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Greater Cambridge Shared Planning Service
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CB23 6EA

18th September 2026

RE: Proposed Submission Greater Cambridge Local Plan (Regulation 19) - Land east of Church Street, Whaddon, Cambridgeshire. Title Number CB168958. Site Reference 211994.

Dear Sir / Madam,

This representation is submitted by Orchestra Land Ltd on behalf of the landowner of Land east of Church Street, Whaddon. The site was submitted in January 2026 under Site Reference 211994, so it is not a new site at Regulation 19. The main objection is to Policy S/DS and the omission of the site from the Plan; Policies S/SH and S/DE are also relevant.

1. Site and proposal

The accompanying plan shows the wider site originally submitted under Site Reference 211994, all of which remains available for allocation. The Council may allocate a smaller area within that boundary if justified, but the landowner considers that the approximately 0.70-hectare area, comprising largely previously developed land, should form the minimum allocation area and the focus for residential development. Around 10 to 15 homes is currently envisaged, subject to proportionate planning and technical work. The balance of the land could provide biodiversity net gain, landscape mitigation and green infrastructure. The site forms part of title CB168958, and the submitted form records access via Town Farm Close, availability now, and no legal or ownership constraints.

2. Why the site appears to have been screened out

Whaddon is classed as an Infill Village, the lowest village category in Policy S/SH. This representation does not seek to alter Whaddon's position in the settlement hierarchy or redirect major growth to the village.

HELAA 2026 Appendix 2 expressly identifies Site 211994 as not assessed because it "does not align with the wider Local Plan Strategy". The HELAA and Development Strategy Topic Paper explain that residential sites which did not accord with the preferred strategy, including sites at Infill Villages, were not taken through detailed assessment or treated as reasonable alternatives. The site was therefore screened out at the strategy stage rather than rejected following a site-specific assessment of its suitability, availability and achievability.

That distinction matters. The Plan is being examined against the December 2024 National Planning Policy Framework (NPPF), which requires the strategy to be justified by proportionate evidence and to consider reasonable alternatives. It is therefore important that the evidence base makes clear what site-specific assessment, if any, the site received and the reasons this contained 0.70-hectare site was discounted.

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3. Why this particular site merits consideration

The approximately 0.70-hectare area is considered to represent a contained, infill-type opportunity in physical terms. It sits immediately east of Church Street, next to existing housing, close to the Village Hall and playground, and within a wider holding that already contains golf-centre buildings. Residential development focused on this area, with an indicative capacity of around 10 to 15 homes, would therefore be materially different from a large outward extension across the wider golf course.

This representation does not suggest that 10 to 15 homes automatically comply with the normal limits for unallocated development in an Infill Village. However, Policy S/SH makes clear that those limits do not apply to Local Plan allocations, while national policy says plans should identify appropriate opportunities for villages to grow and thrive. Whaddon's classification should therefore not prevent consideration of a small site-specific allocation.

The Plan needs a supply of small housing sites. It says 4,807 homes would represent the NPPF's 10% small-site requirement, but only 2,052 homes - 4.3% of the overall requirement - are on identified sites of one hectare or less. Although the Council gives reasons for this shortfall, it remains important to explain why suitable small sites were ruled out. An allocation incorporating at least the approximately 0.70-hectare area could contribute without changing the wider settlement strategy.

4. Modification sought

For these reasons, it is considered that the Plan has not yet been adequately justified in its treatment of the site. It is respectfully submitted that the following modifications would address the objection and assist in making the Plan sound:

(a) undertake and publish a proper site-specific assessment of the whole site within the original submitted red-line boundary, together with any necessary Sustainability Appraisal work, so that it is clear how the site has been considered and, if discounted, the reasons for doing so;
(b) subject to that assessment, reconsider the site's omission and consider it for residential allocation. The whole red-line site remains available, but if a smaller area is allocated, the approximately 0.70-hectare area should be the minimum and the focus for residential development. Capacity should be determined through proportionate planning and technical work, with around 10 to 15 homes currently envisaged. The balance could provide biodiversity net gain and other mitigation; and
(c) any consequential amendment to the Whaddon Policies Map and Defined Development Extent (village boundary) required to reflect the allocation.

The landowner welcomes further engagement on the allocation boundary, capacity and policy wording.

Yours faithfully,



Bassil Aslam BSc (Hons), MRICS, Assoc RTPI
Founder and Land & Planning Director

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