



4800 – Land off Beach Road, Cottenham, Cambridgeshire
Representations to Greater Cambridge Local Plan Regulation 18 Consultation

Representations to Greater Cambridge Local Plan Regulation 18 Consultation

Land off Beach Road, Cottenham, Cambridgeshire

croudacehomes

January 2026

Office Locations

Cambridge

1A Clifton Court, Clifton Road,
Cambridge, CB1 7BN
01223 776740

London

120 Moorgate, London
EC2M 6UR
020 3011 0820

Norwich

Brettingham House, 98 Pottergate,
Norwich, NR2 1EQ
01603 631319

Bath

Newark Works, 2 Foundry Way,
South Quays, Bath,
BA2 3DZ
01225 690119

Manchester

100 Embankment,
Embankment East Tower,
100 Cathedral Approach,
Greater Manchester,
M3 7FB
01617 111740

Edinburgh

1 Lochrin Square,
92-98 Fountainbridge,
Edinburgh, EH3 9QA
01316 000319

York

Stanley Harrison House, The Chocolate Works,
Bishopthorpe Road,
York, YO23 1DE
01904 803800

Issue Sheet

Document Prepared for: Croudace Homes

Representations to the Greater Cambridge Local Plan Consultation:
4800

Prepared by:

Name: Victoria Yeandle

Title: Associate Planner

Date: January 2026

Approved by:

Name: Will Nichols

Title: Regional Director

Date: January 2026

Revision: V2.0

Contents

1	INTRODUCTION	1
1.2	CROUDACE HOMES	1
1.3	STRUCTURE OF DOCUMENT	1
2	SITE CONTEXT	3
2.1	SITE CONTEXT	3
2.2	COUNCIL SITE ASSESSMENT	4
2.3	LAND OFF BEACH ROAD, COTTENHAM, CAMBRIDGESHIRE	4
3	RESPONSE TO REPRESENTATIONS	5
3.2	DRAFT POLICY S/JH: NEW JOBS AND HOMES	5
3.3	DRAFT POLICY S/DS: DEVELOPMENT STRATEGY	6
3.4	DRAFT POLICY S/SH: SETTLEMENT HIERARCHY	11
3.5	DRAFT POLICY S/GB: GREEN BELT	13
4	CONCLUSION	16

Appendices

APPENDIX 1	LOCATION PLAN
APPENDIX 2	A MASTERPLAN VISION: BEACH ROAD, COTTENHAM, CAMBRIDGESHIRE

1 Introduction

1.1.1 These Regulation 18 representations have been prepared by Lanpro Services Ltd on behalf of Croudace ('our client'). The representations respond to the Greater Cambridge Local Plan Regulation 18's draft policies that relate to our client's Site at land off Beach Road, Cottenham, Cambridgeshire ('the Site'). A location plan of the Site is shown at **Appendix 1**, and a Masterplan Vision is contained in **Appendix 2**. These representations follow previous representations submitted on behalf of Croudace.

1.1.2 Our client can confirm that it is continuing to promote this area as part of the emerging Local Plan process for circa 200 dwellings, together with public open space, green corridors, and a new community orchard.

1.2 Croudace Homes

1.2.1 Croudace is a long-established, family-owned residential developer founded in 1946. Croudace builds high-quality homes that reflect local character and contribute positively to communities. Their strength lies in detailed internal and external design, quality materials, and thoughtful landscaping that enhances surroundings.

1.2.2 Croudace homes are expertly built by professionals, with attention to the social and environmental impact of its schemes. They include play areas, sports facilities, wildlife protection, and promote non-car travel. Community events and charity support reflect their commitment to creating desirable, socially vibrant places to live.

1.2.3 Croudace Homes is a responsible, high-quality house builder specialising in strategic land promotion across the South East and East of England. Projects range from 50-home schemes to large urban extensions of several hundred units. The company manages the planning process from promoting the site to building the development, working closely with local communities, planners, and stakeholders to deliver sustainable community-focussed development that benefit both new and existing residents.

1.3 Structure of Document

1.3.1 These representations to the Greater Cambridge Local Plan Regulation 18 consultation are structured as follows:

- Chapter 1: Introduction – This Chapter sets out the introduction to the representations and provides details of our client, Croudace, who are promoting the site for development.
- Chapter 2: Site Context – This Chapter sets out the site context for the Site and demonstrates why the Site should be allocated for development in the emerging Local Plan.

- Chapter 3: Response to Representations – This Chapter provides a response to the draft policies that are considered relevant to the Site. In this section we have followed the approach set out on the Greater Cambridge Shared Planning Service’s portal to enable ease of access.
- Chapter 4: Conclusion – This Chapter concludes these representations.

2 Site Context

2.1 Site Context

- 2.1.1 The Site is located in the large village of Cottenham, which is currently designated as a Rural Centre in the adopted South Cambridgeshire Local Plan (2018). It is located approximately 9 kilometres north of Cambridge. Further detail about the site's context is contained within **Appendix 2: A Masterplan Vision**, which supports these representations and provides a visualisation of how the Site could be developed.
- 2.1.2 The Masterplan Vision sets out the wider context, providing the heritage and townscape context. It provides details of the site's connections and access to public transport, as well as providing additional detail on the extensive range of local services and facilities in the village. It provides a detailed baseline site analysis, and considers ecology, drainage, and flood risk. Finally, it draws on all this information to inform an illustrative masterplan, setting out details on green infrastructure and an open space strategy.
- 2.1.3 The Site, which covers an area of approximately 13.18 hectares is located on the south-eastern edge of Cottenham to the south-west of Beach Road. Existing residential development wraps around the Site to the north, with a mixture of arable farmland, paddocks, and orchards beyond the Site to the south and east. There is also a large area of woodland and scrub beyond the western boundary separating the site from Cottenham Village College (the local secondary school).
- 2.1.4 The main road running through the centre of the village is the B1049, which for most of its length is known as the High Street. The B1049 provides the principal route to Histon, Impington, the A14 Trunk Road (linking the area with the Midlands in the west, and the East Coast port of Felixstowe to the east), and Cambridge to the south, and the village of Wilburton and the A1123 to the north. The other key roads leading out of the village are Oakington Road, Rampton Road, and Beach Road, which abuts the site on its north-eastern boundary. The site is very close to the village centre where virtually all the village's shops, services, and facilities are located.
- 2.1.5 Cottenham is currently designated as a Rural Centre in the adopted South Cambridgeshire Local Plan, but the emerging Greater Cambridge Local Plan proposes to downgrade it to a Minor Rural Centre. Cottenham is one of the largest villages in Cambridgeshire and benefits from a wide range of shops, services, and facilities. These include a secondary school, primary school, special education school, sports centre, post office, pharmacy, GP surgery, vet, several public houses, restaurants and takeaways, estate agents, several independent businesses, including butchers, hairdressers, cafes, bakeries, newsagents, small supermarkets, and convenience stores.
- 2.1.6 The Site has very few constraints and none that would preclude it from coming forward for development. It is located within Flood Zone 1, according to the Environment Agency

(EA's) flood map for planning. It is located within the Cambridge Green Belt, which abuts the southern edge of the village.

- 2.1.7 The nearest bus stops are located approximately 200 metres from the site in the village centre and provide regular services to the nearby large villages of Histon & Impington, and Cambridge city centre. The Cambridgeshire Guided Busway has a stop at Oakington, approximately 4 kilometres south-west of the site providing rapid transit links between Huntingdon and St Ives to Cambridge North railway station, and Cambridge city centre. The closest railway station is Waterbeach, approximately 7 kilometres east of the site; a new replacement Waterbeach railway station is proposed approximately 2 kilometres north of the existing station to serve Waterbeach new town – the distance between it and the site would be broadly similar to the current railway station.
- 2.1.8 As the supporting Vision Document sets out, Cottenham has a rich history with designated heritage assets and a Conservation Area. There are 66 listed buildings within the village, of which 64 of them are located within the Cottenham Conservation Area. There is also a Scheduled Monument comprising a medieval moated enclosure. The Site's northern corner abuts the Conservation Area, and the nearest listed buildings are approximately 100 metres from the site.

2.2 Council Site Assessment

- 2.2.1 The Draft Greater Cambridge Local Plan Housing and Economic Land Availability Assessment (HELAA) (2025) does not appear to have fully assessed the site in its totality. However, the northern part of the site (2.2 hectares) has been assessed with a proposed residential capacity of 50 units. The site does not appear to have been assessed properly in its totality.

2.3 Land off Beach Road, Cottenham, Cambridgeshire

- 2.3.1 Following the publication of this version of the Greater Cambridge Local Plan, our client considers that the Site is a suitable location for allocation as it provides high quality development in that can be delivered within five years of the Plan's adoption.
- 2.3.2 Given the increased need for residential dwellings across Greater Cambridgeshire, the Site could be an additional allocation to support sustainable growth. Cottenham is a sustainable settlement, with several services and facilities within the village itself, which include primary and secondary schools, shop, pubs and regular bus services.

3 Response to Representations

3.1.1 This Chapter sets out our client’s response to the draft polices that are considered relevant to the Site.

3.2 Draft Policy S/JH: New Jobs and Homes

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to cooperate? Yes

Main Comments

- 3.2.1 This draft policy sets out the level of needs for jobs and homes in Greater Cambridge over the plan period from 2024-2045, as well as dealing with specific groups such as Gypsies and Travellers, Travelling Showpeople, boat dwellers, and other caravan dwellers.
- 3.2.2 The policy meets objectively assessed needs for the Greater Cambridge area of 73,000 additional jobs, and a minimum of 48,195 new homes meeting the needs for the total population.
- 3.2.3 The Government’s updated standard methodology for Greater Cambridge is 2,309 dwellings per annum (1,135 in Cambridge City and 1,174 in South Cambridgeshire).
- 3.2.4 It is noted that the number of dwellings per annum being provided by Greater Cambridge is 2,295, which is slightly fewer than the standard method. However, the draft Local Plan acknowledge that the total supply set out in Table 4 is 55,278 dwellings, which is from the current supply and new sites, including North East Cambridge. Therefore, the total number of dwellings that the Councils calculate will be provided across the emerging Plan Period is greater than the standard method, which our client supports.
- 3.2.5 However, it is considered that there may be potential for additional growth across Greater Cambridge. Both the previous and the current Governments recognised the potential of Cambridge to support national growth. The Government has set up the Cambridge Growth Company whose job is to work with local stakeholders to deliver “*high quality sustainable growth in Cambridge and its environs*”¹. Significant funding has been provided to the Cambridge Growth Company to enable and shape this growth.
- 3.2.6 The potential for additional growth to support the ambitions of the Cambridge Growth Company and by extension, the Government, should be incorporated into the draft Local Plan as a material consideration.

¹ <https://thecgc.org.uk/>

3.3 Draft Policy S/DS: Development Strategy

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to cooperate? Yes

Main Comments

- 3.3.1 Draft Policy S/DS sets out the proposed strategy for the patterns, scale and design quality of places in Greater Cambridge, for the plan period to 2045 and beyond.
- 3.3.2 The Cambridgeshire & Peterborough Independent Economic Review (CPIER), which was published in September 2018 around the time of the adoption of the current Cambridge Local Plan and South Cambridgeshire Local Plan.
- 3.3.3 The CPIER recommended a blended spatial strategy being the most appropriate form of development. It considered densification, dispersal, fringe growth, and growth along transport corridors.
- 3.3.4 One element of this approach considers a dispersal strategy, which would bring new homes and jobs to towns and villages where populations are ageing, and new jobs and homes could bring new life to them. Cottenham is one of the largest settlements in Greater Cambridge and as set out in Section 2 of these representations has very few constraints to delivery.
- 3.3.5 While the CPIER report concluded that a dispersed approach should not be the main paradigm for development, it concluded a blended approach was the most appropriate options as none of the approaches on their own are likely to work. However, the balance of development set out in the Greater Cambridge Local Plan is unbalanced and the spatial strategy advance risks delivery of homes, particularly in the early part of the plan period.
- 3.3.6 The Councils are distributing 44% of growth across the Plan Period in new settlements (Figure 12 of the Local Plan). According to the Policy, these new settlements will seek to achieve 47,063 dwellings across the Plan Period.
- 3.3.7 The table below sets out the distribution of growth during the Plan Period across these new settlements and whether these have planning permission. **Appendix 4** sets out the proposed housing trajectory of the new settlements which do not currently have extant consent during the emerging Local Plan timeframe.

Table 3.1: Delivery of new settlements during the emerging Plan Period

Settlement	Number of Homes to be delivered in Plan Period	Total number of dwellings	Extant permission	Percentage of homes delivered

				during Plan Period
Northstowe* ²	6,229	10,107	Yes	62%
Waterbeach New Town*	5,727	11,531	Yes	50%
Bourn Airfield	3,500	3,500	Yes	100%
North East Cambridge	3,950	3,975	No	50%
Cambridge East	3,950	4,050	No	49%
Cambourne North	2,550	10,450	No	20%
Grange Farm New Settlement	2,550	3,450	No	43%

*Northstowe has delivered 1,401 dwellings prior to this emerging Plan Period. Waterbeach New Town has delivered 556 dwellings prior this emerging Plan Period.

3.3.8 Our client does not consider that the delivery rates for these settlements are realistic, particularly regarding the new settlements which are yet to have been granted planning permission, which include:

- North East Cambridge.
- Cambridge East.
- Cambourne West.
- Grange Farm.

3.3.9 In the latest ‘Start to Finish’ Report, undertaken by Lichfields in 2024³, it confirms that sites comprising over 1,000 dwellings will take, on average, five years to obtain detailed planning permission and then a further 1.3-1.6 years to deliver the first dwelling.

3.3.10 Indeed, for sites over 2,000 dwellings, it states that the median timescale from validation of the first planning application to the completion of the first dwelling is 6.7 years.

3.3.11 The Councils’ Local Development Scheme anticipates that the emerging Local Plan will be submitted to the Secretary of State for examination in December 2026. In July 2024

² [greater-cambridge-housing-trajectory-and-housing-land-supply-report-2025.pdf](#)

³ [start-to-finish-3-how-quickly-do-large-scale-housing-sites-deliver.pdf](#)

(after their General Election win), the new Minister for Housing, Matthew Pennycook, wrote to the Planning Inspectorate and noted that the average length of time for the completion of examination had increased from 65 weeks on average in 2016 to 134 weeks on average in 2022 (approximately 2 ½ years)⁴.

3.3.12 Therefore, if the Plan were submitted to the Secretary of State in December 2026, then the earliest that the Plan could be adopted is May 2029, using the data above. That would be equivalent to ‘Year 6’ (2029/2030) in the proposed housing trajectory.

3.3.13 If these new settlements were to be approved in Year 6 (2029/30), then the earliest that the first house could be delivered according to the Lichfields ‘Start to Finish’ is in Year 12 (2035/2036). It is unrealistic to conclude that the first dwellings will be delivered in North East Cambridge and Cambridge East in 2032/33, and in 2034/35 in Cambourne North and Grange Farm. All these sites have significant infrastructure requirements, while the main housing trajectory does not rely on Cambridge North East (following the Government’s recent announcement not to fund the relocation of the waste water treatment works from the existing site to Honey Hill, the delivery targets for the other three areas remain unrealistic. Cambourne North is reliant on East West Rail being delivered and a new railway station being brought forward at Cambourne, while Grange Farm is heavily reliant on the proposed CSET scheme.

3.3.14 Our client considers that the current housing trajectory figures are overly ambitious for new settlements, particularly considering recent delivery rates both within Greater Cambridge and in other parts of the UK. There would be a reduction in 3,000 homes across the Plan Period which would not be delivered on new settlements.

3.3.15 Therefore, in order to meet this shortfall, the Councils should focus on providing smaller and medium sized sizes in and adjoining existing settlements, especially ones that have a good range of shops, services and facilities, such as Cottenham. It has been demonstrated that the Site can easily accommodate circa 200 dwellings.

3.3.16 The Councils’ housing trajectory also reliant on the new settlements delivering 350 dwellings per annum. This is equivalent to seven plots delivering 50 dwellings per annum, by several housebuilders.

3.3.17 The Lichfields ‘Start to Finish’ document also sets out the housing completions of large sites. The table below sets out the average delivery of sites which are for over 5,000 dwellings across the years.

Table 3.2: Table of average housing delivery on sites larger than 5,000 dwellings

Site Name	No of Dwellings	No of Years of Delivery	Average Delivery (rounded)
Former Alconbury Weald, Huntingdon	5,000	2	208

⁴ [Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate \(July 2024\)](#)

Priors Hall, Northamptonshire	5,200	11	135
North West Preston	5,300	8	290
East Kettering SUE	5,500	6	133
Sherford, South Hams	5,500	7	119
South Ashford Garden Community	5,750	2	75
Houlton (Rugby Radio Station)	6,200	3	139
The Hamptons (Peterborough)	6,320	25	224
Ebbsfleet	15,000	14	255

- 3.3.18 Therefore, the table above demonstrates that none of these new settlements achieved, on average, 350 dwellings per annum. For Greater Cambridge to have so many of these type of sites in one area, is particularly problematic for delivery. Therefore, there should be a greater focus on delivering the required housing across sustainable settlements, which includes Cottenham. The Site can help meet the needs of the emerging Local Plan, particularly on adoption of the Local Plan, and in the early part of the plan period.
- 3.3.19 Our client also has concerns about the principle of the development at North East Cambridge, Cambridge East, Cambourne North and Grange Farm, although our client notes that the Councils acknowledge that North East Cambridge may not be available due to the Government withdrawing funding for the wastewater treatment relocation.
- 3.3.20 Regarding Cambridge East (the existing Cambridge Airport), in October 2025, Marshall Group confirmed that they were not relocating to Cranfield Airport, in Bedfordshire, as it was considered “no longer affordable”.
- 3.3.21 There is nothing in the news, which sets out when Marshall Group intends to vacate the Site. Therefore, our client questions whether the emerging Local Plan can be reliant on these dwellings during the Local Plan period.
- 3.3.22 With respect to Cambourne North, the delivery of the settlement extension is principally reliant on the proposed new station that will be delivered as part of East West Rail.
- 3.3.23 Although our client acknowledges that in June 2025, as part of the spending review, the Government committed a further £2.5 billion for the continued delivery of East West Rail, there is far from certainty that this will be delivered. This Government is fully committed to the delivery of East West Rail but there are no guarantees that a future government would be as committed. Indeed, other political parties have suggested they could scrap such a

⁵ <https://www.bbc.co.uk/news/articles/c62l6gnvdyqo>

scheme. While Local Plans clearly cannot necessarily plan for all future potential scenarios, the emerging Local Plan should focus more growth in Rural/Minor Rural Centres such as Cottenham

- 3.3.24 Regarding Grange Farm, our client is concerned that there is not sufficient infrastructure to deliver this Site, particularly as this will be a sustainable new town, located at the heart of the Rural Southern Cluster. Once again, the Local Plan is placing far too much emphasis on the delivery of new standalone new settlements, which past experience demonstrates take a significant time to deliver.
- 3.3.25 The Deliverability Paper that was submitted as part of the previous ‘call for sites’ application for Grange Farm, confirms that 3,560 dwellings (market and affordable) can be delivered during the emerging Local Plan period with the first dwellings being delivered in 2030.
- 3.3.26 The Councils’ housing trajectory states that only 2,550 dwellings can be during the Plan Period, so our client would question how accurate these figures are by both the Councils and the promoter for Grange Farm.
- 3.3.27 There is also a discrepancy between the number in the Housing Trajectory provided by the Council (up to 300 dwellings in 2040) and only 275 dwellings in the Housing Deliverability Note⁶. Therefore, our client has concerns that the Council will be able to deliver that number of dwellings across the Plan Period.
- 3.3.28 In order to help meet this shortfall, our client can provide a Site that is immediately deliverable at a sustainable location.
- 3.3.29 In total, as set out in Figure 12 of the emerging Local Plan above, new settlements will provide 44% of the total housing supply. Given the timings set out in the Lichfields ‘Start to Finish’ report, there is a severe risk of delay in delivering a significant number of Greater Cambridge’s housing sites, which will mean that the Councils will not be able to meet their housing needs across the Plan Period. If the Councils cannot demonstrate a five-year housing land supply or has a housing delivery percentage of less than 75%, set out in the Government’s Housing Delivery Test, then the Plan would be considered out of date. It would, therefore, be subject to paragraph 11 of the NPPF (2024) and attract speculative development.
- 3.3.30 In order to avoid this scenario and to ensure as far as possible a plan-led system can be successfully implemented and delivered, the Site can help the Council deliver a consistent and deliverable supply of housing across the Plan Period to reduce the risk of the Council not being able to meet its housing needs, thereby attracting speculative development.
- 3.3.31 The Site at land of Beach Road, Cottenham forms a natural extension to the growth of a large sustainable village, adjacent to the existing and proposed settlement boundary, and

⁶ <https://oc2.greatercambridgeplanning.org/form/59401>

very close to the village centre with its shops, services and facilities, and secondary school.

- 3.3.32 The Site is immediately deliverable and could contribute towards the Council's increased housing needs to ensure that the required housing delivery numbers are maintained. A greater mix of smaller and medium sized sites would help to ensure that in future Greater Cambridge is able to demonstrate a five-year supply of housing land. smaller and medium sized sites typically come forward quicker than new large settlements which require significant infrastructure to support them. A good mix of these smaller sized sites also enables a wider range of house builders to enter the market providing a wider range in product and often leading to an increase in local employment, such as Cala Homes.
- 3.3.33 The Site is being promoted by Croudace, who are a high-quality housebuilder. They are committed to the delivery of the Site during the first five years of the emerging Local Plan.

3.4 Draft Policy S/SH: Settlement Hierarchy

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to cooperate? Yes

Main Comments

- 3.4.1 Draft Policy S/SH: Settlement Hierarchy 'sets out the groupings of settlements into categories that reflect their scale, characteristics and sustainability, to ensure development is located in the most sustainable places. While this broad approach is support, the precise balance of development being attributed to different settlement types should be altered to ensure deliverability and sustainability.
- 3.4.2 Draft Policy S/SH: Settlement Hierarchy proposes to downgrade Cottenham from its previous role as a Rural Centre to a Minor Rural Centre. There is insufficient justification to justify this approach and as outlined in Section 2, Cottenham benefits from an excellent range of shops, services, and facilities.
- 3.4.3 Cottenham is one of the largest villages in Cambridgeshire and benefits from a wide range of shops, services, and facilities. These include a secondary school, primary school, special education school, sports centre, post office, pharmacy, GP surgery, vet, several public houses, restaurants and takeaways, estate agents, several independent businesses, including butchers, hairdressers, cafes, bakeries, newsagents, small supermarkets, and convenience stores.
- 3.4.4 Indeed, when comparing it against the other three Rural Centres that have not been downgraded (namely Histon & Impington, Great Shelford & Stapleford, and Sawston,

Cottenham performs as well and if not better against some sustainability criteria. Indeed, unlike Great Shelford & Stapleford, Cottenham benefits from a secondary school.

3.4.5 The supporting Development Strategy Topic Paper adds little but draws on the Settlement Hierarchy Review which was published in 2021. It states that ‘*Cottenham should be classified as a Minor Rural Centre reflecting a revision to the criteria for Rural Centres that they must all have high quality public transport in the form of a segregated public transport route such as the Greater Cambridge Partnership schemes or the Cambridgeshire Guided Busway*’.

3.4.6 The Settlement Hierarchy Study Update 2025 includes a table showing the points awarded to different settlements in the hierarchy and uses it to downgrade each settlement.

Table 2: Points awarded to existing Rural Centres under each assessment category and total

Village	Parish Population (as at 2022)	Primary School and GP surgery	Shops and services (retained from 2021)	Secondary School	Job density	Transport	Total
Bourn Airfield (approximate points)	9,800*	2	8	4	1	3	18
Cottenham	6,555	2	7	4	2	0	15
Great Shelford and Stapleford	6,525	2	8	1	1	4	16
Histon and Impington	8,905	2	9	4	1	2	18
Sawston	7,595	2	10	4	1	3	20

* Expected population once built out – Bourn Airfield SPD (2019)

3.4.7 Cottenham’s excellent range of shops, services, and facilities gives it an element of self-containment, and when combined with a regular bus service into Cambridge creates a sustainable settlement, that should be retained as a Rural Centre in the settlement hierarchy. Indeed, and while the presence of a secondary school has been acknowledged in the scoring its importance cannot be underestimated in reducing car journeys.

- 3.4.8 The scoring system attributes far too much weight to unfunded or major new infrastructure projects such as the Cambourne to Cambridge (C2C) and Cambridge South East Transport (CSET), which do not have certainty of delivery. The decision to afford no points at all to Cottenham's very well used existing bus service, while awarding other settlements high scores based on yet to be delivered major busways or railway lines. Furthermore, this apparent deficiency could be more easily remedied by a slight increase in bus frequency, which would be far more achievable, particularly given the forthcoming proposals for bus franchising. Even despite this flaw in the methodology, Cottenham still only receives 1 point fewer than Great Shelford & Stapleford in the assessment. It is therefore concluded that Cottenham should retain its status as a Rural Centre.
- 3.4.9 Finally, the Local Plan's unbalanced focus on continuing to focus on large new settlements risks overall delivery and will inevitably lead to the exclusion of many SME housebuilders from the market. Such housebuilders like Croudace can help to ensure delivery, competition in the market and a high-quality product.

3.5 Draft Policy S/GB: Green Belt

Position on this policy: Object

Do you consider the plan to be legally compliant? Yes

Do you consider the plan to be sound? No

Does it comply with the duty to cooperate? Yes

- 3.5.1 Draft Policy S/GB sets out the Green Belt policy for the area. Criterion 1c states that the Green Belt will be maintained around Cambridge with the specific purpose to 'prevent communities in the environs of Cambridge from merging into one another and with the city'.
- 3.5.2 Paragraph 143 of the National Planning Policy Framework (NPPF) states that the second purpose of the Green Belt is b) to prevent neighbouring towns merging into one another'. It is clear therefore that there is an inconsistency between criterion 1c and paragraph 143 of the NPPF, which refers to communities rather than towns
- 3.5.3 Paragraph 145 of the NPPF states that '*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully justified through the preparation or updating of plans*'. It states that '*Strategic policies should establish the need for any changes to the Green Belt boundaries, having regard to their intended performance in the long term, so they can endure beyond the plan period*'.
- 3.5.4 Exceptional circumstances exist at a strategic level to justify amendments to the Green Belt by virtue of the need for the Greater Cambridge Local Plan to identify additional suitable and sustainable sites for development to meet identified needs, and subsequently directing appropriate growth to sustainable villages.

- 3.5.5 Paragraph 148 of the NPPF states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider ‘Grey Belt’ which is not previously developed, and then other Green Belt locations, to promote sustainable patterns of development.
- 3.5.6 In addition, it is to be noted that emerging national planning policy further states that the preparation of Local Plans should be informed by an assessment which identifies Grey Belt and informs any Green Belt boundary alterations (Draft National Development Management Policy GB2); and Green Belt boundaries should be altered through the Local Plan-making process where this would enable the development of land around stations (Draft National Development Management Policy GB3). There is therefore a clear expectation in current and emerging national planning policy for Local Plans to consider the role of Grey Belt in identifying suitable and sustainable sites to contribute towards identified development needs, and particularly near train stations. However, the draft Greater Cambridge Local Plan currently fails to give grey belt any consideration in informing the proposed Development Strategy.
- 3.5.7 Grey Belt is defined in national planning policy as:
- “Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”*
- 3.5.8 The Greater Cambridge Green Belt Assessment, which was undertaken in 2021, prior to the introduction of Grey Belt. The area of land within which land off Beach Road, Cottenham was located (comprises Parcel CH1 and CH2) was assessed against the five purposes of the Green Belt set out in paragraph 143 of the NPPF, which are :
- a) To check unrestricted sprawl of large built-up areas;
 - b) To prevent neighbouring towns from merging into one another;
 - c) To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.5.9 Appendix B concluded that *‘Parcel CH1 makes a relatively limited contribution to maintaining and enhancing the quality of Cambridge’s setting, and a relatively limited contribution to preventing communities in the environs of Cambridge from merging with one another. The additional impact on the adjacent Green Belt on the release of the parcel would be minor-moderate. Therefore, the harm resulting from its release, as an expansion of Cottenham, would be moderate high’.*
- 3.5.10 It also concluded that *‘Parcel CH2 makes a moderate contribution to maintaining and enhancing the quality of Cambridge’s setting, and a moderate contribution to preventing*

communities in the environs of Cambridge from merging with one another. The additional impact on the adjacent Green Belt of the release of the parcel would be minor. Therefore, the harm resulting from its release, as an expansion of Cottenham, would be moderate high’.

3.5.11 It is noted that the Greater Cambridge authorities have commissioned an update to the Greater Cambridge Green Belt Assessment (GCGBA, 2021) in order to respond to changes in national planning policy, particularly in response to ‘Grey Belt’.

3.5.12 It is clear that the Greater Cambridge Local Plan needs to be informed by a full assessment of the Green Belt in light of the Government’s introduction of grey belt. Given that the previous assessment of land off Beach Road, Cottenham concluded that it does *not* strongly contribute to any of purposes (a), (b), and (d), there is a strong case that the land should be designated as grey belt, and thus suitable for development.⁴⁸⁰

4 Conclusion

- 4.1.1 In conclusion, our client is continuing to promote the Site (land off Beach Road, Cottenham) for circa 200 dwellings that was previously submitted as part of the 2025 'call for sites'.
- 4.1.2 The Site could come forward immediately or following a review of the Cambridge Green Belt
- 4.1.3 It is considered that Cottenham should be retained at its current level in the settlement hierarchy given the excellent range of services and facilities that are located within the settlement, rather than being downgraded as proposed.
- 4.1.4 Once upgraded in the settlement hierarchy, the settlement should be able to accommodate an increased number of dwellings to support sustainable growth. The Site is ideally suited to meet this need. It is also located adjacent to the settlement boundary, meaning that it is within easy walking/cycling distance of the settlement's services and facilities, including Cottenham Village College (the local secondary school), and .
- 4.1.5 Although the Council is providing a greater number of dwellings per annum than what is set out in the Government's Standard Method, there are significant risks that upon adoption, the Council will not be able to maintain a five-year housing land supply. Therefore, it will be found 'unsound' at Examination as it will not comply with paragraph 72 of the NPPF, 2024.
- 4.1.6 Our client considers that there are fundamental issues with the distribution of housing across the Plan Period. There appears to be an overreliance on the delivery of new settlement sites that are larger than 2,000 dwellings. Independent research from Lichfields' 'Start to Finish' confirms that there is a protracted delay in large sites submitting a planning application to the first house being delivered, and this unbalanced approach is likely to see the Council in a situation where it is unable to maintain a 5-year supply of housing land in a short time following adoption.
- 4.1.7 Therefore, there should be an increase in the number of dwellings being allocated within other sustainable settlements. The Site is ideally placed to provide housing at the start of the Plan Period, reducing the reliance on larger sites and ensuring a wider variety of SME housebuilders into the market.
- 4.1.8 Finally, the client would like to draw the Council's attention that Government Planning Practice Guidance discourages the seeking of more than 10% biodiversity net gain. Therefore, the reference to 20% being actively encouraged should be removed.

Appendix 1 Location Plan

Appendix 2 A Masterplan Vision: Beach Road, Cottenham,
Cambridgeshire

