BIDWELLS

Your ref: HELAA SITE ID REF.115443
Our ref: Oakington Road, Cottenham
DD: 07909 532521
E: [redacted]
Date: 24/09/2026

Greater Cambridge Shared Planning
South Cambridgeshire District Council
Cambourne Business Park
Cambridgeshire
CB23 6EA

Dear Sir/Madam,

GREATER CAMBRIDGE LOCAL PLAN REGULATION 19 CONSULTATION 2026 – LAND TO THE SOUTH OF OAKINGTON ROAD, COTTENHAM (HELAA SITE ID REF. 115443)

These representations have been prepared by Bidwells on behalf of Christ's College, Cambridge in response to the Greater Cambridge Local Plan Regulation 19 Consultation (2026). The representations relate to Land south of Oakington Road, Cottenham ('the Site') which is entirely within Christ's College ownership.

The Site was originally submitted in the Call for Sites exercise held in 2019 with subsequent representations submitted pursuant to the Regulation Issues and Options Consultation (2020) and the Regulation 19 Preferred Options Consultation (2021) and through the Council's Housing and Economic Land Availability Assessment (HELAA) was given the site reference 115443. Most recently representations relating to the Site were submitted pursuant to the Regulation 18 Consultation of the Greater Cambridge Local Plan which concluded in January 2026. The Site was referenced as CH10 within the Greater Cambridge Green Belt Assessment – Review following changes to National Policy and Guidance (2026). Documents submitted in support of previous submissions were:

- Vision Document (Bidwells UDS);
- Drainage Assessment (EAS);
- Highway Appraisal (EAS);
- Heritage Appraisal (Bidwells Heritage);
- Ecology Appraisal (Ecology Solutions).

The earlier submissions outlined above made by Christ's College in support of the Site remain up to date and relevant. The suite of technical documents set out above evidence the Site has been appropriately assessed and collectively demonstrate a deliverable site. This representation adds to the suite of submission material previously submitted and addresses any changes to the context of the Site, the emerging Greater Cambridge Local Plan and updates to national policy, notably the National Planning Policy Framework (noting the Plan will be examined against NPPF (2024)).

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The remainder of this representation is set out as follows:

- Site Description
- Cottenham
- Development Proposals
- Response to the Draft Local Plan

Submitted in support of these representations is a Housing Needs and Supply Matters Report prepared by Bidwells and is located in **Appendix A.**

Site Description

The Site is located to the immediate west of the built-up edge of Cottenham, measures 4.2ha and lies entirely within South Cambridgeshire District Council. The Site is currently in agricultural use. To the northwest the Site is bound by Oakington Road, beyond which lies residential development. Elis Close and Moreton Close are two residential cul-de-sacs which lie to the northeast of the site. To the south, the Site is bound by agricultural fields. The Site is characterised by residential development located along Oakington Road with a number of recently constructed dwellings to the north extending the built form of Cottenham further north along Oakington Road and Rampton Road. Development of the Site would be situated within that largely built-up context.

The Site lies approximately 500m from the centre of Cottenham and hosts a strong range of services, shops and facilities; such facilities throughout the village are two doctor's surgeries, dentist, library, two convenience shops, three public houses, village college, primary school, grocers, butchers. There are pavements connecting the site to the village centre, the development would have the opportunity to provide and enhance pedestrian and cycle routes.

The Site is located entirely within the Cambridge Green Belt with the northeastern edge of the Site forming the boundary of the Green Belt. The Site forms parcel 'CH10' as defined within Green Belt Assessment (2026) and is marked as 'provisional grey belt' attracting a 'low harm' in terms of release of the parcel from the Green Belt. The Revised Parcel Assessment (Appendix A of the Green Belt Assessment) confirms that the parcel assessment has not changed since the 2021 iteration of the Green Belt Assessment which identified the following contributions and assessment to the Cambridge Green Belt:

- Cambridge Purpose 1 – Limited/no contribution
- Cambridge Purpose 2 – Relatively limited
- Cambridge Purpose 3 – Limited/no contribution

We support the Authority's identification of the Site as grey belt within the Green Belt Assessment 2026. While the Plan will be examined against the NPPF (2024), the Development Management Policies of the NPPF (2026) will be immediately materially relevant once the emerging Local Plan is adopted. In that context the NPPF (2026) version is relevant and should the Site be allocated for residential development it would meet the Golden Rules set out in policy GB8 which would achieve:

- 50% affordable housing;
- Necessary improvements to local infrastructure; and
- Provision of new green space, accessible to the public.

Through the identification and allocation of grey belt sites across Greater Cambridge, such as the Site, pressures on green space within villages can be alleviated and whilst ensuring the purposes of the Green Belt as set out within the NPPF (2024) and the Draft Local Plan are not compromised. The

allocation of grey belt sites can ensure a spatial strategy with the most sustainable locations developed first and where the local need can be met in those villages where it has been identified that existing services and facilities provide a sustainable opportunity for further development, such as at Cottenham.

The area of grey belt identified as CH10 would lead to only a modest rollback of the Green Belt in a manner to better reflect the contemporary shape and form of Cottenham.

The Site lies entirely within Flood Zone 1 according to Environment Agency mapping and as such is not at risk of flooding from river and sea sources. In terms of surface water flooding small pockets of the site are assessed as being at 'high' (1 in 30) and 'medium' (1 in 100) risk of surface water flooding which can be adequately mitigated through layout and drainage strategy.

The centre of Cottenham is designated as a Conservation Area which contains numerous Grade II Listed Buildings, the nearest of which is Moretons Charity Almshouses located approximately 100m to the north of the Site. Development of the Site could be accommodated through an effective layout to ensure no harm to designated heritage assets in Cottenham including the Conservation Area.

Cottenham

The adopted Local Plan - South Cambridgeshire District Local Plan (SCDLP) (2018) identifies Cottenham as a Rural Centre in the Settlement Hierarchy and is one of the most sustainable villages in the district, recognising the wide variety of services.

Cottenham lies to the west of the A10, with Histon Road/Cottenham Road (B1049) providing a direct route through Histon and Impington into Cambridge.

The Village Classification Report (2012) prepared by SCDC reaffirms the large range of facilities and services and ranks Cottenham as the fifth most sustainable village in South Cambridgeshire, a district which comprises over 100 villages. This is informed by the provision of transport connections, services, facilities and shops. The report found that Cottenham, at the time, had 30 shops and services and was one of the best performing villages. While the report was prepared in 2012, it still demonstrates the general range of facilities and services in Cottenham and that it is one of the better served, and therefore more sustainable villages in the district. More recently the Development Strategy Topic Paper (2026) identifies the sustainability credentials of Cottenham accounting for the wide range of facilities and services offered including a pharmacy, library, post office, dentist, community facilities, a public house and 28 shops.

In terms of sustainable transport Cottenham is well served by the Citi 8 bus route which runs a regular service (approximately every 40 minutes) into Histon and Cambridge. Histon provides a link onto the Cambridgeshire Guided Busway which in turn links to Cambridge North Station. A dedicated cycle way/footpath runs the length of the B1049 between Cottenham and Histon and Impington, where this route connects into the strategic cycle network on Histon Road to the south of the A14.

Cottenham's proposed reclassification from Rural Centre to Minor Rural Centre is objected to and discussed in detail below.

Development Proposals

Christ's College has explored the opportunity to promote the Site through the Local Plan process to accommodate approximately 75 dwellings at the Site. Christ's College is keen to work with the local community to provide a development that will make a positive contribution to Cottenham and wish to provide a housing mix that caters to local needs and complements the existing residential settlements.

The Site represents a logical extension to Cottenham to round off the existing settlement and contribute to Greater Cambridge meeting its housing needs across the emerging Local Plan period (2024 – 2045).

Representations to the Local Plan

A consideration of policies within the Draft Local Plan is set out below.

S/JH: New Jobs and Homes

Christ's College **objects** to draft policy S/JH.

Paragraph 69 of the NPPF (2024) is clear that Authorities need to plan for higher levels of growth than the Standard Method requirement to reflect growth ambitions linked to economic development and infrastructure investment. The draft plan does not do this. Cambridge and the surrounding region are central to the government's ambition to 'supercharge' growth. The draft plan does not reflect this ambition and will not meet the government's expectations.

This is backed by national, regional and authority level investment in infrastructure including the new Cambridge South Train Station providing direct connectivity between Cambridge Biomedical Campus and London, the granting of the Cambourne to Cambridge busway and progression of Cambridge South East Transport to inquiry later this year. In a national context the commitment to East West Rail establishes the area as one benefiting from continued investment in major transport infrastructure.

Growth for Greater Cambridge is also set to be delivered by the Greater Cambridge Development Corporation (GCDC). A body that is now legally formed.

The approach of the LPA may be that the GCDC will deliver the growth over-and-above the minimum provision in the Draft Local Plan, but; the GCDC is yet to receive plan-making powers; it will prepare a Plan after the adoption of the Draft GCLP; it will need to undertake formal consultation and examination in public in the normal way to lead to a formally adopted "successor" Plan. Such a successor Plan will be many years away, while the growth ambition is now. The GCLP needs to address growth now and not rely on a possible GCDC Plan.

The Housing Needs and Supply Matters Report, prepared by Bidwells and submitted in support of these representations, identifies that the Authority's current housing need figure of 48,069 homes is too low. Although this figure aligns with the central growth scenario set out in the Employment and Housing Evidence Update (2026), it does not give sufficient weight to the national importance of the Cambridge economy, to its continued growth or ambitions set out within the Cambridgeshire and Peterborough Combined Authority (CPCA) Local Growth Plan (2025). The Report therefore concludes that the Authority should plan for a higher-growth scenario and identifies a range of alternative housing need figures, each significantly above the Authority's current identified need:

I. 67,244 homes on the assumption that the relationship between the need to support the Local Growth Plan and the minimum local housing need of the standard method is consistent across the CPCA area,
II. 80,769 to 121,514 homes on the basis of the analysis in the Case for Cambridge, or
III. 59,409 homes according to the CPCA's Local Growth Plan ambitions to triple the size of the economy by 2050.

We contend that, in order to ensure the plan is found sound the unique nature of Cambridge and its projected capacity for growth must be supported and planned for by the emerging Local Plan. Specifically, this should be met through increased housing delivery across the Plan period. The Greater Cambridge Housing Need and Supply Matters Report, prepared by Bidwells and submitted in support of

these Representations (located at **Appendix A**) concludes with the recommendation that the Authority should plan for at least 59,409 homes over the plan period to support the local and national economy.

Changes Required

- The Local Plan housing requirement should be increased to 59,409 dwellings across the plan period; and
- A sufficient amount of additional allocations should be identified and allocated to meet the need for 59,409 dwellings.

S/DS: Development Strategy

Christ's College **objects** to draft policy S/DS.

With regards to the appropriate delivery of growth, we note Rural Centres and Minor Rural Centres serve a very limited role in the spatial strategy for this local plan. Figure 9 in the Local Plan highlights this fact with only 15% of the planned distribution of growth in the rural area, set in the context that the larger extent of Greater Cambridge is a rural area. There is a serious risk the large allocations will not deliver homes in the first 10 years of the plan due to the significant infrastructure required to service the very large allocations. We consider this approach flawed as it resultantly relies on two very large allocations set out under 2(c) i Cambourne North (2550 dwellings in plan period) and 2(c) ii Grange Farm (2550 dwellings in the plan period). Senior Councillors at Cabinet have expressed their concerns to officers that the strategy is a risky one to adopt. The problem is highlighted in paragraph 2.76 of the Regulation 19 Local Plan where the text acknowledges that it must '*ensure a deliverable plan but which is reliant on a significant level of infrastructure*'. Further ambiguity is compounded at paragraph 2.80 to the strategy as the Cambridge Wastewater Treatment Works still makes an appearance as a potential development site even though Government funding for the project has been cancelled by Government and there is no current prospect of this site being developed.

Windfall Allowance

As noted in the Housing Needs and Supply Report the PPG (3-023) makes it clear that windfall allowance can be relied upon for years 6-15 of a plan period and within years 1-5 a supply of specific deliverable sites must be identified to form the Authority's housing land supply in accordance with paragraph 72a of the NPPF (2024).

Notwithstanding the Housing Delivery Study Addendum Update (2026) includes a windfall allowance of 1,562 new homes within the first five years of the plan period (2028 – 33); contrary to national policy and guidance.

Delivery Trajectory

The Regulation 19 plan is fundamentally flawed in its chosen delivery strategy. The chosen strategy notably rests on two new main allocations, namely the 13,000 dwellings at Cambourne North and 4,500 dwellings at Grange Farm and the continued allocation of Northstowe, Cambridge East and Waterbeach. This approach is very risky as the local plan relies on significant infrastructure (namely Cambourne Train Station to be delivered as part of East West Rail and CSET respectively) coming forward in a timely manner to service these two large strategic sites. Our view is that the local plan relies too heavily upon these sites, which will not commence delivery until the latter half of the plan, after 2035. The plan period is 2024-2045. Our view is that smaller sites in sustainable settlement locations must be allocated for housing delivery in the first 10 years of the plan to ensure that identified housing needs are met.

The Housing Need and Supply Matters Report addresses the flaws in the Development Strategy, noting at present the Authority rely on overly ambitious delivery targets. Specifically, the trajectories for Northstowe, Cambridge East and Waterbeach New Town are identified to achieve cumulative rates of development which are unprecedented on any of the significant number of sites considered in Lichfields' Start to Finish Report (2024). It's further noted that even if Northstowe, Cambridge East and Waterbeach adopted the most ambitious delivery rates found in Start to Finish (The Hamptons, Peterborough) across the three sites there would still be a reduced supply of 3,581 homes across the plan period.

To address the trajectory issues outlined above the Authority needs to consider and adopt more realistic delivery rates for the sites outlined above which will in turn necessitate the additional allocation of sites capable of delivery earlier in the plan period. Such sites are likely to be those well related to existing settlements and be of a scale that will not require the delivery of significant infrastructure before housing delivery commences.

The Regulation 19 Plan contains very few small and medium-size housing sites allocated in the Rural Area; which the NPPF (2024 & 2026) recognises the important contribution such sites can make to an Authority's housing supply, bring variety (location and typologies) and resilience (more housebuilders wanting to develop).

Variety of Supply and Supporting the Vitality of Settlements

In addition, we consider the proposed approach would form a constraint on the sustainable development of many settlements and their communities. In particular, the lack of housing allocations in the villages fails to support the delivery of homes to meet the local housing needs of the next generation during the plan period. Instead of being able to live locally, this forces newly forming households to relocate to the main settlements, new settlements, or elsewhere – often away from their existing family, community and support network. This leads to an increased need for travel within Greater Cambridge, often via private cars rather than public transport. It also results in population imbalance, with ageing populations in villages and a falling roll in primary schools – whilst the new settlements have predominantly young populations and significant pressure on services.

To ensure the continued vitality of historic settlements across Greater Cambridge in the rural area an appropriate degree of housing and employment growth is required to ensure economic footfall is placed into such settlements and their respective highstreets, services and facilities.

Furthermore, at present the strategy proposes to deliver the majority of development at new towns and settlements within the Authority (Northstowe, Cambourne, Waterbeach and Grange Farm). Whilst the approach to deliver housing at scale is commended, the NPPF (2024) explicitly requires Authorities to enable a sufficient amount of land to come forward for residential development to meet the housing needs of the whole community taking into account need, size, type and tenure (NPPF paragraphs 61 – 63). To meet the needs of the whole Authority we contend a variety of land across the Authority needs to be identified for development. In allocating the majority of proposed housing at new settlements and new towns ignores the desire many people have within the Authority to live in existing settlements and villages located across the rural area. This both reduces market competition and choice which is likely to have a detrimental impact on house prices and market availability.

A more balanced approach is required in respect to the Rural Area, including a wider range of housing sites being allocated – in terms of both site sizes and locations. This is necessary to ensure that the Local Plan supports sustainable communities and sustainable patterns of growth. In addition to providing housing to support new jobs in Cambridge and the key employment growth sectors, the development strategy should take account of the needs and vitality of existing villages and the wider rural economy and make planned provision for them.

In many villages, there is a lack of brownfield land available within the 'defined development extents' to facilitate housing delivery in accordance with the approach set out in Draft Policy S/SH (Settlement hierarchy). Also, small windfall sites provide limited affordable housing to meet local needs. Hence, there should be specific land allocations for housing development in some of the rural villages, to promote genuinely sustainable growth and development – supporting the rural economy, promoting mixed and inclusive communities and ensuring the vitality and viability of local services.

The Authority needs to consider the additional allocation of smaller sites in the rural area that can both supplement the housing land supply of the Authority in the early years of the plan to account for the highly likely scenario that the strategic sites stall. This is identified within the Housing Needs and Supply Report which accounts for the Council's historic overly optimistic delivery rates, a trend which is set to continue as identified by the optimistic delivery rates envisioned by the Council within the forthcoming plan period. The allocation of additional smaller sites offer sufficient variety and choice to residents of the Authority so that housing continues to be made available in a range of locations across Greater Cambridge providing sufficient choice and competition.

Changes Required

- Reassess the plan period supply and the deliverable supply to account for the fact that only specific sites rather than a windfall allowance can be included in years 1-5 as set out in paragraph 72a of the NPPF.
- Remove sites from the plan period supply where the evidence demonstrates that there is no intention to bring these forward for residential uses.
- Reassess the plan period supply and the deliverable supply to reflect realistic delivery rates at Northstowe, Cambridge East (airport) and Waterbeach New Town.
- Additional allocations on small and medium sites should be provided in the Rest of the Rural Area;
- Complete the Housing Land Supply Evidence templates of the Planning Inspectorate for each of these sites included in the deliverable supply, and if necessary, adjust the supply accordingly including for example where there is no evidence that completions will be achieved.
- Allocations should be directed to sustainable settlements and immediately adjacent to them within the Rural Area such as Cottenham to ensure the Plan provides for sufficient choice and flexibility for residents when choosing where to live.

S/SH: Settlement Hierarchy

Christ's College **object** to draft policy S/SH.

The adopted Development Plan (South Cambridgeshire District Local Plan, 2018) identifies Cottenham as a Rural Centre. The Regulation 19 draft proposes to relegate Cottenham from Rural Centre to a Minor Rural Centre. The Development Strategy Topic Paper (2026) rationalises this by stating that Cottenham does not have a segregated public transport route and is hence proposed to be moved down the hierarchy.

We contend Cottenham remains a highly sustainable settlement which is well served by a wealth of services and facilities including:

- Village College;
- Primary School;
- Pharmacy;
- Library;
- Post office;
- Dentist;

- Community facilities;
- Public House; and
- 28 shops.

The absence of a segregated transport route is alone not considered sufficient to justify Cottenham's degrading within the settlement hierarchy – particularly when Cottenham by virtue of its location is located in close proximity to Cambridge, Northstowe and Waterbeach, key settlements and growth locations within the Authority. The village is well served by public transport, with broadly a bus service to Cambridge every 20 minutes. The Council's approach to village classification is too narrow and lacks opportunity for appropriate assessment, it is merely the output of a spreadsheet approach. Clearly Cottenham is a well-serviced large village that performs a role within the area beyond its village boundaries.

Cottenham remains a highly sustainable and well connected settlement which should be reflected within Settlement Hierarchy.

Changes Required

- We therefore contend that to ensure the Local Plan is justified in accordance with paragraph 36(b) of the NPPF (2024) Cottenham should be placed as a Rural Centre within the emerging Settlement Hierarchy.

S/GB The Cambridge Green Belt

Christ's College **objects** to draft policy S/GB

Whilst the GCLP will be examined against the NPPF (2024) it should be noted that the relevant material consideration for the determination of applications in terms of national policy will be the NPPF (2026). Annex A (Paragraph 2) of the NPPF (2026) states that Development Plan policies which are materially inconsistent with the national decision-making policies in the NPPF should be given very limited weight for the purposes of decision-making. To ensure the GCLP is an effective mechanism for decision-making, particularly with regards to the Green Belt it is considered that GCSP should review the NDMPs relevant to development in the Green Belt and update S/GB in full to reflect such position. Such policies that are:

- GB6 (Control of development in the Green Belt)
- GB7 (Development which is not inappropriate in the Green Belt)
- GB8 (Golden rules)

As outlined above it is considered the identified housing needs outlined above are too conservative and do not reflect the growth agenda in national, regional and local contexts mandated by the incumbent Labour government, the Cambridgeshire and Peterborough Combined Authority

Paragraph 146 (NPPF, 2024) (now Policy GB3[2]) identifies that one of the exceptional circumstances in which Green Belt boundaries can be altered is where an authority cannot meet its identified need for development in full, having examined other reasonable options. It is noted the *Response to Development Representations – Development Strategy Topic Paper (2026)* and the *Development Strategy Topic Paper Appendix 5: Revised Greater Cambridge Local Plan Green Belt Review (2026)* that the Authority do not consider exceptional circumstances for a review of Green Belt boundaries to exist other than the release of additional land at Cambridge Biomedical Campus (Phase 3) and at Babraham Research Centre. Notwithstanding the national context for growth, whilst it is acknowledged the growth scenarios

tested within the Sustainability Appraisal identify that the chosen Development Strategy is capable of meeting the objectively assessed needs of the Authority without requiring Green Belt release.

However, we consider Greater Cambridge's reliance on the Liverpool Method in calculating their Housing Land Supply runs a significant risk of under delivery in the early years of the Plan, this is compounded by the Development Strategy's reliance on large strategic sites which, given the extensive infrastructure requirements for such sites, may face delays to delivery. We raise concern that the reliance will lead to unsustainable development patterns and will not ensure a consistent, diverse and appropriate level of housing stock across the plan period.

The NPPF (2024) is clear at Paragraph 146 that exceptional circumstances are not just limited to where an Authority cannot meet its identified needs in terms of quantum. As noted within our comments on the Development Strategy, we consider that to ensure a consistent supply that meets the needs of the Authority across the plan period, Greater Cambridge need to consider the allocation of a diverse range of sites well located to existing settlements to ensure both the longevity of existing settlements and that growth is delivered and experienced across the Authority area.

Paragraph 148 (NPPF 2024) notes that strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary and towards towns and villages inset within the Green Belt boundary. We advocate sites adjacent to sustainable settlements within the Green Belt, such as Cottenham should be considered for allocation to ensure the Development Strategy is sustainable and provides a robust, diverse supply of housing across the Authority throughout the plan period.. We suggest allocating sustainable grey belt sites is considered preferable to other greenfield sites within the Authority which may hold higher landscape value.

Grey Belt

Christ's College support the Site's identification and designation of the Site (CH10) as 'provisional grey belt' within the Green Belt Assessment (2026). However, given the significant importance placed on grey belt within national policy (notably the NPPF 2024 and 2026) we advocate the Authority should identify grey belt land on the Policies Map in the same way in which Green Belt is identified on the Policies Map. This would ensure a consistent reference point for the Authority, developers and the public in referring to land designations.

The omission of any reference to 'grey belt' within the Draft Policy S/GB is challenged. The NPPF (2024) introduced a clear duty for grey belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). The direction of travel towards authorities being required to identify grey belt land within local plans is confirmed within the forthcoming NPPF (2026) (GB2[3]) and at Appendix E where the criteria for undertaking Green Belt Assessments is outlined. Hence, regardless of whether the Draft Local Plan can meet the identified needs for growth without Green Belt release, the relevant Plan Policy (S/GB) should include explicit reference to grey belt (consistent with the NPPF) and the identification of grey belt land within Greater Cambridge. To ensure the longevity of the Local Plan, it is recommended the revised Green Belt Assessment is undertaken with regard to Appendix E of the NPPF 2026.

The identification of the Cambridge grey belt within the Green Belt Assessment (2026) is welcomed, however we object to aspects of the methodology used in its identification which we set out below:

Moderate / Weak Contribution – differing identification of grey belt

The definition of grey belt as found within the NPPF (2026) does not set out a distinction between grey belt that makes a 'moderate' or 'weak' *contribution* to purposes a.), b.) and d.) of the Green Belt as found within Policy GB2 (Assessing existing Green Belt land) (NPPF, 2026). Rather the glossary of the NPPF confirms grey belt is solely land in the Green Belt that *'does not strongly contribute to any of purposes a.), b.) and d.) in policy GB2'.* As such it is considered unnecessary for the Authority to distinguish between 'moderate' and 'weak' in relation to identifying grey belt and instead should remove such distinction to identify one consistent grey belt for Greater Cambridge. This would ensure the Evidence Base on which the GCLP is built upon would be consistent with national policy.

Footnote 7

Whilst it is acknowledged the GCLP will be examined against the NPPF (2024) the relevant material consideration in terms of national policy for the determination of applications will be the NPPF (2026) which indicates both the adopted and future direction of national policy. Specifically Footnote 7 has been removed from the NPPF (2026) and in turn the definition of grey belt has been updated to remove reference to the footnote 7 within the NPPF (2026). It is therefore considered 'footnote 7' is no longer relevant to the decision-making process and therefore all reference and identification of it should be removed from the grey belt maps within the Green Belt Assessment (2026) to ensure the Local Plan is consistent with national policy, namely the NPPF (2026) and the application of its Development Management policies.

Overall, it is considered that Draft Policy S/GB is not consistent with national policy, does not reflect a positively prepared plan and is not justified. Pertinent to ensuring the Plan is sound will require:

- The identification of the Cambridge grey belt on the Policies Map;
- A consideration of higher growth targets and subsequent review of the Green Belt / Grey belt where necessary and subsequent allocation of suitable Grey belt sites.

The Council must take a positive approach to the preparation of the Plan. Its failure to engage properly with the Green Belt has not led the plan to an effective spatial strategy. There is a superior sustainable plan to be formed by properly considering Green Belt (Grey belt) sites that can better underpin sustainable development.

The NPPF (2024) is clear at paragraph 148 that authorities should consider the consequences for sustainable development of channelling development towards villages inset within the Green Belt

The Council needs to properly consider the inclusion of well-performing sites in the grey belt. For example, the land South of Oakington Road, Cottenham (ref: 115443) Site was assessed within the Council's Green Belt Assessment (2021) which supported First Proposals (2021) Draft Local Plan (parcel CH10). We support the appropriate and continued 'low' harm assessment of the Site within the Green Belt Assessment (2026). The Site is the only parcel of Green Belt land bordering Cottenham where the harm from a release is assessed as 'low' when assessed against the three purposes of the Cambridge Green Belt and is the only parcel assessed as making a 'weak' contribution to Purpose D of the Green Belt in Cottenham. The Council needs to release additional Green Belt sites in line with the hierarchy set out in paragraph 148 of the NPPF (2024) to lead to a sustainable spatial strategy.

Changes Required

- Update Policy S/GB to align fully with the NPPF 2026 and Green Belt NDMPs (NPPF, 2026), including revising Green Belt policies and incorporating explicit recognition of grey belt land to ensure consistency with national decision-making policy.

- Review housing growth requirements and consider additional Green Belt/grey belt releases, on the basis that current housing targets may be too conservative and the delivery strategy risks under-supplying housing due to reliance on large strategic sites and the Liverpool Method.
- Identify and map grey belt land on the Policies Map, and amend the Green Belt Assessment methodology to reflect NPPF 2026 by removing distinctions between “moderate” and “weak” grey belt and deleting references to former Footnote 7.
- Allocate suitable grey belt sites adjacent to sustainable settlements, including sites such as Land South of Oakington Road, Cottenham, to create a more sustainable and diverse spatial strategy that supports housing delivery throughout the plan period.

Benefits

Allocation, and in turn development of the Site, would bring numerous social, economic and environmental benefits including:

- Effective use of sustainable grey belt land;
- The opportunity to deliver a substantial amount of affordable housing to address the acute need for affordable housing within Cottenham and Greater Cambridge;
- Locating residential development within one of the most sustainable villages within South Cambridgeshire;
- Opportunity to enhance the biodiversity of the site retaining existing hedgerow and increasing the natural capital of the Site;
- Support existing facilities, services and business ensuring the continued and enhanced vitality of Cottenham;
- Delivering development on grey belt land to provide a natural extension to the existing settlement which will sit in a context defined by residential development at Oakington Road, Rampton Road and Elis Close, Moreton Close and Histon Road, representing an organic addition to the existing urban grain.

Summary

These Representations have been submitted to supplement previous representations in support of the Site (ref: 115443) through previous Call for Sites and consultation submissions. This submission has addressed and responded to the transformed policy context of the Site both in terms of the emerging Draft Local Plan and reforms to the NPPF within the 2024 revision and the full update in 2026. Bidwells have identified the Draft Local Plan over relies on large strategic sites which have historically time-and-time-again failed to deliver to the timetable first assumed by the Council, both the start date and the delivery rates. The absence of allocated smaller sites in sustainable locations that can deliver early in the Plan Period to meet the acute housing needs of Greater Cambridge is a serious flaw of the Draft Local Plan to achieve a sustainable, sound and deliverable spatial strategy.

The Site (ref: 115443) is highly sustainable and remains suitable, available and achievable for residential development to meet the growing housing needs of Cottenham and Greater Cambridge and represents a grey belt site which should be prioritised for allocation. In any case the Site should be identified as grey belt within the Local Plan.

Should you require any further information regarding the Site or these representations please do not hesitate to contact me.

Yours sincerely,



Guy Kaddish
Partner, Planning

Enclosures Housing Needs and Supply Matters Report - Bidwells

Appendix A – Housing Needs and Supply Matters

BIDWELLS

GREATER CAMBRIDGE HOUSING NEED AND SUPPLY MATTERS

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Appendix 1
TECHNICAL NOTE

1.0 Introduction

1.1 This report supports representations which address housing need and supply matters in respect of the emerging Greater Cambridge Local Plan (GCLP).

1.2 The GCLP is being prepared under the legacy system and will be examined in the context of the NPPF of December 2024 and its associated planning practice guidance (PPG). Therefore, all references to the NPPF and PPG are to those of December 2024 unless otherwise stated.

2.0 Policy S/JH: New Jobs and Homes

2.1 Policy S/JH of the emerging GCLP proposes a minimum housing requirement of 48,069 homes from 2024-45. This equates to an average of 2,289 homes per annum.

The full objectively assessed need

The minimum local housing need

2.2 Paragraph 62 of the NPPF requires that the minimum number of homes needed is informed by a local housing need assessment conducted using the standard method set out in the PPG.

2.3 The PPG (2a-008) explains that the minimum local housing need figure that arises from the standard method may change as inputs are updated and this should be taken into consideration. However, it sets out that the results of the standard method may be relied upon for plan-making purposes for 2 years from the time a Local Plan is submitted for examination.

2.4 The GCLP has yet to be submitted for examination, and as such the latest results of the standard method should be used, albeit it should be appreciated that these may change prior to submission and the emerging GCLP should provide sufficient contingency to accommodate any such changes.

2.5 The PPG (2a-004) sets out that the standard method should be calculated using the most recent data on the housing stock and the average affordability ratios over the five most recent years for which data is available. The most recent data on the housing stock was published on 21st May 2026, and the most recent affordability ratios were published on 26th March 2026. On the basis of these inputs, the standard method identifies a minimum local housing need for 2,290 homes per annum as set out in the following table.

Table 2.1 – the standard method

	CAMBRIDGE	SOUTH CAMBRIDGESHIRE	TOTAL
Housing Stock 2025 (A)	58,641	75,102	133,743
0.8% of the Housing Stock (B=Ax0.8/100)	469	601	1,070
Average affordability ratio (C)	11.91	10.29	-
Affordability adjustment (D=(C-5)/5x0.95+1	2.31	2.01	-
MINIMUM LOCAL HOUSING NEED (E=BXD)	**1,085**	**1,205**	**2,290**

2.6 Over the 21-year plan period, this provides for a minimum local housing need for 48,090 homes (=2,290x21). The proposed housing requirement will therefore need to be increased by 21 homes to meet even the minimum local housing need as required by paragraph 62 of the NPPF.

The economic imperative

2.7 It should be underlined that the standard method provides only the minimum local housing need as set out in paragraph 62 of the NPPF and the PPG (2a-002). The PPG (2a-040) makes it 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.

2.8 Greater Cambridge forms part of the Oxford Cambridge Arc (often referred to as the UK's Silicon Valley) which has long been recognised as one of the central planks of the government's plans for economic growth.

2.9 In this context, the government established the Cambridge Growth Company in 2024 to address barriers to growth and help unlock Greater Cambridge's full potential. More recently, the government established the Greater Cambridge Development Corporation (GCDC) in 2026 with the express purposes of building upon the work of the Growth Company to achieve transformational economic growth.

2.10 In conjunction with the Growth Company, the Cambridgeshire and Peterborough Combined Authority (CPCA) adopted a Local Growth Plan in late 2025 which seeks respond to the potential and proposes to triple the size of the local economy by 2050. The Local Growth Plan identifies that this will require an increase in housing supply of 15% by 2035 and 54% by 2050 across the Combined Authority area.

2.11 In 2025, there were 399,714 homes within the CPCA according to Live Table 125, such that the Local Growth Plan relies upon the delivery of 59,957 homes by 2035 and an additional 155,888 homes from 2035-50. These equate to 5,996 homes per annum from 2025-35 and 10,393 homes per annum from 2035-50. Over the remainder of the proposed plan period of the GCLP (2025-45) this equates to an average of 8,194 homes per annum as illustrated in the following table.

Table 2.2 – the rates of housing growth necessary to support the ambitions of the LGP

Housing Stock 2025 across the CPCA (A)	399,714
15% growth by 2035 (B=Ax0.15)	59,957
Average growth per annum 2025-35 (C=B/10)	5,996
54% growth by 2050 (D=Ax0.54)	215,846
Growth from 2035-50 (E=D-B)	155,888
Average growth per annum 2035-50 (F=E/15)	10,393
Growth from 2025-45 (G=(10xC)+(10xF))	163,883
AVERAGE GROWTH PER ANNUM 2025-45 (H=G/20)	**8,194**

2.12 This need for 8,194 homes per annum to support the aspirations of the Local Growth Plan compares with the minimum local housing need of the standard method of 5,860 homes per annum across the CPCA. It is therefore immediately apparent that the Local Growth Plan which aligns with the government's economic aspirations relies upon far greater levels of housing growth across the CPCA than arises from the standard method. Indeed, the Local Growth Plan requires that the minimum local housing need of the standard method is exceeded by 40% across the CPCA. Assuming this was consistent across the CPCA area, this would result in a need for 3,202 homes per annum (=2,290x1.40) in Greater Cambridge which equates to 67,244 homes over the proposed plan period.

2.13 Similarly, in 2024, the MHCLG commissioned Oxford Economics to explore the potential of the Greater Cambridge economy. The resultant Case for Cambridge considered the benefits arising from the delivery of between 100,000 and 150,000 homes over the period 2024-50 in Greater Cambridge, which equate to 3,846 and 5,769 homes per annum respectively, or 80,769 to 121,154 homes over the proposed plan period. On either basis, the proposed housing requirement of 2,289 homes per annum falls substantially short of realising the economic potential of the area.

2.14 Indeed, the CPCA has identified in the Statement of Common Ground that the proposed housing requirement in the emerging GCLP does not provide the ambition or acceleration to enable infrastructure providers to invest in the appropriate infrastructure to achieve growth and suggest that the GCLP should set a requirement of at least 59,409 homes.

2.15 In order to support the planned economic growth of the sub-region as well as the nation, there is a need for either:

I. 67,244 homes on the assumption that the relationship between the need to support the Local Growth Plan and the minimum local housing need of the standard method is consistent across the CPCA area,

II. 80,769 to 121,514 homes on the basis of the analysis in the Case for Cambridge, or

III. 59,409 homes according to the CPCA.

2.16 As such, the proposed housing requirement of just 48,069 homes in the GCLP which reflects the minimum identified by the standard method will clearly act to constrain the economic ambitions of the Local Growth Plan contrary to paragraph 86d of the NPPF.

2.17 The fact that the GCLP is not planning for the level of growth necessary to support the economic ambitions of the Local Growth Plan, which align with the economic objectives of the government is underlined by the fact that the Employment and Housing Needs Update does not even consider the Oxford Cambridge Arc or the Local Growth Plan. Instead, it has been developed on the basis of standard economic forecasts which are inevitably trend-based and so do not account for economic potential of the area as is necessary to align with local and national economic ambitions.

Unmet needs

2.18 The NPPF is also clear that unmet needs should be addressed in establishing the amount of housing to be planned for including in paragraphs 11 and 62.

2.19 In this context, it is apparent that London has a very substantial unmet need for housing given that the standard method identifies a minimum need for 84,884 homes per annum in London and yet the adopted London Plan provides for only 52,287 homes per annum and the draft London Plan proposes a requirement of only 55,800 homes per annum. This shortfall of housing provision within the capital will undoubtedly constrain the economic growth of London and thereby the country, and this will need to be addressed elsewhere.

2.20 Given the strong inter-relationship between Cambridge and London, the overwhelming unmet needs of London, and the identification of the Oxford Cambridge Arc as being a central plank of the government's economic growth agenda, it would be appropriate to address at least a proportion of the unmet needs of London within the GCLP.

The need for affordable housing

2.21 Paragraph 20a of the NPPF requires that strategic policies should make sufficient provision for affordable housing. To support this, the PPG (2a-024) requires that LPAs consider increasing the total number of homes provided where this could help meet affordable housing needs.

2.22 In this context, the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire report identifies that there is an acute need for affordable housing in both LPAs. Indeed, it identifies a need for 1,636 affordable homes per annum across Greater Cambridge in Table 7.16. This means that 71% of the housing requirement of 2,289 homes per annum needs to be delivered to meet affordable housing needs in full. This will clearly not be achieved, and so national guidance requires that consideration is given to increasing the housing requirement to better respond to the need for affordable housing. However, this exercise does not appear to have been undertaken in support of the emerging GCLP contrary to the requirements of national guidance.

2.23 Instead, in paragraph 7.57 to 7.72 of the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire it is suggested that it is not appropriate to undertake the exercise required by national guidance. The premise of this is misplaced including because:

I. In paragraph 7.60, it is correctly recognised that if affordable housing was delivered to meet affordable housing needs, some of those would free up existing market housing which could be used to accommodate other households. However, this disregards the fact that this will only happen if the affordable housing necessary to meet affordable housing needs is delivered in the first place. As such, this does not in any way suppress the need to deliver affordable housing.

II. In paragraph 7.61, it is correctly recognised that the affordable housing need includes newly forming households, who will also be accounted for in the overall housing need. However, once again, this does not in any way suppress the need to deliver affordable housing as it remains necessary to deliver affordable housing to meet the needs of these households, which in turn may necessitate the delivery of greater numbers of homes overall as is necessary to support local and national economic growth.

2.24 Therefore, not only is it inappropriate to depart from national guidance, but the justifications also provided do not stand up to scrutiny. The simple facts are that there is an acute need for affordable housing which will not come close to being addressed under the emerging GCLP and in such circumstances national guidance requires consideration to be given to increasing the number of homes delivered to better meet affordable housing needs.

Summary and modifications required

2.25 The proposed housing requirement of Policy S/JH is unsound including because:

I. It is not positively prepared as it does not meet even the minimum local housing need of the standard method, let alone reflect the economic ambitions of the government as expressed through the Local Growth Plan or respond sufficiently to the acute need for affordable housing.

II. It is not justified as it does not provide any justification for a housing requirement below the minimum local housing need of the standard method, it does not even consider providing for a level of housing which aligns with local and national economic growth ambitions, and it has not considered whether a greater number of homes should be provided to better respond to affordable housing needs.

III. It will not be effective, as it will not meet housing needs, support local and national economic ambitions or deliver as much affordable housing as could sustainably be achieved.

IV. It is inconsistent with national policy as it does not meet the minimum local housing need of the standard method contrary to the requirements of paragraph 62 of the NPPF, and it does not support the planned economic growth contrary to the PPG (2a-040) and paragraph 86d of the NPPF, and it is not informed by a consideration of a greater housing requirement to better meet affordable housing needs contrary to the requirements of the PPG (2a-024).

2.26 In order to overcome these issues and progress a sound Local Plan, it will be necessary to undertake the following additional work and revise the proposed housing requirement accordingly:

I. Increase the housing requirement to reflect as a minimum the minimum local housing need of the standard method for 48,090 homes.

I. Prepare housing projections which align with the economic ambitions set out in the recently adopted Local Growth Plan, which the CPCA suggest will necessitate a requirement of at least 59,409 homes but potentially substantially more.

II. Consider whether it would be sustainable to deliver a greater number of homes to better respond to the acute need for affordable housing.

2.27 In light of the available evidence, this will necessitate a requirement of at least 59,409 homes over the plan period to support the local and national economy, rather than the proposed insufficient housing requirement of 48,069 homes which falls short of meeting even the minimum local housing need and pays no regard to the level of housing necessary to support the local and national economy.

3.0 Policy S/DS: Development Strategy

3.1 Proposed Policy S/DS proposes a series of allocations, which alongside existing commitments and a windfall allowance provide for a potential supply of 52,032 homes according to Table 2 of the GCLP.

The plan period supply

3.2 The Housing Delivery Study Addendum 2026 Update identifies the components of the identified supply of 52,032 homes over the plan period which are relied upon in the emerging GCLP. The supply identified in this document is however inconsistent with national policy in numerous regards as addressed below.

A windfall allowance

3.3 The PPG (3-023) explains 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. Indeed, a windfall allowance 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.

3.4 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 the already insufficient supply.

Specific sites where the evidence suggests that housing will not be delivered

3.5 To be considered developable, the NPPF identifies that sites should have a reasonable prospect that they will be available and could be viably developed at the point envisaged.

3.6 However, the identified supply includes numerous sites which the supporting evidence suggests will not be available including:

II. Cambridge Junction and Cambridge Leisure, notwithstanding the fact that the masterplan for this site does not provide for residential uses as set out in paragraph 3.4 of the Development Strategy Topic Paper.

III. Garages at St Matthews Street and Norfolk Street, notwithstanding the fact that this site is not shortlisted for development and if foreseen to be maintained as garage uses as set out on page 25 of the Development Strategy Topic Paper.

IV. Former Garage Block, East Road, notwithstanding the fact that this is proposed to be removed from the residential land portfolio and the landowner suggests that it should be assumed that no dwellings will be delivered on this site as set out on page 31 of the Development Strategy Topic Paper.

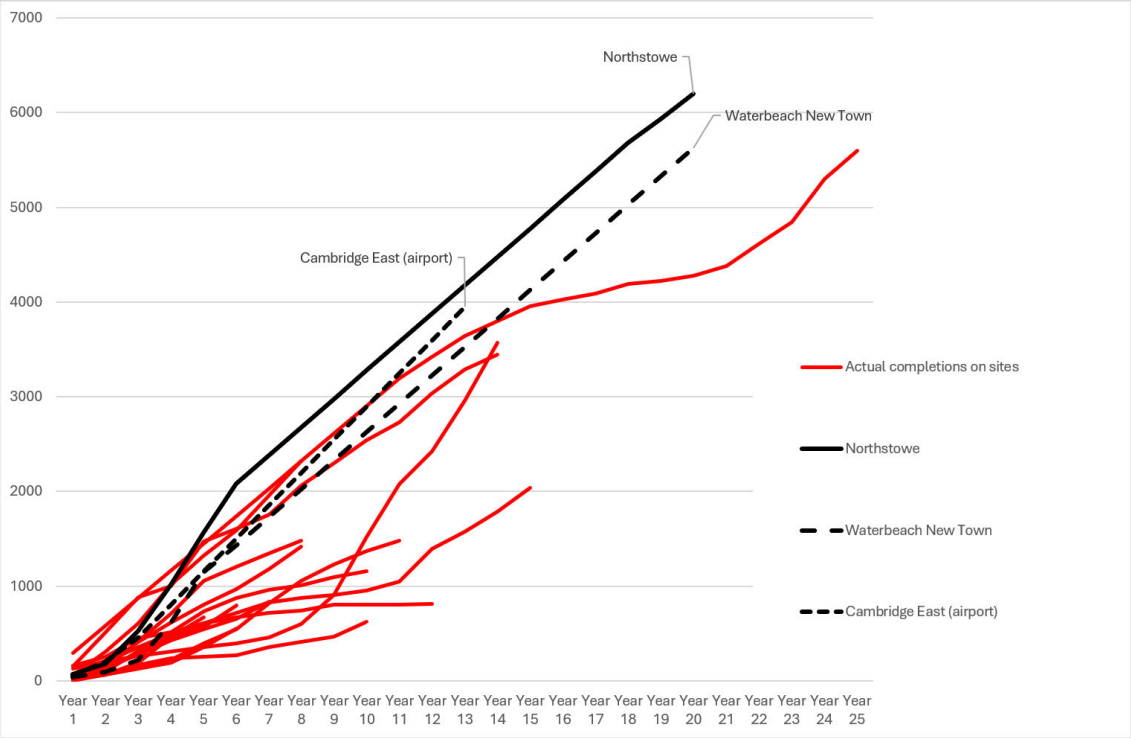
3.7 The above sites contribute to 202 homes to the supply over the plan period.

Specific sites with unrealistic trajectories

3.8 The Housing Delivery Study Addendum 2026 Update assumes that numerous sites will consistently achieve delivery rates of up to either 300 or 350 homes per annum which is unrealistic.

3.9 Whilst these rates of development may be achieved for a few years, they have never been consistently achieved for a longer period on any of the extensive range of sites of 3,500+ homes identified in Appendix 2 of the Start to Finish report as illustrated in the following Figure.

Figure 3.1 – a comparison of the cumulative delivery rates achieved on other sites with those assumed in the GCLP



3.10 The preceding Figure shows that the GCLP relies upon Northstowe, Cambridge East (airport) and Waterbeach New Town achieving cumulative rates of development which are unprecedented on any of the significant number of sites considered in the Start to Finish report. This is unrealistic for each site but is of particular concern given that the GCLP relies upon the delivery of three such sites and so the combined trajectory is even less realistic. There is no evidence to demonstrate how such unprecedented delivery rates could possibly be achieved and this is simply not credible.

3.11 Even on the basis of the unrealistically optimistic assumption that each of these allocations achieved the delivery rates achieved at The Hamptons, Peterborough which has achieved the greatest delivery rates of any of the sites considered in the Start to Finish report:

I. Northstowe would deliver 4,279 homes over the period 2025-45 rather than the 6,201 homes assumed in the Housing Delivery Study Addendum 2026 Update – this equates to 1,922 fewer homes than relied upon by the GCLP.

II. Cambridge East (airport) would deliver 3,641 homes over the period 2032-45 rather than the 3,950 homes assumed in the Housing Delivery Study Addendum 2026 Update – this equates to 309 fewer homes than relied upon by the GCLP.

III. Waterbeach New Town would deliver 4,279 homes over the period 2025-45 rather than the 5,629 homes assumed in the Housing Delivery Study Addendum 2026 Update – this equates to 1,350 fewer homes than relied upon by the GCLP.

3.12 Therefore, even unrealistically assuming that the greatest delivery rates ever achieved were replicated on each of these allocations, it would be necessary to reduce the plan period supply by 3,581 homes.

3.13 Furthermore, as set out in the the analysis of Bidwells (included as Appendix 1) it has taken far longer to achieve completions on strategic scale developments than assumed by the LPAs, and as such it is likely that not only will the delivery rates be materially lower than suggested but the delivery of strategic scale developments will not come forward as rapidly as suggested which will further reduce the plan period (and deliverable) supply.

3.14 In this context, numerous constraints are identified in the GCLP which are likely to at least delay delivery on at least a proportion of sites.

The actual plan period supply

3.15 On the basis of the preceding assessment of the supply, and even unrealistically assuming that some of the allocations match the greatest delivery rate ever achieved on a strategic scale site and that each of the strategic sites achieve completions at the time envisaged by the LPAs, it is necessary to reduce the identified supply of 52,032 homes by:

I. The 1,562 homes in years 1-5 which are identified as a windfall allowance, as these are not specific deliverable sites and so cannot be included in this period as set out in paragraph 72 of the NPPF.

II. The 202 homes which arise from sites where the evidence suggests that completions will not be achieved.

III. At least 3,581 homes at Northstowe, Cambridge East (airport) and Waterbeach New Town which would still unrealistically assume that these sites will replicate the greatest rates of development ever achieved on a strategic site.

3.16 This provides a supply of at most 46,687 homes.

The sufficiency of the claimed supply to meet housing needs over the plan period

3.17 As set out above, in light of the available evidence there is a need for at least 59,409 homes over the plan period to support the economic ambitions of the Local Growth Plan according to the CPCA.

3.18 It is therefore immediately apparent that in order to support the economic ambitions of the CPCA which in turn support the economic ambitions of the government, there is a need to identify a substantial amount of additional housing through additional allocations regardless of whether there is a supply of 52,032 homes as suggested by the LPAs or a supply of at most 46,687 homes as set out above.

3.19 Furthermore, even against the proposed insufficient housing requirement of 48,069 homes there is a need for a substantial amount of additional housing to be identified on additional allocations given that there is a supply of only 46,687 once the supply is robustly assessed.

The need for headroom

3.20 Table 2 of the GCLP identifies that the claimed supply provides a headroom of 8.2% above the proposed insufficient housing requirement. Such headroom is necessary for the GCLP to be effective in meeting the objectively assessed needs as required by paragraphs 11 and 23 of the NPPF, given the inevitability that a proportion of the identified supply will not be delivered.

3.21 However, headroom of just 8.2% is commonly recognised as providing an insufficient level of contingency to ensure that a Local Plan is effective in achieving its minimum requirement. Indeed:

I. The HBF recommend that a headroom of 10-20% is necessary to ensure that housing requirements are met.

II. LPAs commonly recognise the need for and seek a headroom of at least 10%.

3.22 In Greater Cambridge, the 8.2% headroom proposed is demonstrably insufficient given that the previous trajectories of the LPAs have over-estimated supply by more than 8.2% over periods of 4 years or more as is evident from the fact that:

I. The Greater Cambridge Housing Trajectory and Five Year Supply (April 2022) report forecast that 8,804 homes would be delivered from 2021-25 whereas only 7,820 homes were delivered according to the Annual Monitoring Report – this represents an over-estimate of 11%.

II. The Greater Cambridge Housing Trajectory and Five Year Supply (April 2021) report forecast that 10,616 homes would be delivered from 2020-25 whereas only 9,546 homes were delivered according to the Annual Monitoring Report – this represents an over-estimate of 10%.

III. The Greater Cambridge Housing Trajectory and Five Year Supply (April 2020) report forecast that 12,884 homes would be delivered from 2019-25 whereas only 11,080 homes were delivered according to the Annual Monitoring Report – this represents an over-estimate of 14%.

IV. The Greater Cambridge Housing Trajectory and Five Year Supply (November 2019) report forecast that 13,351 homes would be delivered from 2019-25 whereas only 11,080 homes were delivered according to the Annual Monitoring Report – this represents an over-estimate of 17%.

V. The Greater Cambridge Housing Trajectory and Five Year Supply (March 2017) report forecast that 21,127 homes would be delivered from 2016-25 whereas only 16,734 homes were delivered according to the Annual Monitoring Report – this represents an over-estimate of 21%.

3.23 It is therefore clear that the previous trajectories have over-estimated the supply by at least 10% and the extent of over-estimation has increased over longer periods. As the GCLP proposes a 21-year plan period, it is likely that the level of over-estimation will be even greater than the 21% achieved over the 9-year period from 2016-25. As such the available evidence suggests that the GCLP will need to provide for a headroom of at least 20% to stand any prospect of being effective in meeting the objectively assessed need for housing as required by paragraph 11a of the NPPF.

3.24 As illustrated in the following table, it will be necessary to allocate additional sites to:

I. Provide for even the proposed insufficient housing requirement even without any headroom once the supply is robustly assessed – which requires at least 1,382 additional homes.

II. Provide for even the proposed insufficient housing requirement and provide 20% headroom as has proved to be necessary locally – which requires an additional

5,651 homes based on the unrealistic supply of the LPAs or at least 10,996 additional homes once the supply is robustly assessed.

III. Provide for the minimum level of growth identified as being necessary to support economic growth even without any headroom – which requires an additional 7,377 homes based on the unrealistic supply of the LPAs or at least 12,722 additional homes once the supply is robustly assessed.

IV. Provide for the minimum level of growth identified as being necessary to support economic growth and provide 20% headroom as has proved to be necessary locally – which requires an additional 19,259 homes based on the unrealistic supply of the LPAs or at least 24,604 additional homes once the supply is robustly assessed.

Table 3.1 – a comparison of need and supply

REQUIREMENT	SUPPLY	HEADROOM	REQ	SUPPLY NEEDED WITH HEADROOM	CURRENT SUPPLY	ADDITIONAL SUPPLY NEEDED
Proposed insufficient housing requirement	Supply identified by the LPAs	0%	48,069	48,069	52,032	-
		8.2%	48,069	52,032	52,032	-
		20%	48,069	57,683	52,032	5,651
	Maximum supply identified above	0%	48,069	48,069	46,687	1,382
		8.2%	48,069	52,032	46,687	5,345
		20%	48,069	57,683	46,687	10,996
Minimum need identified by the CPCA to support economic growth	Supply identified by the LPAs	0%	59,409	59,409	52,032	7,377
		8.2%	59,409	64,307	52,032	12,275
		20%	59,409	71,291	52,032	19,259
	Maximum supply identified above	0%	59,409	59,409	46,687	12,722
		8.2%	59,409	64,307	46,687	17,620
		20%	59,409	71,291	46,687	24,604

3.25 On any basis, it will therefore clearly be necessary to allocate additional sites to provide a substantial number of additional homes to have any prospect of meeting the proposed insufficient housing requirement or the economic need as required by paragraphs 11 and 23 of the NPPF.

The five-year land supply

3.26 The Housing Delivery Study Addendum 2026 Update and Appendix D of the GCLP suggest that there will be a deliverable supply of 13,635 homes over the period 2028-33 which provides for:

I. A 5.03-year land supply with a surplus of 73 homes using the Sedgefield approach or

II. A 5.47-year land supply with a surplus of 1,163 homes using the Liverpool approach.

The Sedgefield vs Liverpool approach

3.27 The PPG (68-031) explains that any shortfalls that accrue from the base-date of a plan should be added to the five-year requirement using the Sedgefield approach. However, it proceeds to identify that if LPAs wish to deal with past under-delivery over a longer period, then a case needs to be made out as part of the plan-making process.

3.28 This recommendation for the use of the Sedgefield approach is unsurprising given that any alternative approach would only even arguably be appropriate in circumstances where emerging Local Plans have failed to identify a sufficient number of deliverable sites to meet needs such that they will not be supporting the government's objective to significantly boost the supply of housing to the extent required at least in the short term.

3.29 In such circumstances, where there is an insufficient deliverable supply to meet needs, the obvious remedy is to allocate additional deliverable sites rather than seeking to introduce a policy-mechanism such as the Liverpool approach which will only serve to impede the identification of additional sites to remedy the insufficient supply identified in the GCLP through the disengagement of Policy S5(1)(j) of the new NPPF. Indeed, the suggestion that the Liverpool approach is appropriate, implicitly recognises that the GCLP has failed to identify a sufficient supply of deliverable sites to provide comfort that even the proposed insufficient housing requirement will be met in the short-term.

3.30 In this context, numerous Inspectors have recently found Local Plans sound in the absence of a five-year land supply without resorting to applying the Liverpool approach, as was the case in the South Worcestershire Development Plan Review and the Uttlesford Local Plan. This underlines the fact that it is clearly more consistent with the objectives of national policy to adopt a plan without a five-year land supply and allow this to be supplemented to meet housing needs through the development management process and the operation of Policy S5(1)(j) of the new NPPF rather than to introduce a policy-mechanism to reduce the need.

3.31 In any event, in the case of the GCLP, the LPAs suggest that a five-year land supply will be able to be demonstrated regardless of whether the Liverpool or Sedgefield approach is applied. As such, there clearly are no circumstances to justify the application of the Liverpool approach if the supply and the proposed housing requirement of GCLP are accepted.

3.32 The Housing Delivery Addendum 2026 Update nevertheless seeks to argue that the Liverpool approach is appropriate notwithstanding the fact that it concludes that a five-year land supply will be able to be demonstrated using the Sedgefield approach. This is clearly inconsistent with the recommendations of national guidance. It is also not positively prepared as it serves to introduce a policy to reduce the requirement throughout the plan period rather than identifying a sufficient supply of deliverable sites to meet housing needs and support the government's objectives.

3.33 Notwithstanding this, the LPAs seek to provide some justification for the use of the Liverpool approach in paragraphs 3.2.87 and 3.2.89 of the Housing Delivery Addendum 2026 Update. This does not however stand up to any scrutiny.

3.34 Firstly, it is suggested that the Liverpool approach is justified owing to the development strategy. As addressed above, this simply recognises that the development strategy identified in the GCLP has failed to identify a sufficient supply of deliverable sites to provide comfort that a five-year land supply will be demonstrated. This failure of the GCLP cannot be used to justify the use of the Liverpool approach contrary to the recommendations of government as this would only further compound that failure by preventing the shortfalls being remedied through the application of Policy S5(1)(j) of the new NPPF.

3.35 Secondly, it is suggested that the Liverpool approach is justified on the basis of transport infrastructure but provides absolutely no detail as to why this might be the case. This therefore provides no justification.

3.36 Thirdly, it is suggested that the Liverpool approach is justified on the basis of water supply infrastructure. However, the Housing Delivery Addendum 2026 Update acknowledges that this constraint has been resolved and so this provides no justification for departing from the preferred approach of the government.

3.37 Fourthly, it is suggested that the Liverpool approach is justified owing to the lead-in times on strategic sites. This is however demonstrably not the case, given that the LPAs suggest that a five-year land supply will be able to be demonstrated using the Sedgefield approach.

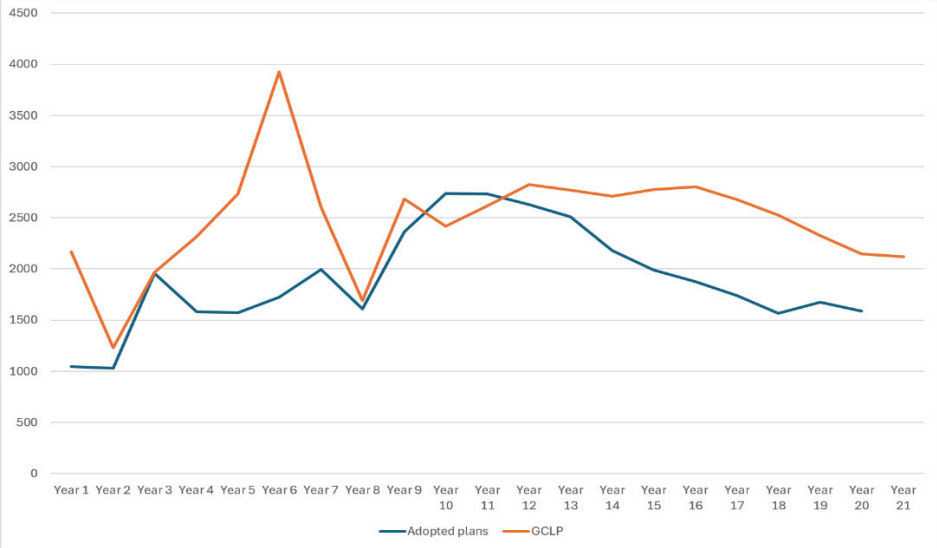
3.38 Fifthly, it alludes to economic headwinds which may impact the five-year housing land supply position. Whilst this is inevitably true, the same would be the case everywhere, and notwithstanding this the government recommend that the Sedgefield approach is applied to ensure that housing needs are addressed rapidly, rather than advocating the preparation of Local Plans that are insufficiently flexible to accommodate such circumstances.

3.39 Sixthly, it is suggested that an increase in completions will not be able to be achieved until the GCLP is adopted. This is simply incorrect. The LPA should apply current national policy and approve planning applications (where appropriate) including on the proposed allocations in advance of the adoption of the GCLP to supplement the supply. Furthermore, this justification is particularly inappropriate, as in effect it is relying upon the shortfall of supply that arises from the currently adopted Local Plans to justify the emerging GCLP seeking to provide for fewer homes than are needed throughout the plan period through the application of the Liverpool approach. In effect, this just compounds the already undesirable situation contrary to the objectives of national policy.

3.40 Seventhly, the LPAs rely upon the fact that the Liverpool approach was supported by the Inspectors examining the adopted Local Plans. The Inspectors supported the Liverpool approach owing to the supply being heavily reliant upon two new settlements in South Cambridgeshire which would not achieve completions until the mid or later years of the plan period such that the trajectory was backloaded1. This is however no longer the case, as the Housing Delivery Addendum 2026 Update relies upon completions being achieved on the majority of strategic scale allocations during the five-year period (2028-33) such that the trajectory of the GCLP is not backloaded as illustrated in the in Figure 3.2 below. Therefore, the circumstances are fundamentally different to those which applied at the time the Local Plans were adopted, and so the conclusions of the examining Inspectors in very different circumstances provide no support for the use of the Liverpool approach.

[1] With 3,427 completions from 2011–16, 6,036 from 2016–21, 7,692 from 2021–26 and 6,431 from 2026–31.

Figure 3.2 – the respective trajectories of the adopted and emerging plans



3.41 In summary, it would not be appropriate to apply the Liverpool approach in the GCLP given that:

I. The government recommend the use of the Sedgefield approach.

II. The application of the Liverpool approach works against the objectives of national policy, by reducing the requirement rather than identifying a sufficient supply of housing to meet housing needs as is expected of Local Plans.

III. The LPAs suggest that a five-year land supply will be able to be demonstrated using the Sedgefield approach and so the Liverpool approach is not justified.

IV. The trajectory of the LPAs is not backloaded and so there is no justification for seeking to apply the Liverpool approach.

3.42 It should however be acknowledged that this issue is somewhat moot, given that the LPAs are unable to demonstrate a five-year land supply regardless of whether the Liverpool or Sedgefield approach is applied against a housing requirement which reflects local and national economic growth ambitions or once the supply is assessed in accordance with national policy as addressed below.

The windfall allowance

3.43 As set out above, the inclusion of a windfall allowance in years 1-5 is precluded by national policy and guidance.

3.44 However, the Housing Delivery Study Addendum 2026 Update includes a windfall allowance of 1,562 homes in the period 2028-33. Without this the Housing Delivery Study Addendum 2026 Update identifies a deliverable supply of 12,073 homes in the period 2028-33. This alone means that a five-year land supply is unable to be demonstrated even against the proposed insufficient housing requirement regardless of whether the Liverpool or Sedgefield approach is applied.

3.45 It is therefore immediately apparent that the GCLP identifies an insufficient supply of specific deliverable sites to meet even the insufficient housing requirement at the point of adoption. This arises solely following consideration of the windfall allowance. However, it is also apparent that many of the specific sites included in the deliverable supply do not meet the requirements of the NPPF.

A realistic prospect

3.46 As addressed above, the trajectory of the LPAs assumes that the three allocations at Northstowe, Cambridge East (airport) and Waterbeach New Town will each achieve unprecedented rates of delivery which is wholly unrealistic. Of these, the LPAs assume that Northstowe and Waterbeach New Town will achieve unprecedented rates of delivery during the five-year period 2028-33. Indeed, the Housing Delivery Study Addendum 2026 Update suggests that these will achieve 2,156 and 1,814 completions from 2028-33 respectively in years 4 to 8 following the first completion. This compares with the 1,451 homes achieved at The Hamptons, which is the site which has achieved the greatest delivery rate according to the Start to Finish report.

3.47 Therefore, even if it was unrealistically assumed that both Northstowe and Waterbeach New Town will replicate the greatest delivery rate ever achieved on a strategic scale site, these would deliver 1,068 fewer homes than assumed in the GCLP during the period 2028-33.

The need for clear evidence in support of Category B sites

3.48 The Housing Delivery Study Addendum 2026 Update includes numerous sites in Category B of the definition of a deliverable site, which should only be considered deliverable where there is clear evidence that completions will be achieved as set out in the NPPF. However, on many such sites, the evidence base prepared in support of the GCLP provides no evidence whatsoever that these will achieve completions including at:

I. 379-381 Milton Road.
II. Police Station, Parkside.
III. Henry Giles House, Chesterton Road.
IV. Horizon Resource Centre, 285 Coldham's Lane.
V. Cambridge Professional Development Centre, Foster Road.
VI. Christ the Redeemer/Meadowlands Methodist Church/Holy Cross Church Hall, East Barnwell Community Centre and Cambridge Spiritualist Centre, Newmarket Road.
VII. North East Cambridge – Land north of Cambridge North Station.
VIII. Land between Huntingdon Road, Histon Road and the A14 (Darwin Green 2/NIAB 2 and Darwin Green 3/NIAB 3).
IX. Cambridge East – north of Cherry Hinton: remainder including RMA6.
X. Northstowe – phase 2 parcel 2D1.
XI. Northstowe – phase 2 remaining parcels including 2C, TC1, C2 and 2F.
XII. Northstowe – phase 3A.
XIII. Northstowe - phase 3B.
XIV. Northstowe – Digital Park.
XV. Waterbeach New Town – West: Parcels P4 and P4.3.
XVI. Waterbeach New Town – West: Parcel P5.4.
XVII. Waterbeach New Town – West: remaining parcels including P3.1, P6.1, P6.2, P7.1, P7.2, P8.1, P8.2, P8.3, P9.1, P9.2, P10.1, P10.2, P11 and LP2.
XVIII. Waterbeach New Town – East.
XIX. Bourn Airfield New Village.
XX. Cambourne West (land north west of Lower Cambourne) – Parcel 2.2a.

XXI. Cambourne West (land north west of Lower Cambourne) – Parcel 2.2b (north).

XXII. Cambourne West (land north west of Lower Cambourne) – remaining parcels.

XXIII. Wellcome Genome Campus, Hinxton.

XXIV. Land to the south of North End, Meldreth.

XXV. Old Press/Mill Lane, Cambridge.

XXVI. Cambridge East – North of Cherry Hinton.

XXVII. Girton College, Huntingdon Road, Girton.

3.49 In aggregate these contribute 7,045 homes to the claimed deliverable supply in the period 2028-33, including the 1,068 homes at Northstowe and Waterbeach New Town which would not be delivered even if the greatest rates of development nationally were replicated on both of these. In the absence of any evidence to demonstrate that completions will be achieved on these sites, these should not be considered deliverable according to the NPPF.

However, providing such evidence is made available these may be considered deliverable, depending on the content of that evidence.

3.50 The LPAs will need to address this through the completion of the Housing Land Supply Evidence templates which the Planning Inspectorate require are completed for every site which is assumed to contribute to the deliverable supply, which has not yet been undertaken.

The currency of the evidence

3.51 The PPG (68-007) requires that the evidence provided in support of Category B sites is up to date. In this context, the Secretary of State has found that where the milestones relied upon in support of a site have not been met, the evidence is not up to date and so such sites should not be considered deliverable in paragraph 21 of the recovered appeal decision at Land off Audlem Road/Broad Lane, Stapeley and Land off Peter de Stapeleigh Way (ref: 2197532 and 2197529).

3.52 On a few of the sites included in the deliverable supply by the LPAs, the milestones have not been met including at:

I. 2-28 Davy Road and Garage Blocks, Cambridge where the Housing Delivery Study Addendum 2026 Update relies upon the submission of a full planning application in the summer of 2026, but no such application was received.

II. Land at Highfields (Phase 2), Caldecote where the Housing Delivery Study Addendum 2026 Update relies upon the application being considered at committee in early summer 2026 but a committee date still has yet to be scheduled for this site.

3.53 From these examples alone it is apparent that the trajectory of the LPAs assumes that sites will be delivered in accordance with the anticipations of developers without regard being paid to the inevitably that at least on some sites, delays will occur. However, with these particular sites, it is unlikely that the delays will materially affect the trajectory and so no adjustment is made for these in the following analysis.

The resultant five-year land supply positions

3.54 The five-year land supply positions are calculated against the proposed insufficient housing requirement and the housing requirement recommended by the CPCA to meet economic needs in Table 3.2 below. This assumes that evidence is provided to demonstrate that each of the

Category B sites will achieve completions. However, without this evidence, the supply would be materially lower than suggested in the following table.

Table 3.2 – the five-year land supply positions

	PROPOSED REQUIREMENT OF 48,069		ECONOMIC NEED OF 59,409	
	LIVERPOOL	SEDGEFIELD	LIVERPOOL	SEDGEFIELD
Housing requirement 2024-45 (A)	48,069	48,069	59,409	59,409
Requirement 2024-28 (B=A/21x4)	9,156	9,156	11,316	11,316
Forecast completions 2024-28 (C)	7,685	7,685	7,685	7,685
Shortfall 2024-28 (D=B-C)	1,471	1,471	3,631	3,631
Shortfall to be addressed in the period 2028-33 (Liverpool: E=D/17x5, Sedgefield: E=D)	433	1,471	1,068	3,631
Baseline requirement (F=A/21x5)	11,445	11,445	14,145	14,145
Baseline requirement plus shortall (G=F+E)	11,878	12,916	15,213	17,776
Five-year requirement including 5% buffer (H=Gx1.05)	12,472	13,562	15,974	18,665
Deliverable supply identified by the LPAs (I)	13,635	13,635	13,635	13,635
– Of which comprising the windfall allowance (J)	1,562	1,562	1,562	1,562
– Of which is unrealistic at Northstowe and Waterbeach New Town even assuming that each of these replicate the greatest delivery rates ever achieved (K)	At least 1,068	At least 1,068	At least 1,068	At least 1,068
Total deliverable supply assuming that there is clear evidence that each and every Category B site will achieve completions (L=I-J-K)	At most 11,005	At most 11,005	At most 11,005	At most 11,005
No. of years supply (M=L/Hx5)	4.41	4.06	3.44	2.95
Surplus/shortfall (N=L-H)	-1,467	-2,557	-4,969	-7,660

3.55 The preceding table illustrates that a five-year land supply is unable to be demonstrated even if:

I. The proposed insufficient housing requirement is found sound notwithstanding the fact that this falls short of meeting the minimum local housing need of the standard method, that it does not align with local and national economic growth ambitions, and makes no consideration of whether a greater level of housing should be provided to better respond to the acute levels of affordable housing need; and

II. The Liverpool approach is applied contrary to the recommendations of national guidance notwithstanding the absence of any justification for this; and

III. It is unrealistically assumed that both Northstowe and Waterbeach New Town will replicate the greatest delivery rate ever achieved on any strategic site nationally as identified in the Start to Finish report; and

IV. It is unrealistically assumed that each strategic allocation will achieve completions at the time envisaged by the LPA; and

V. It is assumed that there is clear evidence that completions will be achieved on each and every Category B site, notwithstanding the fact that this evidence is not currently available.

3.56 Indeed, even with these hugely optimistic assumptions it is clear that the GCLP will need to allocate additional deliverable sites capable of delivering a substantial number of additional homes from 2028-33.

Summary and modifications required

3.57 The GCLP relies upon a plan period supply which is wholly unrealistic and contrary to national policy including because:

I. It relies upon a windfall allowance of non-specific sites in years 1-5 contrary to paragraph 72 of the NPPF which only allows for specific sites to be included in this period.

II. It relies upon sites achieving completions within the plan period, when the available evidence demonstrates that there is no intention to deliver housing on these.

III. It relies upon three allocations achieving unprecedented and unrealistic delivery rates.

3.58 Once the supply is adjusted to take account of these factors, there is a supply of at most 46,687 homes over the plan period, rather than the supply of 52,032 suggested in the GCLP.

3.59 It is clear that on any basis, the supply of either 46,687 homes or 52,032 homes is insufficient to support local and national economic growth which requires the delivery of at least 59,409 homes according to the CPCA or to provide sufficient headroom to meet even the proposed insufficient housing requirement. As such, the GCLP as drafted will not meet the full objectively assessed need for housing contrary to the requirements of paragraphs 11 and 23 of the NPPF.

3.60 Once the supply is assessed in accordance with national policy, the supply is actually lower than even the proposed insufficient housing requirement.

3.61 Additionally, once the supply is assessed in accordance with national policy and even adopting the most optimistic assumptions, there is not a sufficient supply of specific deliverable sites for five years following the intended date of adoption contrary to the requirements of paragraph 72a of the NPPF.

3.62 As a consequence, the GCLP is unsound including because:

I. It is not positively prepared as it does not provide a sufficient supply of housing to meet even the proposed insufficient housing requirement, let alone reflect the economic ambitions of the government as expressed through the Local Growth Plan.

II. It will not be effective, as it will not meet housing needs or support local and national economic ambitions, and in fact will actively constrain these objectives being achieved through the proposed application of the Liverpool approach.

III. It is inconsistent with national policy as it does not identify a sufficient supply to meet the objectively assessed need for housing contrary to the requirements of paragraphs 11 and 23 of the NPPF, and it does not identify a sufficient supply of specific deliverable sites for five years following the intended date of adoption contrary to the requirements of paragraph 72a of the NPPF.

3.63 In order to overcome these issues and progress a sound Local Plan, it will be necessary to:

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

II. Remove sites from the plan period supply where the evidence demonstrates that there is no intention to bring these forward for residential uses.

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

IV. Complete the Housing Land Supply Evidence templates of the Planning Inspectorate for each of these sites included in the deliverable supply, and if necessary, adjust the supply accordingly including for example where there is no evidence that completions will be achieved.

3.64 Having undertaken the preceding work as required by national policy and guidance, it is inevitably the case that the supply of the GCLP falls very substantially short of providing for a sufficient supply, given that even with the benefit of the doubt there is:

I. A supply of at most 46,687 homes over the plan period in response to the proposed insufficient housing requirement of 49,068 homes and the economic need for at least 59,409 homes identified by the CPCA and

II. A deliverable supply of at most 11,005 homes over the period 2028-33 in response to the requirement for either 12,472, 13,562, 15,974 or 18,665 homes depending on whether the housing requirement reflects economic needs and whether the Liverpool or Sedgefield approach is applied.

3.65 As such, in order to be found sound the GCLP will need to identify additional allocations to deliver a substantial number of additional homes including to:

I. Meet the economic need for at least 59,409 homes as identified by the CPCA – this requires the identification of additional allocations which will deliver 12,722 homes over the plan period without any allowance for headroom.

II. Provide sufficient headroom (20%) to ensure that the full objectively assessed need is met as required by paragraphs 11 and 23 of the NPPF – this requires the identification of additional allocations which will deliver 10,996 more homes over the plan period to meet even the proposed insufficient housing requirement or 24,604 homes to meet the economic need with a 20% headroom.

III. Provide for a sufficient supply of specific deliverable sites as required by paragraph 72 of the NPPF – this requires the identification of additional allocations to deliver either 1,467, 2,557, 4,969 or 7,660 more homes from 2028-33 depending on whether the proposed insufficient housing requirement or a requirement which supports economic growth is found sound and whether the Liverpool or Sedgefield approach is supported.

3.66 The scale of the insufficiency of the supply in the GCLP is truly exceptional by reference to that which has arisen in other Local Plans. As such, significant additional work will be required prior to the submission of the GCLP to identify the necessary additional allocations in order for the GCLP to be found sound.

APPENDIX 1
TECHNICAL NOTE

TECHNICAL NOTE ON DELIVERY OF STRATEGIC HOUSING SITES WITHIN GREATER CAMBRIDGE: JANUARY 2026

This Technical Note has been prepared by Bidwells LLP to assess the timescales on the planning process and delivery rates of historic strategic housing sites across Greater Cambridge.

The emerging Draft Greater Cambridge Local Plan will entirely replace the current adopted plans for South Cambridgeshire and Cambridge City and cover the 21- year period up to 2045, fourteen years beyond the current adopted Plans.

It is therefore important to understand how strategic residential allocations have historically performed given the proposed emerging development strategy of the Draft Greater Cambridge Local Plan to rely on a large number of strategic site allocations to meet the majority of the development needs to 2045 and beyond. This comprises carrying forward a number of allocations from the adopted plans, together with two new allocations (Cambourne North and Land adjacent to A11 and A1307 at Grange Farm).

The analysis undertaken in this report has relied as fully as possible upon data within publicly available Annual Monitoring Reports and Housing Land Supply reports of Cambridge City Council and South Cambridgeshire District Council**. A key trend that has been identified is that the Councils have consistently anticipated housing delivery on the large strategic residential sites to be sooner than has proved to be the case and at a delivery rate higher than has been the case**.

There are nine sites reviewed within this Note. Seven of the sites have delivered housing completions but, on average, there has been a delay of 4.9 years from when the Planning Authority first anticipated housing completions and when they actually happened. This leaves two sites that have not delivered any housing completions (Darwin Green Phases 2 and 3 and Bourn Airfield) despite them both forming allocations in respective local plan documents as far back as 2006 and 2018.

Darwin Green is one such example therefore that highlights the over optimism that has been set into historic plan making in Greater Cambridge. Further commentary on this particular site is summarised below. Full analysis of all of the other strategic sites are provided at **Appendix 1**.

Darwin Green

It has been a long-held objective of both Cambridge City Council and South Cambridgeshire District Council to propose a new sustainable urban extension of Cambridge on land between Huntingdon Road and Histon Road (now known as Darwin Green). This first dates back to the Cambridgeshire and Peterborough Structure Plan (adopted in **2003**) which identified land between Huntingdon Road and Histon Road as suitable for release from the Green Belt for housing and mixed-use development, under Policy P9/2c.

That part of the area between Huntingdon Road and Histon Road which falls within the jurisdiction of Cambridge City was released from the Green Belt in the Cambridge Local Plan (adopted in 2006), under Policy 9/8 (also known as ‘Darwin Green Phase One’). The allocation was followed through to the subsequent, and current, Cambridge Local Plan adopted in 2018, under Policy 20.

The remaining land within the jurisdiction of South Cambridgeshire was first allocated in the South Cambridgeshire District Council Site Specifics Policies Development Plan Document (DPD) (adopted in 2010), under Policy SP/2 North West Cambridge Huntingdon Road to Histon Road (also known as ‘Darwin Green Phase Two’). The allocation was followed through to the subsequent, and current, South Cambridgeshire Local Plan adopted in 2018, under Policy SS/2.

Darwin Green Phase One was granted Outline Planning Permission in 2013 (following submission in 2006), benefits from six subsequent reserved matters approvals and is partly occupied, with the remaining parcels under construction. Darwin Green Phases Two and Three secured Outline Planning Permission in 2024, with work currently underway on discharging conditions and preparing the initial reserved matters applications.

Darwin Green Phase One first appeared in the Cambridge City Council Annual Monitoring Report (AMR) in 2010/2011 and this anticipated the first completions to be in 2013/14. However, delivery was later than expected and the City Council AMR from 2018/2019 confirmed that the first completions were not actually delivered until 2019 – **up to 6 years later** than first expected and representing a **13-year period between the outline planning application being submitted and delivery of the first completions**. According to the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2025) only the Local Centre RMA (114 dwellings) and Parcel BDW1 (173 dwellings) have been completed (pursuant to the outline planning permission of 1,593 dwellings).

Similar levels of delay can be seen when reviewing the delivery of Darwin Green Phases Two and Three. Phases Two and Three first appeared in the South Cambridgeshire Annual Monitoring Report (AMR) in 2008/2009 and this anticipated the first completions in 2014/2015. However, no completions have yet been delivered on Site, with the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2025) estimating the first completions in 2028/29 – **up to 14 years later** than first expected.

Therefore, in summary, a strategic site that was first proposed for release from the Green Belt in 2003 (23 years ago) and has been carried forward to form allocations in consecutive local plans ever since (with an estimated capacity for circa 2,700 dwellings in total) has only delivered 287 dwellings to date.

Summary

Whilst in principle a strategy of seeking to deliver a large number of new homes at scale within the Plan is supported, an over reliance on too few strategic sites is not supported. The development strategy set out within the emerging Draft Greater Cambridge Local Plan sets out such a strategy and relies too heavily on allocating significant levels of growth on just a small number of very large sites. A number of these large sites also rely on the timely provision of strategic scale infrastructure which must be in place before they can be constructed. For example, the Cambourne North new settlement (13,000 dwellings) relies upon a new railway station and complicated works to the A428, and Land adjacent to A11 and A1307 at Grange Farm (6,000 dwellings) relying on works to the A505. The draft Plan requires the two sites to deliver 5,100 dwellings between them by 2045. We believe this is highly unlikely based upon our review of historic delivery of strategic sites in Greater Cambridge.

An over optimistic approach to housing delivery is set again into the emerging Local Plan. The over reliance on too few sites to deliver so much of the housing need, embedded within the consistent over optimism in housing delivery, forms a housing delivery strategy that is primed to fail.

A combination of approaches to the distribution of spatial growth are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations and scale of new housing and employment development in the Greater Cambridge area. This is necessary to ensure that the Local Plan supports sustainable communities and sustainable patterns of growth.

Appendix 1 : Analysis of Strategic Housing Sites within Greater Cambridgeshire

North West Cambridge

North West Cambridge effectively comprises two sites that straddle the local authority boundary:

- Darwin Green (NIAB), which is within the control of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners; and
- Eddington, which is being brought forward by the University of Cambridge and Hill Residential.

Darwin Green was allocated in the adopted South Cambridgeshire Local Plan for 1,000 dwellings (SS/2) and within the Cambridge City Local Plan for 1,696 dwellings (R43) meaning the whole allocation was envisioned to deliver 2,696 dwellings. Eddington was envisioned to deliver 3,000 dwellings as outlined within the North West Cambridge Area Action Plan Document. However, this is now proposed to increase to 5,500 dwellings in the emerging Plan to reflect the additional 2,500 homes anticipated to be delivered under Phase 2.

Both sites are addressed in turn below.

Darwin Green

Darwin Green, also referred to as National Institute of Agricultural Botany (hereafter 'NIAB') comprises two main elements:

1: Darwin Green 1 (Also known as NIAB Main), which achieved outline planning permission in 2013 for 1,593 dwellings and achieved first completions in 2018/19. According to the GC HLS Report 2025, the site is planned for completion in 2031/2032 which we have calculated would equate to an average rate of 114 dpa since first completions.

2: Darwin Green 2/3 (also known as NIAB 2 and 3), which achieved outline planning permission in 2024 for up to 1,000 dwellings, with the first RMA yet to be submitted. According to the GC HLS 2025, the anticipated first completions are due to take place in 2028 with a predicted delivery rate of 120 dpa.

Therefore, the overall Darwin Green development is considered, in total, to deliver circa 2,593 dwellings.

Darwin Green 1 / NIAB Main

Darwin Green 1/NIAB Main first appeared in the Cambridge City Council ('CCC') Annual Monitoring Report ('AMR') in 2010/2011 and was identified in the Local Plan (2006) as an area of major change under 9/8 Land between Huntingdon Road and Histon Road. This anticipated the first housing deliveries in 2013/2014.

However, the CCC AMR from 2018/2019 confirmed that the first housing completions happened February 2019, which is 5/6 years after the first report had expected housing.

Outline planning permission was granted for Darwin Green 1 in 2013 (LPA Ref. 07/0003/OUT), totalling a 7-year determination period for outline planning permission. After a further 2 years, the first RMA was submitted (LPA. 15/1670/REM) and approved in May 2016, with first deliveries in 2019. This represents a 13-year period between outline planning submission and first completions.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions for Darwin Green 1. For clarity, anticipated deliveries are taken from the 2019 GC 5YHLS and Actual Deliveries are taken from the 2025 GC 5YHLS.

For Darwin Green 1/NIAB Main, this shows a considerable shortfall against the predicted levels of delivery set out in 2019, compared to the 2025 position. Of the overall 934 dwellings anticipated for completion from 2019 to 2024, only 316 homes have been delivered which equates to only 34% of the total anticipated completions.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED FIRST DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
1,696 dwellings	2013/2014	2019	7 years	2 years	Anticipated	154	180	200	200	200
					Actual	100	103	0	86	27
					Difference	-54 / 65%	-77 / 57%	-200 / 0%	-114 / 43%	- 173 / 13.5%

Darwin Green 2 and 3 / NIAB 2 and 3

Darwin Green 2 and 3/NIAB 2 and 3 first appeared in the South Cambridgeshire AMR in 2008/2009 and was identified in the Local Plan (2006) as an area of major change under 9/8 Land between Huntingdon Road and Histon Road. This report anticipated the first housing deliveries in 2014/2015, whilst the later Site-Allocations DPD (2010) confirmed anticipated deliveries from 2016.

The Greater Cambridge Housing Trajectory and Five-Year Housing Land Supply 2025 confirmed that there had been no housing deliveries on the Site as of 2025 and predicts that the first completion will occur in 2028/2029. This would be 14 years after the first trajectory had expected housing.

Outline planning was submitted in May 2022 and permission was granted for Darwin Green 2 and 3 in September 2024 (LPA Ref. 22/02528/OUT). No reserved matters applications have been submitted as of 2026.

As a result of the above, the Five-Year Housing Land Supply 2025 report outlines that the delivery position has significantly worsened with first completions now anticipated in 2028/2029. The table below compares the period from 2014/2015 to 2023/2024,in terms of anticipated deliveries and actual completions for Darwin Green 2 and 3. For clarity, anticipated deliveries are taken from the South Cambridgeshire AMR 2008/2009 which predicted 630 homes and actual deliveries from the GC 5YHLS 2025.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD
1,000 dwellings	2014/2015	Not yet delivered a dwelling	2 years, 4 months	Not yet submitted

DELIVERY – ANTIPCATED VS ACTUAL	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Anticipated	270	360	360	110	0	0	0	0	0	0
Actual	0	0	0	0	0	0	0	0	0	0
Difference	- 270	- 360	- 360	- 110	-	-	-	-	-	-

Eddington

Eddington is a housing-led mixed-use development located on the northwestern edge of Cambridge. The Site was originally allocated within the Cambridge Structure Plan (2006) for 1,150 dwellings and then updated in the North West Cambridge Area Action Plan ('AAP') (2009) for dwellings approximately 3,000 dwellings.

Outline planning permission was granted for the entire Northwest Cambridge Area in February 2013 for up to 3,000 dwellings. Following the grant of outline planning permission in 2013 (LPA Ref. S/1886/11 and 11/1114/OUT), the first RMA submission came forward in 2013 (LPA Ref. 13/1748/REM) and was approved in 2014, with first deliveries in 2016. This represents a 5-year period between outline submission and first completions.

However, it must be noted that the original outline planning permission has now expired and as a result, there is a current outline application for the Site (LPA Ref. 25/03753/OUT) which is under assessment and proposes to increase the total number of dwellings to 3,800 dwellings to increase scheme density.

For clarity, the wider outline area of Eddington comprises the following elements, known as 'Lots' which are individual reserved maters that have been submitted:

- Lots M1 & M2 – (240 dwellings) which achieved detailed planning permission in 2015 and was built out between 2017 and 2024 at an average rate of 32 dpa according to the GCSP 5YHLS Report 2019.
- Lot M3 - (106 dwellings) which achieved detailed planning permission in 2017 with first deliveries planned for 2025/2026 at a predicted rate of 106 dpa according to the GCSP 5YHLS Report 2025
- Lots M4 & M5 - (160 dwellings) which achieved detail planning permission in 2023 with first deliveries planned for 2025 and completion in 2028/2029 at a predicted rate of 40 dpa according to the GCSP 5YHLS Report 2025.
- Lots S1 & S2 – (373 dwellings) which achieved detailed planning permission in 2022 with first deliveries planned for 2024/2025, according to the GCSP 5YHLS Report 2025
- Lot S3 - (186 dwellings) which achieved detailed planning permission in 2019 with first delivery in 2022/2023 and completed in 2023/2024 at an average rate of 93 dpa, according to the GCSP 5YHLS Report 2025
- Lot 1 - (117 dwellings) which received detailed planning permission in 2014 and was built out in 2017 at a rate of 117 dpa, according to the GCSP 5YHLS Report 2019.
- Lot 2 - (264 dwellings) which received detailed planning permission in 2015 and was built out in 2018/2019 at a rate of 264 dpa, according to the GCSP 5YHLS Report 2019.
- Lot 3 - (232 dwellings) which received detailed planning permission in 2014 and was built out in 2017/2018 at a rate of 232 dpa, according to the GCSP 5YHLS Report 2019.

- Lot 4 - (88 dwellings) which received detailed planning permission in 2022 with first deliveries planned for 2024/2025, according to the GCSP 5YHLS Report 2025
- Lot 8 - (73 dwellings) which received detailed planning permission in 2014 and was built out in 2016/2017 at a rate of 73 dpa, according to the GCSP 5YHLS Report 2019.

  Future Lots – Pursuant to 11/1114/OUT with requirements for 1,152 remaining dwellings (590 dwellings for Cambridge and 562 for South Cambridgeshire) planned for delivery from 2028/2029, according to the GC HLS Report 2025.

Reserved Matters Applications have approved for a total of 1,839 dwellings pursuant to the outline application for 3,000 dwellings. However, as the outline permission has now expired and the amended outline application seeks to increase housing to 3,800 dwellings, this leaves 1,961 dwellings to be delivered.

It is also important to consider that Eddington first appeared in the South Cambridgeshire Annual Monitoring Report in 2007-2008 and Cambridge City AMR 2010 . Both anticipated the first housing deliveries in 2013/2014 and predicted that all dwellings would be completed by 2021/2022 at an average rate of 375 dpa. However, the Greater Cambridge Housing Trajectory and Five-Year Housing Land Supply (2019) confirmed that the first housing completions happened in 2016/2017 in Cambridge, which is 3 years after the first trajectory had expected housing.

Furthermore, the table below compares the period from 2016/2017 to 2023/24 in terms of anticipated deliveries and actual completions for all sites within the North West Cambridge Action Plan Area/Eddington. For clarity, the anticipated deliveries have been taken from the South Cambridgeshire Annual Monitoring Report in 2007-2008 and Cambridge City AMR 2010. Actual deliveries have been taken from the GC 5YHLS 2025.

This shows that since 2016 46% of the predicted housing has been delivered, with an over delivery in 2020/2021 and 2022/2023 but no completions in 2021/2022. The lack of completions in 2021/2022 was due to all RMAs at lots M1, M2, 8, 4, 3, 2 and 1 being completed with completions on Plot S3 then starting again in 2022/2023 following the grant of planning permission in 2019.

Although there has been over delivery in recent years, it must be noted that initial predictions estimated that the development would be completed by this time and this must be viewed with the history of significant udnerdelivery in mind.

Overall, of the 1,839 dwellings benefiting from detailed planning permission, 1,121 have been delivered, representing approximately 60% of the total as of 2025, despite original predictions of all dwellings being completed by 2017/2018.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD
3,000 dwellings	2013/2014	2016	2 years	0.5 years

DELIVERY – ANTIPCATED VS ACTUAL	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Anticipated	400	645	615	550	215	30	0	0
Actual	73	353	409	22	35	0	142	87
Difference	-327	- 293	- 206	- 528	- 180	+30	+142	+87

North East Cambridge

North East Cambridge is a mixed-use development on the northern edge of Cambridge including land both within Cambridge City and South Cambridgeshire.

The general area was first allocated for development in the Cambridge Local Plan 2006, the continued delay in preparation of the site-specific AAP has meant that predictions for first deliveries have been absent from all AMR's until the Greater Cambridge Housing Trajectory and Housing Land Supply Report (2025). with first delivery planned for 2028/2029. At the time of writing, this strategic site cannot therefore be considered to demonstrate delivery. The land within Cambridge City was allocated in the Cambridge Local Plan (2018) for employment focused mixed use development with the number of dwellings not specified. The land within South Cambridgeshire was safeguarded for a railway station and interchange facility in the Site-Specific Policies DPD (2010) and has been carried forward into the South Cambridgeshire Local Plan 2018 as an allocation for employment focussed mixed use development.

Consultation on a site-specific SPD, known as North East Cambridge Area Action Plan ('NECAPP') began in 2015 and the Council's agreed NECAPP subject to further consultation once the DCO for the Waste Water Treatment Plant ("WWTP") relocation had been approved. It was envisioned 8,350 homes would be delivered of which 5,550 would be on the WWTP site.

The Government removed the proposed funding following approval of the DCO application in August 2025[2].

The Site Allocations Topic Paper (2025) submitted in support of the draft Plan outlines that if the treatment plant remains in situ, this scenario would result in a very different vision for overall development.

It states that the number of homes to be delivered would be dramatically reduced with only 90 units across the whole North East Cambridge Area (inconsistent with the 425 consented under 22/02771/OUT). Despite the Central Government decision not to fund the new treatment plant in august 2025, the draft allocation notes the delivery of the maximum 8,350 homes. As a result, the reliance on this number of homes coming forward under the draft Local Plan is considered to be entirely unrealistic.

Despite this, North East Cambridge is now included as a comprehensive site allocation within the draft Cambridge Local Plan (2025) rather than taking forwards a separate Area Action Plan. The original 2006 Local Plan housing trajectory is not available online and we can find no record as to a firm date first

[2] Government decision not to fund Cambridge Waste Water Treatment Plant relocation - Cambridge City Council

housing was expected. However, clearly 20-years have passed since the City Council allocated the general area for development, and in this period no homes have been delivered.

Cambridge East

Cambridge East is allocated for major mixed-use development on the edge of Cambridge, including land within Cambridge City and South Cambridgeshire.

Outlined with the relevant Annual Monitoring Reports and 5YHLS Reports, Cambridge East effectively comprises 3 elements as part of the wider Cambridge East Area Action Plan as follows:

- **Land North of Cherry Hinton** – (1,200 homes) which is within the control of Bellway Homes.
- **Land North of Newmarket Road** (also known as WING or Marleigh) – (1,300 dwellings) which is within the control of Hill Marshall LLP. allocated within the South Cambridgeshire Local Plan for 1,300 dwellings (SS/3).
- **Land at Coldham's Lane** – (57 dwellings) which is within control of Weston Homes.
- **Land south of Worts Causeway** – (230 dwellings) which is within the control of Eddeva Park and Hill.
- **Land North of Worst Causeway** – (200 dwellings) being constructed by Cala homes.

Land at Coldham's lane, south and north of Worts Causeway have been discounted from this note. Land at Coldham's Lane is now completed and all sites are of much smaller scale of development and has therefore not been considered for the purpose of this note.

It must also be noted that the Cambridge East AAP was adopted in 2008 by both Cambridge City and South Cambridge. The plan set out a vision for 10,000 to 12,000 dwellings in the area despite the main landowner, Marshall of Cambridge, announcing in April 2010 that the relocation of Cambridge Airport would not happen before 2031 at the earlierst, as there were currently no suitable relocation options. Within the latest GC 5YHLS (2025) report, it therefore only identifies the allocations outlined above which falls short of the initial expectations of 10,000+ dwellings.

Land north of Cherry Hinton

Land North of Cherry Hinton is allocated within the South Cambridgeshire Local Plan for 420 dwellings (SS/3) and the Cambridge Local Plan for 780 dwellings (R47), comprising 1,200 dwellings.

Outline planning permission for up to 1,200 homes was submitted in 2018 and granted in 2020 (LPA Ref. 18/0481/OUT). The first RMA was approved in 2023 (LPA Ref. 22/05018/REM) and first deliveries on Site in 2024. This represents an ongoing 6-year period from submission of the outline consent to first completions.

The Site is being marketed as 'Springstead Village' and is split into the following phases:

- **First Phase (known as RMA3)** – (351 dwellings) achieved detailed planning permission in 2023 with first completions in 2024 and predicted completion of all dwellings by 2027, according to the GCSP 5YHLS Report 2025
- **Second Phase (known as RMA4)** – (136 dwellings) achieved detailed planning permission in 2024 with first completions planned for end of 2026 and predicted completion of all dwellings by 2027, according to the GCSP 5YHLS Report 2025
- **Third Phase (known as RMA5)** – (292 dwellings) achieved detailed planning permission in 2025 and first completions are planned for early 2027, according to the GCSP 5YHLS Report 2025

- **Forth Phase (known as RMA6)** – (295 dwellings) to be submitted spring 2026 with first completions predicted end of 2027, according to the GCSP 5YHLS Report 2025
- **Remainder of the site** - (713 dwellings) benefitting from outline planning permission and associated RMA's to be submitted by 2028, according to the GCSP 5YHLS Report 2025.

The first mention of delivery of the Site can be found within the Annual Monitoring Report 2012/2013 and with estimated first completions in 2021/2022. The Greater Cambridge Housing Trajectory and Housing Land Supply Report (2025) confirmed that the first housing completions actually happened in 2024, which is 3 years after the first trajectory had expected housing.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions at land north of Cherry Hinton. This shows that since the first anticipated deliveries in 2022/2023, 39 dwellings have been completed compared to an anticipated 295 dwellings which equates to only 13.5% of total anticipated dwellings delivered. This demonstrates a significant shortfall in the number of anticipated dwelling completions.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
1,200 dwellings	2022/2023	2024	2 years	2 years	Anticipated	0	0	0	95	200
					Actual	0	0	0	0	39
					Difference	-	-	-	- 95 / 0%	- 161 / 19.5 %

Cambridge East – North of Newmarket Road

Land north of Newmarket Road is allocated as Phase 1 within the wider Cambridge East AAP and is allocated within the South Cambridgeshire Local Plan (2019) for 1,300 dwellings.

Outline Planning permission was submitted in 2013 and granted in 2016 (LPA Ref. S/2682/13/OL) with subsequent RMA submission being granted in 2019 (LPA Ref. S/1096/19/RM) and first completions taking place in 2020. This represents a period of 7-years from submission of the outline planning application to first completions.

The Site is being marketed as 'Marleigh Village' and is split into 3 phases as follows:

- **Phase 1a** – (239 dwellings) achieved detailed planning permission in 2019 with first delivery in 2020/2021 and 187 dwellings complete by March 2024 at a rate of 47 dpa, according to the GC 5YHLS Report 2019
- **Phase 1b** – (308 dwellings) achieved detailed planning permission in 2020 with first deliveries in 2021/2022 and 141 dwellings complete by March 2024 at a rate of 47 dpa, according to the GC 5YHLS Report 2019
- **Phase 2** – (421 dwellings) achieved detailed planning permission in 2021 with first deliveries in 2022/2023 and 55 dwellings completed in March 2024 at a rate of 27.5 dpa, according to the GC 5YHLS Report 2019.

- **Phase 3** - (423 dwellings) split between an RMA for 332 dwellings and a full application for 91 dwellings with anticipated first completions in 2027, according to the GC 5YHLS Report 2025.

This site first appeared in the South Cambridgeshire and Cambridge City Annual Monitoring Reports in 2013/2014. Both reports anticipated the first housing deliveries in 2018/2019. The Greater Cambridge Annual Monitoring Report 2020/2021 confirmed that the first completions took place in 2020/2021 for Phase 1A which is 2 years after originally anticipated.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions for land north of Newmarket Road. This shows that since the first anticipated deliveries in 2018/2019, 383 dwellings have been completed compared to an anticipated 705 dwellings, which equates to only 54% of the total anticipated dwellings having been delivered.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
1,300 dwellings	2018/2019	2020	3 years	3 years	Anticipated	0	110	160	225	210
					Actual	0	62	84	108	129
					Difference	-	- 48 /56%	- 76 / 52.5%	- 117 / 48%	- 81 / 61%

Northstowe

Northstowe is a new settlement of up to 10,000 dwellings to the north west of Cambridge, adjacent to the villages of Longstanton and Oakington.

Northstowe is allocated within the adopted South Cambridgeshire Local Plan for 10,000 dwellings (SS/5) and prior to this was allocated in the Northstowe AAP adopted in 2007. The AAP took 2 years from initial consultation to adoption.

The site was first allocated in the 2003 Cambridgeshire and Peterborough Structure Plan which does not provide confirmation as to first deliveries, instead these were outlined in the 2007/2008 AMR.

The wider allocation/site is comprised of several phases as follows:

- Phase 1 – Outline permission was submitted in 2012 and granted in 2014 (LPA Ref. S/0388/12/OL) for up to 1,500 dwellings, with the first RMA approved in 2016 and first completions in 2016. This represents a period of 2-years from submission of outline planning to first completions. Phase 1 is being delivered by 5 housebuilders under the following parcels:
  - Parcel H1 – (92 Dwellings) being brought forward by Bloor Homes with construction taking place from 2016 to 2019 at a rate of 31 dpa, according to the GC 5YHLS Report 2025
  - Parcel H2 – (135 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2017 and 2021 at a rate of 34 dpa, according to the GC 5YHLS Report 2025.

- Parcel H3 – (40 Dwellings) being brought forward by Taylor Wimpey with 33 dwellings completed between 2017 and 2019 and planned completion in 2025 at a rate of 5 dpa, according to the GC 5YHLS Report 2025.
- Parcel H4 – (84 Dwellings) being brought forward by Bovis Homes with construction taking place between 2017 and 2020 at a rate of 28 dpa, according to the GC 5YHLS Report 2025.
- Parcel H5 & H6 – (240 Dwellings) being brought forward by Bovis Homes with 167 dwellings completed between 2019 and 2023 and final completions planned for 2025/2026 representing a delivery rate of 33 dpa, according to the GC 5YHLS Report 2025.
- Parcel H7 – (115 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2018 and 2024 at a rate of 20 dpa, according to the GC 5YHLS Report 2025.
- Parcel H8 – (73 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2020 and 2023 at a rate of 25 dpa, according to the GC 5YHLS Report 2025.
- Parcel H9 – (130 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2021 and 2023 at a rate of 65 dpa, according to the GC 5YHLS Report 2025.
- Parcel H10 – (76 Dwellings) being brought forward by Taylor Wimpey with construction taking place between 2020 and 2023 at a rate of 26 dpa, according to the GC 5YHLS Report 2025.
- Parcel H11 – (152 Dwellings) being brought forward by Taylor Wimpey with construction taking place between 2017 and 2021 at a rate of 51 dpa, according to the GC 5YHLS Report 2025.
- Parcel H12 – (271 Homes) being brought forward by Linden Homes with construction taking place between 2017 and 2024 at a rate of 39 dpa, according to the GC 5YHLS Report 2025.
- Parcel H13 – (92 Dwellings) being brought forward by Taylor Wimpey with 73 completions between 2022 and 2024 and final completions planned for 2024/2025 representing a delivery rate of 25 dpa, according to the GC 5YHLS Report 2025.

- Phase 2 – Outline planning permission was submitted in 2014 and granted in 2017 for up to 3,500 dwellings with the first RMAs graned in 2018.Phase 2 is being delivered alongside Homes England and the following Housebuilders:
  - Phase 2a – (406 Dwellings) Homes England remarketing for preferred bidder, with 43 completions between 2020 and 2024 and next completions due to take place in 2027, presenting a delivery rate of 58 dpa, according to the GC 5YHLS Report 2025
  - Phase 2b – (300 Dwellings) being brought forward by Keepmoat Homes with 36 dwellings completed in 2023/2024 and the parcel due for completion by 2029 representing a delivery rate of 50 dpa, according to the GC 5YHLS Report 2025.
  - Phases 2D1, 2C and TC1 – 2,794 remaining dwellings pursuant to the outline planning permission with associated RMA's anticipated for 2028, according to the GC 5YHLS Report 2025.
- Phase 3 – as a whole is anticipated to provide approximately 5,000 dwellings. Phase 3a has outline planning permission for 4,000 homes submitted in 2020 approved in March 2022 with associated RMA's to be submitted in 2027/2028, according to the GC 5YHLS Report 2025.

The wider Northstowe site first appeared in the South Cambridgeshire Annual Monitoring Report 2007/2008. This report anticipated the first housing deliveries in 2011/2012. The AMR of 2016/2017

confirmed the first housing completions actually happened by March 2017, which is 5/6 years after the first trajectory had expected housing.

Furthermore, Appendix 1 compares period 2001/2012 to 2023/2024in terms of anticipated deliveries and actual completions at Northstowe. This shows that since 1049 dwellings have been completed compared to an anticipated 1084, this equates to circa 97% of all dwellings having been completed.

However, it is noted that it is anticipated that 2,834 dwellings are due to be delivered in remaining Phases by 2031. Due to the delay in finding a delivery partner on Phase 2 and based on the average year period from outline consent to deliver housing for phase 1, it is considered that the anticipated delivery of the remaining homes within the plan period may no longer be possible.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	FIRST YEAR OF DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD
10,000 dwellings	2011/2012	2016	2.3 years on average	1.5 years average

DELIVERY – ANTIPCATED VS ACTUAL	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Anticipated	150	400	600	650	650	650	650	650	650	650	650	650	0
Actual	0	0	0	0	0	13	140	278	243	258	219	237	92
Difference	-150	-400	-600	-650	-650	-637	-510	-372	+83	+44	+1	-5	-158

Waterbeach

Waterbeach New Town is within the South Cambridge Local Plan for 8,000 to 9,000 dwellings (SS/6).

The wider site is split between the Western and Eastern Parcels as follows:

- Western parcels – (6,500 dwellings). Outline Planning Permission was granted in 2019 following submission in 2017 (LPA Ref. S/0559/17/OL) with the first approved RMA in 2021 and first completions in 2024.
- This represents 7-years from submission of outline to first completions. The Site being brought forward by Urban & Civic as Master Developer split further into the following phases:
  - Key Phase 1 – permission for landscape, highways, earthworks and surface/foul drainage infrastructure approved 2020.
  - Northern Woods – (89 Dwellings) being brought forward by Stonebond with detailed planning permission approved in 2021. 13 dwellings completed in 2024 and final dwellings anticipated for completion in 2025 representing a built out rate of 45 dpa, according to the GC 5YHLS Report 2025.
  - Eastern Woods Parcel P2.1 – (111 Dwellings) being brought forward by Cala Homes, with detailed planning permission approved in 2021. 12 dwellings have completed as of 2024 and final

dwellings anticipated for completion in early 2026 representing a build out rate of 37 dpa, according to the GC 5YHLS Report 2025.

- Eastern Woods Parcels P5.1, P5.2 and P5.3 – (90 dwellings) first completions anticipated late spring 2026, according to the GC 5YHLS Report 2025.
- Eastern Woods Parcels P4 and P4.3 – (178 dwellings) RMA awaiting submission and first completions anticipated summer 2026, according to the GC 5YHLS Report 2025.
- Eastern Woods Parcels P2.2. and P3.2 – (198 dwellings) RMA awaiting submission following named housebuilder and completion anticipated for summer 2026, according to the GC 5YHLS Report 2025.

- Eastern Parcels – outline planning permission for up to 4,500 dwellings approved in 2024 and being brought forward by RLW Estates. Anticipated delivery of 150-250 dwellings per year with first completions anticipated 2028 to 2030, according to the GC 5YHLS Report 2025.

The wider Waterbeach New Town site first appeared in the South Cambridgeshire Annual Monitoring Report 2012/2013. This first anticipated the first housing deliveries in 2026/2027. The Greater Cambridge AMR of 2024 confirmed when the first housing completions happened by March 2024, which is 2 years before initially anticipated.

Despite delivery being earlier than predicted, the table below sets out the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions at Waterbeach. This confirms that the anticipated delivery was updated in 2019, compared to when Waterbeach first appeared in 2012. In 2019, it was anticipated that 650 homes would be delivered between 2021 and 2024. However, only 25 homes have been delivered as of 2024 which equates to 3.8% and represents a significant shortfall in the anticipated quantum of homes planned for delivery.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED	YEAR OF FIRST HOUSING	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
8,000 to 9,000 dwellings.	2021	2024	2 years	2 years	Anticipated	0	0	150	250	250
					Actual	0	0	0	0	25
					Difference	-	-	-150 / 0%	-250 / 0%	-225 / 10%

Bourn Airfield New Village

Bourne Airfield New Village is allocated in the South Cambridgeshire Local Plan (2018) for a new village of approximately 3,500 dwellings and is subject to a site-specific Bourn Airfield New Village Supplementary Planning Document (SPD) adopted in 2019, following a 6-month consultation.

Outline planning permission was granted for 3,500 dwellings in July 2024 following submission in 2018. As of 2025, there have been no starts on Site and the agent has advised that a housebuilder is currently being onboarded to deliver the first 500 dwellings and expects the first RMA for 150-180 dwellings to be submitted in Q1 2026 with the first dwellings completed in Q2/3 2027, according to the GC 5YHLS Report 2025. This represents a potential 9-year period from submission of the outline application to first completions.

Despite the lack of progress on the Site, Bourn Airfield first appeared in the South Cambridgeshire AMR 2012/2013. This anticipated first housing delivery in 2022/2023. The latest position set out within the 2025 5YHLS report confirms that the delivery of the first units has now been significantly delayed until 2027/2028. The table below demonstrates that there have been no completions over the plan period. This represents a delay of 6 years after completions were initially anticipated.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	FIRST DELIVERIES	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
3,500 dwellings	2020/2021	N/A	6 years	Ongoing 2 years	Anticipated	0	0	25	100	150
					Actual	0	0	0	0	0
					Difference	-	-	-25	-100	-150

Cambourne

Cambourne is a planned new settlement to the west of Cambridge, originally approved in 1996 for 3,300 new homes. The village is comprised of Lower, Great, West and Upper Cambourne. The first dwellings were delivered in Great and Lower Cambourne before the current plan period and are therefore not included within this note.

Cambourne West is allocated within the South Cambridgeshire Local Plan for 1,200 dwellings (SS/8).

Of relevance to the up-to-date housing supply position are the following sites as part of the wider Cambourne new village:

- West Cambourne – outline planning permission for 2,350 dwellings approved 2017 (LPA Ref. S/2903/14/OL) with first RMA in 2020 (LPA Ref. S/4537/19/RM) and first completions in 2021. This represents 7 years from submission of outline to first completions. West Cambourne is comprised of the following parcels:
  - Parcels 1.1a and 1.1b – (200 Dwellings) being brought forward by Vistry, with 190 dwellings completed between 2021 and 2024 with the remaining dwellings to be completed in 2025 representing a delivery rate of 50 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.2 - (190 Dwellings) being brought forward by Taylor Wimpey with 157 dwellings completed between 2021 and 2024 with the remaining to be completed in 2025 representing a delivery rate of 47.5 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.3a and 1.3d – (150 Dwellings) being brought forward by Vistry Group with 141 dwellings completed between 2021 and 2024 and the remaining to be completed by 2025 representing a delivery rate of 37.5 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.3b, 1.3c, 1.3e, 1.4a and 1.4b (286 Dwellings) being brought forward by Taylor Wimpey with 128 dwellings completed between 2021 and 2023 representing a delivery rate of 64 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.5 – (41 Dwellings) being brought forward by Taylor Wimpey with planned completion 2026, according to the GC 5YHLS Report 2025.

- Parcel 2.1 – (118 Dwellings) being brought forward by Vistry with planned completion 2026, according to the GC 5YHLS Report 2025.
- Parcel 2.2b – (120 Dwellings) being brought forward by Taylor Wimpey with planned first completions 2026, according to the GC 5YHLS Report 2025.
- Parcel 3.2b – (122 Dwellings) being brought forward by Vistry with planned first completions by 2026, according to the GC 5YHLS Report 2025.
- Land within Business Park – (256 Dwellings) being brought forward by Hill and planned first completions by 2026 according to the GC 5YHLS Report 2025.
- Remaining parcels 2.3 and 3.2a – 203 Dwellings in Parcel 2.3 and 11 Dwellings in Parcel 3.2a with planned first completions in 2028, according to the GC 5YHLS Report 2025.

West Cambourne first appeared in the South Cambridgeshire Annual Monitoring Report in 2012/2013. This first anticipated housing deliveries in 2016/2017. Following this, the 2022 Greater Cambridge Housing Trajectory and Five-Year Housing Land Supply report confirmed that the first housing completions actually happened in 2021. Which is 6 years after initially anticipated.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions for West Cambourne as Cambourne 950 is now complete. This shows that there has been a significant over delivery on West Cambourne from 2021 to 2024.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	DELIVERY OF FIRST DWELLING	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
2,350 dwellings	2016/2017	2021	3 years	3 years	Anticipated	0	25	130	150	344
					Actual	0	93	263	200	588
					Difference	-	+68	+133	+50	+ 244

BIDWELLS

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