BIDWELLS

Your ref: 40518
Our ref: Land south of Hatton's Road, Longstanton
DD: [redacted]
E: [redacted]
Date: 24/09/2026

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

Dear Sir/Madam

REGULATION 19 PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN CONSULTATION

LAND SOUTH OF HATTON'S ROAD, LONGSTANTON – HEELA SITE ID: 40518

These representations have been prepared by Bidwells on behalf of our client, The Master (or Keeper) of Peterhouse in the University of Cambridge ('Peterhouse'), in response to the Proposed Submission Greater Cambridge Local Plan (GCLP) Regulation 19 Consultation (2026). These representations relate to land south of Hatton's Road, Longstanton ('the Site'). This representation considers the wider spatial strategy proposed by the Council and relevant development management policies.

In support of these representations the following documents are also submitted:

- Site Suitability Report – prepared by Bidwells including the following appendices:
    - Vision Document prepared by Bidwells (Appendix A);
    - Transport Technical Note prepared by Rovia (Appendix B);
    - Flood Risk and Drainage Technical Note prepared by Paul Basham Associates (Appendix C);
    - Landscape and Visual Study prepared by Bidwells (Appendix D); and
    - Preliminary Ecological Appraisal prepared by Applied Ecology (Appendix E)

These representations should be read alongside the documents outlined above, which demonstrate the Site as suitable, available and achievable for residential development.

The remainder of this letter forms Peterhouse's representations to the Proposed Submission GCLP (Regulation 19 Consultation) and is set out as follows:

- Spatial Strategy Response

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Spatial Strategy

S/JH: New Jobs and Homes

Peterhouse **Objects** to Policy S/JH.

Summary

Peterhouse objects to Policy S/JH because it relies on a conservative growth scenario that insufficiently accounts for Greater Cambridge's economic and housing needs. National policy allows authorities to plan for housing above standard method requirements where growth ambitions and infrastructure investment justify it. Cambridge is a nationally significant growth area, supported by explicit policy direction and significant infrastructure investment. The Local Plan should reflect the higher-growth scenarios identified in the EHNU 2026, to increase housing provision, improve affordability, reduce unsustainable commuting and better align housing delivery with anticipated employment growth.

Representation

Peterhouse objects to Policy S/JH. The policy is unsound as it is not positively prepared, not justified, not effective and inconsistent with national policy.

Principally, we consider the proposed housing requirement of Policy S/JH to be unsound 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).

In terms of the policy context, paragraph 69 of the NPPF (2024) notes that an authority may need to plan for greater housing growth above its identified need to reflect growth ambitions linked to economic development or infrastructure investment. Furthermore, paragraph 86(d) of the NPPF (2024) confirms that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment. The Proposed Submission Plan does not do this. This message is translated into HO2(b) of the NPPF (2026), and it is clear that housing requirements within local plans should be set higher than the figure identified within a housing needs assessment where appropriate. It is confirmed that such circumstances include where a higher housing requirement is necessary to reflect growth ambitions linked to economic investment or infrastructure investment. Whilst the GCLP will be assessed against the NPPF (2024), it is clear that the direction established by central government is one of growth, with a particular focus on Cambridge and the surrounding region.

This need for growth is evidenced by national, regional and authority-level investment in infrastructure, including the new Cambridge South Railway Station, which will provide direct connectivity between Cambridge Biomedical Campus (CBC) and London; the granting of the Cambourne to Cambridge busway; and the progression of Cambridge South East Transport (CSET) 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 envisioned by Government is set to be realised and delivered by the Greater Cambridge Development Corporation, which is set to deliver infrastructure-first growth. 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 recognised within the emerging Local Plan.

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.

The GCLP is not planning for the level of growth necessary to support the economic ambitions of the Local Growth Plan, or the wider economic objectives of Government. This is because the Employment and Housing Needs Update (EHNU) (2026) does not test a housing requirement that reflects the Oxford-Cambridge Arc, the Local Growth Plan, or the full scale of policy-led economic growth now being pursued. Instead, it relies on standard economic forecasts which are necessarily trend-based and therefore do not adequately capture the area's growth potential. The EHNU draws its housing and employment conclusions from the 'central growth' scenario, while discounting the 'higher growth' scenario, notwithstanding its own acknowledgement that higher growth could be achieved with a step-change in investment.

The EHNU correctly recognises the relationship between job growth and housing need: higher job growth generates additional derived housing demand, creating a direct interdependency between employment and housing provision. However, the 'central growth' scenario embeds assumptions of slower growth, contractions and economic shocks. As a result, both the proposed jobs figure and the housing requirement in the Proposed Submission Plan are conservative and do not reflect the full growth potential of the Greater Cambridge economy.

With the advent of the Greater Cambridge Development Corporation, backed by £400 million of central government funding, and renewed commitment to delivering growth in the Oxford–Cambridge Corridor, there is a clear rationale for the Authority to adopt the high-growth scenario. Furthermore, whilst the Authority has met its identified housing need via the standard method, it is acknowledged that the standard method does not take into account the specific growth agenda and focus on Cambridge as an area of 'supercharged growth'.

It is evident that committed and future infrastructure projects in Greater Cambridge continue to confirm Cambridge's position as an area capable of supporting and delivering high growth. Within this context Cambridge remains a priority of the incumbent Labour government to deliver 'supercharged growth'. The Employment and Housing Needs Update acknowledges a 'High' and 'High Sensitivity' scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This high level of growth is feasible in Cambridge and would support the Government's direction of travel. It is therefore important to recognise that higher-growth outcomes remain credible and should not be ruled out by policy. This requires revision to the proposed policy wording.

We also note that the Draft GCLP (Regulation 18) required 2,463 dwellings per annum to deliver employment growth of 66,000 jobs, compared to the Proposed Submission (Regulation 19), which requires delivery of 2,292 dwellings per annum to deliver 73,200 jobs across the plan period. This therefore represents a decrease in housing delivery while reflecting an increase in job creation. The EHNU explains this by stating that average household sizes are now larger, leading to an increase in people of working age and more in-commuting, which reduces the number of local people required to fill

jobs created. We are concerned that this is an unsustainable approach to development strategy and reflects a local housing market where many young people are unable to move out of their family homes and move closer to, or within, Cambridge, where jobs are located at key existing and developing employment centres such as CB1, Cambridge Biomedical Campus and Cambridge Science Park. We advocate that the GCLP needs to address the affordability of housing within Greater Cambridge by planning for increased growth and supply to reflect growing demand, rather than embedding the issue of increasing household size. In doing so, and by making provision for increased housing stock in Greater Cambridge in sustainable locations, the Local Plan would promote more suitable patterns of travel, as required by paragraph 111 of the NPPF (2024), using planning policies to minimise the length and number of journeys required for employment.

Changes Required

To make the Plan sound, the housing requirement and supporting evidence should be revised so that they: meet at least the minimum local housing need identified by the standard method; align with planned economic growth and infrastructure investment; respond more effectively to affordable housing need; and provide a deliverable supply across the whole plan period, including the early years.

- Increase the housing requirement to reflect as a minimum the minimum local housing need of the standard method for 48,090 homes.
- 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.
- Consider whether it would be sustainable to deliver a greater number of homes to better respond to the acute need for affordable housing.
- 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.

The GCLP should allocate additional sites across Greater Cambridge to respond directly to higher growth potential, strengthen housing supply, and improve the diversity and deliverability of allocated sites. The Site is available, suitable and achievable, and can assist in delivering new housing in a sustainable location.

S/DS: Development Strategy

Peterhouse **Objects** to Policy S/DS.

Summary

Peterhouse objects to the Proposed Submission GCLP's reliance on a small number of major strategic allocations, particularly Cambourne North and Grange Farm. We contend that their delivery depends on significant infrastructure that remains uncertain or unfunded. This creates a substantial risk to housing delivery in the first half of the plan period. We query the limited proportion of growth directed to rural settlements and the absence of allocated small and medium-sized sites. A more balanced distribution of development across villages and sustainable rural locations would improve housing choice, support local communities and services, and provide greater flexibility and delivery certainty.

Representation

Peterhouse objects to Policy S/DS. The proposed development strategy is unsound because the housing supply assumptions are not sufficiently robust, the delivery trajectory is overly dependent on strategic sites with significant infrastructure requirements, and the plan does not provide enough flexibility through smaller and medium-sized allocations capable of delivering earlier in the plan period. In particular:

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.

If the supply is adjusted to remove unsupported windfall assumptions, sites without a realistic prospect of delivery within the plan period, and unrealistic build-out rates, the deliverable supply is materially lower than stated in the GCLP. On that basis, the plan does not demonstrate a sufficiently robust housing supply to support the proposed development strategy.

Reliance on Strategic Sites

With regard to delivery, Group Villages (such as Longstanton) play a very limited role in the proposed Development Strategy. Figure 9 of the Proposed Submission GCLP sets out that just 15% of planned growth is directed to the rural area.

A strategy which relies too heavily on large allocations creates a significant delivery risk, particularly in the first 10 years of the plan period. Such sites typically require major infrastructure, complex land assembly, detailed phasing and long lead-in periods before housing completions can begin. This risk is acknowledged in paragraph 2.76 of the Proposed Submission GCLP, which recognises the need to *"ensure a deliverable plan but which is reliant on a significant level of infrastructure".* Senior Councillors at Cabinet have also expressed concern to officers that this is a risky strategy to adopt.

We consider this approach flawed as it relies heavily on two very large allocations set out under 2(c)(i), Cambourne North (2,550 dwellings in the plan period), and 2(c)(ii), Grange Farm (2,550 dwellings in the plan period). These rely on significant infrastructure, namely Cambourne Railway 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. Further ambiguity is compounded by paragraph 2.80 of the Plan, as the Cambridge Wastewater Treatment Works still appears as a potential development site even though government funding for the project has been cancelled.

Our view is that the Proposed Submission GCLP relies too heavily upon strategic sites, which will not commence delivery until the latter half of the plan period, after 2035. The plan period is 2024–2045. Our view is that smaller sites in sustainable settlement locations will be needed for housing delivery in the first 10 years of the plan. If this does not happen, the GCLP is unlikely to have sufficient sites available to make up the shortfall in delivery, as required by government.

Small and Medium Sized Sites

Paragraph 73 of the NPPF (2024) stresses the importance of medium and small sites in meeting housing requirements. Such sites are also essential for SME housebuilders and can often be delivered quickly because they usually require limited infrastructure.

The draft Local Plan does not propose sufficient new housing allocations to address this requirement. The evidence base explains this on the basis that it is challenging to identify enough small sites to meet the 10% requirement, and doing so would undermine the Council's development strategy and require the release of Green Belt sites, conflicting with the aim of protecting the Cambridge Green Belt, because the larger and better-served villages are within the Green Belt.

The Housing Delivery Addendum Update (2026) states that, once windfall development of 4,953 dwellings on sites no larger than 1ha is included, 13.5% of homes over the plan period would be delivered on small sites. However, reliance on windfall development to satisfy the small-sites requirement does not provide the certainty needed by SME housebuilders to invest in site delivery. It is also a weaker basis for plan soundness than allocating specific deliverable small and medium-sized sites, particularly where past windfall delivery has generally declined across Greater Cambridge.

Section 2 of the Greater Cambridge Housing Delivery Study Addendum Update (2026) reviews windfall delivery between 2006 and 2024 and concludes that an allowance of 425 dwellings per annum is robust. However, it does not explain why windfall delivery has declined or whether, particularly in South Cambridgeshire, there are enough available sites to sustain windfall delivery at scale across the plan period. Although the report uses data from 2006–2007 to derive an average windfall delivery rate of 470 dwellings per annum, Greater Cambridge has not delivered more than 470 windfall dwellings in any year since 2016–2017. Even against the Council's 425 dwellings per annum assumption, the average over the previous seven years has been 395 dwellings per annum.

Furthermore, it is noted that the Council states that, upon adoption in 2028, it will be able to demonstrate a 5.47-year housing land supply. However, the Authority's decision to use the Liverpool method to assess housing land supply is considered flawed. Paragraph 68-031 of the PPG establishes Sedgefield as the preferred approach, as it ensures any backlog in housing supply is addressed and not pushed back later into the plan period, ensuring delivery is consistent throughout the plan period. Using the Sedgefield approach means the land supply falls to 5.03 years and, while this is marginal, this should not be seen as justification for using the Liverpool method, as it is the Council's decision to focus on larger sites that will inevitably deliver later in the plan period.

This reflects the risk inherent in the Authority's continued preference for strategic sites with long lead-in times. A marginal housing land supply position, particularly when assessed using the Sedgefield approach, does not provide a sufficiently resilient basis for sustained delivery across the plan period. The Development Strategy should therefore be revised to include additional small and medium-sized sites which can diversify supply, support delivery in the early years and reduce reliance on a limited number of major allocations.

Distribution of Growth and the Rural Area

The proposed Development Strategy focuses new housing on a small number of strategic sites, particularly in the rural area. Very few small and medium-sized housing sites are allocated in the rural area, despite the NPPF (2026) recognising the important contribution such sites can make to housing supply.

This approach will constrain the sustainable development of many rural settlements and their communities. In particular, the lack of village allocations fails to support homes for local housing needs during the plan period. Newly forming households may be forced to relocate to main settlements, new settlements or elsewhere, away from family, community and support networks. This increases the need to travel across Greater Cambridge, often by private car. It can also contribute to population imbalance, with ageing village populations and falling primary school rolls, while new settlements experience younger populations and pressure on services.

To maintain the vitality of historic rural settlements across Greater Cambridge, an appropriate level of housing and employment growth is needed to support local high streets, services and facilities.

At present, the strategy proposes to deliver most development at new towns and settlements, including Northstowe, Cambourne, Waterbeach and Grange Farm. While housing delivery at scale is supported, the NPPF (2024) requires authorities to enable sufficient land to come forward to meet the housing needs of the whole community, taking account of need, size, type and tenure (paragraphs 61–63).

Meeting the needs of the whole Authority requires a wider variety of land across the area to be identified for development. Concentrating most housing at new settlements and new towns ignores the preference many households may have to live in existing settlements and villages across the rural area. This reduces market choice and competition, with likely adverse effects on house prices and availability.

A more balanced approach is required in the rural area, including a wider range of housing sites by size and location. This is necessary to support sustainable communities, sustainable patterns of growth, the needs and vitality of existing villages, and the wider rural economy.

In many villages, there is limited brownfield land within defined development extents to support housing delivery under Draft Policy S/SH. Small windfall sites also provide limited affordable housing to meet local needs. Specific housing allocations should therefore be made in some rural villages to promote sustainable growth, support the rural economy, create mixed and inclusive communities, and maintain local services.

Lack of Choice and Flexibility

The focus on large new settlements, urban redevelopment and sustainable urban extensions fails to provide sufficient choice and flexibility for prospective homeowners. Not all purchasers will be able or willing to buy in these locations. For example, young residents of villages in South Cambridgeshire may wish to buy locally to remain close to family and childcare support, which may not be possible if they are required to move to other allocated locations.

The lack of commitment to growth in sustainable rural settlements risks worsening Greater Cambridge's affordability crisis and pushing younger people out of their local communities and support networks. Reliance on strategic settlements outside the Green Belt, and therefore further from Cambridge, is also likely to increase car dependency.

Changes Required

- Revise housing supply assumptions by removing unrealistic windfall, delivery and build-out assumptions.
- Reduce reliance on a small number of large strategic sites with significant infrastructure dependencies.
- Allocate additional small and medium-sized housing sites to improve deliverability and support SME builders.
- Direct a greater proportion of growth to sustainable rural settlements and villages.
- Provide specific village housing allocations rather than relying primarily on windfall development.
- Create a more balanced distribution of growth across Greater Cambridge.
- Increase housing choice, flexibility and affordability by providing a wider range of site sizes and locations.
- Use a more robust housing land supply approach and ensure sufficient delivery in the early years of the plan.

S/MO: Monitoring

Peterhouse **objects** to Policy S/MO.

Summary

The proposed monitoring and intervention mechanisms are reactive and unlikely to address housing under-delivery in a timely manner. Annual monitoring risks delays in identifying and responding to emerging shortfalls, as evidenced by the increasing number of speculative applications and appeals

arising from delayed delivery of existing allocations. Many proposed strategic sites are dependent on significant infrastructure and are likely to experience long lead-in times. To ensure a robust and flexible housing supply, the GCLP should allocate additional sustainable and deliverable sites capable of contributing to housing delivery within the first 10 years of the plan period.

Representation

The draft policy sets out an eight-point mechanism, with further details in Appendix E, for dealing with under-delivery of housing allocations in the plan. The policy requires the two Councils to monitor the implementation and performance of the Local Plan against the monitoring indicators set out in Appendix E: Monitoring Framework. However, results will be reported annually, which is not reactive enough to deal with under-delivery. This is clearly illustrated by the current number of unsolicited planning applications and appeals taking place in the district because the current adopted local plan allocations are not delivering in a timely manner. The policy states:

If, through monitoring, it appears that policies and allocations are not being achieved, the following mechanisms will be triggered:

a. Review of housing and employment land supply and allocations;

b. Action to bring forward sites for development, wherever possible in partnership with landowners and developers;

c. Action to bring forward development on previously developed land;

d. Action to secure the timely provision of infrastructure;

e. Review of all, or relevant parts of, the Local Plan;

f. Review Development Management processes; or

g. Consider undertaking cooperation with other local authorities, including through duty to cooperate.

The above mechanisms will not lead to housing delivery in a timely manner, as demonstrated by current applications and appeals. Thus, the Authority should allocate a number of sustainable and deliverable housing sites in the Local Plan to support delivery in the first 10 years of the plan, given the envisaged lack of delivery on the very large allocations in the Proposed Submission GCLP, which require significant infrastructure to deliver them.

Changes Required

- Additional sites should be allocated with the ambition to boost housing delivery within the first 10 years of the plan period.

Summary

This response collectively forms Peterhouse's formal representations to the Greater Cambridge Local Plan Regulation 19 Consultation with specific regard to its land interests at Land south of Hatton's Road, Longstanton.

Should you have any queries about the submission, please do not hesitate to contact me.

Kind regards,



Rob Hopwood
Partner, Planning