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Project Number: 260065

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Dear Policy Team,

Proposed Submission Greater Cambridge Local Plan
Regulation 19 Consultation
Re – Granta Land / Meldreth

Enodia Planning have prepared this letter by way of representation to the Regulation 19 consultation on the Proposed Submission Greater Cambridge Local Plan, published by the Greater Cambridge Planning Shared Planning team (referred to below as 'Greater Cambridge').

It brings together all comments lodged online via the Opus portal.

Comments are prepared and submitted on behalf of Granta Land, who are actively promoting land interests around Meldreth.

At the present time, none of the promoted land is proposed for allocation within the Proposed Submission Local Plan. Further comment is provided below on behalf of Granta, highlighting why land at **HELAA Refs 200794, 40089, 40088 and 200807** is suitable and appropriate for residential allocation.

Notwithstanding the site-specific suitability to help contribute to a more robust and effective strategy, Greater Cambridge will in any event need to allocate further housing sites to meet their significant housing requirements and economic growth ambition, in light of major concern around the current trajectories. This should be within a broader range of settlements to ensure a balanced and sound approach to housing delivery and match wider growth aspiration and ambition.

This letter summarises Granta Land's comments made in respect of the Proposed Submission Local Plan text and policies; and the supporting evidence base where relevant, having reviewed the Consultation Statement and Appendices, Sustainability Appraisal and Appendices, Topic Papers covering Homes and Development Strategy, and HELAA updates.

Whilst minor comment is made where necessary to development management policies, this representation focusses primarily on the development strategy, and growth / ambition.

The soundness concerns can be summarised as:

- Proposed housing numbers should be more ambitious to support forecast economic growth and stated growth ambitions;
- Over-reliance on existing commitments and large strategic sites;
- Realism of the housing trajectory;
- The need to allocate more sites to address the above.

Proposed Submission Local Plan

The Proposed Submission Local Plan is clear in laying out the challenges faced by Greater Cambridge around delivery of housing and overall growth.

However, there are concerns whether the development strategy is robust in planning for sufficient growth to match ambition, and whether the proposed trajectory is deliverable.

As set out in this representation, there is the need for Greater Cambridge to identify further sites for potential allocation to ensure that the strategy and Local Plan policy are consistent with national policy which, at Para 61 of the 2024 NPPF (noting the Local Plan is progressing under 2024 NPPF Plan-making provisions) states that the overall aim should be to meet an area's housing need.

New Homes and Jobs

At the outset, there is concern that there is a lack of alignment between the jobs and homes numbers, **Policy S/JH** stating that development will deliver 73,300 additional new jobs and a minimum of 48,069 new homes (2,289 per year). It is noted that there is some headroom built into the Development Strategy, which is covered below.

There is concern that this level of housing provision does not fully reflect or account for the level of planned economic growth and that 48,069 new homes will not yield the increase in residents to meet potential employment growth.

That is on the basis of the numbers currently specified. The situation might be even more acute based on existing evidence indicating greater growth, as the Proposed Submission Local Plan acknowledges at Paras 2.10 and 2.11. Greater Cambridge have used a forecast model at the lower end of those within the evidence base, in the Greater Cambridge Employment and Housing Evidence Update 2025 (EHNU 2025).

Based on a track record of recent growth, the EHNU 2025 identified a higher growth forecast than that used to underpin the need to Greater Cambridge. There is a lack of clear justification to why this hasn't been used. Given the recommendation in the evidence base to provide flexibility in employment land to allow the marker to deliver more jobs, this needs to be reflected in policy.

This would also align with stated political ambition to support and facilitate economic growth. Paul Bristow, Mayor of Cambridge and Peterborough, marked his first year in post by setting out this ambition. The detail are set out in an article dated 2 June 2026 published on the Cambridgeshire & Peterborough Combined Authority website. Highlighting various achievements over the preceding 12 months, the clear specific statement is "an ambition to go faster" around delivery.

This sits in the context of the Mayor's Local Growth Plan, 'Get Cambridgeshire and Peterborough Growing'. This includes the headline ambitions for the local economy to grow faster than any other region in the UK and, based on pursuing 'aspirational growth', the potential to triple the size of the economy by 2050. Later in the Growth Plan document is the forecast that the housing supply across the combined area would need to increase by 54% to meet economic growth ambition. This is not reflected in the Greater Cambridge area in the draft Local Plan.

The Proposed Submission Local Plan does not presently match this potential ambition. There is the risk of a Local Plan progressing that limits rather than facilitates this ambition.

There remains a national focus on the Oxford-Cambridge Corridor, with Government commitments of £800m to drive growth, and the Greater Cambridge Development Corporation was launched in July this year to help unlock and deliver development. In launching the Development Corporation, Matthew Pennycook statement 'Realising the Full Potential of Greater Cambridge' highlighted the clear and specific objectives to support ambitious and high-quality sustainable growth in Cambridge and its environs.

All the indicators are there in the available evidence to support more significant economic growth and job creation in Greater Cambridge.

Additional housing numbers will need to be planned for, to support this ambition rather than a framework that potentially limits it. At present there is a lack of evidence to demonstrate that 48,069 dwellings is sufficient to support the delivery of 73,300 additional jobs, notwithstanding the evidence-based justification to plan for more jobs to support growth ambitions.

A further review of numbers is needed. Whilst headroom is built into potential supply in the Development Strategy (see below), this should be formalised within the target headline numbers, and should be informed by the availability of appropriate sites suitable for additional allocation in Greater Cambridge that can contribute to the housing trajectory without being delayed by the need to deliver significant new infrastructure to facilitate the development of new homes.

Without a review and an increased target number of homes, there is a risk of worsening affordability, increased inward commuting, and constrained economic growth.

Development Strategy

Based on the comments raised above, there will need to be a review of the proposed development strategy, to set out where the required additional growth should be focussed.

The Development Strategy as it stands at **Policy S/DS** is also problematic and unsound given its overreliance on significant strategic sites and new settlements.

Highlighting the clear issues with relying on new settlements to deliver a majority of housing, 15,720 homes are identified at an expanded Cambourne, 4,500 at Grange Farm, 10,180 at Northstowe, 11,000 at Waterbeach, and 3,500 at Bourn Airfield.

Of these total 44,900, only around half (22,823) are expected to be delivered in the Plan period. This number equating to 47.5% of the headline housing target number in the Plan.

In highlighting the limitations on delivery on these sites in the Plan period, Greater Cambridge are acknowledging the risks to delivery. Around timescales to planning and, more fundamentally, the need for significant infrastructure to be delivered in advance of housing delivery. There is the clear and obvious risk of delays across these locations in terms of the sites starting to yield in the first place, and to then yield at the ambitious delivery rates. This means that greater numbers will be pushed outside the Plan period, putting the Plan's objectives at significant risk.

That is based on the current baselines, without the Plan being revised to accommodate the increases needed to meet the national and mayoral growth ambitions for Greater Cambridge, as set out above.

The 'current supply' figure of 38,378 is therefore not as robust as the title would suggest. There is currently inflexibility built into the Local Plan to take account of the clear risk of under-delivery. The current supply figure also includes a generous windfall allowance, which we address in the housing trajectory section below.

This all points to the need to allocate additional sites, for the Plan to be more effective. The Development Strategy should build in greater growth on appropriate sites adjacent to existing villages. This would contribute to the overall housing requirement, whilst meeting local need and ensuring affordability in sustainable locations.

Meldreth is a highly sustainable location. Whilst it is a Group Village, it benefits from direct rail access to Cambridge and is also immediately adjacent to the Minor Rural Centre of Melbourn. The settlement hierarchy at Policy S/DS states that development in the rural area will be provided for different categories of village consistent with the level of local service provision and quality of public transport

access to Cambridge. The ability for Meldreth to accommodate growth is clear, helping to meet local need and maintain the vitality of the village, and has been set out in previous comments made on behalf of Granta Land to earlier stages of the Plan process.

The Development Strategy is inflexible in its current form, and overly reliant on the limited number of strategic growth locations including new settlements. As stated above, the new settlement growth equates to 47.5% of the current target. When the proposed growth in and at similarly risky strategic sites on the edge of Cambridge are added, almost 73% of Greater Cambridge's supply is focussed on large sites that are not expected to be delivered in full during the Plan period, resulting in a large deficit of unmet need.

A better and more balanced spread of growth including in sustainable villages will improve resilience, housing delivery, and a more robust Local Plan with less risk around delivery. Suitable locations adjacent to villages should be identified through additional, appropriate, allocations.

Given the clear need for Greater Cambridge to review their Development Strategy, and the need for this to be supported by additional allocations to ensure a robust and balanced approach and to meet economic growth ambitions, Granta's land interests should be reviewed and considered favourably to contribute to this need.

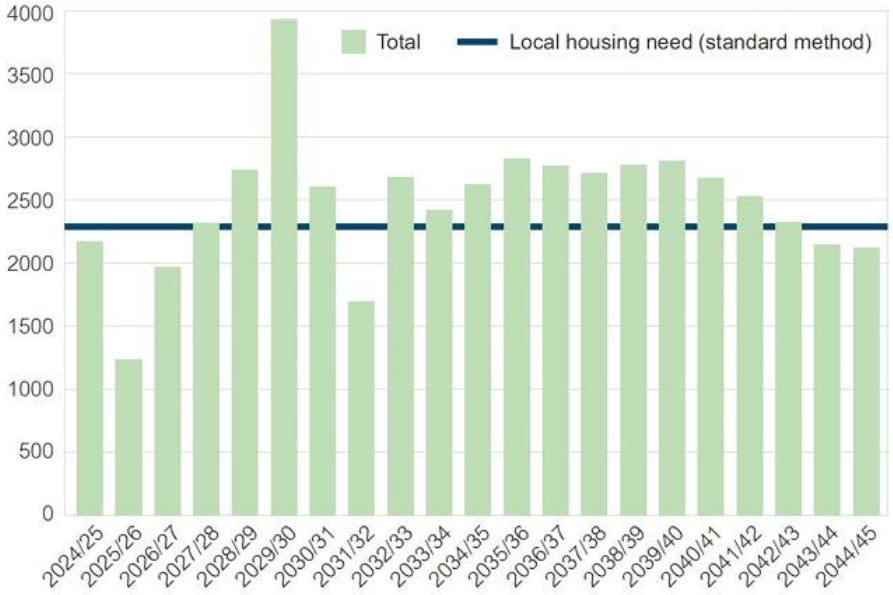
Housing Trajectory

Before examining the detail the yield from strategic sites built into the trajectory, Granta Land make comment on the significant windfall allowance included within the 'current supply' figure that Greater Cambridge are using as the basis of their delivery. This equates to 425 dwellings per year in the supply, taken from the Housing Delivery Study Addendum published within the evidence base. This is informed by data suggesting a historic delivery rate of 470 dwellings per year from windfall.

However, it is noted that this is aged data going back a period of 20 years. And it is a figure that has not been achieved in Greater Cambridge in the last 10 years of monitoring. The last 7 years of monitored dates suggests a windfall delivery rate at 395 dwellings.

There is therefore a clear risk of an over-reliance on windfall sites. Providing further justification for available sites that are demonstrated as appropriate for delivery to be allocated as part of a more effective development strategy underpinned by a robust and reliable trajectory.

The Development Strategy is currently informed by the trajectory information set out at Appendix D of the Proposed Submission Local Plan.



Despite a current under-delivery of dwellings, there is expected to be a significant leap in completions shortly after anticipated Plan adoption before numbers dip once again to then sit consistently above the annual need figure.

Further details are set out in the Development Strategy Topic Paper 2026. Immediately there is concern that the typical assumptions for lead in times and build out rates are based, as stated at Para 2.1 of the Topic Paper, on a Housing Delivery Study from 2021. Market conditions have significantly changed in the interim period.

Greater Cambridge suggest that a 2025 addendum to the Delivery Study indicates that delivery rates can still be relied upon. However, on review of these documents, it is noted that Greater Cambridge are being extremely ambitious in their assumptions underpinning the delivery rates of the large, strategic sites.

The 2025 Delivery Study addendum, from Para 2.41 sets out the current and expected delivery rates of consented sites. None of these are anticipated to breach 300 dwellings per year.

The Topic Paper provides background to the delivery rates included in the trajectory, on a site-by-site basis. The jump in the trajectory (as shown above) around 2027/28 to 2030/31 is as a result of big numbers of circa 500 dwellings per year on each of Darwin Green (491 in 29/30), Northstowe (550 in 29/30) and Waterbeach (539 in 29/30). Plus, a jump to 604 in NW Cambridge (Eddington) in 30/31, despite this site yielding significantly less in the years preceding and following.

The majority of figures are greater than Greater Cambridge's own evidence of delivery on comparable sites, and there is a lack of apparent detail within the topic paper and Plan evidence-base to justify the specific numbers up and around 500 dwellings per year on these specific sites. It is unclear where these numbers have come from come from and how they are justified. There is insufficient evidence to suggest this is a robust and reliant trajectory in its current form, or to suggest that the anticipated fluctuations would suddenly stabilise to allow consistent delivery just above the requirements over later years of the Plan.

There is also a complete lack of evidence to justify why in many cases these largest numbers are greater than those included in the trajectory at the Reg 18 stage. Suggesting that there may be an element of hope value factored in, in an effort to increase yield and engineer a 5-year supply on Plan adoption.

Various assumptions made on sites highlight the risk of delays for infrastructure delivery. Reinforcing previous comments, these risks form genuine concerns around Plan soundness and effectiveness.

Concerns are also raised in respect of the method that Greater Cambridge are using to address the previous shortfall in housing delivery. In choosing to use the Liverpool method, this is not aligned to Planning Policy Guidance which is clear that the preferred approach is the Sedgefield approach and seeking to address the deficit within a 5-year period to boost housing supply.

Whilst PPG does allow the use of the Liverpool method, there is currently insufficient justification to demonstrate why Greater Cambridge are seeking to utilise it at the current time but adds that this must be justified during the plan-making process. Given the Council's own evidence, at the Housing Delivery Addendum 2025 update, states that a 5-year supply could be achieved under the Sedgefield method, basing supply on the Liverpool method at the present time is unjustified and unsound.

Where there are sites available for allocation such as those promoted by Granta Land at Meldreth, this is further justification for multiple smaller sites in other sustainable locations, less reliant on significant infrastructure to be delivered first, to be allocated. Particularly where these are close to stations, well-located to existing settlements, are available and can deliver housing early in the Plan period, including within the first 5 years.

Settlement Hierarchy

The settlement hierarchy policy is at **Policy S/SH**.

Granta Land would broadly reiterate previous comments submitted in respect of the settlement hierarchy for Greater Cambridge, and specifically the classification of Meldreth and Melbourn.

As mentioned above, Meldreth is currently defined as a 'Group Village', and Melbourn as a 'Minor Rural Centre'.

It is logical, both geographically and given the proximity of the services within the settlements, that they should be considered as a single settlement for the purposes of the hierarchy. Of the two, Melbourn is 'above' Meldreth in the hierarchy, as a result of size. However, it is Meldreth that provides the rail station on its southeastern edge. And, although this is within walking distance of Melbourn, it is not considered in the village's assessment.

Whilst separated by the A10, the proximity and foot/cycle path linkages between the settlements would provide clear justification for them to be combined for the purposes of the hierarchy, and the resulting Melbourn / Meldreth to be defined as a Rural Centre. Providing, as it would, a station, secondary school, two primary schools, and various shops, pubs and community facilities. The villages are already highly sustainable, and this would be a more appropriate position and definition within the settlement hierarchy. And further emphasising the credentials for future housing development.

Defined Development Extents

Whilst it appreciated that the Greater Cambridge Local Plan is proceeding under the previous 2024 NPPF, it is important that the policies within the Proposed Submission Local Plan are cognisant of the new 2026 NPPF and seeks to either reflect updates within policies or, at the least, make reference to support where there is NPPF compliance.

Policy D/DE should be amended at part 2 of the policy accordingly, to add additional criteria as below (the proposed additional text in bold):

2. Outside defined development extents, development will not be permitted except for:

a. Allocations within Made Neighbourhood Plans;

b. Rural Exception sites meeting local need for affordable housing;

c. Development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside;

d. Where development is supported by other policies in this plan; ***or***

e. Where development is supported by NPPF policy.

The NPPF, revised and adopted in August 2026 has introduced a new policy, S5, for development outside settlements.

It sets various circumstances where development might be deemed appropriate, with the potential to affect sites around various settlements in the Greater Cambridge area and to which the Proposed Submission Local Plan currently makes no reference.

One of these circumstances, for example, is at **NPPF Policy S5, 1, h**, which potentially supports residential and mixed-use development which would:

i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
ii. Be physically well-related to the station or the settlement within which the station is located;
iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and
iv. Not prejudice any proposals for long-term comprehensive development in the same location.

Given the number of stations in Greater Cambridge settlements that potentially meet the definition of a 'well-connected station', it is important that the role and function that the NPPF will play in decision-making on adoption of the Local Plan is reflected by making appropriate reference to it within policy.,

A well-connected station is defined as one which is located in a top 80 Travel to Work Area and which is served by at least 4 trains in an hour, or 2 in any one direction, or the reasonable prospect of being served.

Meldreth Station is an example which potentially qualifies under this definition, 4 services per hour – 2 each in the direction of Cambridge and to London / Brighton – during peak time, and 2 departures per hour throughout the day to London (one with a change at Cambridge).

There is also the prospect of 2 services in each direction throughout the day, with various submissions having been made to travel groups, and Travel Studies by Greater Cambridge Partnership working on the basis of 2 services per hour throughout the day at Foxton, Shepreth and Meldreth (ref: Foxton Park and Rail Transport Hub Options Assessment Report).

Another policy of relevance is **NPPF Policy S5, 1, j**. This policy provides express decision-making support for development which would address an evidenced unmet need including the provision of housing. Sites need to be well-related to an existing settlement and be of a scale which can be accommodated taking into account the availability of infrastructure.

Based on the acknowledged potential for greater economic growth across Greater Cambridgeshire, and the questionable housing trajectories examined above, there is the real risk that Greater Cambridge will not be allocating enough deliverable sites to meet their need. Sites such as Granta Land's holdings around Meldreth may benefit from the policy support of S5, 1, j given their location and credentials (set out in the next section of this submission). It is logical, therefore, that such sites need to be re-assessed and considered for allocation, so that they can contribute to Greater Cambridge's known and projected need, in a balanced and effective development strategy.

Greater Cambridge have now split out their 5-year supply monitoring between Cambridge City and South Cambs. This skews the overall figure and means potential sites that are well-connected to Cambridge and would help supports its growth may be overlooked, and the opportunity to meet the need of the whole Greater Cambridge area missed. The proposed joint monitoring across the whole is welcomed, but Plan preparation should be informed by joint monitoring to ensure appropriate opportunities for delivery are realised.

Greater Cambridge policy should reflect this NPPF support under its Policy S5 for development in such locations and recognise the role that such locations can play in meeting the growth aspirations for the area. It furthers the credentials for land such as that under Granta Land's control for allocation – allocation being the logical response given the location of the promoted sites adjacent to the settlements of Meldreth and Melbourn in an area where need exists, in close proximity to Meldreth station, and where the sites are available, deliverable, and sustainable.

Site Allocations

Chapter 3.5 of the Proposed Submission Local Plan sets out details of site allocations in the 'rest of the rural area'.

Whilst there are two sites proposed for allocation in Melbourn (Policy S/RRA/ML: the Moor; and Policy S/RR/CR: Land to the west of Cambridge Road) highlighting the appropriateness of the location for some growth, there is none around Meldreth.

For the reasons outlined throughout this representation, additional allocations should be made in the rural areas of Greater Cambridge, to ensure a balanced housing strategy, and maximising the prospect of Greater Cambridge to plan for sufficient growth matching economic ambition.

Granta Land have previously promoted 4 landholdings around the edge of Meldreth. These are:

- Land west of Station Road (HELAA Site ID 200794): 1.42 ha for up to 20 dwellings
- Land east of Station Road (HELAA Site ID 40089): 3.82ha for up to 70 dwellings
- Land at Sheene Farm (HELAA Site ID 40088): 22.25ha for 365-521 dwellings
- Land at Valley Farm (HELAA Site ID 200807): 20.78ha for up to 200 dwellings

Land west of Station Road – 200794



As clarified in previous comments, the 1.42ha promoted site area would include 0.83ha for green infrastructure, so the developable area extends to 0.58ha. For this reason, the promoted capacity of the site is around 20 dwellings at 30dph, rather than the 50 included in the HELAA assessment.

The site is well-enclosed by existing boundary planting, and is unconstrained in terms of land-use or site designations.

For the reasons outlined above in terms of justifying Meldreth and Melbourn as an important location for growth to be included in the Greater Cambridge development strategy, the site is highly sustainable close to services and facilities within Melbourn, and with easy access to Meldreth station.

Within the considerable open space factored into the site area, an appropriate layout can include suitable buffers and provide an attractive landscape-led residential scheme, including an important element of affordable housing in this rural settlement location. Meeting a clear need, and contributing to growth ambitions of Greater Cambridge that are not fully factored into the Proposed Submission Local Plan as it stands.

Delivery of the site would not rely on wider infrastructure improvements of the kind that are likely to delay the delivery of strategic allocations included in the draft Plan.

The site is available and deliverable within a 5-year period. It should be included as an allocation.

Land east of Station Road – 40089



This site remains immediately deliverable, with no reliance on strategic infrastructure to unlock the delivery of dwellings. Any necessary improvements will be site-specific and able to be delivered alongside construction on site. There are multiple options around non-car modes of transport, providing a range of housing (including affordable units) to contribute to the needs of the area whilst providing access to jobs, supporting economic growth

Indeed, previous site promotion has highlighted the opportunities that exist here for links to the Biomedical Campus by cycle. The immediate proximity to Meldreth Station (around 350m northwest of the site) is a clear benefit of the site coming forward, with the circa 10mins journey time to Cambridge South meaning this is a sustainable location providing links to excellent employment opportunities. It provides an alternative to the large strategic options that dominate Greater Cambridge's development strategy and will provide future residents with attractive location options, whilst delivering housing numbers within the key 5-year post-adoption period.

Further enhancing the site's credentials is the ability to design in links between Melbourn and Meldreth, further encouraging non-car movement.

Previous HELAA comments have focussed on concerns about the existing gap between Meldreth and Melbourn and the impact on the landscape here as a result. Whilst not protected in policy terms, the separation is acknowledged. Granta Land maintains that the site would not result in significant harm to the landscape, with the backdrop of the A10 to the west, and adjoining the built form of the village to the east. A carefully masterplanned layout would include suitable buffers within a landscape-led scheme, to maintain character and a gap to the A10, which would act as a clear, established barrier to coalescence. A previously submitted masterplan showed how this can be appropriately achieved.

Any proposals that come forward would demonstrate the ability of the access to accommodate a moderate development of around 70 dwellings, in terms of safety and surrounding network capacity.

The development of the site should be viewed as a highly sustainable extension to the existing village delivering significant benefits. It remains that there are no known constraints to delivery, and the site is readily available.

Extending to circa 3.82ha, it is maintained that the site can deliver around 70 dwellings, based on a reasonable density of 30dph to take account of provision of open space, landscaping and green corridors, and road infrastructure. To help achieve a more balanced housing strategy, and to contribute important additional units to the supply to help meet growth ambition. It should be included as an allocation.

Land at Sheene Farm – 40088



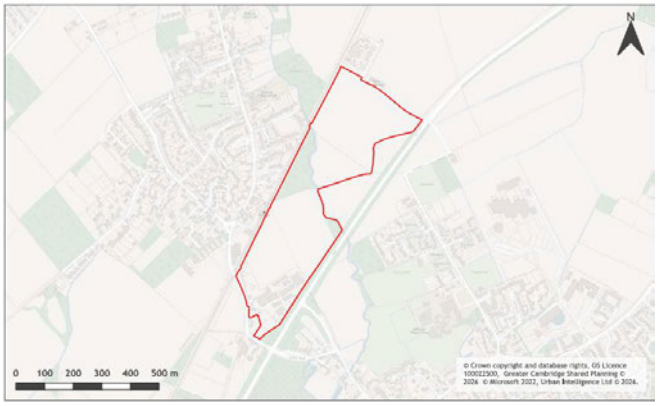
This 22.25ha total promoted site would comprise 10.44ha of developable area, with 11.46ha of green infrastructure including SuDS. A previously included indicative masterplan has demonstrated how the site could deliver around 360 dwellings at 30dph.

There is an existing access which, subject to enhancement, will provide suitable and safe highway access to and from the site. There are small areas of flood risk to the boundaries, but these can easily be factored into a suitable masterplan for the site, including the significant aforementioned open space infrastructure.

There are no other constraints to limit development, the site being suitably distant from heritage assets to ensure their setting will not be impacted.

The site remains available, and is deliverable within a 5-year period. The benefits of doing so would be significant, with the site contributing to a balanced development strategy and helping to accommodate growth ambitions for Greater Cambridge. The site is well-located to public transport links, providing excellent options for travel for employment without the need to rely on the private car.

Land at Valley Farm – 200807



As shown on the previously submitted indicative masterplan, of the large, promoted area of around 20.78ha, the developable area of 6.15ha could yield up to 200 dwellings.

In close proximity to Meldreth station, immediately to the west, the site provides an excellent opportunity to deliver a comprehensive masterplan in a wholly suitable and sustainable location. The River Mel bisects the site with the developable area to the south of this natural feature, and significant opens space beyond to the north.

Part of the site is previously developed, and the masterplan allows for the retention of the existing farm yard (which currently hosts some business land uses) at the southern end of the site. A new access from Station Road will provide an appropriate form access to serve both the development site and the farmyard.

The masterplan would be landscape-led, with significant planting and buffers. This would ensure an attractive layout and also address landscape concerns at the time of previous HELAA assessment. Significant separation would be maintained to the physical defensible boundary of the A10 to the east, which would mean there would be no risk of coalescence and a physical and meaningful gap maintained.

The site, so close to Meldreth station and with the links that can be provided to the station and foot / cycle links to both villages, means that it is exceptionally well-located to the existing settlements of Meldreth and Melbourn. The site's development potential in the context of the 2026 NPPF is compelling, and the site should be re-considered by Greater Cambridge for the purposes of the Local Plan.

It is available and deliverable within 5-years of adoption of the Plan. Given the need for a more effective and robust development strategy, and the need for more housing numbers to meet economic growth

ambition, the case for development is strong. The site should be allocated in the Greater Cambridge Local Plan.

Development Management Policies

As mentioned above, only brief comment in made on the DM policies within the Proposed Submission Local Plan, where changes are needed to ensure they are sound in according with national polices and guidelines.

Policy CC/WE: Water Efficiency in new developments: Whilst it is appreciated that water infrastructure is a current pressure, it is noted that this policy goes significantly beyond current and proposed building regulations.

The proposed 80 litres per day in developments of 100 or more dwellings and 90 litres per day in other developments goes beyond the proposed mandatory 105 litres per day (currently 125) and proposed optional technical water efficiency standard of 100 litres per day (currently 110) for areas of serious water stress.

Whilst it is agreed that Greater Cambridge is an area of serious water stress, given there is a specific mechanism within building regulations in place for such areas, that should be reflected within the Greater Cambridge policy, rather than something over and above. The policy should be adjusted to accord with building regulations.

There is also a lack of evidence to suggest why there should be an increased restriction on developments over 100 dwellings. The policy should be amended to apply to all residential development at the same level.

Policy BG/BG: Biodiversity and geodiversity: This policy has been amended from earlier drafts which applied a 20% BNG requirement across the board. It is now 10% on all developments, but with major development still required to provide 20%.

This is contrary to national statutory net gain requirements of 10%. The 2026 NPPF states at Policy N1 part 2 that development plans should only set local standards for BNG which are in excess of the statutory requirement where this is for specific site allocations, and is fully justified and deliverable.

A blanket approach to major development is therefore contrary to NPPF policy and Policy BG/BG should be amended to reflect this with a policy baseline of 10%. Anything over 10% should only be built into specific site allocations, and even then it needs to be tested and achievable. It should therefore be a site-by-site, allocation-by-allocation consideration.

Updated Evidence Base

Reference has been made to various elements of the evidence base within comments above. Notably Development Strategy Topic Paper and the appended Housing Trajectory.

Those comments are not repeated here.

The general themes and analysis within other Topic Papers provide further justification for the consideration of additional site allocations in appropriate, sustainable locations away from the large strategic sites and new settlements, to help contribute to a robust and effective housing supply.

This includes support for connectivity within the **Great Places Topic Paper.** Given this underpins 'great places' there is justification for additional housing to be directed to locations that satisfy these characteristics and to be consistent with place-making objectives within the Proposed Submission Local Plan.

We have made submissions above to suggest that Melbourn / Meldreth should be logically combined to create a Rural Centre, with all the expected characteristics and services delivered across the settlement(s). It is a wholly suitable for development on the edge of a sustainable village, near a station.

Characteristics that should weigh heavily in favour of considering allocations adjacent to Meldreth in the locations promoted by Granta Land.

The **Homes Topic Paper** highlights the unmet affordable housing need, which would further contribute to the benefits of unlocking additional sites that would contribute to this affordable housing need, alongside market housing requirements.

The detailed **Regulation 19 Sustainability Appraisal** sets out an analysis of various policies, but seemingly doesn't consider the risk associated with the development strategy and reliance on large scale developments for the majority of provision.

As such, it takes policies on face value in terms of meeting the objectives around access to homes, and around access to services given several allocations seek to make additional non-resi provision. It assumes that development will come forward as intended under policies and in line with stated trajectories. There is little to no analysis of risk if this does not happen. And therefore it does not adequately evaluate whether a more flexible strategy, including additional allocations in sustainable locations, would better achieve the Plan's housing, affordability and economic objectives, and contribute to more ambitious growth as endorsed above.

It should be updated to appraise various scenarios of delay to large sites, and model the impact that would have on the Local Plan delivering against objectives. This would help inform a more robust, effective and resilient Greater Cambridge Local Plan.

Conclusion

We trust that the summary provided in this letter is useful. It should be read alongside the comments lodged via the online survey form, but is intended to clearly set out positive support for the land under the control of Granta Land around Medreth and Melbourn (HELAA sites 200794, 40089, 40088 and 200807) to be allocated for residential development. This is contrary to the initial assessment prepared by Greater Cambridge and the proposed allocations within the Proposed Submission Local Plan, but it is trusted that this submission sets out further justification for why the sites should be further considered.

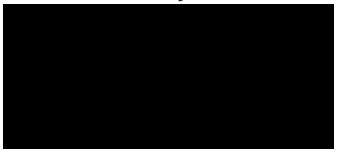
These representations have made clear the concerns that Granta Land have around the Development Strategy as it currently stands, and the inability for the proposed allocations to meet the planned housing targets as they stand, and certainly not the increased numbers that should be planned for to meet stated and evidenced potential economic growth ambition.

There is an imbalanced development strategy with over-reliance on strategic sites and new settlements. Evidence that these sites may be delayed by infrastructure and not yield the numbers included in the trajectories is ignored. There is a compelling case for the allocation of additional sites of a scale not dependent on the level of strategic infrastructure to the unlock delivery, and in a broader range of locations. Particularly where these are sustainable sites, on the edge of settlements, close to stations.

The sites around Meldreth will deliver important market and affordable housing in the rural area in an extremely sustainable location, with direct links to important employment locations at Cambridge and the Cambridge Biomedical Campus.

All locations are available and deliverable. They can make a positive contribution to the significant identified and potential housing land supply, and the likely need for Greater Cambridge to find more sites and numbers as the Local Plan progresses.

Yours sincerely,



Nick Stafford
Director
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