BIDWELLS

Your ref: 40341
Our ref: Land north of Mill Lane, Sawston
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 NORTH OF MILL LANE, SAWSTON (HELAA SITE ID: 40341)

These representations have been prepared by Bidwells on behalf of our client, Northwest Biotheraputics Capital Limited ('NWBio') in response to the Proposed Submission Greater Cambridge Local Plan (GCLP) Regulation 19 Consultation (2026). These representations relate to land north of Mill Lane, Sawston ('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:

- Housing Needs and Matters Report – prepared by Bidwells (**Appendix 1)**
- Site Suitability Report – prepared by Bidwells including the following appendices:
    - Vision Document prepared by Bidwells (Appendix A);
    - Transport Technical Note prepared by EAS (Appendix B);
    - Flood Risk and Drainage Technical Note prepared by EAS (Appendix C);
    - Landscape and Visual Study prepared by Bidwells (Appendix D); and
    - Preliminary Ecological Appraisal prepared by ArbTech (Appendix E)
    - Tree Survey prepared by ArbTech (Appendix F)
    - Heritage Technical Note prepared by Iceni (Appendix G)
    - Archaeology Technical Note prepared by Iceni (Appendix H)
- Grey Belt Assessment – prepared by Bidwells

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

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

- Spatial Strategy Response

Spatial Strategy

S/JH: New Jobs and Homes

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

JH: New Jobs and Homes

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

Summary

NWBio 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

NWBio objects 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 Regulation 19 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 Cambridgeshire and Peterborough Combined Authority (CPCA) Local Growth Plan (2025). 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 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 EHNU 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 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 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 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

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.

It is requested that the GCLP should allocate additional sites in Greater Cambridge to directly respond to the higher growth potential and to increase the diversity of allocated sites to optimise delivery and growth potential. The Site is available for allocation and can assist in delivering new housing development in a sustainable way.

S/DS: Development Strategy

NWBio **Objects** to Policy S/DS

Summary

NWBio 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

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.

Reliance on Strategic Sites

With regard to delivery, Rural Centres and Minor Rural Centres play only a 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.

As referred to in the Bidwells note appended 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 period due to the significant infrastructure required to service the very large allocations. This problem is highlighted in paragraph 2.76 of the Proposed Submission GCLP, 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 Regulation 19 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.

Our view is that the Proposed Submission GCLP 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 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) argues that, once windfall development of 4,953 dwellings on sites no larger than 1ha is included, 13.5% of homes over the plan period will be delivered on small sites. However, relying mainly on windfall development to meet the 10% requirement does not give SME housebuilders the certainty needed to invest in site delivery. Across Greater Cambridge, windfall delivery has generally declined over time.

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 the Council states that upon adoption (2028) they 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 is symptomatic of the Authority's historic and future preferred strategy to pursue strategic sites which as outlined above face long lead in times before the delivery of housing can commence. The marginal housing land supply when considering the Sedgefield approach is considered high risk and does not reflect a positive strategy that will adequately deliver throughout the whole plan period. We therefore reiterate that the Council should revise the Development Strategy to include additional medium and small sites to supplement the housing supply of the Authority across the forthcoming plan period.

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 formed 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

NwBio **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 NWBio's formal representations to the Greater Cambridge Local Plan Regulation 19 Consultation with specific regard to its land interests at Land north of Mill Lane, Sawston

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

Kind regards,



Rob Hopwood
Partner, Planning

Appendix 1: Housing Needs and Matters Report