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Dear Sir / Madam

**RE: DRAFT GREATER CAMBRIDGE LOCAL PLAN – REGULATION 18 CONSULTATION RESPONSE
LAND OPPOSITE BREWERY FIELD, SOUTHWEST OF HUNTS ROAD, DUXFORD (REF: 115069)**

These representations have been prepared by Sworders on behalf of Mr and Mrs Smith in respect of Land opposite Brewery Field, on the southwest side of Hunts Road, Duxford. Whilst we support the progress with the preparation of the draft Local Plan, we have a number of concerns as to the consistency with assessing sites put forward for allocation, in addition to the overall spatial strategy and approach to housing within village locations. Our comments are set out in relation to the draft policies within the Plan and the supporting evidence base below.

Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) 2025

The land opposite Brewery Field, Duxford (the 'Site') was submitted in response to the Site Submissions Update in March 2025 (JDi Number: 200766; Placemaker Number: 115069). Appendix 2 to the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) 2025 (the 'HELAA 2025') states that:

"The site does not align with the wider Local Plan Strategy and therefore has not been assessed."

The 'HELAA 2025' confirms at paragraph 1.24 that, due to the passage of time between the original Call for Sites assessments and the publication of this draft Plan, a Site Submissions Update consultation was undertaken in 2025 allowing new site submissions and additional information to support previous submissions.

It goes on to confirm:

"However, with regard the 2025 Site Submissions Update, only sites that aligned with the emerging preferred strategy were assessed. Hence, sites within or adjacent to Infill Villages and Group Villages without good public transport links and sites not within or adjoining any settlement were not (re-) assessed."



It is noted that the land opposite Brewery Field, Duxford, is well connected to sustainable transport networks, including a mainline railway station at Whittlesford Parkway, with regular train services into London Liverpool Street. It is easily cyclable, or walkable via existing pavements. There is also a good network of local buses in the area, with the nearest bus stop located on Hunts Road, to the south of the site. This stop is served by the 132, which runs regularly between Saffron Walden and Cambridge.

The sustainability of the Site and its proximity to good public transport links is reinforced by the proposed allocation of the Land at Maarnford Farm, Hunts Road, Duxford in Policy S/RSC/MF. This proposed allocation site is less than 120m to the south of the Site, therefore within very close proximity.

The supporting text to Policy S/RSC/MF confirms that the site is *“well related to the existing village and within walking distance of Whittlesford Parkway Station.”* The same conclusion can be applied to the Site opposite Brewery Road, being marginally closer to Whittlesford Parkway Station through its location further north and closer to Hunts Road.

It should also be noted that the site is opposite to Brewery Field open space, within 150m of Duxford Primary School and Pre-School, and within 200m of Duxford Park, Community Centre, playground, and tennis courts. Similarly to the supporting text for the proposed allocation of land at Maarnford Farm, the Site is also well related to the existing village.

As such, it is considered that the site does meet the criteria for being assessed within the HELAA 2025, as set out in paragraph 1.24 of the same, and therefore should not have been discounted from assessment.

It is estimated that 50-70 dwellings could be accommodated on site, comprising a net density of 25-35dph. A mix of market and affordable housing is envisaged, to reflect local need. The site could also offer an opportunity for custom or self-build plots on the edge of the village in a highly sought after location.

The scheme would comprise a high quality design and layout, with on-site SuDs attenuation features and a well-landscaped buffer to the rear, also providing mitigation for any M11 noise. A new vehicular access would be required onto Hunts Road, but in a 30mph zone where safe visibility splays could be achieved. An extended pavement could also be provided, with pedestrian access at the southern end of the site, already designated as a Public Footpath (Duxford 9).

The site lies in floodzone 1, with no risk of surface water flooding. The site is also located at a sufficient distance from designated heritage assets to ensure no harm. There are no other relevant designations or constraints. Utilities are all available within close proximity to the site; no major infrastructure works are required.

The site is under single ownership, with no legal constraints, and could therefore be delivered quickly.



Policy S/DS: Development Strategy

Policy S/DS: Development Strategy states:

“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.”*

Whilst we support the overall inclusion of sites at part e) of the strategy, we do not consider that sufficient sites in such locations have been considered as part of the evidence base and therefore included within the Plan. This is the case for the land opposite Brewery Road, as discussed in relation to the HELAA 2025 above. This site is within the Southern Rural Cluster, adjoining a Group Village (where one allocation is proposed) with good public transport links. Despite this, it was excluded from assessment within the HELAA 2025.

The ‘Summary of the Greater Cambridge Local Plan’ section within the draft Plan states that:

“We want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around.”

This approach fails to conform to the current National Planning Policy Framework 2024 (NPPF), which states at paragraph 83 that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

It also fails to recognise the changing work patterns since Covid-19, with recent ONS studies confirming that 28% of working adults in Great Britain hybrid worked between January and March 2025, representing a rise since March 2022.¹ Further, the UK Government’s commitment to zero emission vehicles by 2035, which falls within the draft Plan period, promoting the change to electric vehicles.

Figure 12 to the draft Plan shows the distribution of growth in comparison to previous local plans. The draft Plan allocates 16% of growth to the Rural Area (including Windfalls). This is compared to 23% in the adopted Local Plan and 30% in the 1999-2016 Plan.

¹

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/whohasaccesstohybridworkinggreatbritain/2025-06-11#hybrid-working-has-increased-since-the-coronavirus-covid-19-pandemic>

We have concerns in relation to the windfall allowance, as outlined below, however, we would question how the evidence base and wider factors as outlined above support the lowest figure for growth within the Rural Areas since 1999.

Figure 9 of the draft Plan, as reproduced below, highlights how the majority of growth is proposed to be delivered through large-scale urban extensions or new settlements.

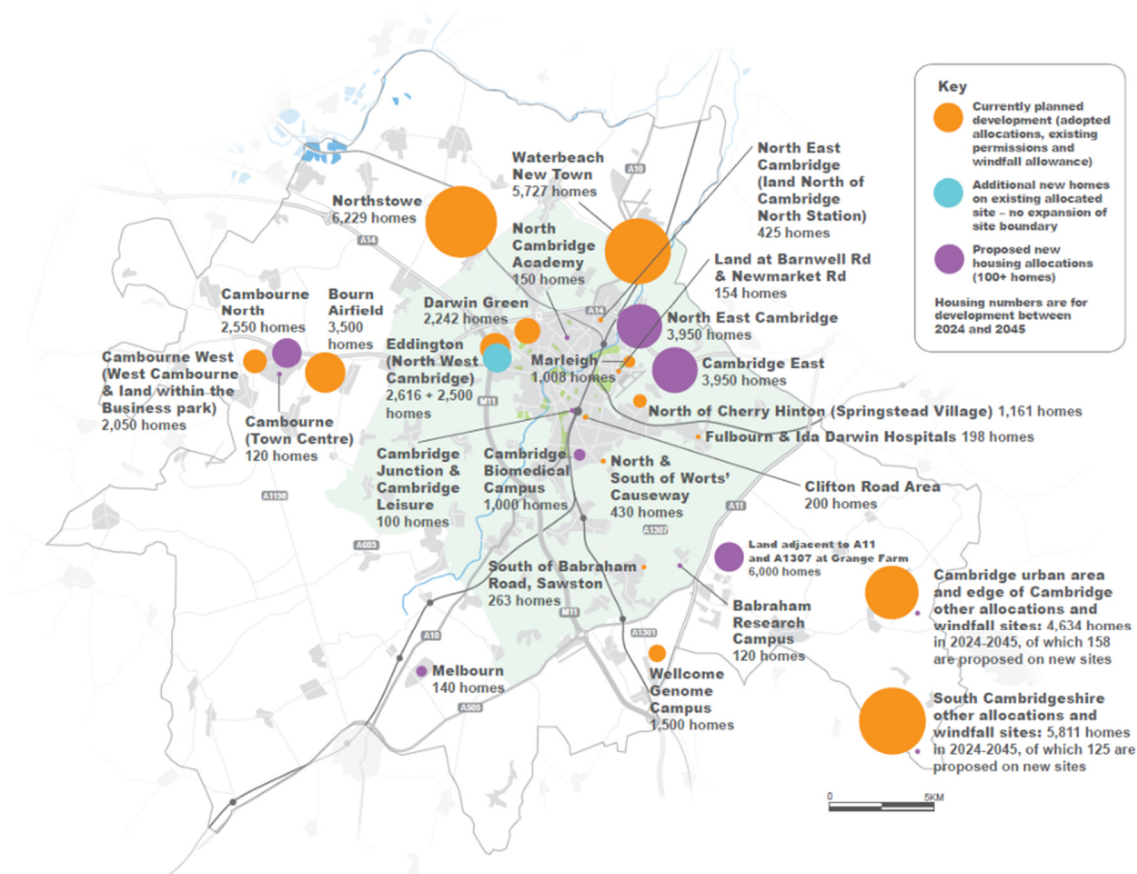


Figure 9: Illustrative map showing locations of proposed new housing development, 2024-2045

There are very few small sites to deliver housing in the short-term, with many sustainable settlements, such as Duxford, overlooked for growth.

Policy S/RSC: Rural Southern Clusters

The supporting text to Policy S/RSC states:

“The majority of new homes and jobs will be delivered at the strategic sites on the edge of Cambridge and at the new settlements as set out in the strategy section of this plan. However, identifying specific sites for housing or employment uses within the Rural Southern Cluster area will take advantage of the opportunity to provide new homes and further local employment opportunities that are close to the existing research parks and in locations with sustainable transport opportunities, as well as helping to support the vitality of villages and the delivery of smaller sites within the area.”



Despite acknowledgment of the presence of existing research parks and sustainable transport opportunities, there is one allocation within Duxford (a Group Village) for 60 homes and a carried-over allocation from the 2018 adopted Plan for 280 homes in Sawston (a Rural Centre).

We consider that further sustainable opportunities for growth have been overlooked in this area, including land within Duxford.

Policy S/SH: Settlement hierarchy

This policy seeks to set development limits within settlement groups for unallocated windfall sites. Paragraph 2.39 of the draft Plan confirms:

*“The Councils’ evidence for this windfall allowance is set out in the Greater Cambridge Housing Delivery Study: Further Addendum (2025). This 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, which all continue to support the delivery of housing on windfall sites. For Greater Cambridge as a whole, **we expect about 7,100 homes to be built during the plan period from this source.**” (Our emphasis).*

We question the level of windfall allowance within the overall housing delivery figure for the draft Plan. This represents a significant proportion of the total housing to be delivered and is not guaranteed. Given the considerable housing need figure for Greater Cambridge, as well as the reliance upon large sites and new settlements to deliver the majority of the residual housing need, it is considered that the draft Plan should look to allocate additional, smaller sites, to ensure the housing need is met and particularly within the short term.

Policy S/DE: Defined development extents

This policy permits development and redevelopment of unallocated land and buildings within the defined development extents as shown in the Policies Map (subject to compliance with the remaining criteria of the policy).

Many settlement boundaries have been drawn extremely tightly around the existing settlements, and in many cases excluding existing properties and built form. With such restrictive boundaries, it is further questioned how the windfall allowance can be met, without relaxation of the Defined Settlement Extents, to enable smaller sites that are more immediately deliverable in the short term to come forward.

Conclusions

It is considered that the land opposite Brewery Field, on the southwest side of Hunts Road, Duxford was erroneously excluded from consideration in the HELAA 2025, despite adjoining a Group Village



and benefitting from good transport links. This site should be assessed and reconsidered for allocation within the Plan.

Further, in its current form and with the current development strategy proposed, it is considered that additional sites, particularly within sustainable village locations such as Duxford, should be identified for allocation within the Plan in accordance with the NPPF. This is necessary to increase the delivery of housing within the short-term Plan period and reduce the reliance on windfall.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Hazel Izod'.

Hazel Izod BSc (Hons) MA

Director

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