TWENTY5

LAND SOUTH EAST OF HATTONS ROAD, LONGSTANTON

Greater Cambridge Local Plan Regulation 19 Representations

On behalf of Hallam Land
September 2026

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Appendix 5 – Ecological Constraints and Opportunities Note (FPCR)

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1 INTRODUCTION AND SUMMARY OF REPRESENTATIONS

1.1 Introduction

1.1.1 These representations have been prepared by Twenty5 Planning Limited ("Twenty5") on behalf of Hallam Land (the "Promoter and joint owner") in response to the Regulation 19 (Publication) version of the Greater Cambridge Local Plan (the "Publication Plan"), currently subject to consultation prior to submission for independent examination.

1.1.2 The representations relate to Land South East of Hattons Road, Longstanton (the "Site"), shown on the Site Location Plan and in the Vision Document at Appendix 1, extending to approximately 54.5 hectares within the administrative area of South Cambridgeshire District. The Site lies to the south west of the village of Longstanton and is not subject to Green Belt designation. The whole of the Site is within the ownership and control of the Promoter.

1.1.3 The Site is promoted as a sustainable new neighbourhood with a capacity of approximately 1,000 homes, delivered alongside a mixed use local centre, primary school provision, one or more mobility hubs, active travel connectivity, public open space including community sports facilities, and supporting drainage and transport infrastructure, with vehicular access from Hattons Road and the B1050. The proposal would deliver at least the 10% biodiversity net gain required by the Environment Act 2021, and would accord with the Publication Plan's requirements for affordable housing, specialist housing, water efficiency and design quality as set out at Section 4.3.

1.1.4 The Site has been promoted by Hallam Land throughout the preparation of the Greater Cambridge Local Plan making process as a sustainable new neighbourhood which can be delivered without the reliance upon complex infrastructure delivery. It would be supported by its own on-site infrastructure, and is also well placed to connect to Longstanton, the new town of Northstowe in the east, and Bar Hill, including the emerging employment allocation S/RRA/SHF: Land north of A1307, Bar Hill 'Slate Hall Farm' to the south west of the Site at which there is pending application for 230,000sqm of employment floorspace (LPA Ref: 26/02534/OUT).

1.1.5 Previous submissions have been made in response to the following Greater Cambridge consultations:

- Call for Sites (March 2025)
- Greater Cambridge Local Plan Regulation 18 Consultation (January 2026).

1.1.6 The Site remains a sustainable and deliverable opportunity to help meet the identified local housing need for Greater Cambridge whilst also supporting the wider Government aspirations for enhanced economic growth within the Oxford to Cambridge Growth Corridor, by providing new homes for the workforce in a commutable location which capitalises upon the existing public transport and guided busway connectivity whilst also delivering supporting community infrastructure required.

1.2 The Statutory Framework

1.2.1 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, before submitting a local plan for independent

examination, a local planning authority must invite representations on the plan as proposed for submission.

1.2.2 Section 20(5) of the Planning and Compulsory Purchase Act 2004 requires the appointed Inspector to consider whether a local plan is "sound". The National Planning Policy Framework published on 17 August 2026 provides at Annex A, paragraph 8 that plans which are not being prepared under the plan-making system introduced by the 2026 Regulations are to be prepared and examined in accordance with the December 2024 Framework. The updated Greater Cambridge Local Development Scheme (July 2026) anticipates submission of the Greater Cambridge Publication Plan for examination by 31 December 2026. On that basis, the Plan is expected to remain within the transitional arrangements and to be examined against paragraph 36 of the December 2024 Framework, under which a plan must be positively prepared, justified, effective and consistent with national policy. These four tests structure the soundness assessment at Section 6 of this statement. There is, however, a material programme risk: if submission slips beyond 31 December 2026, the Plan would fall within the new plan-making system. Under that system, soundness is assessed against five tests and the "Appropriate" test expressly requires reasonable alternatives to have been taken into account.

1.2.3 In addition, Paragraph 16 of the 2024 NPPF states that Local Plans should:

> a) be prepared with the objective of contributing to the achievement of sustainable development;
>
> b) be prepared positively, in a way that is aspirational but deliverable;
>
> c) be shaped by early, proportionate and effective engagement between planmakers 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).

1.3 Summary of Representations

1.3.1 These representations consider that the Publication Local Plan does not match the wider aspirations for Greater Cambridge as a location for growth. The proposed housing requirement has been set at the minimum local housing need figure derived from the standard method using data available in May 2026, which paragraph 62 of the Framework confirms is the minimum number of homes needed rather than a ceiling. There is, further, a continued reliance upon strategic sites which require significant infrastructure investment and delivery. In order to remedy the Plan, Greater Cambridge should plan for additional residential development at locations which already benefit from high-quality public transport connectivity. Land South East of Hattons Road, Longstanton should be identified as an allocation for a residential-led new neighbourhood, adjoining the guided busway corridor and Longstanton Park and Ride.

1.3.2 A critical context for these representations is the acute shortfall in deliverable housing land within Cambridge City. The Greater Cambridge Housing Trajectory and Housing Land Supply Report Addendum, published on 8 September 2026, identifies a housing land supply of only **2.72 years** for Cambridge City for the period 2026–2031. That

substantial shortfall reinforces the need for the Publication Plan to provide a robust and deliverable supply of additional housing sites, including sites capable of contributing without reliance on complex strategic infrastructure.

1.3.3 In addition, the Plan fails to align its own proposed employment growth with housing provision in this location. Draft Policy S/SHF allocates Slate Hall Farm for major employment development immediately south west of the Site, with the current proposal expected to provide approximately **2,900 full-time equivalent jobs**, yet the Publication Plan makes no corresponding housing allocation to serve that workforce. Land South East of Hattons Road is the only identified opportunity in the immediate location to provide a substantial new neighbourhood without releasing land from the Green Belt. Allocating the Site would therefore correct a clear spatial imbalance within the Plan itself by planning homes, jobs and sustainable transport together, enabling employees to live close to work and reducing the otherwise foreseeable risk of substantial car-dependent in-commuting from more distant settlements. The separate Tritax Park Queens' Cambridge proposal reinforces the direction of employment growth in the area, but it remains at pre-application stage.

1.3.4 The Promoter objects to the Publication Plan and considers that it is not sound. This statement should be read with the representation forms submitted alongside it. In summary:

1.3.5 The parts of the Plan objected to are Policy S/JH (new jobs and homes), Policy S/DS (the development strategy), Policy S/SH (the settlement hierarchy), Policy S/DE (defined development extents), the housing trajectory at Appendix D, Policy BG/BG (biodiversity net gain) and Policy BG/UGF (urban greening factor), together with the Policies Map so far as it omits the Site.

1.3.6 The Plan is not positively prepared. It provides only for the minimum local housing need, with headroom of 8.2% across a 21 year plan period, against a Cambridge City housing land supply of 2.72 years, a Housing Delivery Test measurement of 82%, affordability ratios of approximately ten, and its own provision for 73,300 additional jobs.

1.3.7 The Plan is not justified. The Site has been excluded from the reasonable alternatives exercise by the application of criterion which is unsupported by evidence and which was designed for small-scale sites, and by a landscape assessment which has not been updated since 2025 and which pre-dates a material change to the baseline.

1.3.8 The Plan is not effective. The trajectory depends on delivery rates and infrastructure assumptions which are not demonstrated, including East West Rail, the Grafham Water pipeline and the Fens Reservoir, and on delivery peaks at Northstowe, Waterbeach and Eddington which are materially above recent performance.

1.3.9 The Plan is not consistent with national policy. It does not provide a sufficiently resilient supply of housing land, and it does not integrate homes, employment and sustainable transport in this location, notwithstanding its own proposed employment allocation at Slate Hall Farm.

1.3.10 The modifications necessary to make the Plan sound are set out at Section 7. The principal modification sought is the allocation of Land South East of Hattons Road, Longstanton for a residential-led new neighbourhood of approximately 1,000 dwellings, outside the Green Belt, within the catchment of the Cambridgeshire Guided Busway and Longstanton Park and Ride, and adjoining the Plan's proposed employment allocation at Slate Hall Farm.

1.3.11 Hallam Land wishes to participate in the Examination hearing sessions on the matters raised in these duly made representations.

1.4 Structure of this Statement

1.4.1 This statement is structured as follows:

- Section 2: The Site and the Proposed Development
- Section 3: Technical Evidence
- Section 4: Planning Policy Context
- Section 5: The Case for Allocation
- Section 6: Soundness Assessment
- Section 7: Requested Modifications
- Section 8: Conclusion

2 THE SITE AND THE PROPOSED DEVELOPMENT

2.1 Site Description and Location

2.1.1 The Site is located to the south west of the village of Longstanton. The north western edge of Cambridge is circa 8.5km from the Site. Further afield, the market towns of St Ives (c.18km) and Huntingdon (c.19km) are located to the north west of the Site.

2.1.2 The Site comprises approximately 54.5 hectares of arable land southeast of Hattons Road, Longstanton, approximately 8.5 km north of Cambridge.

2.1.3 The Site is located to the south of the existing settlement boundary of Longstanton, as identified on the adopted local plan policies map (2018). Land to the north of the Site, 'Land north of Hattons Road up to the bypass', is allocated for employment use at Policy E/4 of the adopted Local Plan, although it is noted that the Publication Plan proposes not to extend the existing allocation and instead proposes alternative sites for employment use in the locality.

2.1.4 The administrative area of Cambridge City is encircled by South Cambridgeshire District. There is a tightly drawn Green Belt designation around the City which extends to the surrounding settlements that encircle the City including Histon and Impington, Girton, and Milton. The Green Belt abuts Cottenham, Oakington, Bar Hill and Dry Drayton. It is important to note that the Site, and Longstanton, are not subject to Green Belt designation.

2.1.5 There is existing employment provision at Bar Hill focused around Trafalgar Way and Viking Way, comprising light industrial and retail provision. Through the emerging Local Plan there is a proposed allocation at Draft Policy S/RRA/SHF 'Land north of A1307, Bar Hill - Slate Hall Farm' to the south west of the Site. There is a pending application for 230,000sqm of employment floorspace at Slate Hall Farm (LPA Ref: 26/02534/OUT). Once operational, this proposal has the potential to generate approximately 2,900 full-time equivalent on-site jobs across Use Classes E(g)(i), E(g)(ii), E(g)(iii), B2 and B8.

2.1.6 A separate employment proposal is being promoted as 'Tritax Park Queens' Cambridge', which is the scheme name used by Tritax Big Box. In September 2026, the scheme was presented to Members of the Planning Committee as part of a Members Briefing. A full planning application is stated to be submitted imminently for approximately 82,257sqm of B2 and B8 floorspace, together with a local data centre, community pavilion and 3G football pitch. The proposal is expected to generate approximately 1,509 jobs. However, it remains at pre-application stage, is not an allocation in the Publication Plan and therefore carries limited weight in the present soundness assessment.

2.2 Longstanton and Northstowe

2.2.1 The adopted South Cambridgeshire Local Plan (2018) classifies Longstanton as a 'Group Village'. The settlement benefits from the following community facilities and services: Hatton Park Primary School; a recreation ground comprising a large open space with football pitches, home to Longstanton Football Club, cricket pitches, tennis courts, a bowls green and a clubhouse; a public house; a village hall; a local centre including a Co-op food store and a takeaway food outlet; and a nursery school. A Premier convenience store is located at the southern end of Longstanton. Existing medical facilities comprise a GP surgery, a dental practice and a veterinary clinic.

2.2.2 Beyond the village of Longstanton is the new settlement of Northstowe. Longstanton and Northstowe are well connected by active travel routes and sustainable means of transport, including the guided busway, which runs along a former railway line and provides dedicated public transport connectivity between Huntingdon, St Ives and Cambridge. The route serves Longstanton Park and Ride, Cambridge Science Park, Cambridge North railway station, Cambridge railway station and Cambridge South railway station. The Sustainability Appraisal (2026) recognises Longstanton as a 'Group Village' with very good Public Transport Access (Appendix E.73). That is a settlement-level rating and does not automatically apply to the Site, which lies beyond the defined Development Extent. It is nevertheless relevant because the Site can connect directly into the same transport network: existing bus stops on School Lane are approximately 500 meters to the north; established and proposed walking and cycling links connect the Site with Longstanton and Northstowe; and Longstanton Park and Ride and the guided busway are approximately a 15-minute cycle from the Site. The proposed on-site mobility hub, potential bus-service extension and enhanced active-travel connections would embed those links within the development. Subject to the transport evidence confirming that the routes are safe, convenient and deliverable, the accessibility advantages identified for Longstanton are therefore capable of extending to future residents of the Site rather than being relied upon solely by virtue of the Site's proximity to the village. In addition, the A14, M11 and A428 provide the strategic road network to the north and west of Cambridge.

2.2.3 Northstowe includes a range of existing higher order facilities such as the Pathfinder Church of England Primary School, Northstowe Primary School and Northstowe Secondary College, Northstowe 'Tap and Social' Public House, and public open spaces with play facilities. In August 2026, it was confirmed that 'Morrisons Daily' will open the first convenience store at the new town. Further services and community facilities will be available as the remainder of the site is delivered and will be accessible in a sustainable manner.

2.3 Planning History

2.3.1 The Site has limited planning history. Planning permission 23/04353/FUL relates only to an agricultural field access from Hattons Road and an associated swing gate.

2.3.2 Immediately adjacent to the north western boundary of the Site are two attenuation basins associated with infrastructure for Northstowe.

2.3.3 Immediately southeast of the Site, planning permission was granted on 26 June 2026 for a solar farm and battery energy storage system (BESS) for a period of 35 years. If implemented, the development will materially alter the Site's immediate context alongside Northstowe Avenue. It must be treated as both a constraint on the detailed masterplan and a material change to the landscape baseline used to assess the Site.

2.3.4 Planning permission 25/02539/FUL authorises the installation and operation of the solar farm and BESS, together with associated infrastructure, works, equipment, landscape and ecological enhancement and access, for 35 years. The application was accompanied by an Environmental Statement. The consented development will need to be reflected in the residential masterplan, including its implications for amenity, operational noise, fire-safety separation and emergency access in accordance with prevailing guidance, landscape and visual effects, and ecological mitigation. The Environmental Statement also provides a recent landscape and ecology baseline which must be reviewed alongside the Promoter's evidence; it should not be assumed that all findings support residential development.

2.3.5 Planning permission was also granted in June 2026 for an underground grid-connection cable associated with the solar farm and BESS (LPA Ref: 26/00063/FUL).

The application was accompanied by an Environmental Statement, and the cable connects the consented development to the Longstanton primary substation adjacent to the B1050. These June 2026 permissions post-date the HELAA landscape assessment, which has not been updated since 2025. The HELAA's conclusion that residential development would be "*incongruous with the rural character of that area*" therefore relies on a baseline that predates a consented 35-year solar and BESS development immediately to the south east of the Site. This does not remove the need for a landscape-led residential scheme, but it is a concrete reason why the HELAA landscape conclusion must be revisited against the now-consented context.

2.4 The Proposed Development

2.4.1 The Vision Document (Appendix 1) incorporates an Emerging Illustrative Masterplan that has been informed by technical site assessment. The Masterplan:

- Maintains and enhances permanent landscape separation of a defined width between the western edge of Longstanton village and new development, informed by the Landscape and Visual Technical Review Report and mirroring the approach taken at Northstowe in the Area Action Plan.

- Incorporates positive visual integration whilst protecting key views and offsets, orientating development and green space around key view corridors including those towards the spire of All Saints' Church and towards St Michael's Church (Grade II* listed). The effect of the proposals on the setting of those assets is addressed in the Heritage and Archaeology Technical Note at Appendix 4.

- Locates all residential and built development outside Flood Zones 2 and 3 and outside modelled surface water flow paths, subject to confirmation by detailed hydrological modelling. An initial drainage strategy has informed the Masterplan.

- Identifies potential locations for one main vehicular access, with an additional emergency access, from Hattons Road. The existing consent relates only to an agricultural field access and swing gate; it is not relied upon as an established strategic access. The access strategy remains subject to transport assessment and junction design evidence demonstrating geometry, visibility, capacity, safety and deliverability.

- There would be creation of various cycle and pedestrian accesses around the Site to connect to the existing wider active travel network connecting Longstanton, Northstowe and Bar Hill.

- Existing bus stops are located along High Street and School Lane, Longstanton, and there is the opportunity for a bus service extension to be integrated as part of the proposal. Early engagement has taken place with Stagecoach, and the Promoter will provide written confirmation from the operator as to the operational feasibility of a service extension, together with the funding mechanism and the period over which it would be secured. For more detail refer to the supporting Technical Delivery Report (Appendix 2 – Section 2 Transport and Highways).

2.4.2 The planning matters identified in the HELAA Update (2026), including flood risk, landscape and archaeology, can be satisfactorily addressed. The supporting evidence is summarised at Section 3.

2.4.3 The Site is suitable, available, and deliverable. It has the capacity to provide approximately 1,000 homes within the emerging plan period subject to planning.

2.5 Capacity and Land Budget

2.5.1 The Promoter jointly owns and promotes the whole of the Site, extending to approximately 54.5 hectares. The Site is in single ownership and control and is available now. An ownership plan accompanies these representations.

2.5.2 The indicative land budget prepared by David Lock Associates identifies capacity for approximately 1,000 dwellings on the Promoter's landholding, derived from the concept masterplan at an average net density of approximately 35 dwellings per hectare. The land budget allows for residential development together with the primary school, the neighbourhood hub, principal streets, green infrastructure, community sports provision, strategic sustainable drainage, safeguarded land for wastewater infrastructure, and the landscape separation to the built edge of Longstanton. The stated capacity is a minimum and is not advanced as a ceiling; density and housing mix will be refined through the masterplanning and planning application processes, having regard to draft Policy GP/HD.

3 TECHNICAL EVIDENCE

3.1.1 These representations are accompanied by, and should be read alongside, the technical evidence summarised below. Further evidence will be submitted to inform the Examination as it progresses.

3.1.2 The planning matters identified in the 'Housing and Economic Land Availability Assessment' (HELAA) Update (2026), including flood risk, landscape and archaeology, can be satisfactorily addressed. The evidence relied upon is summarised at Section 3 and appended in full. The Site is suitable, available and deliverable within the plan period, with the capacity to provide approximately 1,000 homes.

3.2 Transport and Accessibility

3.2.1 A main vehicular access to the Site, with an emergency access, are proposed, and the Emerging Illustrative Masterplan identifies the potential access locations. The existing consent at the Site relates only to an agricultural field access and swing gate and is not relied upon as an established strategic access; the access strategy is subject to the transport assessment and junction design evidence to be submitted, addressing geometry, visibility, capacity, safety and deliverability. There is opportunity through the proposal to provide enhancement to the B1050, specifically to facilitate the delivery of a cycle link between the stretches that have already been implemented north and south of the Site. It will run parallel to the site along the road , which has not been delivered.

3.2.2 Opportunities for additional active travel connections are being explored. The Site is well located to connect into the extensive network of footpaths and bridleways in the surrounding area, including footpath Longstanton 1 to the north of School Lane and bridleway Longstanton 10 to the south of the Site, which connects to existing footpath, cycleway and bridleway provision to Bar Hill, including Wilson's Bridge. The proposals would promote and enhance access to the countryside and to facilities within the surrounding settlements.

3.2.3 The nearest existing bus stops are located on School Lane, approximately 500 metres to the north of the Site. They are served by Stagecoach routes 5 and 5A, providing services every 30 minutes Monday to Saturday to Cambridge, Bar Hill, Girton, Longstanton, Longstanton Park and Ride, Willingham, Swavesey, Fenstanton, Dry Drayton and St Ives.

3.2.4 The Site is well located to benefit from the long-established Park and Ride and the Cambridgeshire Guided Busway, which provides a dedicated sustainable route directly into Cambridge city centre and the surrounding settlements. Services run approximately every 10 minutes, and the busway is approximately a 15 minute cycle from the Site.

3.2.5 Cambridge North railway station is the nearest railway station to the Site. It is reached by a busway journey of approximately 20 minutes, giving a total journey time from the Site of approximately 35 minutes allowing for the cycle journey to the busway. Cambridge Science Park, a major employment location, is reached on the same basis in approximately 35 minutes. Trains from Cambridge North provide links to London, Ely, Peterborough and the rest of the country. These journey times are indicative and will be confirmed by the transport evidence.

3.2.6 The Transport and Highways section of the Technical Delivery Note at Appendix 2 sets out walking and cycling distances measured from the Site rather than from the village. The existing bus stops on School Lane lie approximately 500 metres north of

the Site boundary; Longstanton Park and Ride and the guided busway are approximately a 15 minute cycle from the Site; and Hatton Park Primary School, the local centre and the recreation ground are within walking and cycling distance via existing and proposed routes. The proposals would deliver additional active travel connections to Longstanton, Northstowe and Bar Hill, including to Northstowe Secondary College. The accessibility of the Site will be confirmed through the transport evidence to be submitted in support of the allocation.

3.2.7 There are numerous recent active travel upgrades in the locality, including completion of enhancements to bridleways, cycling routes and pedestrian footways, connecting Longstanton, Northstowe and Bar Hill. Upgrades to the A14 Bar Hill junction and works to increase the capacity of the local road network in the locality have also been completed.

3.3 Landscape

3.3.1 The Landscape and Visual Technical Review Report at Appendix 3, prepared by Stantec, identifies that the Site has no national or local landscape designations and lies outside the South Cambridgeshire Green Belt. The nearby settlements of Longstanton and Northstowe are separated by robust green spaces which help to maintain their individual identities. The landscape is typical of the Bedfordshire and Cambridgeshire Claylands, characterised by gently undulating land, open arable fields, sparse woodland and long views across the fen-edge landscape.

3.3.2 The Site is partially bound by existing trees and hedgerows along field edges.

3.3.3 The Site is considered to be in a logical location for a residential-led allocation. It responds to existing built development and is well contained by Northstowe Avenue to the south. Residential development can be accommodated at the Site incorporating a landscape strategy which mitigates development effects as necessary.

3.3.4 The development of this site, which relates to the built up area of Longstanton and the new development of Northstowe, responds well to the existing built form and planned future development of Northstowe as shown on the enclosed Vision Document. The proposal would seek to maintain an element of green separation at the western edge of Longstanton reflecting the approach taken at Northstowe within the NAAP.

3.3.5 The HELAA landscape assessment for the Site has not been updated since 2025. It concludes that the Site forms part of the wider rural field structure and that development would be “incongruous with the rural character of that area”. That conclusion predates the grant of planning permission on 26 June 2026 for a solar farm and BESS immediately to the south east of the Site for a period of 35 years, together with the associated grid connection. If implemented, that consent will materially change the rural character and visual baseline on which the HELAA relied.

3.3.6 The HELAA landscape conclusion should therefore be revisited using the consented development and its Environmental Statement as part of the current baseline, alongside the Promoter’s Landscape and Visual Technical Review and landscape strategy. The solar farm and BESS do not remove landscape constraints and may introduce additional amenity, safety, landscape and ecological requirements for the residential masterplan which will be dealt with positively through the planning process. The solar farm and BESS do, however, provide a dated and documentary basis for concluding that the 2025 assessment no longer describes the development context now authorised immediately adjoining the Site.

3.4 Flood Risk and Drainage

3.4.1 The Government's flood risk for planning map illustrates that the majority of the site is located within flood zone 1 the lowest risk of flooding. The northern and western boundaries of the site, south of School Lane, and an area of land between the existing attenuation basins south of Hattons Road, is classified as flood zones 2 and 3, at higher risk of flooding which is acknowledged as part of the HELAA. Refer to the Technical Delivery Note (Appendix 2) for consideration of flood risk.

3.4.2 In terms of surface water flood risk, the eastern extent of the Site is at risk of surface water flooding. The illustrative layout avoids built development within areas at risk of flooding. Further hydrological modelling will be undertaken to define the actual extent of the flood zones within the Site. Through comprehensive sustainable drainage design, flood risk associated with the Site can be mitigated on site and the risk of flooding downstream reduced.

3.5 Heritage and Archaeology

3.5.1 There are no designated heritage assets within the Site. Longstanton contains two conservation areas, the nearer of which lies approximately 650 metres to the east of the Site, together with a cluster of listed buildings including the Church of All Saints and the Church of St Michael, the latter listed at Grade II*. The Heritage and Archaeology Technical Note at Appendix 4 assesses the contribution which the Site makes to the significance of those assets through setting. Having regard to the distance and intervening screening, and to the design response embedded in the Emerging Illustrative Masterplan, including the protection of key view corridors, the proposals are capable of being brought forward without harm to the significance of any designated heritage asset. To the extent that any harm were to arise, it would be less than substantial and at the lower end of that spectrum, and would be clearly outweighed by the public benefits of the proposal. Great weight will continue to be given to the conservation of those assets, and a full setting assessment will be provided to inform the detailed masterplan.

3.5.2 The Heritage and Archaeology Technical Note at Appendix 4 provides further information. It is noted that the HELAA assesses the Site as ‘red’ in respect of archaeology. No geophysical survey or intrusive ground investigation has yet been undertaken, and the assessment in the Technical Note is based on the available data for land in proximity to the Site.

3.5.3 The Promoter will commission geophysical survey of the Site, and will agree a written scheme of investigation with the County Historic Environment Team, with the results provided to the Councils. Trial trenching would follow to inform the detailed masterplan. The Promoter does not accept that the ‘red’ rating, reached without survey evidence, is a proper basis for excluding the Site from assessment as a reasonable alternative.

3.6 Ecology and Biodiversity

3.6.1 The Site is not covered by any statutory or non-statutory designations for nature conservation.

3.6.2 The Ecological Constraints and Opportunities appraisal prepared by FPCR identifies that the Site lies outside the 8km zone of influence of the Ouse Washes SAC/SPA/Ramsar site. Development of the Site is therefore not expected to affect the integrity of that designation, and it is concluded that development would not affect the conservation value of any statutory or non-statutory designation. Any wastewater

solution would be subject to the relevant habitats and environmental assessment processes.

3.6.3 Assessment of the proposal identifies the ability to deliver a minimum of 10% Biodiversity Net Gain (Appendix 6).

3.7 Utilities, Water Supply and Wastewater

3.7.1 It is anticipated that access to utilities will be readily available as the site is adjacent to the existing road network and residential development at Longstanton with the Longstanton primary substation adjacent to the site's south western boundary. Hallam Land is aware of the existing utility provision across the Site, the Illustrative Masterplan incorporates the necessary easement for the existing utilities.

3.7.2 Potable water availability, water quality and wastewater infrastructure capacity are important and distinct considerations for growth in Greater Cambridge. Potable supply is a strategic constraint: the Development Strategy Topic Paper identifies that additional supplies from the Grafham Water pipeline are expected from 2032, with connection to the Fens Reservoir anticipated in the mid-2030s. The delivery and phasing of approximately 1,000 homes at the Site must therefore be aligned with confirmed potable-water capacity and cannot be assumed to precede those strategic reinforcements without further evidence from the statutory water undertaker. Water-quality effects must also be addressed through the relevant regulatory and environmental assessment processes. The letter from Emma Hardy and Lord Vallance dated 22nd May 2026 does not establish a comparative advantage for the Site over the Councils' proposed allocations. Rather, it confirms the Government's expectation that water and wastewater constraints in high-growth areas are to be addressed collaboratively by government, regulators, water companies and developers, with infrastructure and development appropriately coordinated and phased. The letter states:

> *"This Government is clear that water and wastewater infrastructure must support housing and economic growth. Defra has established the Water Delivery Taskforce to bring together government, regulators and water companies to resolve issues at pace. This matters most in high-growth areas such as the Oxford to Cambridge Growth Corridor, where we are committed to ensuring wastewater capacity keeps pace with housing, economic development and environmental needs."*

3.7.3 The letter records Anglian Water's changed planning approach for developments of 500 homes or more and confirms that its engagement will include advice on appropriate phasing, drainage strategies and alignment with future upgrade plans. That approach applies equally to qualifying schemes generally, including the Councils' proposed allocations. Its relevance here is therefore procedural: it establishes that the absence of immediate strategic capacity should be addressed through early engagement, collaborative infrastructure planning and an appropriate phasing strategy, rather than treated as an automatic bar to allocation. The letter states:

> *"Working with the Water Delivery Taskforce, Anglian Water has changed its planning approach. This should help to unblock up to 21,000 homes that might otherwise have faced an objection from the water company.* ***For developments of 500 homes or more, Anglian Water will shift its starting position from objecting to being supportive. The 500 homes decision is a pragmatic cut-off to focus effort on the most constrained, high-impact sites****…*

> *This will include advice on appropriate phasing, drainage strategies and how proposals align with future upgrade plans. It will also apply to schemes brought forward through new local plans, or schemes that were not included in the last Drainage and Wastewater Management Plan (DWMP).* ***The AMP wording is intended to reflect the regulatory reality that funding and delivery of strategic upgrades is agreed and sequenced through Ofwat's normal price review processes, rather than to limit growth to what was previously identified.*** (bold added for emphasis)

3.7.4 The Stantec Technical Delivery Note records that Anglian Water has identified no short-term foul-drainage capacity for the Site. It also identifies the potential for foul flows to be treated on site. Hallam Land will continue to engage with Anglian Water and an appropriate New Appointment and Variation provider to identify a deliverable solution and the phasing required.

3.7.5 The Site-specific position is set out in the Anglian Water pre-development enquiry response and the Stantec Technical Delivery Note. For potable water, the Promoter will seek confirmation from the statutory water undertaker of the available point of connection, network capacity and the timing of any reinforcement required. The development trajectory will need to be phased against confirmed supply, including the strategic reinforcements identified in the Plan evidence, and detailed proposals will be designed in accordance with Building Regulation Standards.

3.7.6 At this stage, the Promoter does not claim that potable-water capacity for 1,000 additional homes is already secured; this remains a material delivery matter to be resolved through continuing engagement and evidenced before examination or determination. For wastewater, Anglian Water has advised that there is no short-term capacity for foul drainage serving the Site. The Promoter does not rely on the Defra letter as evidence that this constraint has already been removed. Instead, the Promoter will work with Anglian Water on the timing, phasing and delivery of any network solution and will also investigate an on-site treatment solution, including delivery through an appropriate New Appointment and Variation (NAV) provider. The Emerging Illustrative Masterplan safeguards sufficient land to accommodate the necessary wastewater infrastructure. Accordingly, potable supply and wastewater treatment both require defined technical and phasing solutions, but the evidence identifies credible routes that can be developed collaboratively through the plan-making and planning application processes.

3.8 Summary of the Technical Evidence

3.8.1 In summary, the Site is in a suitable location. Its relationship to the built-up area of Longstanton reflects the green separation established by the Northstowe Area Action Plan, and the Site is promoted as a new neighbourhood with its own local centre, school, sports provision and mobility hub rather than as a village extension. As set out at Section 4.2, the developable area is in any event capable of being brought forward to share a contiguous boundary with the Defined Development Extent.

3.8.2 The Site benefits from existing accessible active travel connections to existing services, facilities and employment at Longstanton, Northstowe and Bar Hill. There are new proposals for additional employment development. Together there is opportunity to facilitate the delivery of active travel connections and improvements, and enhancements to bus service connections.

3.8.3 The Site carries no national or local landscape, heritage or flood risk designation affecting the developable area. The HELAA has nonetheless assessed the Site's suitability as 'red', with the consequence that the Site has not been taken forward for

consideration as a reasonable alternative within the supporting Sustainability Appraisal. For the reasons set out at Sections 4.4, 6.2 and above, that conclusion rests on a landscape assessment which has not been updated since 2025 and which pre-dates a material change to the baseline, and on an archaeological rating reached without survey evidence. On the basis of the technical information provided, and having regard to the scale of the Site and a landscape-led design approach, effects can be appropriately mitigated.

3.8.4 The Site is owned and promoted by Hallam Land, a national site promoter with a good record of bringing sites forward for delivery by partners. The Site is available for immediate delivery subject to planning permission.

4 PLANNING POLICY CONTEXT

4.1 The Adopted Development Plan

4.1.1 The Development Plan currently comprises of the South Cambridgeshire Local Plan as adopted in 2018.

4.1.2 Given the spatial geography, the adopted Cambridge City and South Cambridgeshire Local Plans (2018) were examined together. The Inspectors found that an early review of the Plan was necessary, based upon:

- updated assessment of housing needs and
- The progress being made towards implementation of the spatial strategy for Greater Cambridge, in particular the new settlements at Waterbeach and Bourn Airfield.

4.1.3 Adopted Policy S/13: Review of the Local Plan (2018) expected the submission of a new local plan for examination by summer 2022. On the current programme, the emerging Local Plan is approximately four and a half years behind that timetable. The Government's decision not to fund the relocation of the waste water treatment plant, and the consequent stalling of growth at North East Cambridge, together with delays to strategic infrastructure such as the new railway station at Waterbeach, have been contributing factors. That history is directly relevant to the weight which can be placed on a trajectory which again depends on strategic infrastructure being delivered to time.

4.1.4 In recent years, South Cambridgeshire District Council has adopted Development Plans which allocated land for the delivery of new settlements just beyond the extent of the Green Belt, including Cambourne, Northstowe, Bourn Airfield and Waterbeach. None of those settlements shared a contiguous boundary with a defined development extent at the point of allocation. Contiguity with an existing settlement edge has not, therefore, been treated as a precondition of the spatial strategy in this area.

4.2 Northstowe Area Action Plan

4.2.1 The site falls within the extent of the Northstowe Area Action Plan (July 2007) (NAAP) however the site is not subject to any designation within the NAAP.

4.2.2 The NAAP provides the policy framework for the delivery of Northstowe. Policy NS/4 seeks to protect the village character of Longstanton and Oakington through green separation. The Emerging Illustrative Masterplan maintains and enhances green separation between the Site and the built-up area of Longstanton, consistent with the approach established by the NAAP. The Promoter notes that the separation required by Policy NS/4 is directed at the relationship between Longstanton, Oakington and the new town of Northstowe. To the extent that the policy does not require separation on the Site's frontage to Longstanton, the developable area is capable of being brought forward to share a contiguous boundary with the Defined Development Extent while retaining a landscape buffer within the Site. The Promoter will confirm that position through the masterplanning process and invites the Councils to engage on it.

4.3 The Publication Plan

4.3.1 Cambridge City Council and South Cambridgeshire District Council are jointly preparing a new local plan through Greater Cambridge Shared Planning.

4.3.2 Consultation on the Greater Cambridge Local Plan Regulation 18 was undertaken jointly by both Councils between December 2025 and January 2026, following the earlier Regulation 18 'Issues and Options' consultation in 2020 and the 'Preferred Option' consultation in 2021.

4.3.3 The Greater Cambridge Local Plan is at the Regulation 19 (Publication) stage, published for consultation on 3rd August, with representations invited until 25th September 2026.

4.3.4 The Publication Plan proposes to cover a plan period of 2024 to 2045, spanning 21 years. Paragraph 22 of the NPPF 2024 requires strategic policies to look ahead over a minimum 15 year period from adoption. On an anticipated adoption in 2027/28 the Plan complies, but with limited margin. Any further slippage in the examination programme would erode that margin and is a further reason for the Plan to provide a more resilient supply of housing land.

4.3.5 Policy S/JH: New jobs and homes would establish a housing requirement of 48,069 homes (2,289 dwellings per annum (dpa), a combined requirement reflecting the local housing need (LHN) of Cambridge City (1,085 dpa) and South Cambridgeshire (1,204 dpa) as calculated using the standard methodology with data available in May 2026. Policy S/JH also proposes to establish the need for specialist provision including gypsy and traveller, housing with care, and support across the plan period.

4.3.6 Table 3 of the Publication Plan sets out that provision will be made for an additional supply (8.2%) of dwellings taking the anticipated supply to 52,032 dwellings over the plan period. This is equivalent to an additional 3,963 dwellings and is described as 'headroom', less than 2 years buffer.

4.3.7 Policy S/JH makes provision for 73,300 additional jobs to support Greater Cambridge's knowledge intensive sectors and to provide a diverse range of local jobs. The Promoter invites the Councils to set out the evidence on the relationship between the jobs provided for and the homes required to accommodate the resulting workforce. A plan which provides for 73,300 additional jobs while adopting the minimum local housing need figure of 48,069 dwellings, in an area with an affordability ratio of approximately ten, requires explanation. This is addressed further at Section 5.1.

4.3.8 Policy S/DS of the Publication Local Plan proposes the following spatial strategy for new jobs and homes:

- a. Within the Cambridge urban area;
- b. On the edge of Cambridge;
- c. At an expanded Cambourne;
- d. At other new settlements; and
- e. In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres

4.3.9 Policy S/SH reflects the spatial strategy with Cambridge City being the focus for development, followed by the Cambourne, Northstowe and Waterbeach new settlements; then the 'Rural Centres', 'Minor Rural Centres' and Group Villages, and lastly Infill Villages.

4.3.10 Policy S/SH proposes to classify Longstanton as a 'Group Village', where *"residential development and redevelopment up to an indicative maximum scheme size of 8 dwellings will be permitted within the defined development extents of Group villages, as defined on the Policies Map, provided that adequate infrastructure is available or can be made available as a result of the development"*. Policy S/SH notes that "*Development may exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site*."

4.3.11 Longstanton is located within the spatial strategy for the 'Rest of the Rural Area'. Paragraph 3.5.1 of the Publication Plan states that:

> *"We want our rural villages to continue to thrive and sustain their local services, but we don't want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services, while in smaller villages, we propose that only small-scale infill development and affordable housing would be permitted. Any development in and around villages needs to be well designed for the rural setting, with a strong relationship to landscape."*

4.3.12 Land North of A1307, Bar Hill (Slate Hall Farm) (113.3Ha) is proposed for allocation at Policy S/SHF (also referenced as Policy S/RRA/SHF) for B2 and B8 uses. The draft policy requires development capacity of the site must be established though a landscape led masterplan process. An Indicative Spatial Framework is provided at Figure 89 (extract provided below), which directs employment led development to the south of Northstowe Avenue and to the east of existing employment uses at Hazlewell Court Bar Road.

4.3.13 As identified in the supporting Vision Document (Appendix 1), Land South East of Hattons Road, Longstanton is located to the north of Northstowe Avenue.

4.3.14 Policy S/DE defines the 'Development Extent' of Longstanton. The Site is located beyond that Development Extent. For the reasons set out at Section 6.2, the Promoter does not accept that a lack of contiguity with the Development Extent is a proper basis for excluding from assessment a strategic new neighbourhood of approximately 1,000 dwellings which would provide its own services and infrastructure. In any event, and as explained at Section 4.2, the developable area is capable of being brought forward to share a contiguous boundary with the Development Extent.

4.3.15 Chapter 9 sets out policies relevant to 'homes'.

4.3.16 Policy H/HM and supporting Table 8 set out the expected housing mix and standards for the development of market and affordable housing, or an alternative as justified, and consideration to viability.

4.3.17 Policy H/AH seeks the delivery of 40% affordable housing, and 50% where the site has been released from the Green Belt with a tenure split of:

- 65% affordable rent homes,
- 10% social rent homes, and
- 25% shared ownership homes

4.3.18 Policy H/SS requires residential development to meet internal and external space standards. The draft policy seeks 10% of the affordable units (the majority being within the social/affordable rented units) and 5% of the market units as 'wheelchair user' dwellings in accordance with the Building Regulations M4(3) standard. These homes should be delivered as Building Regulations M4(3)(a) 'wheelchair adaptable' dwellings unless the Council has identified a need for Building Regulations M4(3)(b) 'wheelchair accessible' dwellings.

4.3.19 Policy H/SH provides that unallocated strategic sites of 1,000 dwellings or more will be expected to provide at least 10% of homes as specialist housing. That requirement would apply to the Site, and the Promoter confirms that the scheme is capable of meeting it.

4.3.20 Policy WS/HD: creating healthy new developments requires major applications of more than 20 dwellings to be supported by health impact assessments to demonstrate the approach to planning for health and well-being.

4.3.21 Policy H/CB seeks 5% serviced plots for self or custom build subject to viability for developments that provide 20 or more new dwellings.

4.3.22 Policy H/BR supports Build to Rent Homes, whilst Policy H/CO supports Co-living proposals for schemes of 50 and 200 dwellings.

4.3.23 Policy H/GT supports the delivery of Gypsy and Traveller pitches subject to requirement. The draft policy also seeks the delivery of 12 Gypsy and Traveller pitches on one area of serviced land of approximately 1 hectare at any unallocated strategic site of up to 5,000 dwellings.

4.3.24 Chapter 7 sets out the requirements for applications to demonstrate the approach to design and to seek to foster good design outcomes. Policy GP/PP: People and place responsive design, Policy GP/QD: Achieving high quality development, Policy GP/HD: Housing density, and Policy GP/QP: Establishing high quality landscape and public realm.

4.3.25 Policy CC/NZ proposes requirements for net zero carbon new homes and buildings. The draft policy requires proposals for large scale new-build developments (a minimum of 100 homes or a minimum of 10,000 square metres GIA of non-residential floorspace) to submit a Whole Life Carbon Assessment using a nationally recognised whole life carbon assessment tool and demonstrate actions to reduce up-front embodied carbon emissions.

4.3.26 Policy CC/WE proposes to restrict water usage of no more than 80 litres/person/day at residential sites of 100 or more dwellings.

4.3.27 Policy BG/BG requires all development to deliver a minimum of 10% net gain in biodiversity, but seeks a minimum of 20% biodiversity net gain as part of major development, with a preference for on site delivery.

4.3.28 Policy BG/UGF requires all major development to achieve Urban Greening Factor scores of 0.5 for predominantly residential development outside Cambridge Defined Development Extent, except where it can be demonstrated that more than 50% of the site area equates to accessible greenspace.

4.3.29 Policy I/ID ‘Infrastructure and Delivery’ is supported by the Infrastructure Delivery Plan (IDP). Policy I/MH supports the delivery of mobility hub facilities, which the proposals would provide on site.

4.4 The Site Selection Methodology

4.4.1 Cambridge City Council and South Cambridgeshire District Council have assessed the land forming the Site as part of the HELAA (2026). The HELAA explains that the methodology informing the assessment accords with planning practice guidance. Page 10 explains that sites for new settlements “are classified as those with a capacity of 4,000 homes”.

4.4.2 The HELAA explains that locations which align with the spatial development strategy include sites “within or adjacent to Group Village with a high-quality public transport connection (i.e. railway or guided busway)”.

4.4.3 However, it is further explained that locations that do not align with the spatial strategy are:

- Residential or small-scale mixed-use sites that do not share a contiguous boundary with a Defined Development Extent (i.e. isolated or detached development in the countryside).
- Two points follow from that methodology, and they are central to these representations.
- First, the Councils have themselves identified Longstanton as a location type which aligns with the spatial development strategy. Longstanton is a Group Village served by the Cambridgeshire Guided Busway and by Longstanton Park and Ride, and the HELAA expressly names the guided busway as a high-quality public transport connection. The Site is not excluded because of its location, its accessibility or its relationship to services and employment. It is excluded on the single ground of contiguity.
- Second, the contiguity criterion cannot properly determine the outcome for a proposal of this scale. The criterion is directed at "residential or small-scale mixed-use sites". The Site is promoted as a new neighbourhood of approximately 1,000 dwellings with its own local centre, primary school, community sports provision and mobility hub, and is not a small-scale site. Nor does the methodology provide any category within which a proposal of this scale can be assessed: Policy S/SH restricts Group Village development to an indicative maximum of 8 dwellings, exceptionally 15, while the HELAA classifies new settlements as sites with a capacity of 4,000 homes. The result is that a detached settlement of 4,000 dwellings aligns with the spatial strategy while a detached neighbourhood of 1,000 dwellings does not, and nothing in the evidence base explains where that threshold has been set or why. As noted at Section 2, contiguity was not a precondition of the allocation of Cambourne, Northstowe, Bourn Airfield or Waterbeach.
- These matters are developed under the 'justified' test at Section 6.2, and the modification sought is set out at Section 7.

4.4.4 The technical documentation submitted with these representations is summarised at Section 3 and comprises the Vision Document incorporating the Emerging Illustrative Masterplan (Appendix 1); the Stantec Technical Delivery Note covering transport and highways, flood risk, surface water drainage, foul drainage, acoustics and air quality (Appendix 2); the Stantec Landscape and Visual Technical Review Report (Appendix 3); the Heritage and Archaeology Technical Note (Appendix 4); and the FPCR Ecological Constraints and Opportunities appraisal (Appendix 5).

4.5 The Sustainability Appraisal

4.5.1 A Sustainability Appraisal (SA) accompanies the Proposed Submission Local Plan. The SA is the document through which the Councils are required to identify, describe and evaluate the likely significant effects of the Plan and of reasonable alternatives to it, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.

4.5.2 The Site has not been assessed as a reasonable alternative within the SA. The Promoter understands that this follows from the HELAA assessment described above, and in particular from the application of the contiguity criterion and from the landscape and archaeology ratings recorded for the Site. The consequence is that a site of approximately 1,000 dwellings, outside the Green Belt, within the catchment of the guided busway and Longstanton Park and Ride, and immediately adjoining the Plan's own proposed employment allocation at Slate Hall Farm, has been screened out of the appraisal without any assessment of its merits against the Plan's SA objectives.

4.5.3 The Promoter objects to that approach. Where a site of this scale is excluded from appraisal on the basis of criteria which are contested, and on landscape evidence which has not been updated since 2025 and which pre-dates a material change in the baseline, the reasonable alternatives exercise cannot be said to have been carried out on proportionate evidence. The remedy sought is a comparative SA and site selection assessment of the Site, as set out at Section 7.

4.6 Topic Papers

4.6.1 The Councils have published a series of Topic Papers explaining the evidence and how it has informed the decision-making process for the development strategy, site selection, climate change impacts, green spaces, wellbeing and social inclusion, great places, jobs, homes and infrastructure. The Site Selection Topic Paper is of particular relevance, since it records the basis on which sites have been taken forward or discounted. The Promoter's response to the site selection methodology is set out at Sections 4.4 and 6.2, and the Promoter will address the Topic Paper further in its Matters Statements as the Examination progresses.

4.7 Viability and Community Infrastructure Levy

4.7.1 It is noted that South Cambridgeshire District Council and Cambridge City Council are both independently bringing forward a Community Infrastructure Levy (CIL), with the CIL Examination programmed to take place on 12th October 2026.

4.7.2 Hallam Land responded to the CIL Consultation in March 2026 to raise objection to the proposed CIL rates. At the time of writing, Examination has not been concluded and there remains significant unresolved objection from various stakeholders.

4.7.3 Hallam Land has highlighted within their duly made representations that:

- The Draft CIL Charging Schedule is not supported by a sufficiently robust viability or infrastructure evidence base.
- The proposed flat £60/m² rate fails to reflect differences in site typology, geography and strategic infrastructure burdens, risks double-charging alongside Section 106 and emerging Greater Cambridge Development Corporation funding responsibilities, and may undermine the viability and deliverability of strategic sites, affordable housing and the emerging Local Plan.

4.7.4 Whilst the emerging CIL charging schedule has been considered as part of the Aspinall Verdi Regulation 19 'Main Viability Report'. The CIL examination is programmed to take place after the close of this consultation and before submission of the Plan. The Promoter reserves its position on the interaction between the emerging CIL and the deliverability of the Plan's policy requirements, and will address the matter further once the CIL examination outcome is known.

4.8 Habitats Regulations Assessment

4.8.1 The Habitats Regulations Assessment produced by LUC on behalf of Cambridge City Council and South Cambridgeshire District Council considers the effects of proposed development on habitats sites, including the wastewater implications of the proposed site allocations and the implications of East West Rail. In respect of the Site, the Ecological Constraints and Opportunities appraisal at Appendix 5 confirms that the Site lies outside the 8km zone of influence of the Ouse Washes SAC/SPA/Ramsar site. Any wastewater solution for the Site, including any on-site treatment option, would be subject to the relevant regulatory and habitats assessment processes, and the Promoter will provide the evidence necessary to support that assessment.

5 THE CASE FOR ALLOCATION

5.1.1 The Promoter recommends the allocation of the Site within the Publication Plan for the reasons outlined throughout these representations.

5.2 Housing Need and Supply

5.2.1 The Promoter supports, in principle, the preparation of a new joint Local Plan to facilitate plan-led growth across Greater Cambridge. However, the Plan should provide for more than the minimum local housing requirement.

5.2.2 Paragraph 62 of the NPPF 2024 states:

> *"**To determine the minimum number of homes needed,** strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."*

5.2.3 Cambridge City Council is currently unable to demonstrate a five year housing land supply as required by the NPPF 2024.

5.2.4 The Housing Delivery Test measurement published in August 2026 records that Cambridge City delivered only 82% of the homes required over the period 2022/23 to 2024/25, engaging the 20% buffer and the requirement for an action plan, and with the potential further to perpetuate issues of affordability. The reported supply position and Housing Delivery Test result for South Cambridgeshire are more positive. That does not diminish the case for additional allocations. The housing requirement and the supply against it are established jointly for Greater Cambridge, and the shortfall in Cambridge City is a function of the tightly drawn Green Belt which encircles the City and constrains its capacity to meet its own need. It is precisely that constraint which makes unconstrained, non-Green Belt capacity elsewhere in Greater Cambridge, at locations already served by high-quality public transport, the appropriate strategic response.

5.2.5 The affordability ratio measures median house prices against median workplace-based earnings. For each authority, median house prices are approximately ten times median earnings.

5.2.6 On 8th September 2026, the 'Greater Cambridge Housing Trajectory and Housing Land Supply Report – Addendum' was published. This identifies that Cambridge City has a housing land supply of just **2.72 years** for the period 2026-2031**,** whilst South Cambridgeshire has a reported supply of over 5 years. The housing land supply position for both Authorities is currently the subject of challenge as part of the ongoing Great Abington appeal (LPA Ref: 25/03315/OUT / PINS Ref: 6005101), with the decision yet to be issued. The Promoter will update the Inspector on the implications for the Plan's housing supply position when the Great Abington decision is issued.

5.2.7 The reported affordability ratio for 2025 is 9.31 in South Cambridgeshire and 10.82 in Cambridge City. That is, median house prices are approximately ten times median workplace-based earnings.[1]

[1] Housing affordability in England and Wales - Office for National Statistics as published in March 2026

5.2.8 Together, these indicators identify that there is a significant demonstrable need to identify and allocate additional sites that can deliver much-needed new homes across the Greater Cambridge area.

5.2.9 The Promoter supports the Councils' proposal to meet the minimum local housing need of 48,069 homes, equivalent to 2,289 dwellings per annum over the 21-year plan period to 2045. However, the standard-method figure is a minimum starting point rather than a ceiling. The Plan should provide additional housing where this is necessary to address Cambridge City's 2.72-year housing land supply, persistent affordability pressures, the proposed creation of 73,300 jobs and the delivery risks associated with the strategic-site trajectory. In combination, those factors justify a higher and more resilient housing provision than the minimum requirement alone.

5.3 Jobs and Homes

5.3.1 While Policy S/JH proposes a significant number of jobs, the housing requirement does not go far enough, creating an imbalance that does not reflect the ambition and potential of Greater Cambridge.

5.3.2 The Sustainability Appraisal recognises that the proposed 73,300 additional jobs could support greater self-containment but also notes significant negative effects for climate-change mitigation and air quality because the scale of growth will increase vehicle movements. Employment growth is supported without sufficient certainty that housing will be delivered in locations capable of minimising longer-distance commuting. This is particularly relevant at Slate Hall Farm, where approximately 2,900 full-time equivalent jobs are planned without a corresponding housing allocation in the immediate area.

> *"5.36 Cambridge itself is a relatively compact city and there are plans for new, efficient public transport networks (such as the new railway station at Cambourne, the proposed public transport improvements to the Cambourne to Cambridge corridor and other public transport projects planned by the Greater Cambridge Partnership) that development will likely be able to take advantage of. In addition, the housing target is supported by a substantial level of job growth in the area (73,300 additional jobs), which is likely to help support self-containment and minimising long-distance commuting, as Greater Cambridge residents will be able to benefit from nearby employment opportunities. However, this scale of growth will inevitably lead to an increase in vehicles on the road, including both domestic and commercial vehicles, resulting in an increase in emissions of greenhouse gases and air pollutants. As such, mixed minor positive and significant negative effects are recorded for SA objectives 12: Climate change mitigation and 13: Air quality. These effects are uncertain due to changing trends in remote working, car ownership, electric/autonomous vehicles and more sustainable fuel"*

5.3.3 The principal employment–housing alignment case arises from Slate Hall Farm. The Publication Plan proposes to allocate that site for major employment development capable of supporting approximately 2,900 full-time equivalent jobs immediately to the south west of the Site, but makes no corresponding housing allocation in this location. Land South East of Hattons Road provides the only identified opportunity in the immediate area to align that planned employment growth with a substantial supply of new homes without releasing land from the Green Belt. Its allocation would enable homes, jobs and sustainable transport provision to be planned together and reduce the risk of car-dependent in-commuting from more distant settlements. The pre-application Tritax Park Queens' Cambridge scheme provides additional context for the direction of employment growth around the A14 corridor, but it carries limited weight and is not necessary to sustain this argument.

5.3.4 The proposed employment allocation at Slate Hall Farm is located immediately to the south west of the Site.

5.3.5 Policy S/JH and the housing trajectory should be modified to include approximately 1,000 dwellings at Land South East of Hattons Road, Longstanton. This would provide additional resilience against delayed delivery at infrastructure-dependent strategic sites and help align housing provision with the employment allocation at Slate Hall Farm, subject to confirmed access, potable-water and wastewater phasing.

5.4 The Spatial Strategy

5.4.1 The Site is a suitable location for a new neighbourhood. It lies outside the Green Belt, within the catchment of the Cambridgeshire Guided Busway and Longstanton Park and Ride, immediately adjoining the Plan's proposed employment allocation at Slate Hall Farm, and within the established Longstanton–Northstowe–Bar Hill cluster. Its relationship to the built edge of Longstanton reflects the green separation established by the Northstowe Area Action Plan and is integral to the proposal as a new neighbourhood with its own local centre, primary school and community sports provision, rather than as a village extension.

5.4.2 Critically, the Site is served by the Guided Busway, providing a direct, high-frequency, high-quality public transport connection link to Cambridge Regional College, Cambridge Science Park innovation cluster, Cambridge City Centre, and Cambridge North Station, and Cambridge South Station (which provides wider regional connectivity).

5.4.3 This places the Site in a strong position to enable the workforce to live affordably with ready access to jobs and skills training, in a highly sustainable location served by a convenient and rapid mode of travel. The balance of affordable homes within convenient commuting distance of world-leading skills training and employment should be a key measure in determining which sites can proceed.

5.4.4 Guided busway services run approximately every 10 minutes. The busway is approximately a 15 minute cycle from the Site. Cambridge Science Park is reached by a busway journey of approximately 20 minutes, giving a total journey time from the Site of approximately 35 minutes. The Vision Document proposes the delivery of integrated mobility hubs at the Site to encourage sustainable travel. These journey times are indicative and will be confirmed by the transport evidence.

5.4.5 Cambridge North railway station is the nearest railway station to the Site. It is reached by a busway journey of approximately 20 minutes, giving a total journey time from the Site of approximately 35 minutes. Trains from Cambridge North provide links to London, Ely, Peterborough and the rest of the country.

5.4.6 The Greater Cambridge 'Settlement Hierarchy' (2025) highlights Longstanton benefits from the following existing key services and facilities which would support delivery of initial residential development.

- Co-op and Premier Store (Convenience Stores)
- Post Office
- Public House
- Primary School
- Employment
- GP Surgery
- Village Hall (Community Hall)
- Sports & Social Club (Sports Fields)
- Play Area

- Bus connectivity – Stagecoach routes 5 and 5A, together with guided busway services via Longstanton Park and Ride.

5.4.7 The delivery of on-site services and facilities increases the potential for 'internalisation' of day-to-day movements, minimising private vehicular trips wherever possible.

5.4.8 An on-site mobility hub is proposed as an integral part of the development, consistent with draft Policy I/MH. Its location is identified on the Emerging Illustrative Masterplan. The hub would accommodate cycle parking and hire, car club provision, electric vehicle charging and a bus stop capable of serving an extended service, and would be secured, funded and managed through the section 106 agreement for the development.

5.4.9 The Site carries no national or local landscape designation, no heritage designation and no flood risk designation affecting the developable area. The Promoter recognises that the absence of designation does not of itself establish suitability, and that the Councils' assessment turns on landscape character. That assessment is addressed at Section 3.2 and in the Landscape and Visual Technical Review Report at Appendix 3.

5.4.10 The landscape and visual evidence confirms that the Site is not subject to any national or local landscape designation. It concludes that development can be accommodated through a landscape-led masterplan that maintains green separation from Longstanton, protects important views and incorporates structural planting and green infrastructure to mitigate visual effects.

5.5 The Housing Trajectory and Delivery Risk

5.5.1 The Publication Local Plan continues to be reliant on large-scale strategic sites (new settlements) that are unlikely to deliver substantial homes until later in the Plan period.

5.5.2 The Councils propose to meet the minimum local housing need throughout the plan period, but there are identified peaks and troughs in delivery when measured against the annualised average local housing need, as demonstrated at Figure D1.

5.5.3 The Development Strategy Topic Paper[2] identifies at Figure 1a that a meaningful supply of new homes at proposed allocation sites, as identified in orange, are only anticipated to start to make strong contributions to the supply from 2032/33 onwards.

5.5.4 Delivery rates at the new allocation sites will be influenced by the availability of infrastructure as set out within the 'Infrastructure Delivery Plan[3]'(IDP). In particular, transport connectivity, with the plan proposing to capitalise on future rail connectivity delivered as part of East-West Rail to support the sustainability credentials of additional development at Cambourne North. A Development Consent Order (DCO) application has yet to be submitted. The East West Rail company considers that delivery of rail connections through a new station at Cambourne could be "*mid to late 2030s"*.

5.5.5 Further, paragraph 6.6 of the Development Strategy Topic Paper identifies that a pipeline connection to Grafham Water will boost supplies to the Cambridge area from 2032, whilst connection to the Fens Reservoir is expected in the mid-2030s, with the associated DCO application expected to be submitted in mid-2027.

5.5.6 Detailed delivery rates are set out in the Housing Trajectory Topic Papers Figures 2 and 3. Peak delivery rates of 350 dwellings per annum are anticipated at new

[2] Topic cover - Development Strategy Topic
[3] GCLP IDP 2026

allocation Cambridge East (airport) at a consistent rate for 10 years, 2035/36 to the end of the plan period.

5.5.7 In 2029/30 there are even more significant delivery peaks anticipated at existing commitment sites including: 550 dwellings at Northstowe and 539 dwellings at Waterbeach. In the following year 2030/31, 604 dwellings are anticipated at Eddington. These rates are comparatively much higher than dwelling completions for 2024/25 and 2025/26.

5.5.8 The new settlement of Northstowe, comprising c.10,000 dwellings, is located c.3km to the north east of the Site. Outline planning permission for Phase 1 was granted in 2014 for 1,500 homes, alongside approval of a development framework plan for the wider settlement. Phase 2, comprising 3,500 homes, was granted outline planning permission in 2017. By 2025, nearly 2,000 homes had been completed at Northstowe, with Phase 1 substantially complete and later phases continuing to be delivered (source: Greater Cambridge Shared Planning, Proposed Submission Greater Cambridge Local Plan, Policy S/NST: Northstowe New Town, August 2026). Even measured from the grant of the first permission in 2014, this equates to an average of fewer than 182 completions per year. That historic average is only around one-third of the 550 dwellings which the Publication Plan trajectory assumes will be delivered at Northstowe in 2029/30. The step change required is therefore material and reinforces the delivery risk associated with relying on that peak output. Construction remains ongoing following the protracted delivery of associated infrastructure, including enhancements to the A14.

5.5.9 The proposed 8.2% headroom does not demonstrate a resilient supply because its effectiveness depends on the deliverability of the sites from which it is derived. The trajectory relies on substantial infrastructure investment, new water resources and delivery peaks materially above recent performance at strategic sites. Additional allocations are therefore required to diversify location, ownership, infrastructure dependencies and delivery partners. Land South East of Hattons Road can perform that role and should be assessed against a realistic programme beginning in 2030/31.

5.5.10 The Promoter intends to bring forward Land South East of Hattons Road, Longstanton as a site capable of delivering approximately 1,000 dwellings from 2030/31, in close proximity to the proposed employment allocation at Slate Hall Farm and without dependence on strategic enabling infrastructure to be funded and delivered by third parties. As such, the proposal is considered to have more resilience to market fluctuations without the reliance upon significant strategic infrastructure.

5.6 Deliverability of the Site

5.6.1 The Site is greenfield. Subject to the matters identified in the technical evidence at Section 3, including the archaeological evaluation to be undertaken, the wastewater solution to be agreed with Anglian Water and the interface with the consented solar farm and battery energy storage system to the south east, there are no known constraints which would generate abnormal costs of a scale affecting the deliverability of the Site.

5.6.2 In order to ensure that the Site delivers at the earliest opportunity following allocation in an adopted Local Plan, an outline planning application would be prepared, with detailed means of access to establish the key parameters of the development, as supported by a design code. This would give delivery partners clarity about the expectations for placemaking and the detailed design across the site.

5.6.3 It is anticipated that housebuilding could commence at Phase 1 within approximately a year after the grant of subsequent reserved matters planning permission, as summarised below.

- 2027 –Outline application preparation
- 2027/28 – Outline application determination
- 2028/29 – Reserved Matters Application determined
- 2030/31 – First dwelling completions

5.6.4 It is anticipated that, at peak delivery between 2032/33 and 2036/37, approximately 150 dwellings would be completed each year through multiple housebuilder outlets across the Site, with final completions anticipated by 2038/39. A year by year trajectory accompanies these representations.

5.6.5 Hallam Land is one of the UK's leading strategic land promoters, with over 30 years' experience of successfully promoting land through the UK planning system and securing deliverable planning consents for sustainable residential and mixed-use development. Its role is to assemble, promote and project manage strategic sites through the planning process working collaboratively with local authorities, landowners, infrastructure providers and the housebuilding industry to bring forward development that is capable of delivery.

5.6.6 Hallam Land's experience is not limited to securing consent. Where required to support timely delivery, it has delivered key enabling infrastructure and fully serviced land parcels so that homes can be brought forward by a range of delivery partners, including national housebuilders, regional operators, SME developers, the private rented sector and affordable housing providers. Hallam Land does not seek to act as master developer for the Site, but its delivery experience demonstrates that it is well placed to manage the planning, infrastructure and phasing requirements necessary to bring the Site forward.

5.6.7 The lead-in periods and annual delivery rates achieved across the Hallam Land portfolio, including at Brooklands, Eastern Green and Great Wilsey Park, are available to the Inspector and support the programme set out above.

5.6.8 Hallam Land has a strong track record of facilitating the delivery of new homes within the region, and a recognised ability to secure planning consents and enabling infrastructure ranging from strategic highways to primary and secondary schools and utilities, delivering fully serviced land parcels where required. The lead-in periods and annual delivery rates achieved at the schemes listed below are available to the Inspector and demonstrate that the delivery programme set out at Section 6.6 is realistic. Homes have recently been delivered by Hallam Land at the following locations:

- Brooklands, Milton Keynes – 2,500 homes, three schools, employment space, local centres and extensive acoustic and landscape infrastructure.
- Eastern Green, Coventry – 2,400 homes, 52 acres of employment land, new A45 grade-separated junction, primary substation and strategic access roads.
- Market Harborough – 924 homes as part of a wider strategic development area, including a new link road and a new bridge over the Grand Union Canal.
- Kettering East – 720 homes forming part of a 5,000-home urban extension, with Hallam delivering a standalone access solution and independent S106 agreement.
- Great Wilsey Park, Haverhill – 2,500-home mixed-use urban extension including two primary schools, new employment space, two local centres and a substantial country park, supported by strategic transport improvements, new access from the A143 and Chalkstone Way and extensive green and SuDS infrastructure.
- Chatteris – 494 dwellings, delivered by Barratt Homes.

- Woolham Park, St Albans – site allocation and pending application.

5.6.9 Technical work already undertaken by the Promoter includes the Vision Document incorporating the Emerging Illustrative Masterplan; the Technical Delivery Note covering transport and highways, flood risk, surface water drainage, foul drainage, acoustics and air quality; the Landscape and Visual Technical Review Report; the Heritage and Archaeology Technical Note; and the Ecological Constraints and Opportunities appraisal.

5.6.10 The technical evidence appended to these representations, and summarised at Section 3, demonstrates that transport, flood risk and drainage, landscape, heritage, archaeology and ecology present no impediment to the allocation of the Site which cannot be addressed through a landscape-led masterplan and appropriately worded policy requirements.

6 SOUNDNESS ASSESSMENT

6.1 Positively Prepared

6.1.1 The Plan is not positively prepared. Although Policy S/JH seeks to meet the minimum local housing need of 48,069 homes, the Councils' September 2026 evidence identifies only a **2.72-year housing land supply** in Cambridge City for 2026–2031. Against that immediate shortfall, an 8.2% plan-period headroom is insufficiently resilient because much of the supply depends on large strategic sites and infrastructure that will not make a strong contribution until the 2030s.

6.1.2 The Plan also allocates Slate Hall Farm for major employment development capable of supporting approximately 2,900 full-time equivalent jobs, but makes no corresponding housing allocation in the immediate area. Allocating Land South East of Hattons Road would add around 1,000 homes outside the Green Belt, close to that planned employment and existing guided-busway connections, while diversifying supply away from infrastructure-dependent strategic sites.

6.1.3 **Conclusion:** by planning only to meet the minimum requirement without a sufficiently robust and deliverable buffer, and by failing to align allocated employment growth with nearby housing, the Plan is not positively prepared. The necessary remedy is to allocate the Site and include its delivery within the housing trajectory.

6.2 Justified

6.2.1 The Plan is not justified, because the site selection methodology applies a criterion which is not supported by evidence and which has operated to exclude the Site from assessment without consideration of its merits. The HELAA identifies locations "within or adjacent to Group Village with a high-quality public transport connection (i.e. railway or guided busway)" as aligning with the spatial development strategy. Longstanton is a Group Village served by the guided busway and Longstanton Park and Ride, and the Site therefore falls within a location type which the Councils have themselves identified as strategy-compliant. It is excluded on the single ground of contiguity with the Defined Development Extent.

6.2.2 The Promoter objects to the application of that criterion for three reasons. First, it is directed at "residential or small-scale mixed-use sites", whereas the Site is promoted as a new neighbourhood of approximately 1,000 dwellings with its own local centre, primary school, community sports provision and mobility hub. Second, the methodology provides no category within which a proposal of this scale can be assessed, Policy S/SH restricting Group Village development to an indicative maximum of 8 dwellings and the HELAA classifying new settlements as sites of 4,000 homes, with the result that a detached settlement of 4,000 dwellings aligns with the spatial strategy while a detached neighbourhood of 1,000 dwellings does not, on a threshold for which no justification appears in the evidence base. Third, contiguity is not a principle which the spatial strategy applies to itself: Cambourne, Northstowe, Bourn Airfield and Waterbeach were each allocated as non-contiguous development.

6.2.3 The landscape rating relied upon compounds the difficulty. The HELAA landscape assessment has not been updated since 2025 and therefore pre-dates the grant of planning permission on 26 June 2026 for a solar farm and battery energy storage system immediately south east of the Site for a period of 35 years. Its conclusion that development would be "incongruous with the rural character of that area" rests on a baseline which the Councils have since consented development to change.

6.2.4 **Conclusion:** the preferred strategy is not shown to be the most appropriate strategy when reasonable alternatives are considered. The necessary remedy is a

comparative Sustainability Appraisal and site-selection assessment of Land South East of Hattons Road, followed by allocation if that assessment confirms the advantages identified in these representations.

6.3 Effective

6.3.1 The Plan is not effective because its trajectory depends on delivery rates and infrastructure assumptions that are not yet demonstrated. The evidence anticipates strong contributions from new allocations only from 2032/33, relies on the Grafham Water pipeline from 2032 and the Fens Reservoir in the mid-2030s, and assumes peak annual delivery of 550 homes at Northstowe and 539 at Waterbeach in 2029/30. Northstowe's delivery record—nearly 2,000 homes by 2025 following the first permission in 2014—shows the material risk in relying on that step change.

6.3.2 The Site would diversify that risk. It is available, outside the Green Belt and supported by a concept masterplan and technical evidence addressing access, flood risk, drainage, landscape, heritage, ecology and on-site infrastructure. Potable-water and wastewater capacity remain material delivery matters, but the evidence identifies a phased approach through engagement with Anglian Water, strategic supply reinforcement, an on-site/NAV wastewater option and safeguarded land. **Conclusion:** without an additional allocation of this kind, the Plan is not demonstrated to be deliverable over the plan period. The necessary remedy is to allocate the Site subject to policy requirements securing the identified infrastructure and phasing.

6.4 Consistent with National Policy

6.4.1 The Plan is not consistent with national policy because it does not provide a sufficiently resilient supply of housing land or demonstrate that homes, employment and sustainable transport have been integrated in this location. The December 2024 Framework supports larger-scale development where it is well located, well designed and supported by necessary infrastructure and a genuine choice of transport modes. The Site has direct potential to connect with Longstanton, Northstowe, the guided busway and the allocated employment growth at Slate Hall Farm, while avoiding Green Belt release.

6.4.2 The submitted evidence demonstrates a policy-compliant route to development: homes would be located in Flood Zone 1; surface-water runoff would be managed through SuDS; at least 10% biodiversity net gain would be delivered; and walking, cycling, bus and mobility-hub measures would reduce reliance on the private car. The masterplan also safeguards land for necessary infrastructure. These matters can be secured through an allocation policy, further technical work and appropriately worded phasing requirements.

6.4.3 **Conclusion:** the Plan's omission of a deliverable, non-Green Belt site capable of linking new homes to allocated employment and sustainable transport is inconsistent with the Framework's objectives for housing delivery, sustainable patterns of development and larger-scale growth. The necessary remedy is to allocate Land South East of Hattons Road with requirements for coordinated transport, water, wastewater, green infrastructure and biodiversity delivery.

7 REQUESTED MODIFICATIONS

7.1.1 The Promoter's landholding within South Cambridgeshire District extends to approximately 54.5ha. The indicative land budget identifies capacity for c.1,000 dwellings on the Promoter's land.

7.1.2 The Promoter considers the following modifications necessary for the Publication Plan to be found sound. At this stage, the Promoter objects to the Publication Plan as published for consultation in August 2026.

7.1.3 **Modification 1 – Housing Requirement and Supply:** Increase the housing provision above the minimum local housing need, or provide additional deliverable headroom, to respond to Cambridge City's 2.72-year housing land supply, affordability pressures, the proposed creation of 73,300 jobs and the identified delivery risks within the strategic-site trajectory. The additional provision should include Land South East of Hattons Road, Longstanton.

7.1.4 Reason: Positive consideration should be given to the identification of additional sites which can deliver in the short term, and benefit from existing sustainable transport connectivity.

7.1.5 Consideration should be given the potential opportunity to reduce unsustainable patterns of employment commuting through delivery of integrated mobility hubs, at accessible locations to avoid reliance upon travel by private vehicles.

7.1.6 **Modification 2 – Development Strategy and Site Allocation:** Allocate Land South East of Hattons Road, Longstanton for a residential-led new neighbourhood of approximately 1,000 dwellings, with a local centre, primary school provision, mobility hub, green infrastructure, sports facilities and the transport, potable-water, wastewater and drainage infrastructure necessary to support phased delivery. Include the Site within the housing trajectory and identify the corresponding policy requirements on the Policies Map.

7.1.7 Reason: to ensure sufficient sites are available, which can deliver housing throughout the plan period, at sustainable locations, which already benefit from existing public transport infrastructure and provide opportunity to act as a buffer to any delays to delivery at larger new settlement allocations which are reliant upon significant infrastructure.

7.1.8 **Modification 3 – Settlement hierarchy and Development Extent:** Make the amendments necessary to ensure that the allocation of Land South East of Hattons Road is not prevented by Longstanton's Group Village classification or the existing Development Extent. The allocation should operate as a strategic policy exception supported by its own infrastructure and phasing requirements, rather than as ordinary village infill or redevelopment.

7.1.9 The allocation of a new neighbourhood at Land South East of Hattons Road, Longstanton with a capacity of approximately 1,000 dwellings would deliver on-site community facilities including a local centre, green infrastructure, sports pitches and an integrated mobility hub.

7.1.10 Reason: The classification of Longstanton does not reflect the role and function of the settlement as existing, nor does it reflect how it will perform with the significant proposed employment delivery at Slate Hall Farm; nor with residential led development at Land South East of Hattons Road, Longstanton.

7.1.11 **Modification 4 – Policy BG/BG, Biodiversity Net Gain:** amend the policy so that the 20% biodiversity net gain sought for major development is expressed as an aspiration to be achieved where feasible, rather than as a requirement, with the

mandatory 10% net gain established by the Environment Act 2021 retained as the policy requirement.

7.1.12 Reason: the proposed 20% requirement is a significant increase above the mandatory position established by the Environment Act 2021. Applied as a blanket requirement, and in combination with the other policy requirements of the Plan and the emerging Community Infrastructure Levy, it risks unintended consequences for scheme viability and, in turn, for the delivery of affordable housing. The Promoter confirms that the Site would deliver at least the mandatory 10% net gain, with a greater gain secured where this can be achieved without prejudicing viability.

7.1.13 The Promoter would welcome the opportunity to discuss an appropriate policy formulation with the Councils in advance of the hearing sessions.

7.1.14 **Modification 5 – Policy BG/UGF, Urban Greening Factor:** amend the policy so that the Urban Greening Factor requirement is targeted at development sites and locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield sites and sites within the Green Belt, rather than applied as a blanket requirement to all major development.

7.1.15 Reason: draft Policy BG/UGF would require all major development to achieve an Urban Greening Factor score of 0.5 for predominantly residential development outside the Cambridge Defined Development Extent, except where more than 50% of the site area is demonstrated to be accessible greenspace.

7.1.16 National policy refers to the Urban Greening Factor in a specific context. Paragraph 159 of the December 2024 Framework, addressing the improvements to green spaces required as part of the Golden Rules for Green Belt release, states:

"*159. The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes."*

7.1.17 Whilst the principle of urban greening is supported, it is considered that draft policy BG/UGF, proposed to be applied as a blanket to all development sites, not those just within the Green Belt or at brownfield development sites, and could act as an excessive technical requirement for development at entirely greenfield sites.

7.1.18 The Natural England guidance 'Urban Greening Factor for England User Guide Green Infrastructure Framework Standards for England' (January 2023)[4] states:

> *"UGF is a planning tool that focuses on the greening of urban areas, and it is recommended that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character. Where appropriate its use can also be targeted to development sites and locations where the level of urban greening is a significant planning issue or requirement. This may include the redevelopment of brownfield or post-industrial sites in rural locations or the creation of garden communities that would be expected to provide a significant proportion of green infrastructure across the entire development."*

7.1.19 In order to conform more closely with national policy and Natural England guidance, Policy BG/UGF should be amended so that it is targeted to development sites and

[4] Urban Greening Factor for England User Guide

locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield sites and sites within the Green Belt. The Promoter confirms that the Site would deliver a substantial proportion of green infrastructure across the development in any event.

7.1.20 **Modification 6 - Policy CC/WE Water Efficiency in new developments:** Planning Policy should not prescribe additional measures which should be controlled by separate permitting systems. In this case, water efficiency is controlled through Building Regulations 2010 Part G.

7.1.21 The current standard for new built residential development is 125 litres per person per day (l/p/d) with an optional standard for 110 litres/person/day (l/p/d). It is therefore considered that Greater Cambridge should plan for the optional standard of 110 (l/p/d)/

7.1.22 In September 2025, the Department for Environment Food & Rural Affairs held a consultation seeking opinion about the potential to revise the minimum water efficiency standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. To date there has not been any revision to building regulations regarding water efficiency.

7.1.23 Policy CC/WE is proposing to restrict water usage even further, with proposals for 100 dwellings or more, expected to minimise consumption of water usage to no more than 80 l/p/d. Whilst development of less than 100 dwellings are expected to minimise consumption of water usage to no more than 90 l/p/d

7.1.24 The proposed standards are excessive and have implications for all new residential development. The proposed standards will require additional restrictions on taps, fixtures and fittings which can not viably be implemented. In respect of the 80 l/p/d standard, the Council's own viability evidence has identified this would lead to an additional cost of £6,000 per unit (Greater Cambridge Local Plan Viability - Main Viability Report page 17).

7.1.25 Policy CC/WE should therefore be amended to reflect Building Regulation Requirements and any national update that may be forthcoming.

7.1.26 **Modification 7 - Policy H/GT: Gypsy and Traveller**

7.1.27 Draft Policy H/GT seeks to address Gypsy and Traveller need by requesting provision of pitches at allocated strategic sites, allocated non-strategic sites and even unallocated sites.

7.1.28

Policy S/JH and the monitoring indicator identifies that there is a target to achieve:
-159 Gypsy and Traveller pitches over plan period
-20 Travelling Showpeople plots over plan period

7.1.29 It is questioned how effective draft policy H/GT will be in practice, to facilitate the delivery of the identified pitches. To provide more certainty regarding this matter it is suggested that Greater Cambridge identifies bespoke solutions through site specific allocations, as well as exploring the opportunity for delivery by the Council with funding secured through S106/ CIL and other available funding streams. Such an approach has been successfully implemented by other Local Planning Authorities including Broadland and Teignbridge District Council as identified in the National Policy Advisory Panel on Gypsy and Traveller Housing 'Places we're proud of'[5] guidance dated January 2021.

[5] National Policy Advisory Panel on Gypsy and Traveller Housing 'Places we're proud[5] guidance dated January 2021 - A short guide to providing and managing sites for Gypsies and Travellers

8 CONCLUSION

8.1.1 These representations are submitted by Twenty5 Planning Limited on behalf of Hallam Land in respect of the Regulation 19 (Publication) version of the Greater Cambridge Local Plan. The Promoter strongly requests that the Councils reconsider the potential of Land South East of Hattons Road, Longstanton for allocation for a sustainable new neighbourhood which can be delivered relatively quickly without the reliance of significant supporting infrastructure.

8.1.2 Measured against the four tests of soundness at paragraph 36 of the NPPF, the Plan is not positively prepared. The Councils propose to meet only the minimum local housing need, with headroom of 8.2% across a 21 year plan period, against a Cambridge City housing land supply of 2.72 years, a Housing Delivery Test measurement of 82%, affordability ratios of approximately ten, and provision for 73,300 additional jobs. The Plan is not justified, because the Site has been excluded from the reasonable alternatives exercise by the application of a contiguity criterion which is unsupported by evidence and by a landscape assessment which has not been updated since 2025. The Plan is not effective, because its trajectory depends on delivery rates and infrastructure assumptions which are not demonstrated. And it is not consistent with national policy, because it fails to provide a sufficiently resilient supply of housing land or to integrate homes, employment and sustainable transport in this location.

8.1.3 The Government has established clear aspirations for the growth of Cambridge, with a particular focus on economic growth, alongside the other objectives reflected in the proposed Vision for the Local Plan. The Plan should be more ambitious if it is to respond to those aspirations and to its own provision for 73,300 additional jobs.

8.1.4 A particular deficiency is the absence of any housing allocation to serve the major employment development proposed at Slate Hall Farm, capable of supporting approximately 2,900 full-time equivalent jobs immediately to the south west of the Site. Allocating the Site would align homes, jobs and sustainable transport in this location and reduce the risk of car-dependent in-commuting, without releasing land from the Green Belt.

8.1.5 Whilst there is significant evidence base supporting the draft Local Plan, there has been no assessment of allocation of Land South East of Hattons Road, Longstanton as an alternative allocation within the emerging Local Plan.

8.1.6 Further there is concern regarding the continued reliance upon large strategic sites which are intended to bring forward, or follow the delivery of significant infrastructure.

8.1.7 It is therefore questioned whether the Local Plan will be effective in facilitating the delivery of much needed housing in the short to medium term at locations which are not dependent on strategic enabling infrastructure funded and delivered by third parties.

8.1.8 In respect of the Site, the land is jointly owned and promoted by Hallam Land and is available now. The Site is capable of accommodating approximately 1,000 dwellings together with supporting infrastructure including a local centre, a primary school, a mobility hub, community sports provision and green infrastructure, alongside at least 10% biodiversity net gain. The technical evidence demonstrates that flood risk and drainage, landscape, heritage and archaeology present no impediment to delivery within the plan period. Potable water supply and wastewater capacity remain material delivery matters, and the Promoter has identified credible routes to their resolution through continuing engagement with Anglian Water and the statutory water undertaker, with delivery phased accordingly.

8.1.9 Subject to the modifications sought, the allocation of the Site would be consistent with national policy, including the flood risk and sustainable drainage provisions of the Framework and Planning Practice Guidance, the biodiversity net gain requirements of the Environment Act 2021, and the sustainable transport objectives of the Framework, as set out at Section 6.4.

8.1.10 The Promoter accordingly requests that the Publication Plan be modified as set out at Section 7 in order to make it sound. The modifications sought are directed principally at increasing the resilience of the housing supply, at securing the assessment and allocation of Land South East of Hattons Road, Longstanton as a deliverable, non-Green Belt new neighbourhood aligned with planned employment growth and existing high-quality public transport, and at ensuring that the Plan's policy requirements are proportionate and do not prejudice the

delivery of affordable housing at sustainable and accessible locations throughout the plan period.

8.1.11 The Promoter would welcome the opportunity to engage with the Councils on the matters raised in these representations in advance of submission.

8.1.12 Hallam Land through Twenty5, wishes to participate in the Examination hearing sessions relevant to the matters raised within these duly made representations. Hallam Land reserves the right to submit further representations, including Matters Statements, as the Examination progresses.