Greater Cambridge

Local Plan

Regulation 19 Consultation

September 2026

NIGHTINGALE LAND

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1. INTRODUCTION

1.1 Scope of Representations

1.1.1 These representations provide the response by Nightingale Land (NL) to the current consultation held by the Greater Cambridge authorities on the proposed submission version of the Greater Cambridge Local Plan (GCLP) under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.1.2 NL have land interests in Great Shelford at Land at Mingle Lane and are promoting the site for residential development of up to 240 dwellings. The site was originally identified as a preferred option for development at the 'First Proposals' stage of the GCLP under site reference "S/RSC/HW" accommodating approximately 100 dwellings. Following this, NL entered a memorandum of understanding with the Greater Cambridgeshire authorities to promote the site through the plan making process. The site was later removed from the draft Local Plan as part of the Regulation 18 consultation which ended in January 2026 following the identification of Land at Grange Farm.

1.1.3 An application was submitted at Land at Mingle Lane for up to 110 dwellings and refused on 8th July 2026. There are no technical constraints that prevent the delivery of the site coming forward and it was only refused on the basis the Council consider it can demonstrate a housing land supply (as the Council accept the land is Grey Belt). An appeal has been submitted and is currently awaiting determination.

1.1.4 NL submit that the proposed spatial strategy remains too heavily focused on the delivery of large scale strategic sites to meet housing needs and that it fails to provide a suitable mix of sites of a less strategic nature and thereby risks the soundness of the plan. Additional sites of a less strategic nature are required to provide a flexible and responsive supply of housing land should the large scale strategic sites/new settlements fail to come forward as anticipated.

2. NATIONAL PLANNING POLICY AND GUIDANCE

2.1 National Planning Policy Framework

2.1.1 The National Planning Policy Framework (the Framework) sets out the government's planning policies for England and how these are expected to be applied.

2.1.2 Provided that the GCLP is submitted prior to December 2026 the previous plan making requirements set out in the 2024 Framework apply. The Framework is clear that the planning system should be genuinely plan-led. It is vital that up-to-date Local Plans are in place which provide a positive vision for the future of the area and to ensure housing and economic needs are met in full.

2.1.3 Paragraph 20 makes clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. National policy is clear that sufficient provision should be made for housing (including affordable housing), employment, retail, leisure and other commercial development.

2.1.4 The Framework sets out four tests that must be met in order for the Local Plan to be found sound. In this regard, the plan must be:

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

2.2 National Planning Policy Framework 2026

2.2.1 The latest update to the Framework has resulted in a number of significant changes to national policy through the introduction of plan making and national decision making policies.

2.2.2 The Greater Cambridgeshire Authorities will need to be mindful of the proposed changes and what effects it may have on the development strategy. Indeed, whilst the plan falls under the scope of 2024 Framework for plan making, the National Development Management Policies took effect from 17th August 2026.

2.2.3 Annexe A is clear for the purposes of decision making that development plan policies which are materially inconsistent with the national decision making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted or made against this Framework. The GCLP will be examined under the Framework (2024) however it is clear that any policies progressed that are materially inconsistent with the decision making policies in the updated Framework will receive limited weight. It is therefore important that the Local Plan is reviewed in the context of the updated Framework so that the policies align with the approach of national policy without unnecessary duplication.

2.3 Planning Practice Guidance

2.3.1 The Planning Practice Guidance (PPG) was first introduced in 2014 and has been updated in the intervening period and provides clarification on how the requirements of the Framework should be interpreted.

2.3.2 Relevant to this submission is the guidance in relation to housing needs and affordability which will be referred to in section 4 of these representations.

3. LEGAL COMPLIANCE

3.1 Duty to Co-operate

3.1.1 The Duty to Cooperate is a legal requirement which all authorities are expected to adhere to[1]. It requires local planning authorities to engage constructively with neighbouring authorities on cross-boundary strategic issues throughout the process of plan preparation.

3.1.2 The Duty to Cooperate is a process of ongoing engagement that is meant to produce effective policies on cross-boundary strategic matters such as unmet housing needs.

3.1.3 The Council has included in its evidence a Duty to Cooperate Statement of Compliance and Statement of Common Ground. It is supported that these interim documents have been prepared to support the current consultation.

3.1.4 Following Matthew Pennycook's letter to the Planning Inspectorate on 27th November 2025, this acknowledges that the DtC will cease to apply when the Regulations come into force early 2026, including for plans at examination at that point. Despite this, the GCLP is being examined under the Framework (2024) and the reforms to the Framework still require plans to be positive and realistic based on effective joint working on cross boundary strategic matters.

3.1.5 Whilst it is recognised that there is engagement between Cambridge City Council and South Cambridgeshire District Council reflecting the geographical and functional relationship of the area, there are wide ranging cross boundary strategic issues which the Councils will need to demonstrate a written record of the progress to the point of submission with relevant key stakeholders, particularly in relation key infrastructure bodies and whether any requests to accommodate unmet housing needs of neighbouring authorities have been received.

3.1.6 It is noted within the Statement of Compliance at paragraph 7.61 that National Highways has previously raised significant concerns about the major allocations on the Strategic Road Network, in particular, Cambourne North and Land at

[1] Subject to NPPF reforms.

Grange Farm which were identified as likely to generate unacceptable impacts without substantial mitigation. Such concerns are likely to have a real impact on housing delivery and are discussed in further detail at section 4.3.

3.1.7 It is also noted that the Councils issued a letter to neighbouring authorities concerning the preferred strategy in June 2025 regarding the need for exceptional circumstances to justify Green Belt release. Several responses where received notably that of North Hertfordshire District Council who raised concerns over the lack of supporting evidence at that time. Several other authorities have expressed concerns over their ability to meet their own needs in full due to their housing needs increasing as a result of the stock based approach to the Standard Method.

3.1.8 The SOCG states that signatures are not required at this stage and will be reviewed prior to submission. It is unclear at this stage whether relevant stakeholders concerns over strategic cross boundary issues remain and we therefore reserve the right to provide further comments in this regard.

3.2 Sustainability Appraisal/Strategic Environmental Assessment

3.2.1 The Sustainability Appraisal (SA) is an iterative process required through the plan making process which needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach and assess these against the baseline environmental, social and economic characteristics[2].

3.2.2 The results of the SA will need to explain clearly why some policy options have progressed and others have been rejected through a comparative and equal assessment of all reasonable alternatives.

3.2.3 The Councils' have identified a range of options including scale of development and spatial options. In 2022, the Councils identified updated growth options based on updates to employment needs evidence. The Councils previously considered that planning for the higher jobs forecast and level of homes associated with its maximum growth option at Table 4.1 was rejected as although the higher jobs forecast could be possible, it was not the most likely future scenario. The Council

[2] PPG Reference ID: 11-018-20140306

consider that the updated Standard Method would provide for the most likely jobs forecast over the plan period and as such this figure formed the objectively assessed need for housing with previously considered figures no longer forming reasonable alternatives.

3.2.4 However, it does not appear that any additional testing has been undertaken to determine whether the assumptions previously applied particularly with regard maximum growth scenario was capable of being implemented. The stated reasoning for rejecting the higher employment led Maximum growth option related to a forecasting judgment as opposed to a sustainability/environmental objection. It appears that no further testing of a higher employment forecast linked to Standard Method figure has been undertaken through the SA process taking account of the Employment and Housing Need update 2025.

3.2.5 More importantly, the assessment in the Employment and Housing Need update provides a flawed reliance on a single baseline forecast using Cambridge Econometric (CE) rather than assessing economic growth based on available forecasts such as Oxford Economics (OE). Nightingale Land and Gladman Developments Ltd have commissioned Turley to provide an assessment of the Council's forecasting. This is set out at appendix 1 of this response. Against OE, it identifies a significant increase compared to the baseline assessment illustrated at figure 1 of that report. Consequently, the use of CE alone appears very pessimistic in this context.

3.2.6 Given the Councils economic ambitions in terms of research development, Oxford-Cambridge arc etc there is a justification to consider the higher employment led scenario and this should be tested within the SA particularly the use of OE forecasting.

3.2.7 Regarding site specific testing, appendix E of the SA sets out the reasons why site OS216 is not preferred[3]. It states that the Cambridge Green Belt Study (2026) identifies that release of land in this area development of the site would result in a moderate – high level of harm. However, the site is considered to be potential

[3] Sustainability Appraisal Appendices E and F – p60

grey belt (now confirmed in the Officer Report[4] for a planning application on the land and the Council's updating Green Belt evidence). The proposed development strategy has identified alternative locations to meet development needs, including within the Southern Cluster, and therefore the Council do not consider that there are exceptional circumstances for a Green Belt release in this location.

3.2.8 NL consider that exceptional circumstances do exist on account of the acute affordable housing needs within the Plan area as well as specific identified affordable housing needs in the Great Shelford area neither of which are going to be met in full and this has not been factored into the SA consideration of sites.

3.2.9 Whilst an assessment of the site was undertaken at Table 4.21 of the SA (2021) it fails to recognise the sustainability of the site in transport terms. Given the location of development and its surrounding context within walking distance to rail services, the site should be reappraised through the SA process.

[4] Committee Report - 26/00610/OUT 8th July 2026

4. Greater Cambridge Local Plan

4.1 Context

4.1.1 This section of the representations will address matters of concern relating to the soundness of the plan associated with the proposed policy choices and supporting evidence base.

4.1.2 Both the South Cambridgeshire Local Plan and the Cambridge Local Plan were adopted in 2018 and are now 7 years old. Work commenced on the joint GCLP in 2019 to replace the existing development plans for South Cambridgeshire and Cambridge.

4.1.3 In 2021, the Council consulted on its preferred options consultation which identified Land at Mingle Lane as a draft allocation for approximately 100 dwellings. In 2022, the LDS confirmed the Councils intended to undertake a Regulation 19 consultation in Autumn 2024. By 2024, the Councils confirmed that the Regulation 19 consultation had been delayed by a further 2 years and that this consultation was not expected to take place until Summer/Autumn 2026 subject to the outcome of the Cambridge Waste Water Treatment Plant (CWWTP) DCO application. The Government has since confirmed in August 2025 that funding for the CWWTP will not be provided through the Housing Infrastructure Fund.

4.1.4 During this period, NL entered a Memorandum of Understanding with the Councils to carry out a full suite of survey, technical and design work to support its inclusion as a proposed allocation. The reports submitted as part of the outline planning application demonstrate, and Consultees have all confirmed, that there are no technical constraints that would prevent the development proposed from coming forward.

4.1.5 Taking the delays into account and in the context of a local and national housing crisis, together with the acute affordable housing need in Greater Cambridge there is a greater need to allocate sites of a less strategic scale to meet the housing needs of local communities across Greater Cambridge.

4.2 Vision and strategic priorities

4.2.1 In principle, NL support the proposed vision in principle which seeks to plan to meet the Councils' housing needs including significant quantities of housing that is affordable to rent and buy to meet the area's diverse housing needs. This is in line with the Labour Government's national growth agenda which seeks to boost housing delivery supported by the changes to national policy to facilitate this.

4.2.2 However, it is considered that the housing needs do not provide align with the economic aspirations of the area, nor does the proposed spatial strategy cater for the needs of many local communities across Greater Cambridge, such as Great Shelford and Stapleford. Whilst the vision sets out an appropriate aspiration, the policies as drafted do not facilitate the delivery of non strategic sites that don't require extensive infrastructure, which are required to provide the homes required in response to local communities housing needs now. This will result in significant consequences on the ability of local communities accessing good quality housing and further perpetuates the existing affordability issues present in the area. Accordingly, the spatial strategy needs to be amended so that the plan caters for these needs and will be discussed in section 4.3 below.

4.3 Planning Policies

Policy S/JH: New jobs and homes

4.3.1 Policy S/JH seeks to meet the objectively assessed needs in Greater Cambridge over the plan period 2024 – 2045 through the provision of a minimum 48,069 new homes meeting the needs for the total population, including affordable housing and specialist accommodation of specific groups. This equates to an annual need of 2,289 dwellings. This is a slight reduction in housing numbers by -126 dwellings from the previous Regulation 18 consultation.

4.3.2 There are no exceptional circumstances that would warrant a different approach other than the standard method being used as a starting point to determine the housing requirement for Greater Cambridge. However, these should be seen as the minimum housing requirement to plan for. In this regard, the jobs target is 73,300 additional jobs represents a centralist point of view which only matches jobs growth associated with the standard method figure based on a single baseline assessment using CE data.

Need for economic uplift

4.3.3 Iceni Projects undertook an Employment and Housing Needs update in 2025 which factors in a central and high level employment growth assumption comparable to the number of homes required. The Central Growth assumption requires the delivery of 2,292dpa and is broadly akin to the housing figure required by the Standard Method. It also provided forecasting for a Higher Growth scenario which suggested a requisite housing figure of 2,829dpa is required.

4.3.4 Whilst the report does caveat that the higher growth scenarios tested require continuous expansion with limited or no shocks or cyclical periods of growth, it does suggest that these could be achieved or exceeded, but it would require a step change in infrastructure investment, notably through transport infrastructure as well as wider services infrastructure.

4.3.5 The Greater Cambridge City Deal recognised the relationship between housing and economic growth, and that the shortage of available and affordable housing within Greater Cambridge has had an impact on house prices, commuting patterns, and recruitment and retention of employees. The housing target in Policy S/JH ignores the commitments made in the Greater Cambridge City Deal and the Cambridgeshire and Peterborough Devolution Deal. It also ignores the findings of work undertaken by the National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership.

4.3.6 The Government is committed to the continued economic expansion and recognises it as a central component of the UK's economy's overall success with a particular focus on the devolution agenda and commitments made to significant infrastructure schemes such as A14 upgrade and East West Rail together with investment in research and development. On 23rd July 2026, the Government established the Greater Cambridge Development Corporation which will set out an ambitious plan for long-term sustainable growth in Greater Cambridge by coordinating the delivery of infrastructure, investment and strategic development.

4.3.7 Whilst it is accepted that the Local Plan will not be tested against the latest iteration of the Framework, Policy HO2 (3b) is clear that housing requirement figures should be higher than the overall figure identified in the local housing

needs assessment where appropriate. This includes where a higher housing requirement is necessary to meet the needs of neighbouring areas, or to reflect growth ambitions linked to economic development or infrastructure investment.

4.3.8 The report prepared by Turley at set out at Appendix 1 demonstrates inadequacy of the Councils' evidence base using a single baseline forecasting assumption. Paragraph 8 of the report identifies that it is entirely reasonable to note that OE envisage up to 8,480 jobs being created annually from 2023 – 2050, with at least 5,370 annual jobs even in the low scenario. The draft plan's target of only 3,500 job per annum over a shorter period is pessimistic and out of kilter with the growth aspirations for Cambridge. Further, without increasing employment land there is likely to be an increase of private vehicles where some 84% of those community more than 10km to work in Greater Cambridge by car, compared to only 46% of those travelling shorter distances.

4.3.9 The report concludes that planning more positively for at least 2,828 homes per annum should help to improve the ability of housing stock aligned with economic growth and this should be retested through the evidence base.

4.3.10 Taking the Government's commitment to the role that Greater Cambridgeshire will play in terms of both local and national economic growth it is considered that the plan's aspirations fail to take account of the need to increase the housing requirement to support economic growth aspirations and should be reconsidered and land identified to meet this figure.

<u>Need for affordable housing uplift</u>

4.3.11 Greater Cambridgeshire is one of the most expensive places to live with house prices well in excess of average earnings. More housing is needed above the minimum local housing need figure generally to make the supply greater and housing generally more affordable. NL consider that there is a need for more housing in Greater Cambridge, namely, to address the current housing crisis that is seen at both a national and local level, providing affordable housing which is an acute issue in the area. The Governments Written Ministerial Statement (June 2024) states "*increasing supply will be an essential part of improving affordability*".

4.3.12 Indeed, the headline figure taken from the latest Housing Needs Assessment (2025) confirms at paragraph 7.72 that there is a net affordable housing need of 1,636dpa across the plan area representing over 60% of the total housing requirement for all tenures. Paragraph 1.41 also clearly states:

"It does need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does, however, suggest that affordable housing delivery should be maximised where opportunities arise." (emphasis added)

4.3.13 The PPG is clear[5] that the total affordable housing need can be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the proposal percentage of affordable housing to be delivered by eligible market housing led developments and that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable housing.

4.3.14 Whilst it would be difficult to deliver the full affordable housing need in terms of how many market homes would need to be delivered, given the ongoing shortage of affordable homes and implications for not delivering a sufficient number, it is considered that there is a strong case for an uplift to the housing requirement to assist in affordable housing delivery which will result in both social and economic benefits and help to rebalance the housing market, particularly when the Councils' own evidence states every effort should be made to maximise delivery where possible.

Housing requirements for Neighbourhood Areas

4.3.15 Policy S/JH also sets out housing requirements for designated neighbourhood areas for which any additional or amended neighbourhood areas.

4.3.16 The methodology is calculated based on the overall housing requirement, the development strategy, the population of the neighbourhood area and its

[5] Paragraph: 024 Reference ID: 2a-024-20190220

proportion of the Greater Cambridge population. It therefore proposes a housing requirement of 6,183 dwellings (-122 dwellings from Regulation 18 consultation).

4.3.17 In principle, NL support the Council in setting a housing figure for relevant neighbourhood areas. However, these should only be seen as a starting point for setting a housing requirement where there is a lack of evidence surrounding individual housing needs of neighbourhood plan areas. If a housing needs assessment has been undertaken as part of preparing a neighbourhood plan or a previous assessment of need then it should be this figure that the housing requirement is predicated on.

4.3.18 In this regard, the Stapleford and Great Shelford Neighbourhood Plan (SGSNP) wade made in October 2025 and covers a slightly different plan period of 2024-2041. The Stapleford & Great Shelford Housing Needs Assessment prepared by AECOM (2023) confirms an affordable housing need of 348 homes for social and affordable rent and 300 homes for affordable home ownership over the period 2023 – 2043 and is therefore not too dissimilar to the period associated with the emerging Local Plan.

4.3.19 The SGSNP was prepared in the context that the GCLP would allocate Land at Mingle Lane to meet some of its housing needs due to its location in Green Belt. Indeed, this is reflected in South Cambridgeshire District Council's response to the Neighbourhood Plan Regulation 16 consultation in which the Council recognises the neighbourhood area's constraints and its ability to meet affordable housing needs. The response states at paragraph 10 that:

"The Neighbourhood Plan highlights that there is a high level of affordable housing need in the plan area, including from those with a local connection to the area. The response to meeting the needs of those with a local connection is usually to deliver rural exception sites for affordable housing, and the Neighbourhood Plan supports this, but any rural exception sites are unlikely to deliver the number of homes necessary to meet needs…Neighbourhood Plans cannot allocate sites within the Green Belt or remove land from the Green Belt in order to allocate sites. It is therefore considered acceptable for Neighbourhood Plans in this situation to specify that local connection criteria can be applied to a proportion of the new affordable homes on future Local Plan allocations and any windfall sites (that are

not rural exception sites, and where affordable housing can be secured) outside of the development framework boundary". (emphasis added)

4.3.20 The Greater Cambridge authorities took the decision to delete Land at Mingle Lane as a proposed allocation. Consequently, the GCLP provides no mechanism to even achieve the suggested housing requirement and more importantly the housing needs of the settlement. The Neighbourhood Plan is now unable to meet its housing needs and it is unlikely that any affordable housing will be delivered within the settlement. Even if the plan where to be reviewed the neighbourhood area is unable to allocate any meaningful growth unless land is released from the Green Belt to meet housing needs. Consequently, the community's housing needs will go unaddressed and affordability pressures will increase. Therefore, Land at Mingle Lane will need to be reincluded in the plan to achieve the proposed housing requirement and should be reflected in Policy S/DS.

Policy S/DS: Development Strategy

4.3.21 Policy S/DS sets out the development strategy of the area. The focus of development is within Cambridge, on the edge of Cambridge, the expansion of Cambourne, at other new settlements within the rural southern cluster and wider rural area.

4.3.22 The plan seeks to identify land to meet a housing need of 48,069 homes over the plan period. This consists of 38,378 homes located on existing committed sites and/or allocations. A total 9,691 additional homes are required to be identified on proposed allocations to meet the residual need.

4.3.23 Table 3 suggests the Council has a total supply of 52,032 dwellings and provides 8.2% headroom in relation to housing needs. However, as stated in our response to the Regulation 18 consultation, the GCLP places a significant over reliance on the ability of strategic and/or new settlements as part of the proposed spatial strategy. Such sites can often be delayed and stall housing delivery (as is currently evidenced by the Council's inability to demonstrate a housing land supply). Indeed, following the outcome of the CWWTP DCO application in which the Government has confirmed no funding to be provided, the site is now expected to be safeguarded for future development. Whilst this is now a longer term aspiration it

is just one example where large scale strategic sites could stall unexpectantly and effect the Council's ability to demonstrate a housing land supply.

4.3.24 Whilst large strategic sites/new settlements make an important contribution to the overall growth strategy, they are often complicated to bring forward due to land assembly, land remediation, submission of the initial application, discharge of conditions etc. Indeed, the Lichfields Start to Finish Report Third Edition suggests on average annual delivery of schemes of 2,000 dwellings or more build out at a rate of 100-188dpa and schemes of 500-999 dwellings build out at a rate of 44-83dpa depending on the number of outlets operating on each site. In this regard, the housing trajectory is fundamentally over optimistic as set out in paragraphs 4.3.31 – 4.3.33 below.

4.3.25 Whilst the development strategy identifies a number of strategic sites it fails to identify growth in sustainable settlements, such as Great Shelford, in terms of sites of a less strategic scale which are required for existing and future housing needs across many communities within the plan area. If any slippage occurs on these strategic sites, then it jeopardises the Councils' ability to demonstrate a flexible and responsive supply of housing land over the duration of the plan period. Indeed, it is not considered that the Council is currently able to demonstrate a housing land supply at present.

4.3.26 In this regard, the Councils' previous draft allocation at Land at Mingle Lane (ref:S/RSC/HW) sought to provide 100 dwellings to meet some of the housing needs of Great Shelford and Stapleford. The supporting text to that policy first published as part of the Regulation 18 consultation in 2021 stated that there is potential for higher capacity if additional access could be provided and that the site is well located in relation to Stapleford railway station (and the potential Cambridge South East Transport (CSET) guided busway which will run through Great Shelford with a stop on Hinton Way adjacent to the site) with resulting excellent access to Cambridge and Cambridge Biomedical Campus with the newly opened Cambridge South Station. The latter, was the justification by the Greater Cambridgeshire authorities that provided exceptional circumstances for Green Belt release as it ensured carbon benefits of locating homes close to jobs in research parks where existing and future opportunities to enable sustainable

modes of travel. NL do not disagree with the Councils' previous assessment of the site.

4.3.27 The recent changes to the Framework allow development which is well located and has access to rail services, even on land designated as Green Belt. In addition, there are further exceptional circumstances to justify its release discussed in response to Policy S/JH above i.e. the affordable housing need in the village that is currently not being met. This is a key issue which must be addressed by the plan. The inclusion of less large scale strategic sites across the district will help to provide access to both market and affordable housing locally to areas of need.

4.3.28 Despite the site's deletion, the Regulation 18 consultation in 2026 noted that Mingle Lane as a 'highly sustainable location' and that its only reason for removal was that the Council considers exceptional circumstances no longer exist following the identification of Land at Grange Farm. However, the identification of this site does not respond to local housing needs and the ability of existing residents to stay within their local communities.

4.3.29 The Councils continue to progress a strategy which seeks to limit climate change impact, enable national and global economic employment sectors to flourish and therefore these exceptional circumstances to Green Belt release still apply.

4.3.30 The Council has updated the Green Belt assessment and consider the site is now Grey Belt. Given the Government's emphasis of directing homes where they are well related to rail services the site should be reallocated for development.

4.3.31 The Site Allocations Topic Paper has been updated as part of this consultation. However, the previous 2025 paper stated at paragraph 6.72 that the decision to allocate the new settlement at Grange Farm now means that there is a significant allocation on route of the Cambridge Southern Corridor. It concludes that the Councils consider sufficient sites have been identified without the need to release land from the Green Belt and that no exceptional circumstances existing for release of Green Belt land.

4.3.32 The identification of Grange Farm, whilst located in the southern cluster it will take time to come forward and deliver at a sustained rate. It does not specifically

respond to the needs of individual settlements such as Great Shelford and Stapleford in which existing residents need access to new homes to remain within their existing communities. These matters are further discussed in response to Policy S/GB and S/JH to avoid repetition. It is also located further from Cambridge/Biomedical Research Campus meaning increased motor vehicle trips.

Housing trajectory

4.3.33 Appendix D shows the Councils' housing trajectory together with their housing land supply position. The housing trajectory shows that there is a minor deviation in terms of housing delivery across the plan period. However, it is notable that supply will drastically increase to 4,000 dwellings in 2029/30 showing a pronounced and unexplained peak and rise and fall of some 40-45% either side of a single year. No corresponding step-change is identified supported by evidence to justify this anomaly. A trajectory that assumes such a sharp, single year spike is not underpinned by robust or credible evidence.

4.3.34 NL note paragraph D.4 which the Council state that "*a sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period*". This makes the isolated early spike hard to reconcile with the Council's own stated approach to phasing. Indeed, the housing land supply assessment submitted as part of the application concerning Land at Mingle Lane identifies the Council is currently unable to demonstrate a supply and is over optimistic over the delivery of strategic sites that do not have the necessary evidence to justify their inclusion within the supply.

4.3.35 Furthermore, it is noted that the Councils are seeking to establish supply on the basis of the Liverpool Method. This is not considered appropriate and the Sedgefield approach should be used as this accords more broadly with national policy as it ensures historic under delivery is addressed now to boost housing supply. The housing trajectory and housing land supply methodology should be recalculated on a Sedgefield basis, requiring any shortfall to be met within the first five years as a minimum.

4.3.36 Taking the above into account, the Councils need to boost supply immediately in line with Government policy and need to maintain supply throughout the plan

period to avoid delays to large sites. If large sites start later then larger housing numbers will fall off the end of the plan period and housing needs will not be delivered in full. The answer to addressing this is through the allocation of smaller and medium size strategic sites. A big advantage of Land at Mingle Lane is that it is immediately deliverable with minimal infrastructure requirements and could be fully built out within 5 years.

Policy S/SH: Settlement Hierarchy

4.3.37 The settlement hierarchy seeks to direct development towards higher level services with Cambridge as a focal point for future development followed by the towns of Cambourne, Northstowe and Waterbeach.

4.3.38 NL support the identification of Great Shelford and Stapleford as a Rural Centre which is one the largest and most sustainable villages within Greater Cambridge. The settlements have access to a number of services including rail, primary education, employment opportunities, shops, and restaurants.

4.3.39 NL recognise the Councils' approach that development should be directed towards higher order settlements. However, the PPG is clear that a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket polices restricting housing development needs to be supported by robust evidence of their appropriateness.

4.3.40 Whilst we agree with the placement of Great Shelford and Stapleford within the settlement hierarchy, it must be remembered that this area has excellent access to Cambridge which will improve as part of future infrastructure initiatives such as the CSET busway and the new Cambridge South Station of the Cambridge Biomedical Campus which is directly accessed from Shelford station. Given the recognition of the number of services and facilities available within the settlement and its position within the settlement hierarchy it is imperative that sufficient growth is directed toward this location through the reintroduction of Land at Mingle Lane as a proposed allocation to enable better distribution of growth across Greater Cambridge.

4.3.41 Whilst no strategic constraint to the amount of development or redevelopment is imposed to these areas, this only relates to development within existing built

limits. Consequently, there is a lack of flexibility in terms of land adjacent to settlement boundaries particularly in the context of Grey Belt land.

4.3.42 The changes to the Framework has introduced National Development Management Policy S5 which sets out the principle of development outside settlements where they are within a reasonable walking distance of a well-connected station and in instances where there is an evidenced unmet housing need and does not stipulate a cap on any future development.

4.3.43 Policy S/SH should be updated to reflect Government's intention that allows development outside of existing development frameworks.

Policy S/DE: Defined development extents

4.3.44 Policy S/DE seeks to define settlement boundaries for settlements located within Greater Cambridge. Whilst the policy stipulates what development can come forward this is limited to allocations within Made Neighbourhood Plans, rural exception sites and development which requires a countryside location i.e. horticulture, forestry etc.

4.3.45 As stated above, for Stapleford and Great Shelford, there are no sites within the defined development extent that would be capable of coming forward to meet the identified need nor would rural exception sites be capable of meeting their need given the Council's response to the neighbourhood plan consultation.

4.3.46 The use of settlement boundaries should not preclude the ability of sustainable development opportunities from coming forward and should include a mechanism to ensure that development beyond settlement boundaries can come forward to respond to changes in circumstances over the plan period. Indeed, the reforms to the Framework have now introduced national development management Policy S5 which allows for development outside of defined development limits subject to the criteria attached to that policy. Whilst the Local Plan is being prepared in the context of the Framework 2024, the intention of Government is clear that the principle of development outside defined built up areas is acceptable subject to meeting the stipulations of Policy S5 of the Framework (2026).

4.3.47 Annex A of the Framework 2026 makes clear that development plan policies which are materially inconsistency with national decision-making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted or made against this Framework. Consequently, even on adoption of the plan very limited weight will be applied to S/DE as it does not accord with the approach of the Framework 2026. Therefore, the policy should be updated to remove the limitations of development outside defined and to allow sustainable locations such as Great Shelford and Stapleford to grow to support existing services, facilities and deliver housing to meet identified needs of these villages.

Policy S/GB: The Cambridge Green Belt

4.3.48 Policy S/GB seeks to maintain the existing Cambridge Green Belt. The Councils have updated its Green Belt to identify what it considers Grey Belt sites.

4.3.49 The Councils assessment considers Land at Mingle Lane as well as wider land is provisional Grey Belt with a moderate contribution. The evidence prepared by CSA and submitted as part of the application for 110 dwellings considers that the site makes a weak/no contribution to the Green Belt. Given that the area assessed incorporates wider land, it is our opinion that Land at Mingle Lane provides a weak contribution to the Grey Belt overall and the assessment and inclusion of the site in the plan should be reconsidered.

4.3.50 Notwithstanding this, as made clear in our previous response to the Regulation 18 consultation, the PPG is clear that where local authorities seek to review and alter Green Belt boundaries it is expected that authorities identify Grey Belt land to inform this work and prioritise development in accordance with paragraphs 147 – 148 of the Framework (2024).

4.3.51 Where land is identified as grey belt land, any proposed development should be considered against the requirements of paragraph 155 of the Framework which now includes the Golden Rules set out at paragraph 156.

4.3.52 The Green Belt Assessment (2021) identifies the level of harm to the Green Belt of the site at Mingle Lane, Great Shelford, as 'moderately high'. However, it scored as follows:

Settlement	Parcel Ref	Release scenario	Area (ha)	P1 contribution	P2 Contribution	P3 Contribution	Harm
Great Shelford	GS9	Release of land as expansion of Great Shelford	43.91	Moderate	Relatively limited	Limited/no contribution	Moderate High

4.3.53 Whilst the Council considers its contribution as moderately high in its previous Green Belt Assessment when assessed against individual purposes its highest contribution scored 'moderate'. Furthermore, the overall conclusion of "Moderate High" doesn't align with the conclusion reached for each criteria, which ranged from no contribution to moderate contribution.

4.3.54 The Green Belt Topic Paper notes judgments in Calverton and Keep Bourne End which find that exceptional circumstances is a matter of planning judgment. It is noted that the evidence paper accepts that these judgments pre-date the changes to national policy and do not consider the revised approach introduced by the Framework (2024) and concept of Grey Belt which is material consideration given the substantial change to Green Belt policy. The Development Strategy seeks to amend Green Belt boundaries at Cambridge Biomedical Campus and Babraham Research Campus. The Council confirm at paragraph 3.3 that the case for exceptional circumstances for these sites relate to site specific circumstances and unique economic factors. Whilst is it accepted that these sites may provide exceptional circumstances linked to economic growth it does not absolve the Councils that the Framework requires Grey Belt land to be prioritised over the release of land at other Green Belt locations.

4.3.55 It concludes at 4.1 that *"on this basis, the preferred option development strategy meets our identified need for development such that NPPF paragraph 146 is not*

relevant to the emerging plan. As there are no strategic exceptional circumstances for Green Belt release, the Councils have not considered grey belt land although we have carried out an assessment to identify land that could provisionally be considered grey belt, in line with NPPF requirements."

4.3.56 The updated assessment relating to Land at Mingle Lane is limited to a single paragraph at paragraph 4.25 of the Green Belt assessment – Review following changes to National Policy and Guidance which considers *"the partial containment of the parcel by urban development would be slightly increased but not enough to reduce the harm rating as this is still a fairly substantial area of land, the development of which would have some increased urbanising influence on open land to the north."* The parcel assessment includes wider land and does not appear that the Council have reviewed the full extent of the site ownership from what was submitted as part of the consultation.

4.3.57 Given the site meets the criteria for Grey Belt, is within walking distances to rail services and would provide significant market and affordable housing to meet the local community housing needs, it is considered there are exceptional circumstances to justify its release and it should therefore be reintroduced as an allocation to meet the needs of Great Shelford and Stapleford.

4.3.58 Furthermore, it is requested that Purpose 1c in Policy S/GB is amended to refer to towns and not communities in accordance with national policy. The amended text should be as follows: prevent towns in the environs of Cambridge from merging into one another and with the city.

<u>Policy CC/FM: Managing Flood Risk</u>

4.3.59 The policy states 'flood risk from all sources will be managed using the sequential, risk-based approach taking into account the impacts of climate change…'. This policy requires updating to take account the latest guidance set out in the PPG that the sequential test no longer needs to be applied where a site specific FRA demonstrates that occupiers will remain safe from surface water flood risk for the lifetime of the development without increasing flood risk elsewhere.

Policy BG/BG: Biodiversity and geodiversity

4.3.60 The above policy requires all development to provide a minimum of 10% biodiversity net gain. It further states major development must provide a minimum 20% biodiversity net gain unless exempt under the Environment Act 2021 to be provided on-site where this is feasible and effective.

4.3.61 National Development Management Policy N2 makes clear that development proposals may incorporate biodiversity enhancements which exceed the statutory objective, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. It further states decision makers should not give weight to other development plan policies which require biodiversity gains to go beyond the statutory framework.

4.3.62 Notwithstanding this, Table 9 of the updated Local Plan Viability Assessment (2026) considers affordable housing percentage relative to biodiversity net gain. However, it only considers affordable housing up to 40%. Given the Golden Rules this would increase affordable housing requirement to 50% which appears untested.

4.3.63 The PPG is clear that:

"Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented[6]."

4.3.64 The Draft Local Plan Viability Assessment (2026) considers that the 20% threshold is viable. The evidence supporting the 20% threshold is based upon the DEFRA 'Impact Assessment Biodiversity Net Gain and Local Nature Recovery Strategies IA No. RPC Reference No: RPC-4277(1)-DEFRA0EA and SQW report 'Viability Assessment of Biodiversity Net Gain in Essex' (August 2024). In this regard, the

[6] PPG Paragraph: 006 Reference ID: 74-006-20240214

market in Essex is invariably different to Greater Cambridge and it is unclear what effects setting a 20% threshold will have on development viability in the local area. Further evidence is required to demonstrate a local need for the higher percentages and impacts on viability related to Great Cambridge market area is required to justify any increase above the statutory 10% threshold.

Policy BG/EO: Providing and enhancing open spaces

4.3.65 In principle, NL support the above policy which seeks to ensure development provides for a mix of on-site provision and/or financial contributions for off-site open space provision to meet the needs arising from new development. However, the accessible Green and Open Space standards are considered to be excessive and would not be effective use of land which could maximise housing delivery on a site and realise development density in line with the current thinking of Government.

Policy WS/HD: Creating healthy new developments

4.3.66 NL support the principle behind this policy which seeks to promote health and wealth being by providing and enhancing accessibility to green spaces, open space and sport pitch and is designed to facilitate and encourage walking, wheeling and cycling that is accessible for all.

Policy GP/HD: Housing Density

4.3.67 Policy GP/HD requires development to make efficient use of land through applying appropriate densities that reflect local character and context through a design-led approach.

4.3.68 NL largely support the proposed policy particularly in relation to criteria 5 which allows for higher density development in sustainable locations that are well served within 1,200m by existing or proposed high quality public transport such as the Cambridgeshire Guided Busway, a transport interchange or railway station. This allows for a locally relevant policy consistent with the approach of national policy which seeks to direct development towards locations that have access to sustainable modes of transport.

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

4.3.69 The onus of the above policy is on the protection, conservation and enhancement of features that positively contribute to the quality and character of local areas. It further sets out Important Countryside Frontages (ICFs) where these penetrate or sweep into the built-up area providing a significant connection between the built environment and surrounding rural area and provides an important rural break between two nearby but detached parts of defined development extent.

4.3.70 NL consider that the policy should be more akin to that set out in Policy GP/QP which seeks to integrate new development into existing landscape features. Further, the ICF would in effect protect the countryside for its own sake rather than distinguishing the importance of perceived landscape asset. In essence they are an important view policy by another name. These areas will need to have some physical attribute to allow a decision maker to come to a view whether physical attributes 'take it out of the ordinary' rather than protecting views which may not have any landscape significance. Opinions on landscape are highly subjective and it is considered that this policy should be amended to ensure development can be designed in such a manner that takes account of the ICF through appropriate master planning rather than implementing what could be perceived as a blanket approach to protect views for their own sake.

Policy H/AH: Affordable Housing

4.3.71 In principle, NL are generally supportive of Policy H/AH which sets affordable housing requirement for the area. It requires all major development to provide at least 40% affordable housing of new homes unless a different is set out in the specific allocation policy, located within the Green Belt or is a co-living development. All major development within the Green Belt is to provide at least 50% affordable housing in compliance with the Golden Rules.

4.3.72 The Government's Written Ministerial Statement (June 2024) affirms the importance of affordable housing delivery. It states that:

"Although increasing supply will be an essential part of improving affordability, we must also go further in building a greater share of genuinely affordable homes.

That is why the Government is committed to the biggest growth in social and affordable housebuilding in a generation..."

4.3.73 The Council's assessment of affordable housing need identifies that it would be necessary to deliver over 60% of all homes in the form of affordable housing to meet demand and that delivery of affordable housing delivery has lagged behind the actual level of need. Accordingly, this points to a need to increase the housing requirement figure and identify further housing land to help reduce the level of acute need in Greater Cambridge.

Policy H/CB: Self and Custom Build Homes

4.3.74 NL reiterate the response made to the previous Regulation 18 consultation.

4.3.75 The above policy requires development proposals including 20 or more dwellings to provide at least 5% of new homes as service plots for custom and self build homes.

4.3.76 In principle, NL are generally supportive of the approach to assist in the delivery of custom and self build homes if evidence demonstrates the need for this type of development. However, it is typically the case that if plots remain unsold that they are returned to the developer to be provided as part of the market housing element. Whereas in this instance, the developer is required to either allow for a period of further marketing or that the plots are transferred to a registered provider at affordable housing land values.

4.3.77 The imposition of this aspect of the policy is therefore a never-ending period of marketing which could slow down housing delivery on the wider site until plots are acquired and stalling the delivery of much needed housing. Further, whilst there is an acute need for affordable housing, there is no guarantee that individual plots will be acquired by registered providers who would typically acquire development blocks that are already built to their specification to enable certainty over future management and costs associated with these homes. It is unlikely that Registered Providers will seek to acquire individual plots that are not built out by the developer and it is questionable whether this is actually viable for them to

acquire individual plots that are likely to be pepper potted throughout the development which will unlikely fit into their business structure.

4.3.78 Notwithstanding this, if these plots were transferred to a Registered Provider it would mean that the land value would ultimately reduce from custom build to affordable and may have an unintended consequence of rendering a development unviable. NL also question how this policy interacts with the 40-50% affordable housing policy requirement as it seems if self build plots are not sold then this will artificially increase affordable housing contributions above a policy compliant affordable housing contribution and thus questions whether this policy is compliant with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.The policy should be modified so that after a period of marketing that the homes will revert to open market housing.

5. Site Submission

5.1 Land at Mingle Lane, Great Shelford

Context

5.1.1 NL have land interests in Great Shelford at Land at Mingle Lane and are promoting it for residential development. The site was originally identified as a proposed allocation for residential development for 100 dwellings. There is a significant need to allocate additional housing sites of a smaller scale in response to acute housing needs and to allow a Council to demonstrate a 5 year housing land supply on plan adoption.

5.1.2 NL has acquired additional housing to the north meaning that the site is now capable of accommodating up to 240 dwellings. Consequently, two options for the development of the site are put forward for consideration as omission sites.

5.1.3 To support these representations a Vision Document is included at Appendix 2 of this submission which sets out the development concepts for both sites and demonstrates neither site is technically constrained and should be reallocated for development in light of the changes made to the Framework and the sustainability credentials both sites offer to meet growing housing needs.

Need for Development in Great Shelford

5.1.4 The Council consider that the site is sustainable and that development in this location would appear to utilise Grey Belt land and not fundamentally undermine the purposes taken together of the remaining Green Belt across the plan area[7].The AECOM housing needs assessment to support the SGSNP, there is currently a substantial unmet affordable housing need that is not currently being catered for within the draft GCLP or SGSNP. Consequently, there is a need for residential development to meet the needs of the settlement.

[7] Paragraph 12.25 of Committee Report associated with application reference 26/00610/OUT

5.1.5 Great Shelford is well placed to accommodate new development. The village centre is less than a 15-minute walk from the centre of the site and includes a delicatessen, library, pharmacy, barbers, butchers, hot food takeaway, convenience store, café and Memorial Hall. Other services include a Health Centre and tennis and bowls club.

The sustainability of Great Shelford to accommodate residential development

5.1.6 The site is well served by sustainable modes of transportation. Multiple bus stops are located within the vicinity of the site and less than 4-minute walk away. Shelford railway station and is accessible from Hinton Way which is approximately 656m/8minute walk from the site's centre providing routes to Cambridge and London. In addition, the settlement will also benefit from access to Cambridge South East Transport route providing a dedicated guided busway between the travel hub and Cambridge Biomedical Campus once implemented.

5.1.7 Its proximity to Shelford Station and sustainable modes of transportation provided the Council's justification for exceptional circumstances in allocating the site for residential development within the Regulation 18 Local Plan First Proposals consultation. This remains unchanged but strengthened in the context of the reforms to the Framework which seeks to direct new development within acceptable walking distance of railway stations.

Option 1: Development up to 110 dwellings

5.1.8 The site extends circa 7.44ha and was previously identified as a preferred option for development in the Councils' First Proposals consultation in 2021 and is illustrated at figure 1 below. The supporting vision document sets out how the site influences have been considered and contains an indicative framework plan which demonstrates how the development could come forward.



Figure 1: Location Plan

5.1.9 The proposed development has been guided by the principles established as part of the First Proposals consultation and policies contained in the now made Neighbourhood Plan. Extensive community engagement has been undertaken since 24th February 2025. The illustrative framework plan attached at appendix 2 reflects discussions which have taken place and feedback received from Great Shelford Parish Council, Stapleford Parish Council and South Cambridgeshire District Council to date.

5.1.10 An outline planning application was submitted on 17th February 2026 for up to 110 dwellings. All technical documentation can be viewed on the Council's public access system under application reference: 26/00610/OUT. The application was refused on 8th July 2026 and an appeal has been subsequently submitted. Notwithstanding the Council's reasons for refusal, this was purely based on housing land supply (as accepted site is Grey Belt without) as opposed to fundamental technical or landscape reasons. The evidence prepared by the Greater Cambridge Authorities and that prepared by NL is clear that the site is

sustainable and in a suitable location for housing and should be reinstated within the GCLP to meet the local communities housing needs.

5.1.11 The following benefits can be achieved:

- The developable area extends 3.99ha and can deliver up to 110 market and affordable dwellings at circa 27.5dph. The mix of housing types and tenures has been informed by the latest assessment of local housing need to align with the requirements in the made Neighbourhood Plan and to the respond to the local character of the area.
- At least 50% affordable housing will be provided meeting the acute needs of the local community and wider area.
- Circa 53% of the total site area to provide public open space and landscaping increasing biodiversity net gains. This will include:
    - Publicly accessible, high-quality green spaces for the benefit of existing and future residents. This includes a network of recreational routes throughout the site. There is a potential for a circular loop around the perimeter of the north eastern parcel and green spine route which will enhance access to nature and support community wellbeing.
    - The site will include a Locally Equipped Area of Play at the centre of the Green Spine ensuring natural surveillance and fostering a safe and inclusive environment. Additional trim trails will be proposed along the recreational route.
    - Sustainable Drainage Systems will be incorporated into the landscape buffer along with native tree planting and meadow planting. These basins will be designed to maximise benefits for biodiversity and to create attractive and varying landscape.
- Existing vegetation across the site would be retained, conserved and enhanced as far as possible. Any minimal losses will be mitigated by new native species planting.
- The site provides excellent connectivity to wider services and facilities. This can potentially be increased through the provision of a pedestrian and cycle link to Hinton Way.
- Local and district-wide benefits through investment in the local community resulting in increased economic activity because of construction phases and increase footfall supporting local businesses. The site is expected to generate 96 FTE jobs on site every year for the 4 years of the build (or 398 FTE positions

over the entirety of the project. The development of 110 dwellings also has the potential to generate approximately £273,284 in Council Tax revenue per annum.

Option 2: Development up to 240 dwellings

5.1.12 NL has acquired additional land to increase the developable area and community benefits in response to housing needs, particularly the acute affordable housing need and will provide further ecological enhancement and useable areas of public open space. A location plan is provided at figure 2 below. The supporting vision document sets out how the site influences have been considered and contains an indicative framework plan which demonstrates how the development could come forward.

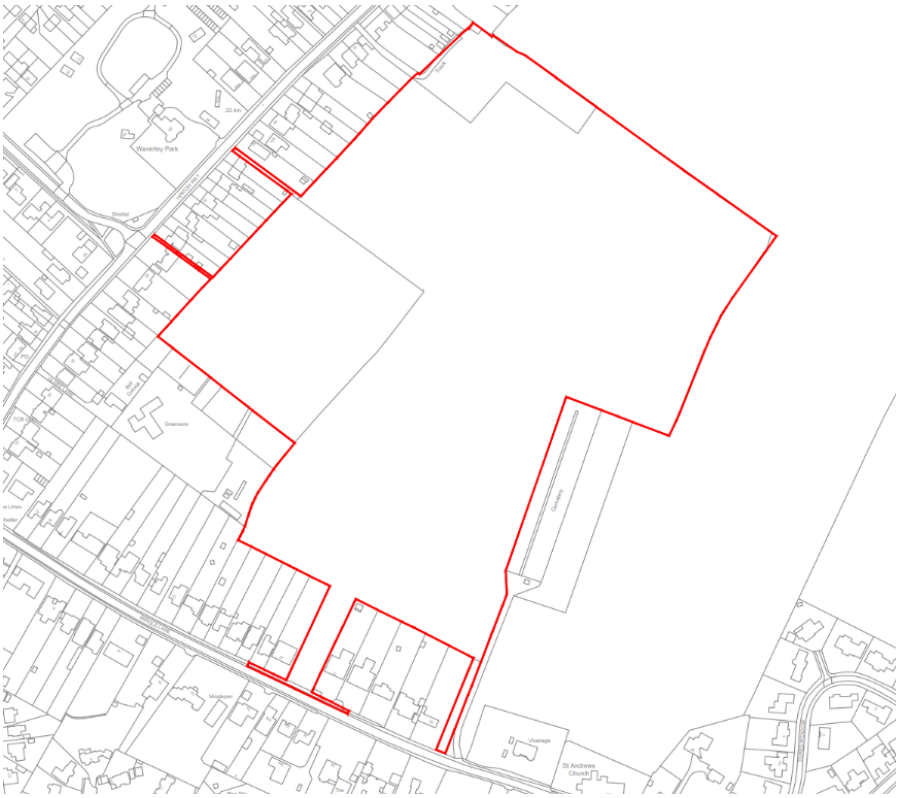


Figure 2: Site location plan

5.1.13 The site extends 12.06ha. Following a suite of technical reports the site can accommodate up to 240 dwellings.

5.1.14 Notwithstanding the above, the additional land under Nightingale Land's control provides the opportunity to increase the quantum of development in response to housing needs of the area and deliver a more comprehensive masterplan response to the site with additional open space/play areas and ecological enhancement. It also responds directly to the Framework which seeks to locate development near railway stations.

5.1.15 The land remains within a suitable walking distance to the railway station. Notably, the Council's HELAA (site ID: 116487) confirms that any potential policy constraints could be overcome through the planning application process, that the site has good accessibility to key local services, transport including within walking and cycling distance of Shelford Station. The latest landscape commentary provided in 2026 advises development to be located to the southern extent. The proposals will allow for suitable amount of retained fields and transitional landscape this would counteract any harm caused to the village edge as demonstrated by the lack of objection to application ref 26/00610/OUT.

5.1.16 The proposed development opportunity has been guided by an in depth masterplan designed principles taking into account the layout set out in Option 1. The site can achieve the following benefits

- Deliver a high quality, sustainable residential development to provide up to 240 dwellings.
- The development will provide 50% affordable housing in response to acute affordable housing needs of the area both in the context of its immediate location and district wide affordable housing need.
- Existing trees will be retained and protected through the inclusion of root protection areas. The proposed development includes a mix of densities and will allow a suitable landscape approach along the peripheries to ensure the site responds to its wider landscape context. The development will achieve on average 35dph which aligns with the requirements established in the Framework. This landscape-led approach will support habitat connectivity, reduces visual impact and enhances both ecological and aesthetic value.
- Vehicular access is provided via a new entrance along Mingle Lane, complemented by tree lined streets. This provides active travel connections to

the site and wider village through pedestrian and cycle connections along Hinton Way and Mingle Lane.

- A network of recreational paths running through the development will promote well-being and healthy lifestyles and connect to various equipped areas of play. It is proposed that the site will include 1no. NEAP, 2no. LEAP together with Trim-Trail/Natural Play trail which will be a benefit to both existing and future residents.
- A significant proportion of the site will provide new Green Infrastructure opportunities totalling 46% of the total site area. This will provide high quality setting for new homes and support biodiversity including improvements through the use of wild flower, native and thicket tree planting.
- The site will provide significant socio-economic benefits associated with its build out and use by future residents. It is estimated that the site will result in an increase of 307 economically active residents, and provide 134 Full Time Equivalent jobs. And result in £5.96m of Council Tax payments over the next decade.

Conclusion

5.1.17 There are no technical constraints which prevent either Option 1 or 2 coming forward. Both sites are considered sustainable and will provide wide ranging benefits to existing and future members of the local community.

5.1.18 As the Local Plan is heavily reliant on large scale strategic allocations/new settlements coming forward it is considered that the proposed allocation should be reinstated and extended to include wider land to ensure a flexible housing land supply is maintained and provide development which responds directly to local housing needs of Great Shelford and Stapleford.

6. CONCLUSIONS

6.1 Assessment of soundness

6.1.1 The Framework sets out four tests that must be met in order for the Local Plan to be found sound. In this regard, the plan must be:

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

6.1.2 NL do not consider the plan to be positively prepared, justified, effective or consistent with national policy due to the matters raised in relation to reliance of strategic sites which can be difficult to bring forward at a sustained rate and risks the deliverability of the plan. Furthermore, it is considered that the housing requirement should be increased so that it aligns with economic growth given the Government's commitment to the expansion of Cambridge as an area of economic importance nationally and therefore further housing land is required to facilitate this. Consequently, additional smaller scale housing sites are required to ensure this is achieved and also contributing to sustainable settlements individual needs, such as Great Shelford and Stapleford.

6.1.3 Accordingly, modifications are required to the plan to address these concerns through the allocation of land at Mingle Lane.

6.1.4 Nightingale Land request to be added to the consultation database to be kept informed of any future updates to the Local Plan and notified when the Plan is

submitted for examination. Further, we request to participate at the examination in public to discuss the matters raised in these representations.