective or consistent with national policy and is unsound.**

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

The proposed housing target should be increased to fully align with the proposed job target as set out within our representations to Policy S/JH.

Additional housing sites should be allocated to increase the housing supply to meet the additional housing requirement and to provide a larger housing supply buffer including small and medium sized housing sites across the sustainable villages of South Cambridgeshire, including Land South of St Neots Road, Hardwick.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Policy S/RRA: Site Allocations in the Rest of the Rural Area

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Draft Policy S/RRA allocates specific sites within the rest of the Rural Area to help meet the development needs across Greater Cambridge. Pigeon, objects to the draft Policy on the basis that the housing allocations identified within the Rest of the Rural Area are insufficient to meet local housing needs in villages, and further, that it omits 'Land South of St Neots Road and West of Howells Way, Hardwick' for residential development. **The Policy is therefore not considered to be positively prepared, justified, effective or consistent with national policy and is unsound**

Pigeon considers that the housing allocations proposed in the Regulation 19 Proposed Submission Local Plan are insufficient to meet local housing needs in the villages of the District. The lack of new housing site allocations in the villages within the Rural Area reflect wider concerns set out in our responses to other Policies (S/JH and S/DS) that confirm the Plan is not providing for sufficient number of new homes in the right places.

As a result of the Development Strategy being pursued, there are very few new housing allocations in the 'Rest of the Rural Area', which are largely overlooked in favour of significant New-Settlement allocations.

Pigeon is concerned that the Plan does not meet the requirements of Part (a) of Policy HO6 of the NPPF 2026 which requires the Council to allocate 10% of their housing requirement on sites no larger than 1 hectare, and a further 10% between 1-and-2.5 hectares.

Further, the Part (b) of Policy HO6 requires the Councils to allocate "sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services". The Government's intention is therefore clear - growth within villages is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. Such sites are necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

The Regulation 19 Proposed Submission Local Plan makes only a handful of housing allocations within the 'Rest of the Rural Area'.

- S/RRA/ML (Moor Lane) – 20 dwellings
- S/RRA/H (Highfields Phase 2) – 65 dwellings
- S/RRA/ (Cambridge Road, Melbourn) – 125 dwellings
- S/AMC/HIS (Histon and Impington Station) – Mixed use – no quantum confirmed

As set out above, across the S/RRA Policies, the allocations total just 210 homes across the district – equal to **less than 0.5% of the identified housing requirement**. The overwhelming majority of the proposed allocations relate to employment or an unspecified quantum of mixed-uses. These allocations alone are considered to be woefully insufficient to meet the housing needs of the villages of South Cambridgeshire and does nothing to support the local economies and services within these settlements.

For Hardwick, there are no specific housing allocations made, though the proposed employment allocation S/RRA/SNR (St Neots Road) is around 500m to the west towards Bourn Airfield The allocation relates to approximately 4.6 hectares of Class E(g) employment land. It is noted this allocation sits to the north of Caldecote and is not within, or adjacent to a settlement boundary of any settlement.

It is considered that the housing allocations identified within the Rest of the Rural Area are not aligned with the settlement hierarchy in terms of distribution and scale of development.

As mentioned within our representations to Policy S/DS, there is a strong focus within the Draft Local Plan on the delivery of strategic sites, particularly New Settlements. Whilst it is recognised that strategic sites are capable of delivering large numbers of homes and making a meaningful contribution to meeting identified development needs, the proposed New Settlements make up almost half of the planned housing supply. This reliance on large strategic sites places an undue reliance and significant dependence on such sites and risks under delivery in the face of any delays to their delivery, particularly as many of these sites are subject to significant infrastructure delivery requirements.

Over-reliance on Windfall

Paragraph 2.41 of the Regulation 19 Plan confirms that the Councils intend to rely heavily upon windfall to meet the small-sites requirement. The Councils contend that allocating the full amount on specific identified sites would be "*extremely challenging*". Pigeon contends that this is not a sound strategy and Policy HO6 is clear that the Councils should be allocating specific sites to meet the needs of the rural area to maintain the vitality and viability of such settlements and meet local market and affordable housing needs in these communities.

The arguments for not allocating specific sites in is not justified. The Councils state that allocation of the full small-sites requirement would direct "*a significant portion of growth to less sustainable locations where levels of car use would be higher, negatively impacting our response to the challenges of net zero carbon and Climate Act obligations and undermining our vision and strategic priorities*". Notwithstanding that Pigeon consider that this conclusion is incorrect and fails to reflect the full range and diversity of the villages in the Rural Area, the Council's reliance upon windfall to meet the need in the Rural Areas will still result in housing being introduced to these locations and so appears to be inconsistent with the conclusion.

The Policy as currently drafted risks artificially constraining housing provision outside of Cambridge and the New Settlement allocations. In doing so, the Plan risks worsening the acute affordability pressures already present within the District, whilst increasing the need to commute and restricting labour supply. Ultimately, in failing to deliver sufficient new homes in the villages of the District – in addition to those in Cambridge and the new settlements – the Council are constraining business and economic growth. This is at odds with the stated ambitions of the Government, and the Councils' own evidence and as such will fail to support the planned economic growth of the City region.

In relying upon windfall developments to exclusively meet the housing needs of the majority of the villages of the District, and when considered in combination with S/SH - which Pigeon have also made representations on within this submission – the Council are restricting the ability of developments to meet the affordable needs of the villages. Policy S/SH currently restricts Group Villages to "an indicative maximum scheme size of 8 dwellings" with up to 15 in 'exceptional' circumstances. As mandatory Affordable Housing provision is only triggered on Major sites, the Council are relying exclusively on goodwill and rural exceptions sites. This is not considered a robust approach to meeting the affordable housing needs of the District's villages.

Meeting Local Housing Needs

The evidence base does not assess affordable housing need within the District's villages, which raises the question of whether the Plan and Policies can be said to address local housing needs and whether they have been properly planned for.

The Plan itself acknowledges that locating homes closer to employment can reduce commuting. Sustainable villages, including those benefiting from committed transport improvements, can make a meaningful

contribution to this objective. The absence of significant housing allocations in such locations therefore represents a missed opportunity to support sustainable travel patterns.

The proposed housing strategy also lacks sufficient diversity. Only a small proportion of housing need is expected to be delivered through specific small and medium-sized allocations, with significant reliance on windfalls and large strategic sites. This approach is inconsistent with the Government's increasing emphasis on the role of small and medium-sized sites in boosting housing delivery and market diversity. Evidence consistently shows that smaller sites are delivered more quickly and can improve resilience within the housing trajectory.

The Plan should therefore identify additional small and medium-sized allocations in suitable village locations and ensure new settlements are supported by sufficient employment opportunities to create balanced and sustainable communities.

Land South of St Neots Road, Hardwick (Site ID 115234; HELAA ID 40273)

The Site has consistently been promoted on behalf of Pigeon in response to the Call for Sites and Local Plan consultation exercises, most recently in January 2026.

Since the Regulation 18.3 Consultation, Pigeon has prepared and submitted an Outline Planning Application for up to 138 dwellings (Ref: 26/01263/OUT) to Greater Cambridge Planning which remains under determination at the time of the Regulation 19 Consultation. Pigeon contends that the materials and technical details submitted with the Outline Application provide strong evidence that the site is suitable for residential development and that the Site is available and deliverable.

It should also be noted that, since the Regulation 18.3 submission, the Cambridge-to-Cambourne (C2C) busway has been approved by the Secretary of State. This will provide a direct, off-road bus rapid transit route between Cambourne (west of the site) and Cambridge (east of the site) via the West Cambridge Campus. The C2C route also proposes a segregated active travel route between these destinations, providing an attractive route for active travel.

Pigeon would highlight the opportunity for further sustainable growth at Hardwick, especially in the context of the recent development immediately adjacent to the site to the east, as well as separate proposals for transport enhancements including East-West Rail and Cambourne to Cambridge travel route which will significantly enhance the availability of sustainable and active travel connections between the village and Cambourne and Cambridge. Indeed, the Site is particularly well-located in this regard being close to the C2C route and associated bus stops.

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

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

This Site represents a suitable opportunity to secure sustainable residential development comprising both market and crucially, affordable, homes within the settlement of Hardwick.

In this regard Pigeon notes and welcomes that the RAG assessment for the Site has been updated since the Regulation 18 consultation, which improves, in some cases significantly, the RAG rating for the Site and highlights that the Site can be developed without any significant harm. The RAG assessment is summarised on the attached RAG Site Review, alongside responses from Pigeon and the project team.

The Site is available now, is suitable, is achievable and can deliver new housing within the first 5-year Plan period.

Conclusions

Accordingly, for the reasons outlined above, Pigeon contends that Policy S/RRA is unsound. By focusing growth almost exclusively on strategic sites and constraining the range and distribution of housing growth by largely excluding growth at sustainable villages, the Plan risks:

- Failing to meet local market and affordable housing needs.
- Increasing commuting and associated congestion and emissions.
- Undermining the vitality and viability of village services and facilities.
- Over-reliance on a small number of large allocations, reducing delivery resilience.
- Failing to capitalise on committed transport investments, including: GCP Greenways; the C2C Busway Mass-rapid transit scheme and; East-West Rail (EWR) and the new stations associated with it.
- Exacerbating affordability pressures and undermining the labour supply and economic growth ambitions of Greater Cambridge.

Accordingly, **the policy is not positively prepared, justified, effective or consistent with national policy.**

The allocation of a small number of additional, smaller and more easily deliverable sites in the Rest of the Rural Area, such as Land South of St Neots Road, would go some way to meeting this need, whilst also strengthening the Council's slim 5-year housing land housing supply buffer, which by the Council's own admission, is marginal upon adoption of the Plan.

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Site Plans for Land South of St Neots Road, Hardwick

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

The proposed housing in the 'Rest of the Rural Area' should be increased to help meet the higher housing requirement proposed in Pigeon's response to Policy S/JH, provide a more robust, flexible and deliverable housing supply and to meet national policy as set out in HO6 – namely, to allocate specific sites to meet at least 10% of the housing requirement; a further 10% for medium sites (up to 2.5ha) and; sufficient sites to support the village economies, local services and facilities.

Pigeon's Site at Land South of St Neots Road, Hardwick, should be allocated for a residential development of approximately 138 dwellings.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Local Plan Policies Map – Hardwick Inset Map

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Land South of St Neots Road, Hardwick (Site ID 115234; HELAA ID 40273)

For the reasons set out in our representations to Policy S/RRA, Pigeon strongly objects to the proposed inset map for Hardwick on the grounds that it does not allocate Land South of St Neots Road, St Neots for residential development.

By focusing growth almost exclusively on strategic sites and constraining the range and distribution of housing growth by largely excluding growth at sustainable villages, the Local Plan risks:

- Failing to meet local market and affordable housing needs.
- Increasing commuting and associated congestion and emissions.
- Undermining the vitality and viability of village services and facilities.
- Over-reliance on a small number of large allocations, reducing delivery resilience.
- Failing to capitalise on committed transport investments, including: GCP Greenways; the C2C Busway Mass-rapid transit scheme and; East-West Rail (EWR) and the new stations associated with it.
- Exacerbating affordability pressures and undermining the labour supply and economic growth ambitions of Greater Cambridge.

There are no residential allocations proposed within Hardwick within the Proposed Submission Plan, despite the village being a demonstratively sustainable location for development which is accessible to jobs and key services.

The allocation of a small number of additional, smaller and more easily deliverable sites in the Rest of the Rural Area, such as Land South of St Neots Road, would go some way to meeting this need, whilst also strengthening the Council's slim 5-year housing land housing supply buffer, which by the Council's own admission, is marginal upon adoption of the Plan.

Moreover, the Site at Land South of St Neots Road, Hardwick is available now is suitable now, is achievable and can deliver new housing within the first 5-year Plan period.

Accordingly, **the inset map is not positively prepared, justified, effective or consistent with national policy.**

The Policy Inset Map for Hardwick should therefore be updated to allocate Land South of St Neots Road, Hardwick for a residential development of 138 homes.

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Illustrative Masterplan for Land South of St Neots Road, Hardwick.

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

The Inset Map should be amended to allocate Land South of St Neots Road, Hardwick (Site ID 115234; HELAA ID 40273) for residential development of 138 homes.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary

To fully represent our client's interests in this important matter which is fundamental to the promotion of Land South of St Neots Road, Hardwick, and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.

Land South of St Neots Road, Hardwick (Site ID 115234; HELAA ID 40273)

Updated RAG Site Review and Promoter Comments 2026

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Response
Adopted Development Plan Policies RAG (2026)	Amber	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.	A planning application has been submitted in relation to the Land South of St Neots Road (26/01263/OUT) On the basis that the planning submission is compliant with local and national policy, it is considered that the assessment should be updated to **Green**.
Flood Risk RAG Assessment (2026)	Amber	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.	The Site is located wholly in Flood Zone 1, which has the lowest probability of flooding. The Site also has very low chances of flooding from surface water. A Flood Risk Assessment has been prepared as part of the planning application which confirms this position. Given the Council's comment associated with the RAG rating, it is not clear why the site is not 'Green'. Accordingly, Pigeon contend that the rating should be updated to **Green**.
Landscape RAG Assessment (2026)	Amber	2026 Comments: Having considered the updated information submitted, the site assessment remains the same. The site lies outside but adjacent to the village framework. Despite relative enclosure, it retains some rural edge qualities. **We consider the site has some capacity for development, but proposals must be LVIA-led to minimise harm to countryside character and visual receptors**. Even with mitigation, some landscape and visual effects are unavoidable given the site's greenfield, rural location. 2025 Comments: A written, unillustrated landscape and visual appraisal has been submitted along with a proposed masterplan. The additional information does not change the RAG assessment. The location of the site on the edge of Hardwick and the open landscape to the south mean that previous comments on the requirements for landscape enhancements and mitigation still apply.	The update comments are welcomed. Pigeon have brought forward an LVIA and landscape-led scheme for the site which addresses its location and landscape sensitivity. The LVIA accompanies this response to provide further information in this regard. The LVIA and application materials demonstrate that the development will not result in an unacceptable landscape impact. It is therefore considered that the assessment should be updated to **Green**.

		Also of relevance are comments from 2023 and 2021: 2023 – Additional comments reply to the previous assessment scoring. As previously noted, mitigation measures would need to be introduced to ensure development of the site does not have an adverse impact on the landscape character of the area. Therefore no change the RAG assessment of this site is proposed as additional landscape enhancements would be required to overcome development impacts. 2021 – The key constraints are that the site is outside of the development, and not adjacent to it either where a village extension may be justified. The woodland adjacent to the site proposes an opportunity for neighbouring amenity space or pleasant views. Development to be sited close to the existing built area to maintain open views of the landscape. Landscape mitigation needed to minimise adverse impacts.	
Biodiversity and Geodiversity RAG Assessment (2023)	Amber	No additional information has been provided in relation to ecology impacts, mitigation and Biodiversity Net Gain and therefore there is no change to the site assessment scoring. 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. Also of relevance are comments from 2021: All new housing developments will require assessment of increased visitor pressure on nearby SSSI. There are no apparent priority habitats within the site; however, there are grasslands, woodland areas, hedges, and wooded boundaries on site that are likely to have an ecological value. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find offsite compensation to comply with up-coming National legislation and developing local policies. Development of the site may have a detrimental impact on a designated site, or those with a regional or local	It is considered that this assessment is out of date. Pigeon have conducted extensive technical investigations on the site which have been submitted in support of the Outline Planning Application, in accordance with legislative requirements, the proposed scheme will deliver a minimum of 10% biodiversity net gain through a combination of on- and off-site measures. Full details of the proposed biodiversity enhancements will come forward at any Reserved Matters stage.

		protection but the impact could be reasonably mitigated or compensated.	
Policy RAG Rating (2026)	Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	The assessment is welcomed. It is deemed that there is no change on site that would alter this assessment, and therefore the assessment should remain **Green**.
Historic Environment RAG Assessment (2023)	Green	The additional information has not changed the RAG rating which was green. There will be no detrimental impact on any heritage assets as there are none close to the site.	The assessment is welcomed. It is deemed that there is no change on site that would alter this assessment, and therefore the assessment should remain **Green**.
Archaeology RAG Assessment (2025)	Amber	The assessment for the site remains unchanged as amber. Investigations will be necessary in advance of development. Also of relevance are comments from 2021: Iron Age settlement recorded to the north of the site.	Pigeon have commissioned the completion of a Desk-Based Heritage Statement which concludes that there are no heritage constraints that would preclude the site's proposed development, but it is anticipated that further archaeological works are required to establish the presence or absence of archaeological remains. As per the consultation response from Conservation Officers, further archaeological investigation should be undertaken following the grant of planning permission due to current site constraints. It is therefore deemed acceptable that the assessment is **Amber**.
Accessibility RAG Assessment	Amber	Adequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.	The Site is a highly sustainable location, readily accessible to a range of essential shops, services and employment within Hardwick and beyond. In particular, we wish to highlight the opportunity for further enhancement of Hardwick, especially in the context of the now-approved C2C scheme, planned East-West Rail and station at Cambourne. Therefore, the RAG assessment should be updated to **Green**.
Site Access RAG Assessment (2026)	Amber	Based on the additional information provided within the Proposed Site Access Plan, the site assessment has been amended to amber. The proposed site is acceptable in principle subject to detailed design.	The LPA's updated assessment revises the RAG rating to Amber. This is welcomed. The Outline Planning Application includes full detail of Access which the County Council have no objections to. The assessment should be updated to **Green**.

Transport and Roads RAG Assessment (2026)	Amber	2026 Comments: Having considered the updated information, the site assessment rating remains amber. Any potential impact on the functioning of trunk roads and/or local roads will need to be mitigated. There are also potential impacts on the A428 which may require mitigation. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use. It will need to provide high-quality local non motorised user routes linking to C2C and Cambridge to Cambourne cycleway 2025 Comments: Based on the additional information provided there is no change to the assessment score as it will need to provide high quality local non motorised user routes linking C2C and Cambridge to Cambourne cycleway. There are also potential impacts on the A428 which may require mitigation. Also of relevance are comments from 2021: Any potential impact on the functioning of trunk roads and / or local roads could be reasonably mitigated.	The proposals provide enhanced footpath and cycle connections onto St Neots Road which would potentially link in with the proposed C2C footpaths to the north and ensuring integration with these proposed public transport and active travel enhancements. Other pedestrian and cycle routes are proposed within the site with potential to link with surrounding networks. This Transport Assessment also concludes that the proposed development is not considered to have detrimental impact on the operation or safety of the local highway network. The acceptability of the Transport and Roads has been demonstrated through the Outline Application. Therefore, the RAG assessment should be updated to **Green**.
Noise, Vibration, Odour and Light Pollution RAG Assessment (2023)	Amber	New information provided has not changed the assessment. Detailed site-specific assessments will be required for any future planning applications at this location. Also of relevance are comments from 2021: 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.	Detailed technical work relating to noise, vibration, odour, and light pollution has been prepared in relation to the Outline Application. The assessment identifies no significant issues subject to incorporation of standard mitigation including adherence to a CEMP during the construction phase. Therefore, the RAG assessment should be updated to **Green**.
AQMA RAG Assessment (2023)	Green	The additional information provided does not significantly affect air qualities issues or mitigation. Therefore, the assessment of the site remains unchanged since the original assessment. The site does not lie within an AQMA and there will be minimal impact on AQMA.	The assessment is welcomed. It is deemed that there is no change on site that would alter this assessment, and therefore the assessment should remain **Green**.
Contaminated Land RAG Assessment (2023)	Amber	The additional information provided does not significantly affect environmental health issues or mitigation. Therefore, the assessment of the site remains unchanged since the original assessment as this is a site	Based on the findings of a preliminary risk assessment, no significant contaminant sources have been identified. A Contaminated Land Assessment has been conducted which

		previously in agricultural use with the potential for historic contamination and planning conditions will be required.	recommends that a Discovery Strategy is implemented during any development. It is anticipated that this can form the basis of a planning condition. Therefore, the RAG assessment should be updated to **Green**.
Available RAG	Green	Updated to Green in 2026.	The updated rating is welcomed. The Site is available now and can deliver new housing within 12 months of detailed permission – within the first 5 years of the new Local Plan adoption.
Achievable RAG	Green		The assessment is welcomed. It is deemed that there is no change on site that would alter this assessment. The site is achievable and therefore the assessment should remain **Green**.