

Great Cambridge Draft Local Plan

Representations on behalf of Mac Mic Land



Introduction

Planning Potential has been instructed by Mac Mic Land to submit representations to the Greater Cambridge Local Plan Regulation 18 Consultation, which runs from 1 December 2025 to 30 January 2026. These representations provide comment on the proposed policies that relate directly and indirectly to the site known as Crow's Nest Farm, Papworth (HELAA Site Ref: 48096).

The purpose of this submission is also to provide updated information in respect of the site to demonstrate its suitability for development and alignment with the emerging Local Plan objectives.

Previous submissions have been made to the Council under the Call for Sites (Site Ref: 48096), the Greater Cambridge Local Plan Issues and Options Consultation (January 2020), and the 'First Proposals' Consultation (December 2021). This representation builds upon those earlier submissions and introduces additional considerations following formal pre-application advice received in September 2025. The scheme has evolved in response to Officer feedback and now focuses on delivering housing as part of a Papworth town extension, while maintaining a strategic gap to the proposed Cambourne North extension and ensuring a sustainable development that can integrate with wider redevelopment opportunities. Land at Crow's Nest Farm continues to represent a viable and deliverable opportunity to support wider growth, benefiting from its strategic location near Cambourne and its strong connectivity with the proposed East West Rail (EWR) Oxford–Cambridge link.

This representation is set out in the following format:

- Response to proposed Local Plan policies
- Site specific representations:
 - **Update to Site Context:** Introduction to the site
 - **Pre-application History:** Summary of the pre-application feedback
 - **Proposed Allocation:** Planning proposal, assessment & justification for allocation, including response against the HELAA 2021
 - **Proposed Policy:** Comments submitted in relation to the proposed policies listed within the Regulation 18 Document
 - **Conclusion:** Final remarks in relation to the representation

The site submission is supported by the following additional documentation:

- Site Location Plan (EDP)
- Indicative Masterplan (EDP)
- Technical Briefing Note (Richard Jackson Engineering Consultants)
- Archaeology and Heritage Statement (Heritage Potential)
- Anglian Water Utilities Note
- Pre-Application Transport Note (SLR)
- Preliminary Environmental Appraisal (EDP)

Draft Greater Cambridge Local Plan – Response to proposed policies

Policy S/DS: Development strategy

Mac Mic Land are supportive of the proposed role of Cambourne and surrounding areas as a cornerstone of the spatial strategy for Greater Cambridge, which offers a significant growth potential subject to the delivery of major infrastructure projects including East West Rail. We strongly support the national direction of growth to this region, and the delivery of committed projects is critical to the success of the development strategy. We support recognition within the spatial strategy of directing growth outside of Cambridge City, which is a unique urban context in terms of its established heritage assets and spatial character that inhibits its ability to densify in ways that other major urban centres do. The plan recognises this limitation and proposes ambitious growth accordingly.

Outside of development in, or on the edge of Cambridge, Cambourne is the third strand of the development strategy with a proposed allocation at Cambourne North, and an updated Cambourne allocation identified. We suggest that the development strategy should be flexible to enable deliverable development sites that compliment strategic growth objectives to be progressed in the early years of the plan period. While the principle of new towns and major urban extensions are a cornerstone of Government's growth strategy, which Mac Mic Land strongly supports, such projects are invariably more exposed to wider economic conditions which can affect the timely delivery of development. In the context of Cambourne, growth is dependent on major infrastructure projects including East West Rail, the delivery of which is beyond the control of Greater Cambridge authority. While we support growth that is contingent on nationally significant investment projects, more local scale growth can help to bridge the timing gap in the short term.

Policy S/SH: Settlement hierarchy

The settlement hierarchy recognises the development potential of rural centres in accommodating growth beyond the main settlements. Given that the development strategy is dependent on the delivery of major urban extensions and development akin to new towns principles, we consider that in the short term, the sustainable growth of established settlements will offer an important source of new homes and other development. In the context of minor rural centres, we would suggest that an indicative maximum scheme size is not prescribed because this will be influenced by local contextual factors such that it is inappropriate to ascribe an arbitrary upper limit on development.

Policy S/CBN: Cambourne North

Mac Mic Land are generally supportive of the proposed allocation of Cambourne North as a strategic site which further consolidates the further expansion of Cambourne. Subject to the delivery of a new railway station through the East West Rail project and the Cambourne to Cambridge (CtoC) Guided Busway, the proposed allocation recognises the significant growth potential of the area, which in turn alleviates the significant development pressure on Cambridge city and its surrounding Green Belt.

The policy recognises the multi-layered considerations that will influence the growth potential of Cambourne, and associated timescales for delivery, most notably in terms of the delivery of the railway station which will be the catalyst for growth. Mac Mic Land engaged in optioneering workshops with the Greater Cambridge policy team which considered the range of growth options around Cambourne, and suggested the southward expansion of Papworth Everard via Crow's Nest Farm (Site Ref. 48096), as a short to medium term growth option that could compliment the wider objective of delivering Cambourne North.

Papworth Everard forms part of the same geographical hinterland as Cambourne and so is well placed to compliment planning growth as a sustainable extension to the existing settlement, whereby the individual identity of the village would be safeguarded through the identified Strategic Enhancement Area – areas of non-development land designed to reinforce access to nature and avoid coalescence of settlements. While the development potential of Papworth Everard is similarly influenced by wider strategic infrastructure delivery, a proportionate extension to the existing settlement offers a more sustainable short-term growth option, capitalising on the site's adjacency to the existing settlement and the suitability of access off Ermine Street South, its principal thoroughfare.

We support the growth of Cambourne through the Cambourne North allocation, which aligns with Government's wider support for new towns, but concerned that its delivery – and the realisation of the range of significant planning benefits – optimistically represent a medium to long term growth option dependent on external factors which could cause projected delivery timescales to slip.

At present, the proposed Cambourne North allocation is severely segregated from the existing Cambourne settlement by the A428 such that it is reasonable to assume that housing starts within the allocation will only happen when improved connectivity and infrastructure are crystallised. In recognition of the national mandate to boost housing delivery in the short term, an extension to Papworth Everard, benefiting from a direct relationship with the existing settlement, is a more attainable short-term growth option.

Mac Mic Land have undertaken extensive technical work to demonstrate that the land at Crow's Nest Farm is deliverable in the short-term. The development yield is flexible and can be scaled up to support and compliment wider strategic housing growth, and is underpinned by non-residential uses which are designed to improve the sustainability of the settlement, whilst creating active transport links to the wider Cambourne community. It would also align with the proposed Strategic Enhancement Area which surrounds Cambourne North and is designed to create defensible settlement limits and promote accessible nature. The indicative masterplan for land at Crow's Nest Farm includes a substantial green edge.

We object to the extent of the Strategic Enhancement Area as shown on the Policies Map, which extends over a significant portion of the Site Ref. 48096 and therefore would inhibit any future complimentary development potential offered by the site. We consider that the boundary of the Strategic Enhancement Area should be drawn less tightly around the eastern edge of Papworth Everard, to avoid prejudicing a

proportionate level of settlement expansion. A reduction in extent would not undermine the function of the Strategic Enhancement Area to avoid coalescence with Cambourne North.

It is emphasised that our land interest would not seek to compete with the primacy of the Cambourne North expansion. The identified vision for Cambourne North is robust and coherent, but as the draft policy recognises, the overall success of the town will depend on physical integration and onward connectivity via railway to Cambridge and beyond. It is important for the emerging Local Plan to be resilient to wider economic factors that pose a threat to growth, and the delivery of the spatial strategy. Proportionate and incremental extensions to existing settlements like Papworth Everard present a sustainable alternative.

Policy J/AL: Protecting the best agricultural land

Mac Mic Land supports the principle of protecting the best and most versatile agricultural land and recognises the importance of safeguarding Grades 1, 2 and 3a land where reasonable alternatives exist. However, the approach set out in Policy J.AL appropriately recognises, through criterion (b) that the protection of agricultural land must be balanced against wider sustainability considerations and demonstrable development needs. This planning balance strand is supported and consistent with national policy, which requires decision-makers to take a proportionate and pragmatic approach where the benefits of development clearly outweigh the loss of agricultural land and where there are no suitable or available lower-grade development.

Policy H/AH: Affordable housing

Mac Mic Land are largely supportive of the principle of maximising affordable housing delivery in Greater Cambridge and recognises the acute affordability pressures for the authoritative area. However, as currently drafted, Policy H/AH risks being overly rigid, insufficiently responsive to site-specific viability and inconsistent with national policy expectations on flexibility and deliverability. Modifications are required to ensure the policy is effective, justified and consistent with the National Planning Policy Framework (NPPF, 2024) particularly in respect of overly prescriptive tenure mix.

The draft policy proposes a minimum affordable housing requirement of 40% on major developments of 10 dwellings or more, unless otherwise specified through site specific allocation policies or within the Green Belt. While the principle of a policy led approach to affordable housing delivery is supported, the imposition of a uniform minimum requirement risks failing to adequately reflect the diversity of site conditions, abnormal costs and market circumstances that can materially affect scheme viability. Although the policy allows for viability testing, the overall framing remains prescriptive, which may discourage development coming forward, particularly on marginal or constrained sites. Its suggested perhaps a tiered approach to affordability is implemented in order to encourage SME provision.

In addition, the tenure requirements set out in Table 00: (Affordable Housing Tenures) are considered overly rigid. For schemes delivering 10–14 dwellings, the requirement for 75% social and affordable rent and 25% shared ownership or other affordable housing, and for schemes of 15 dwellings or more, the requirement for 65% affordable rent, 10% social rent and 25% shared ownership or other affordable tenures, significantly limits flexibility. Such fixed tenure splits do not adequately account for site specific viability considerations, local market demand, or the ability of registered providers to take on particular tenures. As a result, these requirements risk prejudicing the deliverability of development and undermining the overall objective of maximising housing supply, including affordable homes.

Mac Mic Land therefore considers that Policy H/AH should be amended to introduce greater flexibility in both the headline affordable housing requirement and the prescribed tenure mix, with clearer recognition of viability considerations at the planning application stage.

Policy H/HM: Housing Mix

Mac Mic Land supports the overarching objective of Policy H/HM to secure a balanced housing mix that responds to identified needs across Greater Cambridge, including the delivery of family housing, smaller homes and accommodation suitable for older people. However, the use of fixed percentage requirements could undermine scheme design and may inadvertently undermine deliverability.

In this regard, Mac Mic Land welcomes the supporting text to Policy H/HM, which confirms that deviations from the prescribed housing mix will be permitted where an alternative mix is justified, having regards to factors including site context, character, build form, the nature of the proposed development, site specific viability considerations, changes in local housing demand, and the existing housing mix in the surrounding area. This flexibility is strongly supported and should be clearly embedded within the policy wording to ensure consistent and pragmatic decision making at the application stage.

Policy I/ST: Sustainable transport and connectivity

The principle of reducing reliance on private car travel and the promotion of sustainable, inclusive and well-connected development through a vision-led approach is strongly supported. Policy emphasis on walkable neighbourhoods, high-quality walking, wheeling and cycling infrastructure and integration with public and community transport is welcomed and aligns with our objectives for Papworth South, as explored in the site specific representations.

Of particular support is subsection (c) which requires the provision of new mobility (travel hubs) to enable interchange between different modes of sustainable transport. It is considered that the wording used to define travel hubs are expanded to other community and connectivity requirements, to provide flexibility to the community in question.

Policy I/TH: Travel hub facilities

It is acknowledged that 'Policy I/TH: Travel Hub Facilities' provides additional information and design requirements in connection to the delivery of Travel Hub facilities. It is suggested that an additional criterion is added under part 2, i.e as clause (g) for the following lines to include accessibility of facilities:

“(g) they incorporate inclusive and step-free access between transport modes, appropriate lighting and natural surveillance”

This would strengthen the effectiveness of the policy, whilst also ensuring that the delivery of these travel hubs are future proofed and inclusive of wider population needs.

Mac Mic Land supports the role of travel hubs as strategic components of the sustainable transport network and considers them to be particularly important in the context of town extensions, which are a key component of the Local Plan development strategy. Such developments are often delivered over long timescales and are typically located at the edge of existing settlements, increasing the risk of early car dependency if sustainable travel options are not available from the outset. Travel hubs provide a critical mechanism to secure early and long term integration with public and community transport, enable modal interchange, and mitigate cumulative transport impacts. The policy would be strengthened by explicitly recognising the importance of early delivery, phasing and long term adaptability of travel hubs within town extensions, ensuring they function as foundational infrastructure rather than retrospective mitigation.

Policy I/SI: Safeguarding important infrastructure

The policy identifies land that is subject to safeguarding directions, including the East West Rail scheme. Mac Mic Land are concerned with the extent of land safeguarded for East West Rail which is contained within the ownership boundary of Crow's Nest Farm (Site Ref. 48096). Mac Mic Land have made extensive representations to the non-statutory consultation in 2024 which raised concern with the location and extent of land proposed to be acquired through the Development Consent Order process to enable EWR to be delivered. Further representations will be made to the statutory consultation in due course.

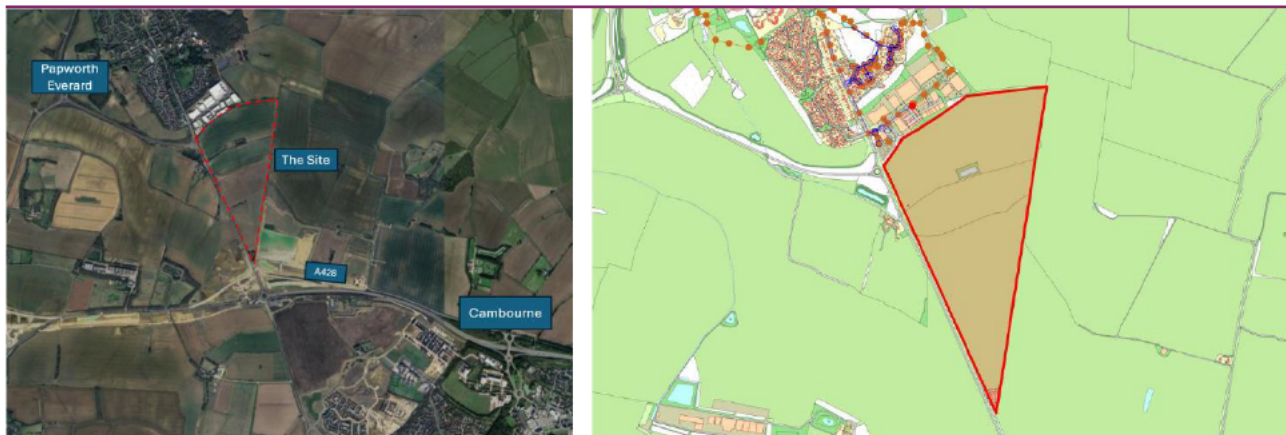
Our view is the land safeguarded, and subsequently confirmed on the draft Proposals Map has not been justified by EWR and extends northwards into Site Ref 48096, and so prejudices the site's development potential. It is unclear why such an extensive tract of land is safeguarded beyond the proposed route of the railway. For the avoidance of doubt, Mac Mic Group strongly supports the principle of East West Rail as a catalyst to realising the regions growth potential but land should be safeguarded in a proportionate and justified manner that does not sterilise the development potential of adjacent land.

Site 48096 – Site Specific Representations

The site comprises 55 hectares (ha) of arable land located immediately south adjacent of the Papworth Everard Settlement boundary. Cambourne is located immediately south on the other side of the A428 (approximately 1 mile). Immediately north of the site is the Papworth Business Park.

The below image identifies the site boundary (Outlined in red) and its context.

Figure 1. Ariel view of the site outlined in red & Site Location Plan



Source: Site Location Plan (EDP Architects, December 2025) & Google Maps (December 2025)

The site is not located within the Green Belt and lies wholly within Flood Zone 1. There are no listed buildings on or adjacent to the site, nor is it situated within a Conservation Area. No other statutory or non-statutory designations apply.

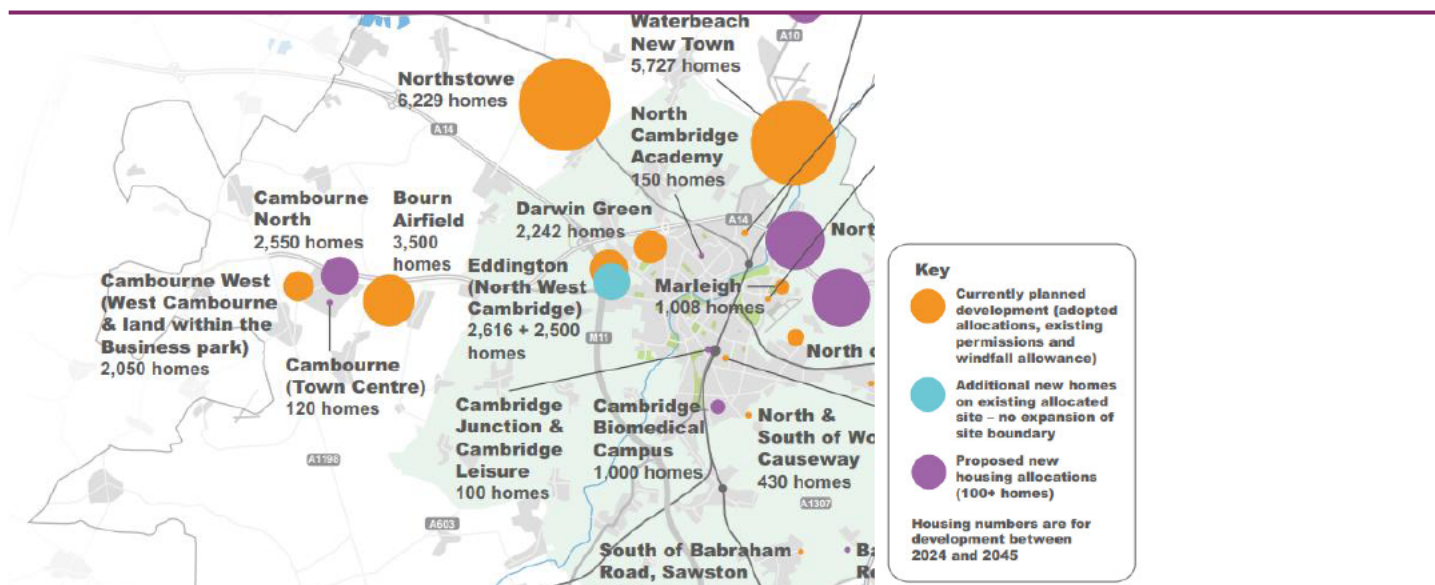
Within the adopted South Cambridgeshire Local Plan (2018), Papworth Everard is identified as a Minor Rural Centre under Policy S/9. The Local Plan contains two site allocations within Papworth Everard. Policy H/4: Papworth Everard West Central, which seeks to provide a mix of uses including community uses, employment uses and housing development to invigorate the village centre. Policy E/6: Papworth Hospital promotes the reuse or redevelopment of the Papworth Hospital site, as defined on a sequential approach to finding replacement uses beginning with healthcare. Beyond these allocations, policy supports windfall residential development in Minor Rural Centres.

The evolving policy framework strongly supports the delivery of sustainable housing in this location. The site sits within the Oxford–Cambridge Arc growth corridor, an area identified for significant investment and infrastructure improvements over the coming years. Key projects include:

- **East–West Rail Link:** Connecting Oxford to Cambridge, with a new station proposed at Cambourne, located between North Cambourne and South Papworth Everard.
- **A428 Black Cat to Caxton Gibbet Improvements:** A major upgrade introducing a two-lane dual carriageway west of Caxton Gibbet, alongside enhanced pedestrian and cycle crossings to improve connectivity between Cambourne and Papworth Everard.
- **Cambourne to Cambridge (C2C) Better Public Transport Project:** A dedicated busway link to strengthen sustainable transport options between the two settlements.

The proposed scheme represents a logical and sustainable extension to Papworth Everard, delivering approximately 400 new homes alongside supporting infrastructure. The site benefits from proximity to Cambourne and forthcoming strategic transport improvements, while complementing, rather than undermining, the planned Cambourne extension. This development offers a unique opportunity to meet pressing housing needs and contribute positively to the long-term growth objectives, not just for the area, but principally, Papworth Everard.

Figure 2. Spatial Strategy for North Cambourne & Key



Source: Greater Cambridge Local Plan (Regulation 18).

Positive Engagement & Pre-application History

On 6th May 2025, Planning Potential were invited by Greater Cambridge to present the latest proposals for the site and supporting technical work with Greater Cambridge's consultant team, led by ARUP, to feed the ongoing Local Plan spatial planning options assessment. The project team met with the Council on 14th May 2025. The project team had used the interim period to progress the feasibility work, including engaging in pre-application discussions with Anglian Water and Cambridge Water to determine water capacity, which was referenced in early meetings as a matter for resolution.

Pre-application discussions were held with officers at Greater Cambridge Council on November 11th 2025. An initial high-level masterplan was presented to Officers: Charlotte Spencer, Jane Rodens and Rebeccas Smith. The discussion was successful in establishing the hierarchy of development and future spatial strategy in bringing forward the site for development. The following feedback is summarised below:

- Maintain North Cambourne's primacy in the settlement hierarchy (not compete with North Cambourne)
- Redesign the masterplan to not undermine the emerging spatial strategy and prevent coalescence once North Cambourne comes forward.
- Proportionate extension to Papworth Everard and reduce overall quantum
- Provide robust green strategic gap/wedge between Papworth and North Cambourne – Strong defensive boundary.
- Residential-led development
- Remove Business uses as Cambourne North proposal features ample delivery of employment space.
- Focus on local centres and community uses
- Responds to the HELAA Constraints
- Consider East-West Rail safeguarding via layout & phasing

The scheme has been redesigned to respond to the above and is set out fully within the next section of the representation. It is our ambition to pursue a PPA with the Council to continue work on the evolution of the development, as such the proposal in its current form is a high-level vision of what the scheme may look like coming forward. Nevertheless, it is considered that the site should be allocated under the emerging local plan and considered as part of the authority's assessment for long-term housing delivery for Papworth-Everard.

Proposed Allocation

The proposed development for 'Papworth South' will include circa 400 housing units, a local centre comprising a community centre and a rural travel hub, with dedicated open space and high-quality soft landscaping. Please refer to figure 2 below for the latest masterplan which sets out a reduced development area comprising of the northern parcel of the wider landholding shown in the site location plan above.

Figure 2. The previous [left] and evolved [right] High-level masterplan of Papworth South



Source: EDP Architects (January 2026)

As demonstrated by the revised design, the scheme responds directly to previous feedback through a reduction in overall quantum and a repositioning to create a residential-led development anchored by a new community centre. This approach strengthens integration with Papworth Everard and enhances local placemaking. The below addresses each point in turn.

Reduced Scale and Quantum

The developable area has been significantly reduced, concentrating development on the northern portion of the site. The southern area is retained and enhanced to maintain separation from Cambourne, ensuring a clear buffer between the emerging Cambourne North extension and Papworth South. The proposal has been reduced from approximately a 700-unit scheme and reflects the following principles:

- A desire to respond positively to landscape and settlement edge considerations.
- The need to avoid over-extension of Papworth, Everard in advance of the planned strategic growth at Cambourne; and
- The importance of ensuring deliverability and market realism within the early part of the plan period.

This revised quantum remains policy compliant, makes a meaningful contribution to housing supply, and aligns with national guidance that development densities and site capacities should be design-led rather than fixed.

Residential-Led Focus

All employment space has been removed, allowing the scheme to focus on delivering approximately 400 dwellings alongside community facilities. This does not undermine Cambourne North's strategic role in the settlement hierarchy, which is expected to deliver substantial employment opportunities. Instead, the proposals complement Cambourne North, creating synergy between the two locations as well as providing the much-needed rejuvenation of Papworth Everard, providing a local centre which will provide greater identity to the settlement.

The development focuses on small, appropriately scaled local centre to support day-to-day needs and strong walking, cycling and public transport connections to higher-order facilities in Cambourne. The scale of development is proportionate to Papworth Everard, bringing much-needed investment and supporting the creation of a vibrant, sustainable community.

Strong Landscape and Boundary Definition

A key outcome of the redesign is the intentional incorporation of a substantial green gap to the south of the site, towards Cambourne. This green infrastructure serves multiple plan-led objectives:

- it reinforces the planned spatial distinction between Papworth Everard and the Cambourne extension proposed under the Draft Local Plan;
- it avoids the perception of settlement coalescence as Cambourne grows northwards; and
- it delivers multifunctional green infrastructure with landscape, ecological and recreational benefits.

This approach actively responds to the Draft Local Plan's strategic growth strategy and demonstrates how development at Crow's Nest Farm can complement, rather than compete with or prejudice, the planned expansion of Cambourne.

Safeguarding for East-West Rail

Initial consideration has been given to safeguarding land for the East-West Rail corridor. Delivery will be phased to ensure access for rail infrastructure, with further engagement planned to achieve a coordinated approach.

Recommendation

Given the above evolution and justification, the site 'Papworth South' should be allocated under the local plan and assessed holistically as part of the local plan process. The allocation should seek to set out the approximate delivery of 400 dwellings, delivered through a landscape-led and design-led master planning approach. The final number of homes shall be determined through a detailed assessment of design quality, landscape character, infrastructure capacity and environmental considerations.

As such, it is considered that the proposed inclusion of the site is justified based upon recent pre-application response, the planned role of Cambourne represents a positively prepared delivery of homes which responds to local constraints.

Response to HELAA 2021

The site was assessed as part of the Greater Cambridge HELAA 2021 under reference 48096. As part of the assessment it was recognised that the land is available and deliverable within the next 5 years as well as being economically viable. The scheme is not located within a historically sensitive setting is not the site designated as protected open space. There were a number of concerns highlighted which marked against the acceptability of the scheme coming forward, thus against allocation. These issues are addressed in turn within the table below:

Category	Response
<p>Landscape and townscape impact</p> <p>Development would cause significant adverse impact on the rural landscape character and result in encroachment into open countryside. The site is large, with medium visibility due to gappy vegetation, making mitigation challenging. A substantially reduced scheme to the northwest may be acceptable with strong landscape mitigation.</p>	<p>The current scheme has been substantially reduced to approximately 400 dwellings, focused towards the north-western portion of the site, consistent with the HELAA's own acknowledgment that a reduced development footprint could be acceptable subject to strong landscape mitigation. The revised approach is landscape-led, retains substantial areas of open land, and introduces a strategic green gap to the south, reinforcing separation from the planned Cambourne extension.</p> <p>Visibility has been further mitigated through the retention and reinforcement of hedgerow networks, woodland planting and edge treatment to define a robust and defensible settlement boundary. As redesigned, the scheme would avoid unacceptable harm to the landscape character and represents a context-responsive evolution</p>

	of Papworth Everard, rather than encroachment into the wider countryside.
<p>Transport and Highways</p> <p>The A428 corridor is already congested and cannot accommodate the proposed scale of growth (1,500 units).</p> <p>Anticipated to be heavily car-dominated, which the Highway Authority cannot support.</p> <p>Requires high sustainable mode share and integration with mass transit solutions (e.g., planned sustainable corridor investment).</p> <p>Current cycle mode share in Cambourne is low; direct walking/cycling links to St Neots and Cambourne will be expected.</p> <p>Local accident clusters at key junctions (A428/St Neots Road/B1040 and A428 Caxton Gibbet) add safety concerns.</p>	<p>The scale of the development has been significantly reduced to approximately 400 units, thereby will result in a significantly lower trip generation, enabling impacts to be mitigated through proportionate measures that strategic highway interventions. The scheme is no longer car-dominated by default, with design now centred on:</p> <ul style="list-style-type: none"> • Walkable internal layout; • Direct and attractive cycling connections to Papworth Everard, Cambourne and proposed transport infrastructure; • Strong reliance on planned mass-transit investment in the Cambourne corridor. <p>The delivery of a southern green gap also removes pressure to function as a through-route between settlements, helping to manage traffic movements. Identified accident clusters are acknowledged; however, the reduced traffic generation associated with the revised scheme ensures that impacts can be appropriately assessed and mitigation at application stage.</p>
Flood Risk – parts of the site are at risk of surface water flooding (up to 8% in a 1-in-1000-year event)	<p>Importantly, the site lies wholly within Flood Zone 1 and the identified surface water risk is neither extensive nor unmanageable. The redesigned scheme avoids development in high-risk areas and will incorporate a comprehensive SuDS-led drainage strategy, utilising attenuation basins, swales and greeed infrastructure to manage exceedance flows.</p> <p>The presence of undeveloped land within the reduced site boundary provides additional flexibility to manage surface water effectively and deliver betterment relative to existing greenfield runoff rates.</p>
Biodiversity – Impact on hedgerows, mature trees and watercourses – nearby SSSIs	<p>The proximity of designated sites is acknowledged; however, the inclusion of extensive green infrastructure, separation distance, and on-site biodiversity enhancement ensures that the scheme can deliver measurable biodiversity net gain without adverse effects on nearby SSSIs. The green gap to the south plays a critical role in reducing recreational pressure on sensitive sites.</p>
Accessibility – Distance to schools ,healthcare and employment – rapid transport is over 1,800m away	<p>While distances may exceed 1,800 metres in places, this finding must be considered in the context of:</p> <ul style="list-style-type: none"> • the planned expansion of Cambourne, • proposed mass-transit investment along the A428 corridor, • the revised scheme's emphasis on cycling, micromobility and public transport connectivity. <p>Additionally, the introduction of a local centre within the scheme reduces reliance on longer-distance trips. The site therefore</p>

	performs acceptably in accessibility terms for a village-edge location within a strategic growth corridor.
Site Access -Acceptable in principle, but subject to detailed design and potential constraints exist.	<p>The HELAA confirms that site access is acceptable in principle, subject to detailed design. This position remains unchanged. The reduced scale of development simplifies access requirements, avoids the need for multiple strategic access points, and allows design to prioritise safety, legibility and integration with existing road infrastructure.</p> <p>Any remaining constraints are resolvable at application stage and do not represent a barrier to allocation.</p>
Air Quality & Noise – Large scale could impact AQMA traffic road and noise mitigation needed	<p>The revised scheme's significantly lower traffic generation markedly reduces potential impacts on nearby AQMAs and the strategic road network.</p> <p>Noise impacts from transport and adjacent land uses can be appropriately mitigated through buffer zones, landscape design and building orientation, consistent with standard development management practice.</p>
Adjacent to industrial land – potential contamination	The proximity of industrial land is acknowledged and does not preclude residential development. Potential contamination risks are typical of edge-of-settlement sites and can be addressed through standard site investigation and remediation strategies. The reduced scale and refined layout offer greater flexibility in ensuring appropriate land use compatibility.
Agricultural land – Grade II quality	<p>The site's classification as Grade II agricultural land is noted. However, national policy does not preclude development on such land where necessary to meet housing needs, particularly where the site:</p> <ul style="list-style-type: none"> • is not subject to Green Belt designation, • is adjacent to an existing settlement, and • forms part of a strategic growth corridor supported by infrastructure investment.

When taken together, the HELAA findings do not present an in-principle objection to development at Crow's Nest Farm. When assessed against the current, reduced and redesigned scheme, the majority of Identified constraints have been either removed or materially mitigated, reinforcing the suitability of the site for inclusion within the Draft Local Plan.

Technical Matters

Vehicular access to the site has been assessed through an initial Transport Note prepared by SLR. The site benefits from an existing roundabout at the southern entrance to Papworth Everard from Cambourne, which provides a suitable and deliverable access point. The roundabout can be readily modified to accommodate an additional arm into the development, with no significant physical constraints or capacity issues identified. The introduction of a fourth arm onto Ermine Street South is achievable within the existing highway arrangement and does not require substantial alteration, supporting the timely delivery of the site.

Initial discussions have also been held with Anglian Water regarding utilities and foul water drainage. Confirmation has been received that Papworth South can be accommodated within the capacity of the existing foul water network, and that a connection to the public sewerage

system is feasible without resulting in unacceptable flood risk. Anglian Water has confirmed, however, that whilst capacity is currently available, it cannot be reserved in advance. This reinforces the need for a flexible and responsive approach to delivery, whereby detailed design and mitigation are secured through planning conditions and phased implementation.

Evidence from the statutory undertaker therefore confirms that foul water drainage solutions are technically feasible for development at this location, but also highlights the importance of avoiding policy requirements that seek absolute certainty of infrastructure provision at an early stage. Local Plan policies should continue to allow infrastructure matters to be addressed through appropriate phasing and conditions, as requiring full up-front certainty risks delaying otherwise sustainable and deliverable housing sites, contrary to national planning policy objectives.

An initial Heritage and Archaeological Desk Based Assessment has been undertaken by Heritage Potential and confirms that no designated heritages assets sit within the site boundaries, nor are there any heritage or archaeological constraints which would preclude development. Whilst a number of listed buildings, scheduled monuments and Papworth Everard Conservation Area are located within the wider surrounding area, the site is considered to make only a limited contribution to their setting.

As such, as potential effects are anticipated to be limited and at most, would result in less than substantial harm, capable of being appropriately mitigated through sensitive masterplanning, landscaping and design. The site has low to medium archaeological potential, with no known remains of such significance. It is considered that any residual uncertainty can be addressed through proportionate investigation and as when required. Overall, the assessment concludes that the site is viable and suitable for development from a heritage and archaeological perspective, with any identified effects capable of being satisfactorily managed and weighed in the planning balance in accordance with national policy.

Conclusion

In conclusion, Crow's Nest Farm represents a sustainable, deliverable and flexible opportunity for residential development which is capable of contributing positively to the housing supply over the plan period. The revised scheme—comprising approximately 400 dwellings, supported by a local centre and significant green infrastructure—responds directly to site-specific constraints and the evolving spatial strategy for growth at Cambourne. Technical evidence confirms that access, utilities and foul water drainage can be accommodated, with detailed design appropriately addressed through phased delivery and planning conditions.

When assessed against the Draft Local Plan as a whole, the site can come forward in a manner that is positively prepared, justified by up-to-date evidence, effective over the plan period, and consistent with national planning policy. The allocation (or continued consideration) of the site, supported by proportionate and flexible policy wording, would therefore materially assist in ensuring a diverse, resilient and deliverable housing land supply. Our representations set out how this site can compliment wider strategic growth options including Cambourne North, with a focus on short-term delivery.

We welcome continued correspondence in relation to the development of the site and would be happy to provide any further information to support the local plan process.

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