BIDWELLS

Your ref:
Our ref:
DD: [redacted]
E: [redacted]
Date: 24/09/2026

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

Dear Planning Policy,

PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN 2024 – 2045

REGULATION 19 CONSULTATION SEPTEMBER 2026

LAND TO THE SOUTH OF STATION ROAD, HARSTON (HEELA 2026 SITE ID: 115742)

These representations have been prepared by Bidwells LLP on behalf of Jesus College in response to the Regulation 19 Consultation of the Proposed Submission Greater Cambridge Local Plan ('GCLP'). These representations relate to Land to the south of Station Road, Harston ("the Site") which is within the ownership of Jesus College. Please refer to **Appendix 1** for site location plan.

These representations set out comments with a specific consideration of the requirements of Paragraph 36 of the National Planning Policy Framework ('NPPF') (2024) which states that when examining local plans they should be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are 'sound'. A plan is considered 'sound' if it is:

a) ***Positively prepared –*** *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs[20]; 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 –*** *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

These representations also take account of Paragraph 16 of the NPPF (2024) which states that Plans should:

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Bidwell House, Trumpington Road, Cambridge CB2 9LD
T: 01223 841841 E: info@bidwells.co.uk W: bidwells.co.uk

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a) be prepared with the objective of contributing to the achievement of sustainable development[10];

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Whilst the GCLP will be examined against the NPPF (2024), due to transitional arrangements once adopted (anticipated 2028), the NPPF (2026) will be the relevant material consideration in terms of national policy that future development proposals will be assessed against. Annex A (Paragraph 2) of the NPPF (2026) states that development plan polices which are materially inconsistent with the national decision-making polices ('NDMPs') in the NPPF should be given very limited weight. As such the below representations take account of this and where necessary comment on the consistency of polices with the NDMPs set out within the NPPF (2026).

These representations follow those previously submitted to the Regulation 18 consultation of the Draft Local Plan. Through the Council's Housing and Economic Land Availability Assessment (HELAA) (2026), the Site given a reference of 115742. The Site was referenced as forming part of parcel HS9 within the Greater Cambridge Green Belt Assessment (2021) and the Greater Cambridge Green Belt Assessment – Review following changes to National Policy and Guidance (2026).

The earlier submissions outlined above made by Jesus College in support of the Site remain up to date and relevant. The site remains available, suitable and deliverable. This representation adds to the suite of submission material previously submitted and accounts for changes to the context of the Site, the emerging Greater Cambridge Local Plan and updated national policy, notably the National Planning Policy Framework (NPPF). This representation considers the relevant policies relating to the wider Development Strategy proposed in the Plan and the Rest of the rural area.

The remainder of this letter is set out as follows:

- Site Description
- Development Proposals
- Response to the Proposed Submission Greater Cambridge Local Plan (GCLP)

The Site

The Site is in a central village location and within 100m of the High Street (A10). The Site lies to the south of Station Road, Harston and extends to approximately 1.2 hectares. It is currently in agricultural use as a horse paddock. The Site is relatively flat, comprising an open field with trees and hedges along its boundaries, together with post and wire paddock fencing. The frontage with Station Road comprises an evergreen hedge that extends to two metres in height.

The Site lies immediately adjacent to existing residential development along Station Road to the west and Baggot Hall Farm to the east. It therefore represents a small gap between existing built development. To the north of the Site lies recreational land associated with Harston and Newton County Primary school and open countryside lies to the south.

The Site is currently accessed from agricultural land to the south, on land also owned by the College.

The Ste is within the Environment Agency defined Flood Zone 1 in terms of flooding from rivers (very low risk of flooding). The majority of the site is also within a 'very low' risk of flooding from surface water.

The Site is not within a Conservation Area but Baggot Hall lies to the east of the Site and is Grade II Listed.

A variety of facilities and services are currently available within walking distance of the site including Harston and Newton County Primary school (immediately north of the site), a doctor's surgery, a post office, village hall, public houses and a convenience store.

The nearest bus stop to the Site is located approximately 250m north, along the High Street (A10). There is a bus stop on both sides of the A10 serving north bound and southbound services through to Royston to the south, the Trumpington Park and Ride site and Cambridge to the north, as well as national express coach services to Gatwick airport.

Off-road cycle ways connect the Site to Foxton railway station approximately 2.5km to the south which offers services to Cambridge (and beyond) and London. The proximity of the Site to this transport interchange makes it readily accessible by active modes of travel, particularly cycling.

Furthermore, the A10 runs through the village, which is a strategic transport corridor within Greater Cambridge, where numerous transport improvements are planned to deliver a high-quality public transport corridor, including:

- Improved transport hub at Foxton railway station (3km from the site);
- Proposed improved transport interchange at Trumpington A10/M11 junction (3.2 km from the site);
- Park and ride site at Hauxton;
- Off road cycle links along the A10;
- Walking and cycling links to Melbourn and Bassingbourn Village Colleges.

In addition to the above, Harston falls within the 'Preferred route option' area of the proposed East-West rail alignment which would deliver faster and improved frequency of trains to Cambridge and in turn to London.

As such, the Site is well located to reduce the need to travel by car and can promote sustainable travel. Further public transport enhancements are also proposed that will improve connectivity to Harston by sustainable and active modes of transport.

Development Proposal

An emerging concept proposal has been prepared by Bidwells LLP which accompanied previous representations, informed by a suite of technical assessment work.

The emerging proposal is for a residential development of approximately 10 dwellings, with a mix of terraced, semi-detached and detached houses.

In order to protect the significance of the adjoining Baggot Hall and is setting, the proposed layout seeks to incorporate significant areas of retained open space within the centre of the Site and along its eastern boundary. This will ensure that views of Baggot Hall are retained from Station Road to the north and open countryside to the west. The total amount of public open space currently proposed extends to circa 0.31 hectares. The eastern boundary also incorporates a proposed drainage attenuation feature.

The proposed layout responds appropriately to its rural location by retaining views of the countryside beyond and protecting the existing rural character of the site. The internal road layout is gently curved, in a similar design to that serving Linden House to the south-west of the Site, and the dwellings are loosely arranged within the site, with the larger units proposed to the south designed to respond to the adjoining agricultural buildings at Baggot Hall farm.

There is an existing two-metre-tall evergreen hedge along the length of the Station Road frontage that prevents visual access to the countryside. This will be retained with the exception of two small sections to be removed in order to accommodate access. A pair of semi-detached dwellings are proposed along the Station Road frontage, to continue the existing residential building line to the west. The remaining units are proposed to be sited off the internal road. The loose grain of development and low density proposed will enable views of the open countryside beyond to be retained from Station Road.

Existing boundary vegetation will be retained where possible and enhanced in order to provide a defensible boundary to the Green Belt edge.

A suitable vehicular access can be achieved off Station Road, together with an adequate visibility, in line with the Manual for Streets parameters for a road with a 30mph speed limit, such as Station Road. The existing footway on the south side of Station Road can also be widened to 2m and tactile paving added to the existing informal crossing to Harston and Newton County Primary School.

Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in the next Local Plan period. With the right design, including a suitable layout and design concept, the proposed development on the site could be accommodated without having a significant impact on the surrounding heritage context of the site or landscape setting.

The land is available, achievable and suitable and the development proposals will bring a number of tangible social, economic and environmental benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:

- Representing appropriate development in the Green Belt and effective use of sustainable, Grey Belt land;
- Development in a sustainable location with good transport links north into Cambridge via the A10;
- Close proximity to existing services including primary school; doctors surgery;
- Development between existing built development;
- Development within Flood zone 1;
- Access to local green space;
- Contributions to affordable housing in accordance with Local Plan Policy;
- Improved transport hub at Foxton railway station (3km from the site);
- Proposed improved transport interchange at Trumpington A10/M11 junction (3.2 km from the site);
- Park and ride site at Hauxton;

- Off road cycle links along the A10; and
- Walking and cycling links to Melbourn and Bassingbourn Village Colleges.

Response to the Proposed Submission Greater Cambridge Local Plan (GCLP)

Policy S/JH : New Jobs and homes

Jesus College **object** to Policy S/JH. The policy is unsound as it is not positively prepared, not justified, not effective and inconsistent with national policy.

These representations are supported by the enclosed Note on Housing Need and Supply Matters. This concludes that the proposed housing requirement of Policy S/JH is 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 an Authority may need to plan for greater housing growth above their 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 draft 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 the direction being 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 providing direct connectivity between Cambridge Biomedical Campus (CBC) and London, the granting of the Cambourne to Cambridge busway and 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 set to deliver infrastructure first growth. We contend in

order to ensure the Plan is found sound the unique nature of Cambridge and its projected capacity for growth must be realised 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 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 (EHNU) (2026) 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. The EHNU draws its conclusions and jobs and housing needs from the 'central growth' scenario with the 'higher growth scenario' dismissed. However, it is noted the EHNU notes that the higher scenario could be achieved with step change in investment.

Rightly the EHNU draws a relationship between job growth and housing need, on the basis that greater job growth in the region will generate a derived demand for housing, creating an interdependency between the two. The 'central growth scenario,' as outlined within the EHNU, builds in assumptions of slower periods of growth, contractions, and economic shocks. Inherently both the number of jobs and homes proposed within the Proposed Submission Plan are conservative rather than reflective of 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 delivery of growth in the Oxford – Cambridge Growth Corridor there is clear rationale for the Authority to reasonably adopt the high growth scenario. Furthermore whilst the Authority have met their identified needs for housing via the Standard Method it is acknowledged 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 the Regulation 18 version of the emerging Local Plan required 2,463 dwellings per annum to deliver employment growth of 66,000 jobs compared to the Regulation 19 version which required delivery of 2,292 dwellings per annum to deliver 73,200 jobs across the plan period; representing a decrease in housing delivery whilst reflecting an increase in job creation. The EHNU reasons this in stating the fact 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 raise concern 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 development employment centres such as CB1, Cambridge Biomedical Campus and Cambridge Science Park. We advocate the Plan needs to address the affordability of housing within Greater Cambridge by planning for increased growth and supply to reflect growing demand rather than embed the issue of increasing household size.

In doing so and making provision for increased housing stock in Greater Cambridge in sustainable locations would ensure the Local Plan promotes more suitable patterns of travel as required by paragraph 111 of the NPPF (2024) using planning polices to minimise the length of and journeys required for employment.

Changes required to the plan

In order to overcome the issues highlighted in this representation and the enclosed Note on Housing Need and Supply matters and progress a sound Local Plan, it will be necessary to undertake the following additional work and revise the proposed housing requirement accordingly:

- 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.

Policy S/DS: Development Strategy

Jesus College **object** to Policy S/DS: Development Strategy. The policy is unsound as it is not consistent with national policy.

These representations are supported by the enclosed Note on Housing Need and Supply Matters. This concludes that the proposed housing requirement of Policy S/DS is unsound 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.

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.

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.

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

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.

As a consequence, the GCLP is unsound 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.

In terms of the Rest of the Rural Area, we note that this serves a very minor role in the chosen strategy for this local plan. Figure 9 in the Plan highlights this fact with only 15% of the planned distribution of growth in the rural area. As referred to in the Bidwells note appended to the Note on Housing Need and Supply Matters, a strategy which relies too heavily on large allocations risks a lack of delivery in the first 10 years of the Plan due to the significant infrastructure required to service the very large allocations. This problem is highlighted in paragraph 2.76 of the Plan where the text acknowledges that it must 'ensure a deliverable plan but which is reliant on a significant level of infrastructure'. Senior Councillors at Cabinet have also expressed their concerns to officers that this strategy is a risky one to adopt.

We consider this approach flawed as it heavily 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) which relies 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 at paragraph 2.80 of the Plan 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.

Our view is that the local plan relies too heavily upon the strategic 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 will be needed for housing delivery in the first 10 years of the plan. If this does not happen the Plan is unlikely to have sufficient sites available to make up the shortfall in delivery, as required by Government.

In particular, there are very few small and medium size housing sites allocated in the Rest of the Rural Area. This lack of housing allocations in the rural area 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 settlements across the Greater Cambridge 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. 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 may have within the Authority to live in the existing settlements and villages located across the rural area. This further serves to reduce 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. The development strategy should take account of the needs and vitality of existing villages and the wider rural economy, making planned provision for them specifically.

In many villages, such as Harston, 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.

Furthermore, Paragraph 73 of the NPPF (2024) stresses the importance of the inclusion of medium and small sized sites in order to meet the housing requirement of an Authority. They are also essential for SME housebuilders to deliver new homes whilst being built out relatively quickly by virtue of the often-minimal infrastructure requirements. The draft Local Plan does not propose to allocate any new housing sites to address this requirement, the Evidence Base providing rationale for this that:

- It is challenging to identify a large number of small sites to meet the 10% requirement
- It would undermine the Council's development strategy and necessitates the release of Green Belt sites conflicting with the aim of protecting the Cambridge Green Belt as the larger and better served villages are located within the Green Belt.

The Housing Delivery Addendum Update (2026) argues when accounting for windfall development of 4,953 dwellings coming forward on sites no larger than 1ha then 13.5% of homes over the plan period will be delivered on small sites. Primarily relying upon windfall development to address as much of the 10% requirement as possible, does not help provide small and medium enterprise housebuilders with the certainty required to invest in delivering sites. Across Greater Cambridge there has also been a general decline in the delivery of windfall sites over the years. The Greater Cambridge Housing Delivery Study Addendum Update (2026) in section 2 considers windfall delivery between 2006 and 2024 and consider a windfall allowance for 425 dwelling per annum would be robust. This section of the report sets out what it considers the favourable policy which may assist the delivery of windfall sites in the future. However, it fails to identify why over time there has been a general trend downward on windfall sites, and whether in reality, particularly in the South Cambridgeshire area there is now a lack of available sites to continue to deliver windfall at scale across the plan period. For instance, it presents a data set as far back as 2006 – 2007 for windfall completions to find an average delivery rate of 470 dwellings per annum, fails to realise that Greater Cambridge has not delivered more than 470 dwellings in a year from windfall since 2016 – 2017. Even if the Council uses 425 dwelling per annum for windfall over the previous seven years of data the average delivery has been 395 dwellings per annum. As such, there needs to be greater certainty injected into small and medium sized sites by allocating these in the emerging Local Plan, to aid with confidence of being able to deliver such sites but also recognising that opportunities for brownfield redevelopment or residential sub-division can only continue to deliver so much housing across Greater Cambridge.

The focus upon large new settlements, urban redevelopment and Strategic Urban Extensions also fails to properly consider the need to offer sufficient choice and flexibility to perspective homeowners. Not all perspective purchasers will be able to, or wish to buy, in these locations. For instance, existing young residents of village settlements in South Cambridgeshire may wish to buy a home in the settlement to be close to existing family for childcare which may not be possible should they have to move to other proposed allocations.

The proposed development strategy's lack of commitment to delivering growth in sustainable settlements in the rural area risks exacerbating the affordability crisis in Greater Cambridge, likely pushing younger people out of their local communities and support networks. Reliance on strategic settlements outside of the Green Belt (and hence further away from Cambridge) is also likely to increase car dependency.

Changes required to the plan

In order to overcome the issues highlighted within these representations 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.

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.

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.

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.

One such site that would be suitable to consider as a deliverable site within the Rest of the Rural Area is Land to the south of Station Road, Harston (HELAA 2026 Ref: 115742). Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in Local Plan period. With the right design, including a suitable layout and design concept, the proposed development on the site could be accommodated without having a significant impact on the surrounding landscape setting.

Policy S/SH: Settlement hierarchy

Jesus College **object** to Policy S/SH. The policy is unsound as it is not effective.

The indicative maximum scheme sizes are not considered to be necessary for the Group villages. Windfall development that comes forward within these villages should be considered on the basis of the site and its context. Schemes should be encouraged to make an efficient and effective use of land whilst delivering housing development that is appropriate and helps in meeting the needs of the local community. Often small windfall sites (under the thresholds indicated from Group and Infill Villages) will provide limited or no affordable housing, exacerbating the situation for newly forming households who cannot meet their housing needs locally.

Changes required to the plan

In order to ensure that the best windfall Sites come forward to meet the target of 4,953 dwellings and are of sufficient size to able to make a meaningful affordable housing contribution, we advocate for the removal of the indicative maximum scheme size in Group Villages.

Policy S/GB: The Cambridge Green Belt

Jesus College **object** to Policy S/GB. The policy is unsound as it is not effective.

The *Development Strategy Topic Paper (2026)* states GCSP consider the identified need for 73,300 jobs and 48,069 new homes across the plan period can be delivered without necessitating the allocation or release of Green Belt land within the authority area. Notwithstanding given the fundamental changes to National Policy introduced by the NPPF (2024), notably the introduction of grey belt, the Authority have prepared and published a revised Greater Cambridge Green Belt Assessment – Review following changes to National Policy and Guidance (2026) ('the Green Belt Assessment (2026)' prepared by LUC. This is welcomed in principle.

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 polices which are materially inconsistent with the national decision-making polices 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)

It is considered the identified 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. In line with the Written Ministerial Statement made by Matthew Pennycook (Minister of State for Housing and Planning) on 23 October 2025 the ambition remains to 'supercharge growth' within the Oxford-Cambridge Corridor and realise the full potential of Greater Cambridge. Furthermore, with the advent of the Greater Cambridge Development Corporation (backed by £400 million of central government funding) and renewed commitment to delivery of growth in the Oxford – Cambridge Growth Corridor it is expected an ambitious growth target will be identified; likely to exceed that currently envisioned by GCSP. Collectively it remains apparent the government have a continued agenda to deliver high levels of growth within Greater Cambridge and as such it is considered that GCSP will need to plan for a greater level of growth as the Local Plan progresses.

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.

However, as identified through the enclosed Note on Housing Need and Supply Matters, 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 the 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.

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, towards towns and villages inset within the Green Belt boundary or towards locations beyond the outer Green Belt boundary. In considering this, we advocate by virtue of many of the rural settlements, such as Harston, that these are sustainable locations to facilitate further growth. As

such, the Plan should consider the additional allocation of smaller sites on the edge of settlements inset into the Green Belt to ensure the Development Strategy is sustainable and provides a robust, diverse supply of housing across the Authority throughout the plan period.

Whilst the identification of the Cambridge grey belt within the 'Cambridge Green Belt Assessment Review following changes to National Policy and Guidance' (2026) is welcomed, the omission of any reference to 'Grey Belt' within Policy S/GB is questioned. 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). 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.

In considering the above, GCSP may also require a further Green Belt review and consider the additional release of land from the Green Belt to accommodate sustainable and continued growth in the Authority across the emerging plan period. This would ensure the emerging Local Plan is positively prepared, justified, effective and consistent with national policy.

One such site that would be suitable to consider for Green Belt release is Land to the south of Station Road, Harston (HELAA 2026 Ref: 115742). Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in Local Plan period.

The site itself forms a relatively small area of land within a much larger parcel identified in the Greater Cambridge Green Belt Assessment (2021) (Parcel HS9) and development of the Site would comprise limited infilling of a small gap between existing built development. The wider Parcel HS9 is identified in the Greater Cambridge Green Belt Assessment (2021) as having either no/limited or moderate contribution to the three Cambridge Green Belt purposes (and the corresponding NPPF Purposes (a), (b) and (d)).

The Site therefore meets the NPPF definition of 'grey belt' on the grounds that it is land in the Green Belt that does not does not 'strongly contribute' to any of purposes (a), (b), or (d) in paragraph 143.

As discussed below, Bidwells advocate that the Councils must include the identification of Grey Belt land within the Draft Local Plan and as such the Site should be clearly identified as Grey Belt. Any future residential development of the Site is also capable of meeting the 'Golden Rules' set out within Paragraphs 156 - 157 of the NPPF.

Through the identification and allocation of Grey Belt sites across Greater Cambridge, such as Land to the south of Station Road, Harston, pressures on green space within villages can be alleviated. Furthermore, 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.

The area of Grey Belt identified within this submission would support a modest rollback of the Green Belt, to better reflect the contemporary shape and form of Harston.

As referred to above, the identification of the Cambridge grey belt within the Cambridge Green Belt Assessment Review following changes to National Policy and Guidance (2026) is welcomed, however Bidwells object to aspects of the methodology used, in particular the identification of both a 'moderate' or 'weak' contribution to NPPF purpose D. The definition of grey belt as found within the NPPF (2026) does not set out such a distinction. 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.

Changes required to the plan

Pertinent to ensuring the Plan is sound will require:

- The publication of a revised Green Belt Assessment to support the Local Plan
- A consideration of higher growth targets and subsequent review of the Green Belt / Grey Belt where necessary
- The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites.

Policy S/MO: Monitoring

Jesus College **object** to Policy S/MO. The policy is unsound as it is not effective.

The draft policy sets out an 8-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 the monitoring framework, set out in Appendix E: Monitoring Framework. However, results will be reported on annually which is not reactive enough to deal with under delivery. This is clearly illustrated by the current number of speculative planning applications and appeals taking place in the authority area 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 proven by current applications and appeals. Thus, the GCLP should allocate a number of sustainable and deliverable housing sites in the local plan to serve delivery in the first 10 years of the Plan due to the envisaged lack of delivery on the very large allocations in the Plan which require significant infrastructure to deliver them.

Changes required to the plan

Additional housing allocations will be required within the Local Plan to serve delivery in the first 10 years to ensure the monitoring framework remains robust and fit for purpose.

One such site that would be suitable to consider as a deliverable site within the Rest of the Rural Area is Land to the south of Station Road, Harston (HELAA 2026 Ref: 115742). Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in Local Plan period. Land to the south of Station Road, Harston (HELAA 2026 Ref: 115742) will ensure a balanced, diverse and varied supply of housing stock to provide resilience to the Authority's supply over the forthcoming plan period, especially during the first 10 years of the plan period.

Policy GP/LC: Protection, conservation and enhancement of landscape character

Jesus College **object** to Policy GP/LC. The policy is unsound as it is not justified.

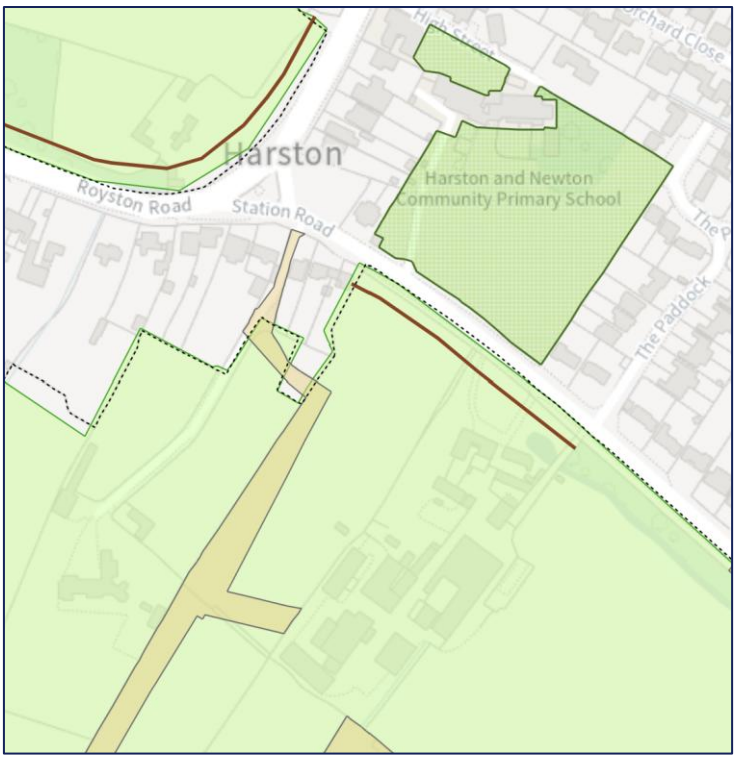
Part 2 of the Policy states that "*Important Countryside Frontages (ICFs) are identified on the Policies Map and are in villages where land with a strong countryside character either:*

a. Penetrates or sweeps into the built-up area providing a significant connection between the built environment and the surrounding rural area; and

b. Provides an important rural break between two nearby but detached parts of a defined development extent."

Part 3 of the Policy then states that "*Planning permission for development will be refused if it would compromise these ICF purposes."*

An extract of the Policies Map as it relates to Land south of Station Road, Harston is shown below (ICF shown as the brown line):



Jesus College do not consider the Important Countryside Frontage designation to the south of Station Road in Harston is justified. The existing two-metre tall evergreen hedge along the length of the Station Road frontage can be retained and managed as part of any development proposal, with the exception of two small sections to be removed in order to accommodate access. This hedge already acts as a natural barrier to the countryside frontage and the loose grain of development and low density proposed will also enable views of the open countryside beyond to be retained from Station Road. As such, residential development on Land to the south of Station Road, Harston could be brought forward without compromising the purposes of Important Countryside Frontages, in terms of 'providing a significant connection between the built environment and the surrounding rural area' and 'providing an important rural break'.

Sustainability Appraisal

Paragraph 1.6 of the Sustainability Appraisal (2026) ('SA') states 'Developing options for a plan is an iterative process, involving a number of consultations with stakeholders and the public. The SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for the policies to be included in a plan.' These options are explained and their effects summarised in Chapter 4 of the full SA report.

Paragraph 2.10 of the SA states 'The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan makers when selecting preferred options for their plan.

It is clear is that the proposed Development Strategy underpinning the Regulation 19 Local Plan is not a sufficiently robust development strategy which positively plans for housing delivery in the first 10 years or so of the plan period. This is because the strategy relies very heavily on the deliverability of two very large strategic sites at Cambourne North and Grange Farm, between them accounting for 5,100 dwellings in the plan period, which are very likely to be delayed due to the significant infrastructure required to deliver the housing numbers. Indeed, in a site-specific sense, Grange Farm represents a late allocation entry (due to the Cambridge Waste Water Treatment Works de-allocation) jumping the Green Belt into open countryside. As such, Grange Farm has poor public transport connectivity beyond the A1 and senior councillors have expressed concerns about the potentially very high number of car-generated trips expected due to the divorced nature of site from the planned Travel Hub south of Babraham village. The Infrastructure Delivery Plan states a 'Shuttle / commuter services connecting Grange Farm to nearby campuses and railway stations will be essential' to service this site. It is further noted the Housing Delivery Study Addendum (2026) identifies Phase 2 of CSET is essential for the delivery of Grange Farm (3.2.66). It notes that the timescales for delivery and phasing of CSET are still being discussed and that the conclusion of these discussions will dictate when a full site build-out to align with typical assumptions can be achieved. It is therefore considered the Development Strategy as currently proposed relies significantly on assumptions on the timely delivery of infrastructure which given the ongoing difficulties with the delivery of Cambourne to Cambridge (C2C) is high risk.

Summary

These representations have been submitted to supplement previous information submitted in support of the Site through previous Call for Sites consultations and Regulation 18 consultation and the conclusions and findings remain correct. This submission has addressed and responded to the transformed policy context of the Site in terms of the emerging Local Plan. Bidwells has identified that the Proposed Submission Local Plan continues to over rely on large strategic sites which have historically failed to start their delivery in a timely manner and then at much slower rates than the Council anticipated and relied

upon. The absence of smaller sites in rural communities that can deliver early in the plan period to meet the acute housing need of Greater Cambridge is also considered a serious a flaw of the Local Plan to achieve a sustainable spatial strategy.

The Site is highly sustainable and remains suitable, available and achievable for residential development to meet the growing housing needs of Harston which should be prioritised for allocation.

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

Kind regards

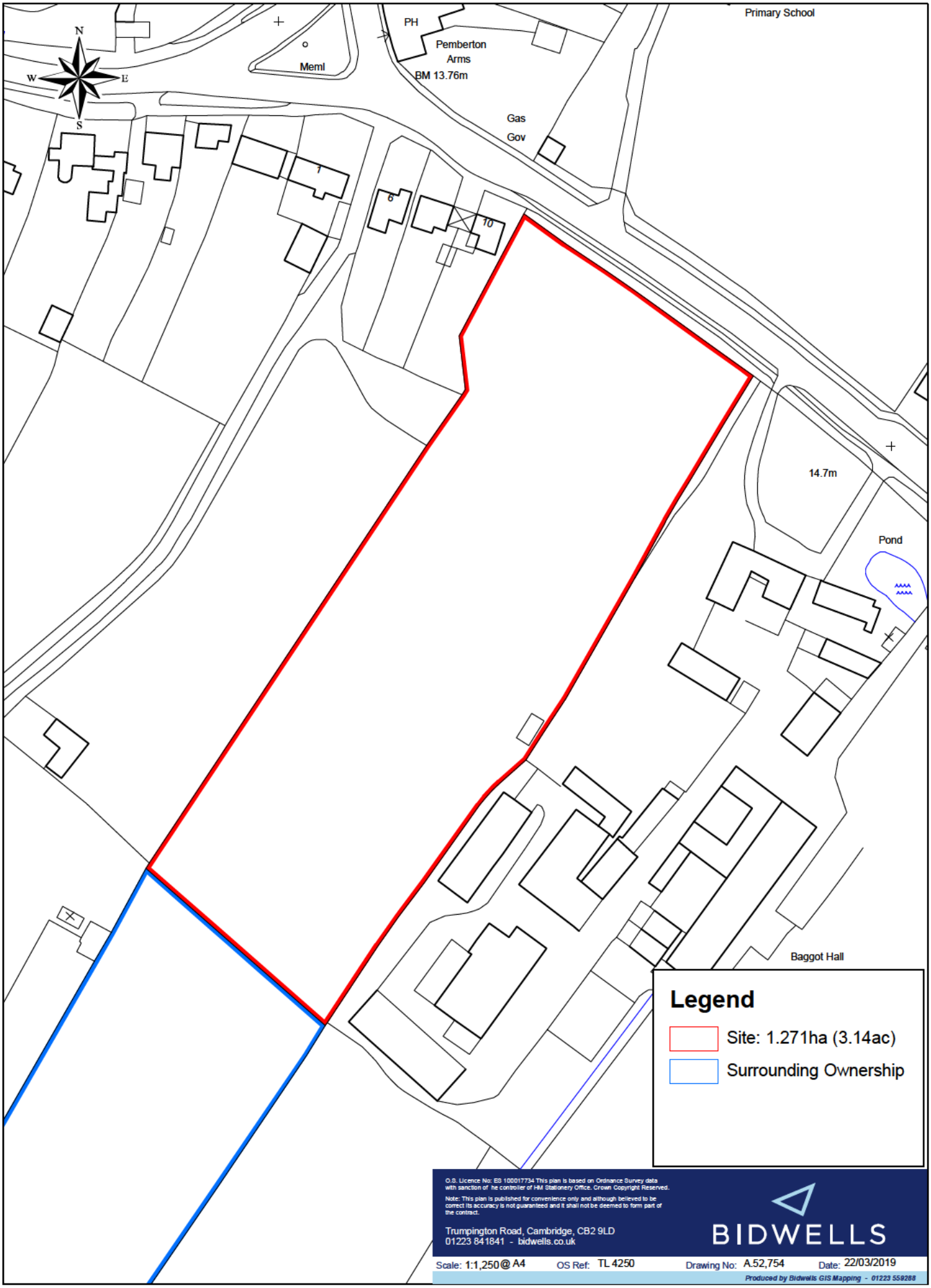


Alison Wright
Partner

Appendix 1 **Site Location Plan : Land to the south of Station Road, Harston**

Enclosures **Housing Need and Supply Matters Note**

Land at Station Road, Harston



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Trumpington Road, Cambridge, CB2 9LD
01223 841841 - bidwells.co.uk

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