Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Robert Wilson	Edward Durrant
Organisation (where relevant)	R2 Development Ltd.	Pegasus Group
Job Title (where relevant)	Managing Director	Associate Planner
Address, including Post Code	C/O agent	2nd Floor, Victory House, Vision Park, Histon, Cambridge, CB24 9ZR
Telephone	C/O agent	[redacted]
Email address	C/O agent	[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/DS
Proposed Submission Policies Map	N/A
Sustainability Appraisal	N/A
Habitats Regulations Assessment	N/A

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes

Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

The Councils recognise that to help Greater Cambridge transition to net zero carbon by 2050 it is essential that development is sited in places that help to reduce carbon emissions. Accordingly, the development strategy seeks in part to maximise opportunities for growth by the location of existing and committed public transport schemes. Examples of this are development north of Cambourne taking advantage of the proposed East West Rail station and Cambridge East being supported by the proposed Cambridge Eastern Access public transport corridor improvements. Weight is also attached to the potential for a new rail station to be delivered on the site to make it more sustainable.

It is clear from this strategy that significant weight is being attached to delivering growth around future train stations. This broadly accords with the approach taken by the Government in the 2026 revision of the NPPF, which seeks to focus growth around existing, well-connected station. Specifically, compliance with decision-making Policy S5(h) meaning that applications for sites near to well-connected stations should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF.

Whilst this local plan is being prepared under the legacy plan making system, with soundness in relation to consistency with national policy being considered against the NPPF of December 2024, the decision-making policies of the NPPF 2026 will nonetheless be material considerations in the determination of any applications for windfall sites. This is important as the Councils recognise that windfall sites are a valuable supply of new homes and employment opportunities. However, the emerging Local Plan is failing to capitalise on the benefits of windfalls sites that are now likely to come forward within reasonable walking distances of well-connected stations in accordance with Policy S5. This is a missed opportunity to strengthen the supply of new homes and mixed-use developments whilst also providing greater opportunities for developers of small and medium sized sites.

Figure 5[1] shows the disconnect between the development strategy of the emerging GCLP and the Government's aim of concentrating development around well-connected stations. Given that there are well-connected stations to the south of Cambridge, allocating sites that are physically well-related to these stations must form part of the development strategy for the Greater Cambridge area. Especially, as it is inevitable that sites will now come forward for development. Sites such as those being promoted by our client, R2 Developments Ltd., at 'Land to the south-east of Cambridge Road, Foxton'

[1] Figure 5: Map showing proposed Development Strategy for Greater Cambridge

(HELAA Site ID 40408 -Site ID 115890) and 'Land to the north and east of Barrington Road, Foxton' (HELAA Site ID (2023) 40412 -Site ID 115891) ('the Foxton sites').

Presently, outside of Cambridge, the city fringes and new settlements, development in rural areas is focused on Rural Centres and Minor Rural Centres. Whilst there is merit in this strategy, it ignores the fact that the majority of these settlements are not near to well-connected stations. In contrast there are a number of Group Villages that have railway stations on the London to Cambridge line (Foxton, Meldreth and Whittlesford). Compliance with Policy S5 now means that applications for windfall sites that are physically well-related to these stations should be approved, even where they are within the Green Belt. Therefore, the emerging GCLP needs to acknowledge the potential for these windfall sites to deliver new homes as part of a plan led process, rather than through allowing them to come forward as windfall applications.

The allocation of small and medium sized sites, like the Foxton sites, near these stations would not compromise the development strategy. Rather, they would offer an opportunity to deliver a more diverse growth strategy through a greater range of sites in sustainable locations where levels of car use for travel to work would not necessarily be higher than in Rural Centres and Minor Rural Centres that do not have railway stations. This change would be a positive response to the challenges of net zero carbon and Climate Act obligations and not undermine the Councils' vision and strategic priorities.

National planning policy states that plans should set out "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence". The 2026 revisions of the NPPF now mean that growth focused around the existing railway network is a reasonable alternative that needs to be considered. If not, then it risks undermining the emerging Local Plan through speculative applications supported by Policy S5(h) resulting in unplanned growth.

It is acknowledged that the GCLP team identified alternative development strategy choices based on geographically focused hybrids of previously identified sources of supply. One of which comprised Public Transport Corridors. It is unclear why the Cambridge to London rail network was not considered further. Especially as the proposed East West rail route is driving development north of Cambourne.

The blended strategy to meet a variety of needs and responding to the opportunities provided by different sources of supply does not fully utilise the public transport corridor of the London to Cambridge railway lines and the settlements with stations on them. Where those settlements are also within cycling distance of higher order settlements, then their potential to accommodate growth should be acknowledged and promoted through site allocations. Whilst those sites supported by Policy S5(h) nearer to Cambridge are inevitably within the Green Belt, like the Foxton sites, decision-making Policy GB7(1)(h) now confirms that these are now a category of development that is not inappropriate in the Green Belt.

Given the reliance on windfall sites, the revision to the NPPF and they impact they will have on delivery around stations must now be acknowledged. The Councils' evidence for its windfall allowance is based on in-depth analysis of historic housing completions on windfall sites and consideration of future trends taking account of national legislation, and national and local planning policy. Given the timing of this consultation, it is inevitable that this in-depth analysis could not have taken into account the recent revisions of the NPPF and the implications of applications coming forward in compliance

with Policy S5 in particular. Accordingly, the development strategy must consider the implications of Policy S5 on the determination of applications for windfall and use this as an opportunity to allocate more small and medium sized sites that are well located to existing well-connected railway stations.

Figure 9[2] shows how the development strategy is increasingly focussing larger sites including new settlements, which take can years to deliver new homes and employment opportunities. Indeed, 81% of the homes to be delivered across Greater Cambridge are on sites of 1,000 or more homes. This clear over reliance on strategic sites reduces the opportunity for small and medium sized developers that are more likely to build out smaller sites faster if they are allocated through the emerging Local Plan. This approach would also offer greater resilience to changes in the housing market and increases in materials and energy costs that may slow the build out of larger strategic sites. There would also be the added benefit of ensuring a more robust five-year supply position in the early years of the plan.

The trend for local plans covering the Greater Cambridge authorities to rely on larger sites for housing delivery and economic growth has its risks. This approach sidelines small and medium sized developers that are finding it increasing difficult to deliver sites in and around Cambridge. It is important that the emerging Local Plan is a vehicle for growth of the SME sector rather than offering few opportunities for small and medium developers to find sites.

Requiring SMEs to have a greater reliance on windfall sites means that individual sites have greater risks of not being considered suitable for development if they are outside settlements. As the principal of their development is not established through an allocation even when they are in sustainable locations. This means that SMEs inevitably have to look for less certain sites where the costs of attempting to secure a planning consent, and the risks of not achieving one would inevitably be higher.

This approach in effect prioritises volume housebuilders that may be less likely to utilise local trades, services and supply chains. The distinct lack of small and medium sites being allocated will contribute to the continued decline in small and medium sized house builders operating in Greater Cambridge.

SMEs offer a greater diversity of choice in house designs and materials that can add character and legibility to the villages of Greater Cambridge. The increased reliance of volume housebuilders who rely on larger less diverse supply chains can lead to a homogeny in house types and materials to do not always reflect the unique characters of the traditional settlements of South Cambridgeshire.

Wider regional needs

The benefits of delivering housing around railway stations that provide direct access to London have wider, regional benefits in meeting some of the housing needs of the capital. The recently published draft London Plan indicates that there would be a significant undersupply of housing in the first ten years after its adoption. The draft London Plan's approach to increasing housing supply towards the end of the plan period will inevitably have an impact upon settlements outside of London that have traditionally been used by commuters reliant on the railway. This potential wider housing need for

[2] Figure 9: Distribution of growth in comparison to previous Local Plans

the southeast of England is likely to put further pressure for development around stations that access London, which is supported by Policy S5.

Policy S5 promotes both residential and employment uses near to the well-connected station. In this case the Foxton sites offer the opportunity for commercial development alongside housing. Indeed, this could be a means of maximising the development potential of the Cambridge Road site in particular. By delivering employment opportunities alongside new homes it would meet the requirements of paragraph 111 of NPPF seeking to minimise the length and journeys needed for employment opportunities. The location of employment uses on the A505 corridor, where there are nearby, larger employment sites would help to deliver a greater range of employment space for companies to grow whilst staying within the same geographical area. This would be important for staff retention and building client bases that companies need to grow.

The Government is clear that sustainable development in line with Policy S3 of the 2026 NPPF can be delivered by the development of sites within reasonable walking distance of well-connected stations. Sites such as those in Foxton have effectively been given a green light for applications to be supported where they comply with Policy S5(h). However, there is still a risk for small and medium developers in attempting to secure planning permission for such sites. This risk could be removed by the emerging Local Plan allocating them for development.

Given the number of such stations to the south of the Greater Cambridge area the development potential of land surrounding them cannot be ignored as they now offer a reasonable alternative for meeting some of the growth needs. The GCLP elevates Rural Centres and Minor Rural Centres when considering sustainability in the rural areas of Greater Cambridge. However, in light of the 2026 NPPF changes, lower order settlements with well-connected should now be on an equal footing with their sustainability acknowledged through the strategy for growth in rural areas.

Please provide a 100 word summary of your representation.

Recent changes to national planning policy support the development of sites that are within walking distance of well-connected railway stations. The strategy for the growth of Greater Cambridge ignores the role that these sites can play in delivering sustainable development.

The strategy, which presently has an overreliance on strategic sites, could be made more robust and resilient if it included allocations for more medium sized sites that would also allow greater opportunities for local workers. The Councils should acknowledge the role of sites within walking distance of well-connected railway stations and positively plan for them in the emerging Local Plan.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Criterion 'e' of Part 1 of Policy S/DS should be amended by way of the text highlighted in bold below:

1. The need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge Green Belt:

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 **and within reasonable walking distances of well-connected stations**.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	Yes / No
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Because the existing strategy for the distribution of housing growth ignores the role that sites within reasonable walking distance of well-connected railway stations that provide connectivity with Cambridge and London. In considering this strategy the Inspector should have every opportunity to assess the appropriateness of alternative sites for the delivery of new homes and jobs on sites near to well-connected railway stations.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes