25th September 2026

Greater Cambridge Planning Service

Andy Moffat

E: [redacted]
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Botanic House
100 Hills Road
Cambridge CB2 1PH

Dear Sirs,

Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation

Representations on behalf of Hopkins Homes

LAND EAST OF BUSH CLOSE, COMBERTON. HELAA SITE ID REFERENCE: 40501

Savills (UK) Ltd Planning Team are instructed by Hopkins Homes to make representations as part of the Proposed Submission Greater Cambridge Local Plan (Regulation 19 stage) in respect of development at Land East of Bush Close, Comberton.

These representations relate to Policy S/JH: New Jobs and Homes and Policy S/DS: Development Strategy & Key Diagram and include an assessment of Land East of Bush Close, Comberton as it is important that they are read holistically together.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which required that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

> a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
> b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
> c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
> d) Consistent with national policy.

These representations therefore relate to these tests.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Summary of representations:

- The Proposed Submission Local Plan needs to be changed to make provision for more housing land than currently proposed to meet the needs arising from the proposed additional jobs, to avoid an exacerbation of in-commuting into the area and to provide an adequate buffer;
- To ensure they continue to be vibrant, inclusive communities, growth within villages is essential as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and this should include sustainable Grey Belt sites within villages in the Green Belt. The Local Plan needs to be changed to deliver this.
- The five year housing land supply will be fragile even by the Councils' own calculations for years following adoption. Additional identified supply through small and medium sized sites coming forward in the first five years post-adoption would provide the necessary contingency to ensure the five-year supply is maintained, and the plan remains up to date;
- The Councils have confirmed that Land East of Bush Close, Comberton is Grey Belt land and is in a sustainable location;
- All planning matters, including landscape / visual effects, site access and flood risk, relating to Land East of Bush Close, Comberton can be satisfactorily addressed;
- The Site is suitable, available and deliverable within the next 5 years;
- There are exceptional circumstances to justify the alteration of the Green Belt to include the release of Land East of Bush Close, Comberton;
- As part of a robust, sustainable housing supply to meet the needs of all of Greater Cambridge, sustainable Grey Belt village sites such as Land East of Bush Close, Comberton need to be allocated as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs; and
- For these reasons, the Local Plan needs to be changed to include the allocation of Land East of Bush Close, Comberton.

Policy S/JH: New Jobs and Homes

It is Hopkins Homes' position that the Proposed Submission Local Plan does not currently provide sufficient land to meet the housing requirement.

The Proposed Submission Local Plan aims to meet the objectively assessed needs between 2024-2045 for 73,300 jobs and a minimum of 48,069 new homes. We support the increase in jobs being planned for in the Proposed Submission Local Plan to around 73,300 additional jobs, up from the 66,600 jobs referenced in the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023 and the 58,500 included in the Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021).

There has though not been a corresponding increase in the proposed housing requirement. When compared to the First Proposals Draft, Greater Cambridge are proposing 8.3% more homes annually. This is though against the background of a significantly increased Standard Methodology figure for Greater Cambridge. The Proposed Submission Local Plan proposes around 25% more jobs across the plan period than the First Proposals, meaning there is an increasing disparity between the jobs target and the housing target. Greater Cambridge needs to plan for a corresponding increase in

housing delivery, because anything else jeopardises the continued economic success of Cambridge and the delivery of the required housing in the right locations.

It is evident that the housing land identified in the Proposed Submission Local Plan (Regulation 19 stage) is insufficient to meet the real-world need in and around Cambridge for two further key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites. The latter point is expanded upon under the S/DS: Development Strategy & Key Diagram heading below.

In terms of in-commuting:

The Councils' Development Strategy Topic Paper published as part of the draft Local Plan - Regulation 18 consultation (December 2025 - January 2026) recognised that "a critical assumption informing the relationship between the number of jobs and homes - is imperfect." It is understood why the 2021 census information is not considered robust, as it was influenced by the COVID-19 pandemic, but it is not robust to use "Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this" as the basis for justifying the housing requirement. Previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. Using previous commuting assumptions will result in increased numbers of workers commuting into the area. Some will use public transport, but this will inevitably result in an increased number of workers using Greater Cambridge's constrained road network.

The Councils' Development Strategy Topic Paper published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026) makes no reference to commuting.

The Councils' Consultation Statement Appendix 6: Response to Representations - Development Strategy includes "Regarding commuting assumptions, the 2011 Census is used in the EHNU 2025, considering the issues at the time of the 2021 Census (pandemic enforced work from home). As a result, this means the Greater Cambridge modelling assumes a greater draw from other areas than the 2021 Census implies. This is the same approach taken as in previous iterations of the work. The Plan's Standard Method requirement already incorporates an uplift for affordability in its calculation, therefore further uplifts are not considered suitable." Those previous iterations of the work were not sound, as set out above, and taking the same approach now remains unsound.

It remains the case that the proper planning of the area would see a greater housing requirement identified, and that requirement being met by sites that can readily access existing and 'currently being delivered' public transport and cycle links. The proposed (inadequate) identified housing requirement risks increasing strain on key infrastructure whilst also driving up property values due to a shortage of supply relative to demand.

As evidenced within the Government's Case for Cambridge report (March 2024), it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country. ONS data confirms that housing affordability in South Cambridgeshire and Cambridge remains unaffordable and considerably above the ONS's affordability threshold of 5 times average earnings, with median house prices equating to 9.5x median earnings in South Cambridgeshire and 11.3x median earnings in Cambridge.

Policy S/DS: Development strategy

A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. It does though lead to the conclusion that Greater Cambridge needs to adopt a more substantial housing supply buffer than the contended 8.2% currently proposed. A higher housing supply buffer would provide the necessary flexibility of delivery and ensure a robustness of supply in accordance with the intentions of the NPPF. The current buffer is insufficient and fails to recognise the delivery challenges which have historically held back early delivery on the large-scale strategic sites within Greater Cambridge. As a result, Greater Cambridge should employ a housing land supply buffer certainly over 10% and we would suggest circa 15-20% above the identified requirement which, for the reasons set out under the Policy S/JH: New Jobs and Homes heading above, also needs to be higher than the Standard Methodology figure.

Paragraph 2.51 of the Proposed Submission which follows Policy S/DS states that "We made sure to consider the sustainability impacts of focusing growth outside the green belt in comparison with alternatives of releasing green belt land, as we are required to do by national planning policy". Paragraph 2.50 states that the Councils "also identified six development strategy choices which form geographically focused hybrids of the previously identified sources of supply" which included "A hybrid involving release of land from the Green Belt." It is not evident in the Sustainability Appraisal (SA) that this has been done in relation to Green Belt releases in villages with only a seeming reference to "Hybrid spatial strategy including Edge of Cambridge: Green Belt…" in the SA. The Councils have not given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which would justify a more flexible and permissive approach to grey belt release in particular. The Councils have now published a Development Strategy Topic Paper Appendix 4: Revised Greater Cambridge Local Plan Green Belt as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026) which includes an Annex 1: Draft Local Plan Consultation Site Submissions featuring Grey Belt Comments, and confirms that 40501: Land East of Bush Close, Comberton is Wholly Grey Belt.

The Greater Cambridge Shared Planning Service Housing Delivery Study Addendum 2026 Update includes a Trajectory for the Proposed Submission Local Plan as its Appendix A.1 with five-year housing land supply calculations at A.2. This assumes the Local Plan is adopted in the 2028/29 monitoring year, and the first five-year housing land supply calculation period is 1st April 2028 to 30th April 2033. Even by the Councils' own calculations, the land supply would only be 5.03 years (Sedgefield method) / 5.47 (Liverpool method), and remains below 6 years until 2034/35 (Sedgefield method) / 2035/36 (Liverpool method). The land supply is fragile even by the Councils' own calculations, and any delay to the delivery of the newly allocated sites, or the pace of delivery on the previous allocations, could mean the Council falling below / further below the required 5 years. Additional identified supply through small and medium sized sites coming forward in the first five years post adoption would provide the necessary contingency to ensure the five-year supply is maintained, and the plan remains up to date.

Growth within villages, including villages within the Green Belt, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. Such sites are necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

As part of a robust sustainable housing supply to meet the needs of all of Greater Cambridge, it is clear that medium sized sites, including sustainable Grey Belt sites, are needed as part of a blended development strategy (reducing the reliance / dependency on strategic sites) to ensure that dwellings are delivered throughout the Plan period to meet all needs.

Land East of Bush Close, Comberton (Site ID 115138; HELAA Site ID 40501)

Through pre-application discussions and the Housing and Employment Land Availability Assessment (HELAA 2026), the Councils have confirmed that the Site is:

a) Grey Belt land; and
b) In a sustainable location (having regard to NPPF paragraphs 110 and 115).

Furthermore, the Development Strategy Topic Paper Appendix 4: Revised Greater Cambridge Local Plan Green Belt published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026) confirms that the Site (40501: Land East of Bush Close, Comberton) is "Wholly Grey Belt".

As set out above, it is contended that the Proposed Submission Local Plan does not currently plan for the actual housing requirement in Greater Cambridge. Furthermore, the Plan needs to support growth within villages, including villages within the Green Belt, to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities.

The allocation of Land East of Bush Close, Comberton can help meet all of these objectives.

Taking the key matters in turn:

Landscape / Green Belt

A 'Green Belt Strategic Site Landscape Appraisal February 2020' was first submitted in February 2020. An updated 'Green Belt Strategic Site Landscape Appraisal March 2025' was submitted as part of the Call for Sites in March 2025.

The HELAA 2026 for Land East of Bush Close, Comberton (Site ID 115138; HELAA Site ID 40501) includes:

> "The site is within the perceived envelope of the village and has some capacity for development, but mitigation measures would need to be introduced to ensure development of the site does not have an adverse impact on landscape character. Existing vegetation should be retained."

Those mitigation measures would be integral to a detailed scheme on the Site to ensure development of the site does not have an adverse impact on landscape character. Indeed, the Green Belt Strategic Site Landscape Appraisal March 2025 already identifies the following elements to be incorporated into any proposed development:

- Retain and reinforce the existing mature vegetation structure to the Site boundaries, where possible, enhance through additional planting to create soft landscape buffers to the Site boundaries and create a verdant landscape setting for any new development;

- Incorporate a comprehensive scheme of landscaping utilising locally native species. Offsets to be established along the eastern and southern Site boundaries to provide a robust landscaped boundary and creating a degree of separation between the Site and the wider landscape;
- Create new, varied habitats that are characteristic of this landscape setting. In particular, hedgerow and hedgerow tree planting should be incorporated into the landscaping scheme to reinforce the presence of this characteristic local landscape feature;
- Incorporate a network of publicly accessible open spaces within the Site. This would not only assist in provision of formal and informal recreation facilities but break up the built environment and assist in placemaking;
- Create opportunities to enhance public access to the countryside, which at present is limited;
- Adopt a positive outward looking layout to ensure that the proposals do not appear to be turning their back on the wider setting and create an appropriate transition settlement edge; and
- Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.

The National Planning Policy Framework 2024 (NPPF 2024) defines Grey Belt for the purposes of plan-making and decision-making as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143, namely (a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; or d) to preserve the setting and special character of historic towns.

Paragraph 148 of the NPPF 2024 states that "Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary".

Paragraph 149 (e) of the NPPF 2024 states that when defining Green Belt boundaries, plans should (amongst others) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

As the site does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF 2024 – namely (a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; or d) to preserve the setting and special character of historic towns – it is 'Grey Belt' and the Council has confirmed this.

The Councils' Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025 includes:

> "40501: Land at Bush Lane, Comberton Issue (First Proposals Consultation)

2.164 Representor's Green Belt assessment was carried out prior to the GCGBA *(Greater Cambridge Green Belt Assessment)* and do so does not take issue with it. However, it suggests a limited contribution to all of the NPPF Green Belt purposes and no impact on the openness of the wider Green Belt.

Response

2.165 The GCGBA rated this parcel as 'moderate' harm, including a minor level of impact on adjacent Green Belt. The representor's assessment focuses more on impact on the wider Green Belt than on the loss of contribution of the land that would be developed."

This reiterates the position that the site does not strongly contribute to any of the Green Belt purposes, although it is noted that this document references the originally submitted 'Green Belt Strategic Site Landscape Appraisal February 2020' rather than the updated 'Green Belt Strategic Site Landscape Appraisal March 2025' submitted in March 2025 and which was available to the Councils when this Assessment was completed.

In conclusion, it is agreed that the Site is Wholly Grey Belt and there is no indication of any landscape or Green Belt reasons why the Site should not be allocated (beyond the need for exceptional circumstances that is justified for the reasons set out above).

Sustainable Location / Connectivity

The HELAA 2026 confirms that the Site has "Good accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services".

Connectivity of the site and village with Cambridge and the surrounding area is being improved with work on the Comberton Greenway having begun. Sections of the path between Comberton and Barton have been widened, and with Comberton Village traffic calming improvements completed including new Zebra crossings and 20mph zone. Adams Road has opened to the public following improvements, the Coton Village improvements have been constructed and in March 2026 the Greater Cambridge Partnership Board decided to approve the plans for both the Experimental Traffic Regulation Order on Sidgwick Avenue and the full business case for the greenway. As the scheme webpage states "The greenway will make it safer and easier to reach Cambridge University West Campus, the Sidgwick site and Newnham. As well as better access to Comberton Village College and Long Road Sixth Form."

The Cambourne to Cambridge scheme website states that "It would also provide a path for pedestrians, cyclists and horse riders. The path would connect with new and existing routes, such as the planned Comberton Greenway, to complement the growing rural walking and cycling network".

Comberton is increasingly connected to employment opportunities and facilities. It has a range of facilities and services (including Comberton Village College, sports facilities, Primary School, Surgery, Village Hall, Public House, two Churches, and a range of shops and employment opportunities).

Site Access

The Technical Note 01 in relation to this Site previously submitted demonstrates that safe highway access to the site can be provided and that the existing Byway Open to All Traffic (BOAT) can be upgraded / widened to provide a link to the surfaced road providing access to Thornbury and thereby directly link the site with the B1046.

In this regard. KMC Transport and Hopkins Homes met with Cambridgeshire County Council Officers and, reflecting this, the HELAA 2026 states that "Based on the information provided and previous discussions with the Highway Authority undertaken by the promoter, the assessment has been amended to amber. Whilst access may be possible, further transport assessments and access design details will be required to identify any necessary mitigation measures".

Other Matters

It continues to be the case that the positive conclusions demonstrated by the previously submitted information remain valid, and together with the HELAA 2026 assessment, it can be concluded that:

- **Utilities**

  The site is within close proximity to existing statutory provider assets in order that the site may be serviced by electricity, water and telecommunications.

- **Foul Water Drainage**

  There are existing foul water sewers present within the access road to Thornbury and on the B1046 which could provide a point of connection for the site.

- **Surface Water Drainage**

  At present the site is a green field and therefore the natural drainage mechanism has been reviewed. Currently the site falls generally towards the Tit Brook and the brook forms the southern boundary of the site. The Greenfield runoff rate will be assessed and proposed surface water flows will be directed to the brook at a maximum discharge rate to reflect that of the present greenfield runoff. As such, attenuation of flows is anticipated to be provided in the form of an open basin SuDs feature along with additional SuDs solutions where space permits to store flows over and above the greenfield discharge up to a critical design storm event of 100yr + 40% climate change, with adequate freeboard to accommodate a further 10yr storm within 24 hours. Water quality will be controlled using SuDs features such as swales, permeable paving and filter drains, and will be determined further as the drainage strategy is developed.

  The HELAA 2026 states that the Site is wholly within Flood Zone 1, and in relation to Surface Water Flooding, 8% lies in a 1 in 30-year event. 4% lies in a 1 in 100-year event. 4% lies in a 1 in 1000-year event, and states that the site is a dry island. The Flood Risk RAG Assessment 2026 is Red.

  The Appendix to this letter shows the Flood map for planning Surface Water 1 in 30 Annual likelihood of flooding and Extent over 150mm, 1 in 100 Annual likelihood of flooding and Extent over 150mm, and 1 in 1000 Annual likelihood of flooding and Extent over 150mm. This

shows that for the 1 in 30 Annual likelihood of flooding, the site is not an island, with dry access achievable. For the 1 in 100 and 1 in 1000 Annual likelihood of flooding, only a few metres squares is potentially at risk of flooding and then only to between 150mm and 300mm depth. Flood risk is not a reason to not allocate the Site.

- **Biodiversity**

  A Phase 1 Ecology Report was carried out by Aspect in January 2020, which concludes that the site itself, comprising a single grassland field is unlikely to comprise an important ecological feature and should therefore not form a constraint to development. Any habitats of elevated value are restricted to the site boundaries. The Phase 1 Ecology Report identified potential for a small number of faunal species.

  A Preliminary Ecological Assessment (PEA) was prepared by SES dated 12th January 2026. The PEA concludes that the site supports a range of habitats, including priority hedgerows, in addition to areas of lower value grassland and scrub habitats, and provides suitable habitat for a number of protected and/or notable species. A summary of features, likely impacts, and outline mitigation and enhancement measures is provided in the Assessment. The PEA also includes initial Biodiversity Net Gain scenario testing which indicates that reserving c.35% of the site (c.1.53 ha) as greenspace, alongside the provision of 70 street trees, would yield a developable area of approximately 3.15 ha and enable delivery of a 10% net gain.

  Taking account of the Preliminary Ecological Assessment (PEA) dated 12th January 2026, the HELAA 2026 states that all new housing developments will require assessment of increased visitor pressure on nearby SSSI, and all non-householder applications will require consultation with Natural England regarding Eversden and Wimpole Woods SAC. It also recognises that there are no other apparent priority habitats within the site; however, there are grasslands, hedges, and wooded boundaries on site that are likely to have ecological value.

- **Archaeology**

  The HELAA 2026 states that cropmarks recorded to the east show extensive remains of Roman date, including a Scheduled Monument, and that archaeological investigations would be necessary in advance of development.

- **Deliverability**

  The site would be delivered in the 5-year period following adoption of the Plan (or potentially earlier if planning permission was granted in advance of adoption of the Plan). The HELAA 2026 recognises that the development completion timescales would be 0-5 years.

- **Other Issues**

  The green rating in the HELAA 2026 for the site for Open Space / Green Infrastructure; Historic Environment; Noise; Vibration; Odour and Light Pollution; and Air Quality is welcome. Flood Risk, Biodiversity and Geodiversity, Archaeology, Transport and Roads, Contamination and Ground Stability impacts can all be adequately mitigated.

Conclusion

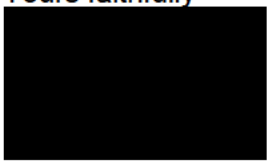
In summary:

- The Proposed Submission Local Plan needs to be changed to make provision for more housing land than currently proposed to meet the needs arising from the proposed additional jobs, to avoid an exacerbation of in-commuting into the area and to provide an adequate buffer;
- To ensure they continue to be vibrant, inclusive communities, growth within villages is essential as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and this should include sustainable Grey Belt sites within villages in the Green Belt. The Local Plan needs to be changed to deliver this.
- The five-year housing land supply will be fragile even by the Councils' own calculations for years following adoption. Additional identified supply through small and medium sized sites coming forward in the first five years post-adoption would provide the necessary contingency to ensure the five-year supply is maintained, and the plan remains up to date;
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- All planning matters, including landscape / visual effects, site access and flood risk, relating to Land East of Bush Close, Comberton can be satisfactorily addressed;
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- For these reasons, the Local Plan needs to be changed to include the allocation of Land East of Bush Close, Comberton.

We trust that the above comments are clear and helpful. We look forward to continuing positive engagement with the Council and key stakeholders to deliver the extensive benefits and opportunities presented by the development of Land East of Bush Close, Comberton.

Hopkins Homes requests the opportunity to appear before and be heard by the person(s) carrying out the examination on this matter in order to ensure that these points are fully understood and the necessary modifications to the Local Plan are made.

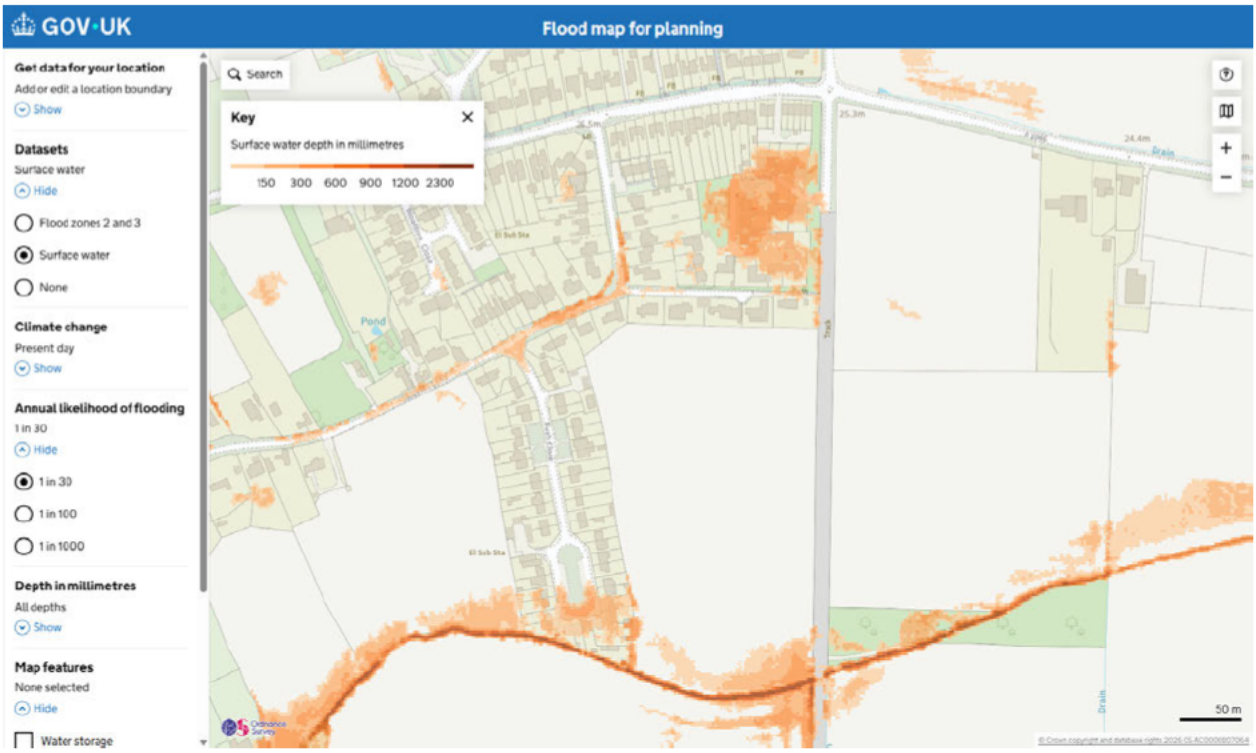
Yours faithfully



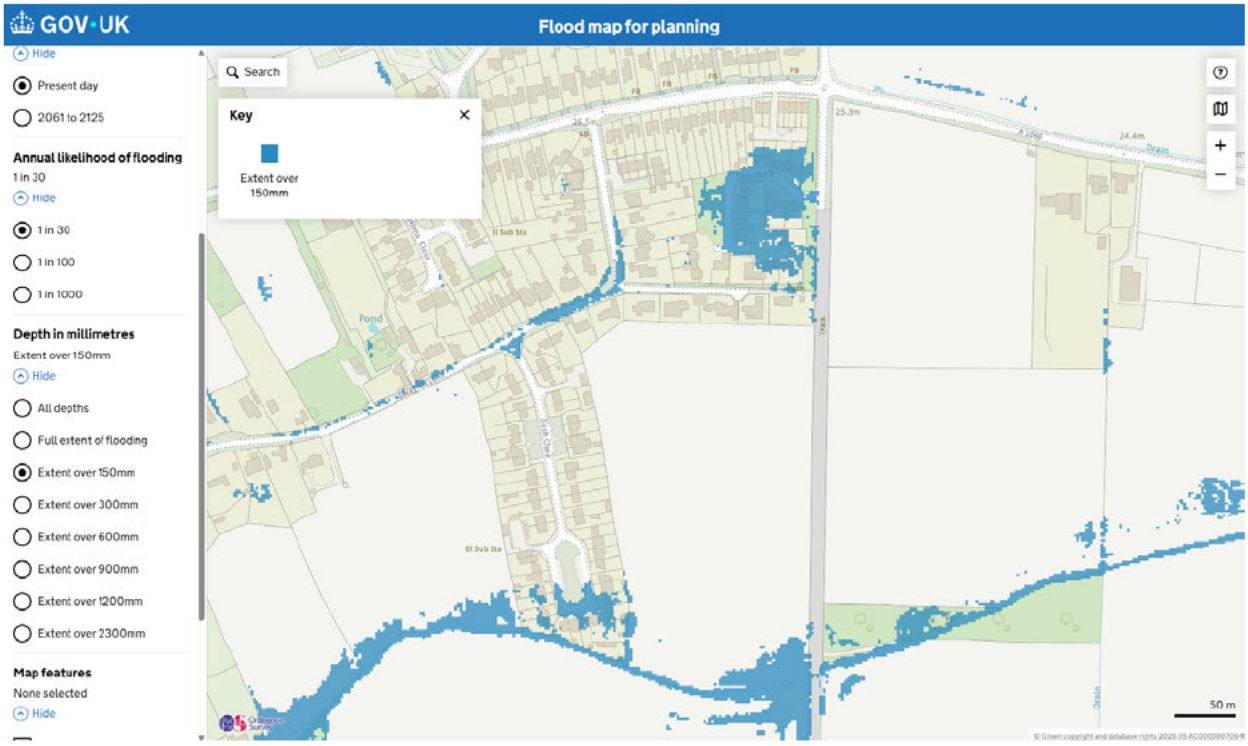
Andy Moffat BA(Hons) MPhil MRTPI
Planning Director and Head of Department

Appendix – Flood map for planning – Surface Water

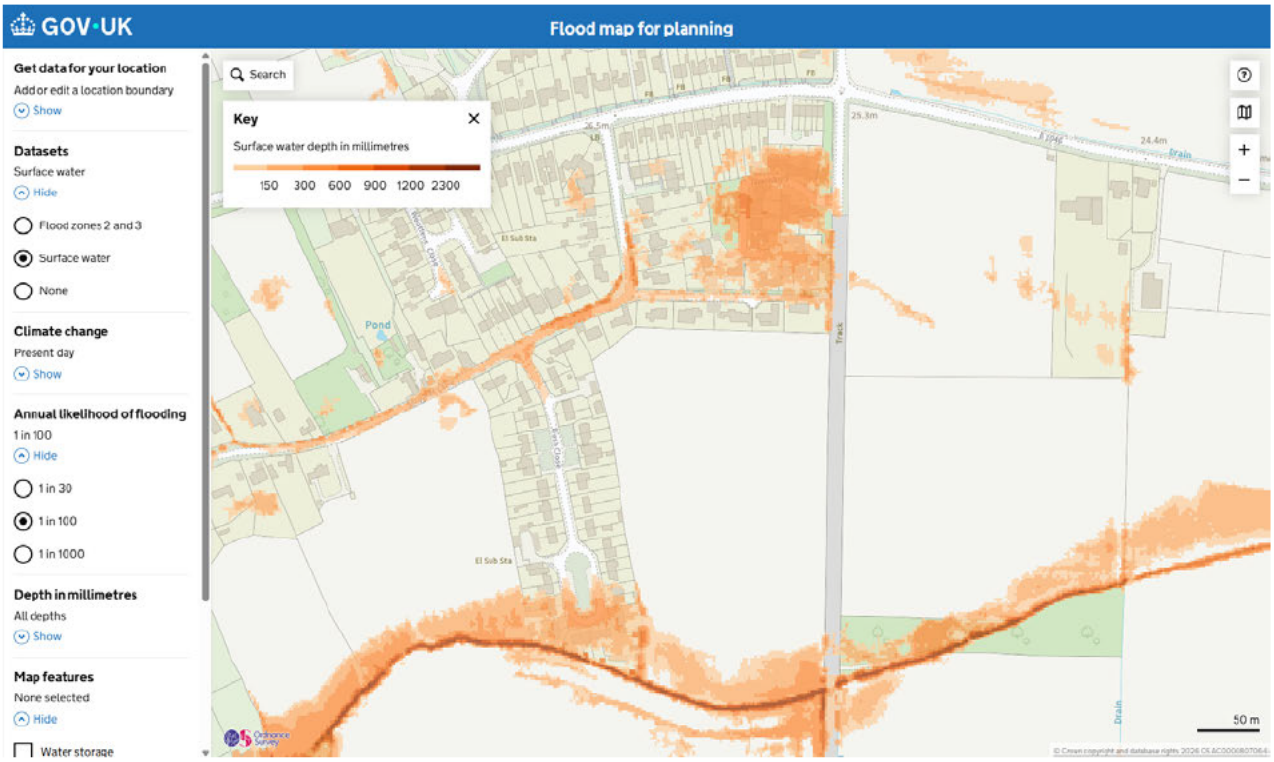
Flood map for planning – Surface Water – 1 in 30 Annual likelihood of flooding



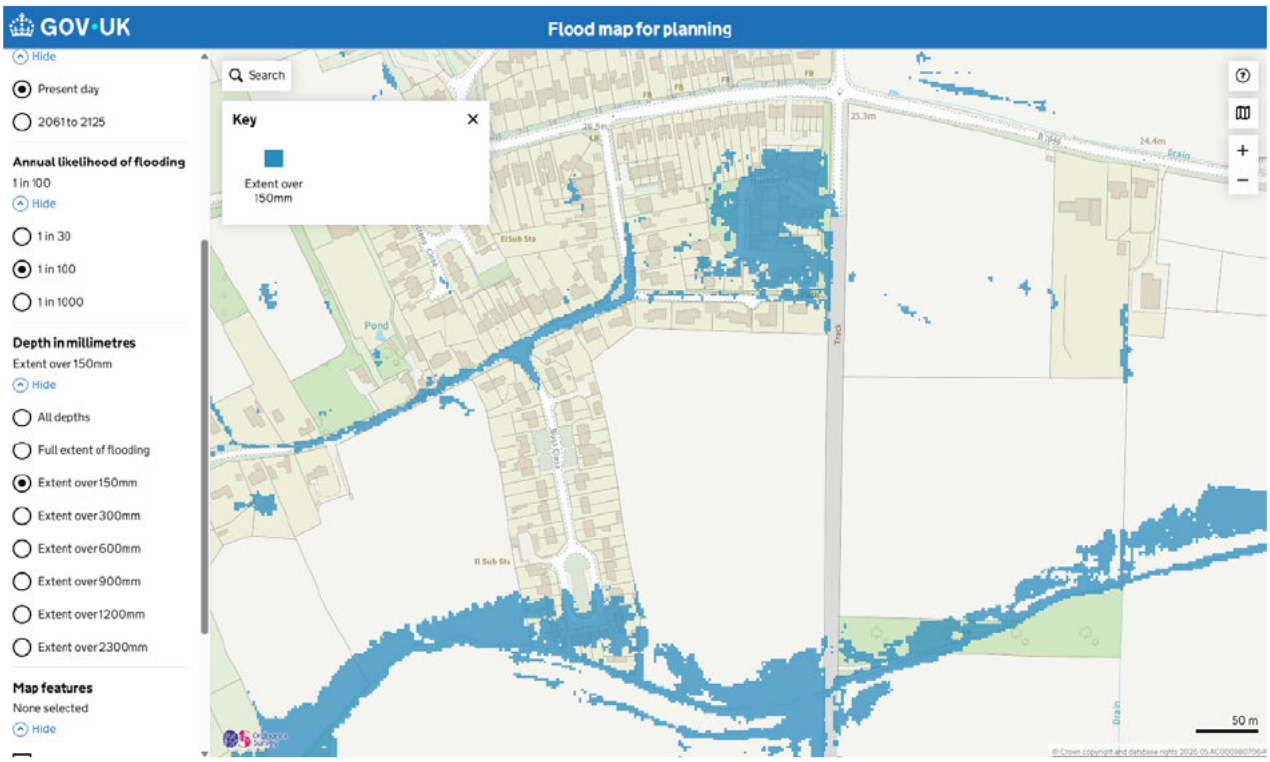
Flood map for planning – Surface Water – 1 in 30 Extent over 150mm



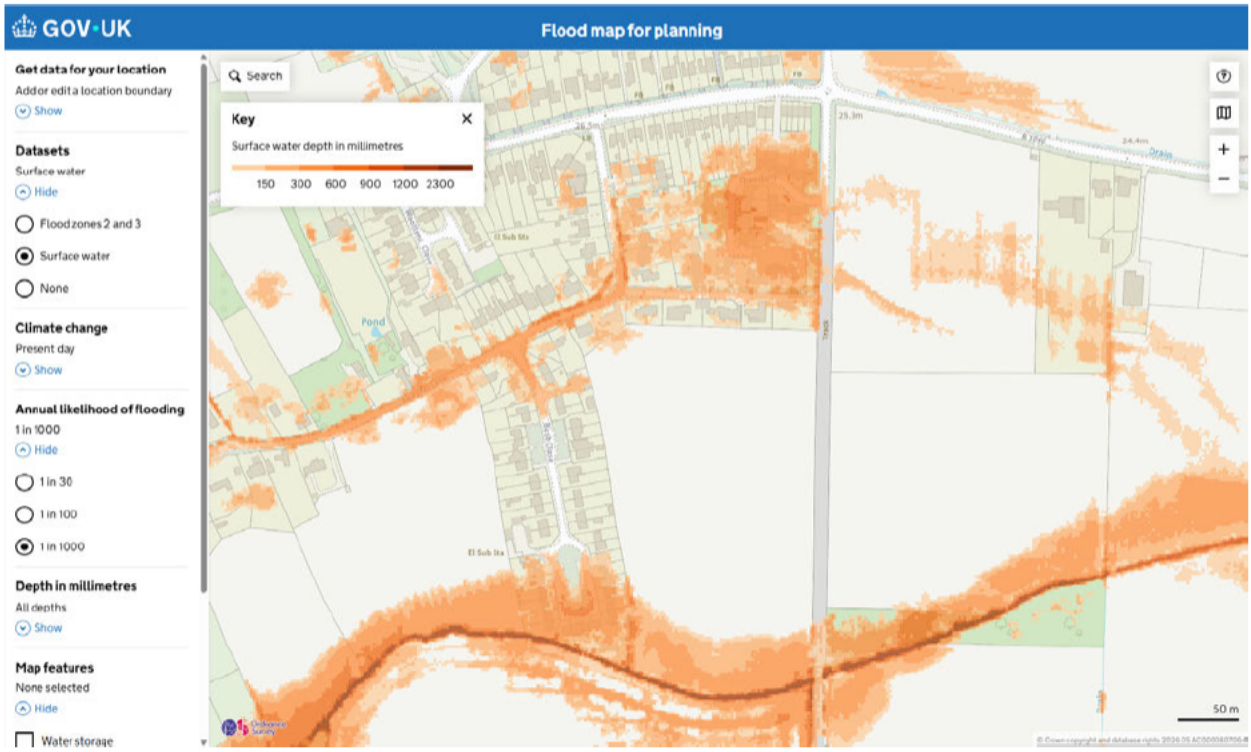
Flood map for planning – Surface Water – 1 in 100 Annual likelihood of flooding



Flood map for planning – Surface Water – 1 in 100 Extent over 150mm



Flood map for planning – Surface Water – 1 in 1000 Annual likelihood of flooding



Flood map for planning – Surface Water – 1 in 1000 Extent over 150mm

