

Your ref:  
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Greater Cambridge Shared Planning Policy Team  
South Cambridgeshire District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge CB23 6EA

Dear Planning Policy,

**DRAFT GREATER CAMBRIDGE LOCAL PLAN 2024-2025**

**REGULATION 18 CONSULTATION DECEMBER 2025 – JANUARY 2026**

**LAND TO THE SOUTH OF STATION ROAD, HARSTON (HEELA 2025 SITE ID: 115742)**

These representations have been prepared by Bidwells LLP on behalf of Jesus College in response to the Draft Greater Cambridge Local Plan Regulation 18 consultation (2026). These representations relate to Land to the south of Station Road, Harston (“the Site”) which is within the ownership of Jesus College. Please refer to **Appendix 1** for site location plan.

These representations follow those previously submitted to the March 2019 Call for Sites, February 2020 Issues & Options consultation and December 2021 Preferred Options consultation. A range of technical and design work was undertaken to support these representations, as follows:

- Preliminary Ecology Appraisal
- Highways and Access Transport Appraisal
- Emerging Concept Proposal

Through the Council’s Housing and Economic Land Availability Assessment (HELAA) (2025) it was given the site reference 115742. The Site was referenced as forming part of parcel HS9 within the Greater Cambridge Green Belt Assessment (2021).

The earlier submissions outlined above made by Jesus College in support of the Site remain up to date and relevant. This representation adds to the suite of submission material previously submitted and accounts for changes to the context of the Site, the emerging Greater Cambridge Local Plan and updated national policy, notably the National Planning Policy Framework (NPPF). This representation considers the relevant policies relating to the wider Development Strategy proposed in the Plan and the Rest of the rural area. It also addresses the red, amber and green (RAG) scores in the HELAA assigned to the Site to demonstrate that the site remains available, suitable and deliverable.



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The remainder of this letter is set out as follows:

- Site Description
- Development Proposals
- Response to HELAA
- Response to the Draft Greater Cambridge Local Plan

### **The Site**

The Site is in a central village location and within 100m of the High Street (A10). The Site lies to the south of Station Road, Harston and extends to approximately 1.2 hectares. It is currently in agricultural use as a horse paddock. The Site is relatively flat, comprising an open field with trees and hedges along its boundaries, together with post and wire paddock fencing. The frontage with Station Road comprises an evergreen hedge that extends to two metres in height.

The Site lies immediately adjacent to existing residential development along Station Road to the west and Baggot Hall Farm to the east. It therefore represents a small gap between existing built development. To the north of the Site lies recreational land associated with Harston and Newton County Primary school and open countryside lies to the south.

The Site is currently accessed from agricultural land to the south, on land also owned by the College.

The Site is within the Environment Agency defined Flood Zone 1 in terms of flooding from rivers (very low risk of flooding). The majority of the site is also within a 'very low' risk of flooding from surface water.

The Site is not within a Conservation Area but Baggot Hall lies to the east of the Site and is Grade II Listed.

A variety of facilities and services are currently available within walking distance of the site including Harston and Newton County Primary school (immediately north of the site), a doctor's surgery, a post office, village hall, public houses and a convenience store.

The nearest bus stop to the Site is located approximately 250m north, along the High Street (A10). There is a bus stop on both sides of the A10 serving north bound and southbound services through to Royston to the south, the Trumpington Park and Ride site and Cambridge to the north, as well as national express coach services to Gatwick airport.

Off-road cycle ways connect the Site to Foxton railway station approximately 2.5km to the south which offers services to Cambridge (and beyond) and London. The proximity of the Site to this transport interchange makes it readily accessible by active modes of travel, particularly cycling.

Furthermore, the A10 runs through the village, which is a strategic transport corridor within Greater Cambridge, where numerous transport improvements are planned to deliver a high-quality public transport corridor, including:

- Improved transport hub at Foxton railway station (3km from the site);
- Proposed improved transport interchange at Trumpington A10/M11 junction (3.2 km from the site);
- Park and ride site at Hauxton;
- Off road cycle links along the A10;
- Walking and cycling links to Melbourn and Bassingbourn Village Colleges.

In addition to the above, Harston falls within the 'Preferred route option' area of the proposed East-West rail alignment which would deliver faster and improved frequency of trains to Cambridge and in turn to London.

As such, the Site is well located to reduce the need to travel by car and can promote sustainable travel. Further public transport enhancements are also proposed that will improve connectivity to Harston by sustainable and active modes of transport.

#### Whether development of the Site can be regarded as appropriate in the Green Belt

Harston is inset within the Green Belt with its own defined development framework. The Site lies immediately to the south of the proposed defined development extent for Harston and within the Cambridge Green Belt.

Notwithstanding the underlying purposes of the Green Belt (Para. 143 of the NPPF(2024)), where it can be demonstrated that 'appropriate' development can be brought forward in the Green Belt, sites should be considered within the context of their individual circumstances.

Paragraph 154 (limb (e)) of the NPPF confirms that exceptions to inappropriate development in the Green Belt can include for 'limited infilling of villages'. The adopted South Cambridgeshire District Council Local Plan (2018) includes for a policy to allow for infilling in the Green Belt (Policy NH/9). These representations to Policy S/DE: Defined development extents and Policy S/GB: Green Belt have stated that the said policies should equally be clear on the forms of development that would not constitute inappropriate development in the Green Belt.

The proposed residential development on Land to the south of Station Road, Harston, is considered appropriate in the context of Para. 154 and would comprise suitable infill development that would extend only as far the existing development line of its neighbouring residential and agricultural properties. The proposed residential development would respect the immediate character and would retain the openness of the Green Belt and purpose of the land to the same extent as existing neighbouring development. Land off Station Road is therefore considered suitable to become a residential site allocation as it would comprise a moderate extension to the village and suitable infill development.

However, even if for any reason the Councils consider development of the Site would not constitute limited infilling, these representations make the case that, by virtue of the Site's location and its context, it is by definition Grey Belt in accordance with the NPPF (2024). Paragraph 155 of the NPPF confirms that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the provisions in the paragraph apply.

The glossary of the NPPF defines 'grey belt' as follows:

*"For the purposes of plan-making and decision-making, 'grey belt' is defined 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."*

The Greater Cambridge Green Belt Assessment (LUC, August 2021), prepared in support of the emerging Greater Cambridge Local Plan provides a thorough analysis of the Cambridge Green Belt, scoring each parcel against the three NPPF purposes relevant to the grey belt definition. The assessment of contribution applies to each parcel as a whole and provides a rating on a 5-point scale (limited/no contribution, relatively limited, moderate, relatively significant or significant).

The established purposes of the Cambridge Green Belt are defined in the adopted Local Plans, as to:

- Purpose 1 : Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- Purpose 2 : Maintain and enhance the quality of its setting;
- Purpose 3 : Prevent communities in the environs of Cambridge from merging into one another and with the city.

The Site is located within a much wider parcel, Parcel HS9, of the Greater Cambridge Green Belt Assessment (2021) (see Plan 1 below). Parcel HS9 extends to 15.09ha in total and includes land to the south of Harston that runs between the railway line to the east through to Royston Road (A10) to the west.

The Detailed Contribution and Harm Assessment for Parcel HS9 is set out at pages HS-P40 to HS-P43 of Appendix B of the Assessment and assesses the contribution of the parcel to the Green Belt purposes. This is summarised in Table 1 below.

## HS9



**Plan 1** : Map of Parcel HS9 (Source: Detailed Contribution and Harm Assessment for Parcel HS9, Appendix B of Greater Cambridge Green Belt Assessment (2021))

<b>CONTRIBUTION OF PARCEL HS9 TO THE GREEN BELT PURPOSES</b>		
<b>Cambridge Purpose</b>	<b>Contribution</b>	<b>Comment</b>
1. to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	Limited/No contribution	Land is not close enough to the main urban area of Cambridge to be associated with it; the land is closely associated with the settlement of Harston. It therefore makes no contribution to Cambridge Purpose 1.
2. to maintain and enhance the quality of Cambridge's setting	Moderate	Land has a moderate distinction from the edge of Harston, meaning it has some relationship with the inset area. However, it comprises open farmland with scattered agricultural buildings meaning it has some rural character. To the southeast land makes some contribution to a rural landscape setting experienced on approach to the wider city from the southwest along the railway line connecting Cambridge with London. Land also fronts onto the historic core of the village along Royston Road and Station Road, which is marked by several listed buildings. As such, it allows some appreciation of the rural character and setting of Harston in proximity to the more intact and historic parts of the village, which in turn makes some contribution to the quality of Cambridge's setting. Overall the parcel makes a moderate contribution to Cambridge Purpose 2.
3. to prevent communities in the environs of Cambridge from merging into one another and with the city	Moderate	Land is open and lies in a moderate gap between Harston and Foxton, but wooded areas act as a significant separating feature. The parcel has some relationship with the inset area, but also has a degree of distinction from it. Overall, the parcel makes a moderate contribution to Cambridge Purpose 3.

**Table 1 : Contribution of Parcel HS9 to the Green Belt Purposes** (Source: *Source: Greater Cambridge Green Belt Assessment (LUC, August 2021) Appendix B, Pages HS-P40 to HS-P43*)

In summary, the Site forms a relatively small area of land within a much larger parcel (Parcel HS9) and development of the Site would comprise limited infilling of a small gap between existing built development. The wider Parcel HS9 is identified in the Greater Cambridge Green Belt Assessment (2021) as having either no/limited or moderate contribution to the three Cambridge Green Belt purposes (and the corresponding NPPF Purposes (a), (b) and (d)).

The Site therefore meets the NPPF definition of 'grey belt' on the following grounds;

- i. It is land in the Green Belt that does not does not 'strongly contribute' to any of purposes (a), (b), or (d) in paragraph 143; and
- iii. It is land which does not include areas or assets in footnote 7 (other than Green Belt) that would provide a strong reason for refusing or restricting development.

As discussed below, Bidwells advocate that the Councils must include the identification of Grey Belt land within the Draft Local Plan and as such the Site should be clearly identified as Grey Belt. Any future residential development of the Site is also capable of meeting the 'Golden Rules' set out within Paragraphs 156 - 157 of the NPPF.

Through the identification and allocation of Grey Belt sites across Greater Cambridge, such as Land to the south of Station Road, Harston, pressures on green space within villages can be alleviated. Furthermore, the allocation of Grey Belt sites can ensure a spatial strategy with the most sustainable locations developed first and where the local need can be met in those villages where it has been identified that existing services and facilities provide a sustainable opportunity for further development.

The area of Grey Belt identified within this submission would support a modest rollback of the Green Belt, to better reflect the contemporary shape and form of Harston.

#### Whether development of the Site could compromise the purposes of the Important Countryside Frontage

The Station Road frontage of the Site, together with the Station Road frontage of Baggot Hall farm to the east, is proposed to continue to be subject to the 'Important Countryside Frontage' Policy, under Policy GP/LC: Protection and enhancement of landscape character. Policy GP/LC states that Important Countryside Frontages are "identified on the Policies Map and are in village where land with a strong countryside character either:

*a) Penetrates or sweeps into the built-up area providing a significant connection between the built environment and the surrounding rural area; or*

*b) Provides an important rural break between two nearby but detached parts of a development framework"*

Policy GP/LC advises that planning permission for development would be refused if it would compromise these purposes.

The Great Places Topic Paper (2025) states that a Protected Open Spaces Review (2025) was a desk-based review which demonstrated that the open spaces identified for protection are reasoned and justified by meeting the relevant policy criteria. The Protected Open Spaces Review (2025) is then provided in Appendix 2 of the Biodiversity and Green Spaces Topic Paper (2025). The Review states that the criteria used to determine whether a site should warrant designation as an Important Countryside Frontage (ICF) consisted of two tests;

- **The first test** asked whether it was land on a frontage with a strong countryside character that provides an important rural break between two nearby but detached parts of the defined development extent.
- **The second test** asked whether the frontage allows land with a strong countryside character to penetrate or sweep into the built-up area providing a significant connection between the street scene and the surrounding rural area.

If a site scored green to at least one of the two tests, the conditions to be designated as an ICF was met.

Land to the south of Station Road, Harston was identified as scoring red against the first test (important rural break) but green against the second test (significant connection (street vs rural)).

Jesus College question the robustness of the Protected Open Spaces Review (2025) being only a desk-based review and considers a more detailed assessment is needed that includes a site visit to understand the site specific context and landscape character. This should be undertaken to inform the preparation of the Regulation 19 consultation of the Plan.

Notwithstanding the above, the existing two-metre tall evergreen hedge along the length of the Station Road frontage can be retained as part of any development proposal, with the exception of two small sections to be removed in order to accommodate access. This hedge already acts as a natural barrier to the countryside frontage and the loose grain of development and low density proposed will also enable views of the open countryside beyond to be retained from Station Road. As such, residential development on Land to the south of Station Road, Harston could be brought forward without compromising the purposes of Important Countryside Frontages, in particular the purpose of 'providing a significant connection between the built environment and the surrounding rural area'.

## Development Proposal

An emerging concept proposal has been prepared by Bidwells LLP which accompanied previous representations, informed by a suite of technical assessment work.

The emerging proposal is for a residential development of approximately 10 dwellings, with a mix of terraced, semi-detached and detached houses.

In order to protect the significance of the adjoining Baggot Hall and its setting, the proposed layout seeks to incorporate significant areas of retained open space within the centre of the Site and along its eastern boundary. This will ensure that views of Baggot Hall are retained from Station Road to the north and open countryside to the west. The total amount of public open space currently proposed extends to circa 0.31 hectares. The eastern boundary also incorporates a proposed drainage attenuation feature.

The proposed layout responds appropriately to its rural location by retaining views of the countryside beyond and protecting the existing rural character of the site. The internal road layout is gently curved, in a similar design to that serving Linden House to the south-west of the Site, and the dwellings are loosely arranged within the site, with the larger units proposed to the south designed to respond to the adjoining agricultural buildings at Baggot Hall farm.

There is an existing two-metre-tall evergreen hedge along the length of the Station Road frontage that prevents visual access to the countryside. This will be retained with the exception of two small sections to be removed in order to accommodate access. A pair of semi-detached dwellings are proposed along the Station Road frontage, to continue the existing residential building line to the west. The remaining units are proposed to be sited off the internal road. The loose grain of development and low density proposed will enable views of the open countryside beyond to be retained from Station Road.

Existing boundary vegetation will be retained where possible and enhanced in order to provide a defensible boundary to the Green Belt edge.

A suitable vehicular access can be achieved off Station Road, together with an adequate visibility, in line with the Manual for Streets parameters for a road with a 30mph speed limit, such as Station Road. The existing footway on the south side of Station Road can also be widened to 2m and tactile paving added to the existing informal crossing to Harston and Newton County Primary School.

Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in the next Local Plan period. With the right design, including a suitable layout and design concept, the proposed development on the site could be accommodated without having a significant impact on the surrounding heritage context of the site or landscape setting.

The land is available, achievable and suitable and the development proposals will bring a number of tangible social, economic and environmental benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:

- Representing appropriate development in the Green Belt and effective use of sustainable, Grey Belt land;
- Development in a sustainable location with good transport links north into Cambridge via the A10;
- Close proximity to existing services including primary school; doctors surgery;
- Development between existing built development;
- Development within Flood zone 1;
- Access to local green space;
- Contributions to affordable housing in accordance with Local Plan Policy;
- Improved transport hub at Foxton railway station (3km from the site);
- Proposed improved transport interchange at Trumpington A10/M11 junction (3.2 km from the site);
- Park and ride site at Hauxton;
- Off road cycle links along the A10; and
- Walking and cycling links to Melbourn and Bassingbourn Village Colleges.

#### Response to HELAA 2025 – Site ID: 115742

The following sub-sections follow the Council’s structure in the HELAA (2025) and seeks to address the scores and comments assigned to the Site by the Councils where necessary.

<b>HELAA RAG RATING AND RESPONSE (2025) (OR EARLIER DATE IF NO 2025 RESPONSE)</b>	<b>PROPOSED RAG RATING AND RESPONSE</b>
<p><b>Adopted Development Plan Policies (2025)</b></p> <p>Development of the site has some potential policy constraints, but these could be overcome through the planning application process</p>	<p>Jesus College welcome and agree with the continued position that whilst there are some policy constraints these are capable of being addressed via the planning application process</p>
<p><b>Flood Risk Assessment (2025)</b></p> <p>Flood Zone: Wholly in Flood Zone 1. Surface Water Flooding: 8% lies in a 1 in 1000 year event</p>	<p>The site is wholly within Flood Zone 1 (low risk of flooding). Whilst 8% of the site lies in a 1 in 1000 year event for surface water flooding, this constraint is capable of being addressed via the planning application process. There is sufficient land to deliver an acceptable scheme, and the surface water can be appropriately addressed via a detailed drainage strategy without impact to onsite or offsite flood risk.</p>

<p><b>Landscape Assessment (2023) (No 2025 rating or response provided)</b></p> <p>Additional information includes further representations replying to the previous helaa assessment. However these do not address landscape impact concerns as it is considered this development will cause irreversible harm to the views and local openness, village approach and landscape character, therefore the previous scoring remains unchanged.</p>	<p>Jesus College remain of the view that development on the site is capable of being delivered without causing irreversible harm to the views and local openness, village approach and landscape character.</p> <p>There is a two-metre-tall evergreen hedge along the site frontage that prevents visual access to the countryside. Furthermore, the Site has potential for a high-quality landscape led development which respects the setting of the important countryside frontage and wider character area and improves on the existing hedgerow screening which already acts as a natural barrier to the countryside frontage. The loose grain of development and low density proposed will also enable views of the open countryside beyond to be retained from Station Road.</p>
<p><b>Biodiversity and Geodiversity (2021) (No 2023 or 2025 rating or response provided)</b></p> <p>All new housing developments will require assessment of increased visitor pressure on nearby SSSI. No apparent priority habitat; however, there are hedges within the boundary which will likely have ecological value.</p> <p>Development of the site would not have a detrimental impact on any designated site, or those with a regional or local protection.</p>	<p>A site-wide ecological appraisal and background desk study was completed by Applied Ecology Ltd in January 2020 and accompanied the Issues and Options consultation. This confirmed there are no overriding ecological constraints to development of the Site. No rating or response has been provided by the Councils since 2021 so it is unclear whether this information has been considered.</p> <p>Furthermore, the site is capable of delivering a policy compliant level of Biodiversity Net Gain (BNG) on site as part of any future development proposals, thus enhancing the ecological value of the Site.</p>
<p><b>Policy (2025)</b></p>	<p>Jesus College welcome and agree with the Councils RAG rating. The site is not on protected open space designation and any impact of the proposed development could be reasonably mitigated or compensated.</p>
<p><b>Historic Environment Assessment (2021) (No 2023 or 2025 rating or response provided)</b></p> <p>Development of 22 dwellings would have some impact on setting of the Grade II listed Hall; however, the impact could be reasonably</p>	<p>Whilst there are some policy constraints these are capable of being addressed via the planning application process. This can include</p>

<p>mitigated with careful consideration of layout, design and landscaping.</p>	<p>incorporating significant areas of retained open space within the centre of the Site and along its eastern boundary. This will ensure that views of Baggot Hall are retained from Station Road to the north and open countryside to the west.</p>
<p><b>Archaeology (2021) (No 2023 or 2025 rating or response provided)</b></p> <p>Cropmarks of enclosures and linear boundaries known to the west</p>	<p>Whilst there are some policy constraints these are capable of being addressed via the planning application process. Trial trenching to establish the archaeological value of the site could take place during the determination of a future application or secured via an appropriately worded condition</p>
<p><b>Accessibility (2025)</b></p> <p>Adequate accessibility to key local services, transport, and employment opportunities</p>	<p>Jesus College agree with the Amber RAG rating based upon the scoring system in the HELAA methodology</p>
<p><b>Site Access (2021) (No 2023 or 2025 rating or response provided)</b></p> <p>The proposed site is acceptable in principle subject to detailed design</p>	<p>A detailed analysis of the Site has been undertaken in support of previous representations, including a Sustainable Transport Appraisal which included an indicative Site Access drawing. This demonstrates that a 2.4m x 43m visibility splay can be achieved which is in line with guidance for a road with a 30 mph speed limit such as Station Road. The existing footway on the south side of Station Road can also be widened to 2m and tactile paving added to the existing informal crossing to Harston and Newton County Primary School.</p>
<p><b>Transport and Roads (2021) (No 2023 or 2025 rating or response provided)</b></p> <p>Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated</p>	<p>A detailed analysis of the Site has been undertaken in support of previous representations, including a Sustainable Transport Appraisal. This confirmed that the number of vehicle trips generated would be imperceptible upon the surrounding highway network.</p>
<p><b>Noise, Vibration, Odour and Light Pollution (2021) (No 2023 or 2025 rating or response provided)</b></p> <p>The site is capable of being developed to provide healthy internal and external environments in</p>	

regard to noise / vibration / odour / light pollution after careful site layout, design and mitigation	Jeus College welcome and agree that the Site can be made acceptable in all these terms subject to detailed design.
<b>AQMA (Air Quality) Assessment (2021) (No 2023 or 2025 rating or response provided)</b>  Site does not lie within an AQMA. Minimal traffic impact on AQMA	Located outside any AQMA. Any impact on neighbouring AQMA could be mitigated through detailed design and would accompany a future application.
<b>Contaminated Land (2021) (No 2023 or 2025 rating or response provided)</b>  Previous agricultural land use. Potential for historic contamination, conditions required.	Potential for contamination due to historic uses noted. Contamination Reports and subsequent remediation scheme would accompany future application and appropriate remediation scheme secured via condition.
<b>Overall Suitability Score</b>	The above demonstrates the Site is a suitable location for development and compatible with neighbouring uses. Where constraints exist, these can be appropriately mitigated.
Available	The Site remains in single ownership and is available for development within the next 5 years
Achievable	The Site remains achievable and deliverable.

## Response to the Draft Greater Cambridge Local Plan

### Policy S/JH : New Jobs and homes

Jesus College **object** to Policy S/JH.

Policy S/JH sets out the level of objectively assessed needs in Greater Cambridge over the period 2024-2045 for jobs and homes. It states that 73,300 additional jobs and a minimum of 48,195 new homes are required to meet the needs for the total population.

The provision of 73,300 additional jobs and 48,195 new homes across the plan period should be regarded as the very minimum rather than a maximum or constraining target. Supporting evidence to the policy titled the 'Greater Cambridge Employment and Housing Needs Update 2024-2045' (September 2025) (EHN), states at 3.55 that the various scenarios modelled indicate a need of between 67,600 and 90,900 additional jobs over the plan period. This compares to between 66,600 and 75,800 additional jobs modelled under the previous 2023 results. This significant increase in the upper end of the modelling indicates that economic growth expectations have strengthened exponentially, not diminished.

As set out in the EHN, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The conclusion of the EHN is then based on the 'Central growth' scenario of 73,200 jobs across the plan period, representing sustained annual growth of around 3,500 jobs. Crucially, the Central growth scenario builds in assumptions of slower periods,

contractions, and economic shocks, and is therefore inherently conservative rather than reflective of the full growth capacity of the Cambridge economy. It is also worth noting, at paragraph 3.62 of the EHN, it is acknowledged that the ‘high’ scenarios could be achieved or exceeded if there is a step change in infrastructure investment.

Greater Cambridge is one such location where there has indeed been a step change in infrastructure investment which heightens the urgency in increasing job creation and housing supply and justifies adopting a higher growth scenario. On 23rd August 2024, Matthew Pennycook reaffirmed the Government’s commitment to Cambridge stating; *“The economic growth of Cambridge has been a phenomenal success and we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy.”* Pennycook goes on to say; *“Greater Cambridge has a vital role to play in this Government’s mission to kickstart economic growth.”* Furthermore, the Cambridge Growth Company was established in 2024 to address barriers to growth and help unlock Greater Cambridge’s full potential. In terms of approach, in October 2025, the Government announced its intention to consult on the case for a centrally led Development Corporation as one potential route for delivery (backed by £400m funding). This is to be the subject of statutory consultation in 2026. It is anticipated that Cambridge Growth Company (CGC) will publish its own evidence base ahead of the formation of the Development Corporation, which whilst yet unknown it is expected that an ambitious growth target will be identified; likely to exceed that currently envisioned by the Councils for the Greater Cambridge Local Plan.

Furthermore, Greater Cambridgeshire has been, and continues to be, the location of strategic infrastructure investment that will continue to drive upwards increases in the need for new jobs and homes. This includes the proposed East West rail station as well as the proposed public transport improvements for the Cambourne to Cambridge corridor and the Cambridge Eastern Access corridor. The Cambridgeshire and Peterborough Local Growth Plan 2025 also identify priority growth sectors, and the need for further skills development.

The Employment and Housing Needs Update acknowledges a ‘High’ and ‘High Sensitivity’ scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This high level of growth is feasible in Cambridge and would support the Government’s direction of travel. It is therefore important to recognise that higher-growth outcomes remain credible and should not be ruled out by policy. This requires revision to the proposed policy wording.

For these reasons, the Local Plan should consider utilising a more optimistic and realistic figure for job and housing numbers and include explicit support for higher-growth scenarios. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity.

It is requested that the Plan allocates additional sites in Greater Cambridge to directly respond to the higher growth potential and to increase the diversity of allocated sites to optimise delivery and growth potential. Land to the north of Station Road, Harston can soundly assist in realising a greater and more appropriate level of growth in a sustainable way.

### **Policy S/DS: Development Strategy**

Jesus College **object** to Policy S/DS.

Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge and sets out where the homes and jobs identified in Policy S/JH should be provided to meet the vision and strategic priorities of the Plan.

Firstly, as referred to in representations to Policy S/JH, the identified needs in the Plan are considered too conservative and do not reflect the growth agenda in national, regional and local contexts mandated

by the incumbent Labour Government. In line with the Written Ministerial Statement made by Matthew Pennycook (Minister of State for Housing and Planning) on 23 October 2025 the ambition remains to 'supercharge growth' within the Oxford-Cambridge Corridor and realise the full potential of Greater Cambridge. Further it is anticipated that the Cambridge Growth Company (CGC) will publish its own evidence base ahead of the formation of a centrally-led Development Corporation (backed by £400m funding announced in October 2025), which, whilst yet unknown, it is expected that an ambitious growth target will be identified; likely to exceed that currently envisioned by the Councils. Collectively it remains apparent therefore that the Government have a continued agenda to deliver high levels of growth within Greater Cambridge and as such more optimistic and realistic figures for job and housing numbers are needed to support sustainable economic growth and productivity.

Secondly, the supporting text to Policy S/DS states, at paragraph 2.64, that *'drawing on our evidence and consultation feedback, we do not consider that our development needs alone provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt in this Local Plan, having regard to the identification of other sources of land supply that can meet needs sustainably without the need for Green Belt release'*. Paragraph 146 of the NPPF (2024) identifies that one of the exceptional circumstances in which Green Belt boundaries can be altered is where an authority cannot meet its identified need for homes, commercial or other development through other means. Therefore whilst the Councils, drawing on their current evidence base, do not consider that their development needs alone provide the exceptional circumstances required to justify removing land from the Green Belt, the further evidence referred to above may well change the context within which the Councils need to consider the Plan and the potential release of Green Belt land. Those sites in locations that are defined as grey belt should be strongly considered in order to increase the supply of homes.

Thirdly, whilst in principle a strategy of seeking to deliver a large number of new jobs and homes at scale within the Plan is supported, an over reliance on too few strategic sites, particularly those that require significant, costly infrastructure to unlock and deliver them, is not supported. Indeed, it is considered that Policy S/DS sets out such a strategy and relies too heavily on allocating significant levels of growth on just a small number of very large sites. A number of these large sites rely on the timely provision of strategic scale infrastructure which must be in place before they can be constructed. For example, the Cambourne North new settlement (13,000 dwellings and 108,000 sqm employment floorspace) relies upon a new railway station and complicated works to the A428, and Land adjacent to A11 and A1307 at Grange Farm (6,000 dwellings and 35,000 sqm employment floorspace) relying on works to the A505. The draft Plan requires the two sites to deliver 5,100 dwellings between them by 2045. We believe this is highly unlikely.

In particular, the lack of housing allocations in the villages fails to support the delivery of homes to meet the local housing needs of the next generation during the plan period. Instead of being able to live locally, this forces newly forming households to relocate to the main settlements, new settlements, or elsewhere – often away from their existing family, community and support network. This leads to an increased need for travel within Greater Cambridge, often via private cars rather than public transport. It also results in population imbalance, with ageing populations in villages and a falling roll in primary schools – whilst the new settlements have predominantly young populations and significant pressure on services.

A combination of approaches to the distribution of spatial growth are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations and scale of new housing and employment development in the Greater Cambridge area. This is necessary to ensure that the Local Plan supports sustainable communities and sustainable patterns of growth. In addition to providing housing to support new jobs in Cambridge and the key employment growth sectors, the development strategy should take account of the needs and vitality of existing villages and the wider rural economy and make planned provision for them.

In many villages, there is a lack of brownfield land available within the 'defined development extents' to facilitate housing delivery in accordance with the approach set out in Draft Policy S/SH (Settlement hierarchy). Also, small windfall sites provide limited affordable housing to meet local needs. Hence, there should be specific land allocations for housing development in some of the rural villages, to promote genuinely sustainable growth and development – supporting the rural economy, promoting mixed and inclusive communities and ensuring the vitality and viability of local services. Additional small and medium sized sites coming forward in the first five years post adoption of the Plan would also provide the necessary flexibility and breadth of supply in the early stages of the plan period and ensure the Plan remains up to date. This is particularly important in light of the fact that the housing land supply across the plan period does not exceed 5.5 years.

### **Policy S/SH: Settlement hierarchy**

Jesus College **object** to Policy S/SH.

The indicative maximum scheme sizes are not considered to be necessary for the Group villages. Windfall development that comes forward within these villages should be considered on the basis of the site and its context. Schemes should be encouraged to make an efficient and effective use of land whilst delivering housing development that is appropriate and helps in meeting the needs of the local community. Often small windfall sites (under the thresholds indicated from Group and Infill Villages) will provide limited or no affordable housing, exacerbating the situation for newly forming households who cannot meet their housing needs locally.

### **Policy S/DE: Defined development extents**

Jesus College **object** to Policy S/DE.

At part 2 of the Policy it states that 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; or
- d. where development is supported by other policies in this plan.

The supporting text to Policy S/DE then states, at paragraph 2.136 that, *"It should be noted that case law has established that the National Planning Policy Framework's (NPPF) exception to Green Belt development being inappropriate if it comprises 'limited infilling in villages' is not restricted to sites that fall within defined policy extents for villages established by local plans. As such, consideration of Green Belt policy is therefore a separate consideration to the application of the defined development extent policy, which still applies in Green Belt areas."*

The text then continues at paragraph 2.137 in advising that, *"Where a village's form extends beyond a defined development extent and is situated within the Green Belt, the Local Planning Authority will need to assess whether or not the proposal site could be understood as falling within the wider understanding of the village extent, and thus subject to the limited infilling exception."*

Policy NH/9 : Redevelopment of Previously Developed Sites and Infilling in the Green Belt of the adopted South Cambridgeshire Local Plan (2018), at limb (d), specifically recognises that infilling in the Green Belt could be considered appropriate development, as follows:

*“1. Redevelopment of Previously Developed Sites and Infilling in the Green Belt will be inappropriate development except for:*

...

*d. Limited infilling, where infilling is defined as the filling of small gaps between existing built development (excluding temporary buildings). Such infilling should have no greater impact upon the openness of the Green Belt and the purpose of including land within it than the existing development. The cumulative impact of infilling proposals will be taken into account;”*

Policy S/DE should equally be clear on the forms of development that would not constitute inappropriate development in the Green Belt. Alternatively, this could be made clear under Policy S/GB: The Cambridge Green Belt.

The Councils needs to properly consider the inclusion of well-performing sites that constitute limited infilling in the Green Belt. For example, Land to the land South of Station Road, Harston (HELAA (2025) ref: 115742).

### **Policy S/GB: The Cambridge Green Belt**

Jesus College **object** to Policy S/GB.

Firstly, the supporting text to Policy S/DE: Defined Development Extents states, at paragraph 2.136 that, *“It should be noted that case law has established that the National Planning Policy Framework’s (NPPF) exception to Green Belt development being inappropriate if it comprises ‘limited infilling in villages’ is not restricted to sites that fall within defined policy extents for villages established by local plans. As such, consideration of Green Belt policy is therefore a separate consideration to the application of the defined development extent policy, which still applies in Green Belt areas.”*

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Policy S/GB should equally be clear on the forms of development that would not constitute inappropriate development in the Green Belt.

Secondly, although the Policy states that supporting evidence studies include the Greater Cambridge Green Belt Assessment (2021), it is understood that a revised Green Belt Assessment will be completed and published after the Regulation 18 Consultation closes. It is argued the revised Green Belt

Assessment should have informed the Draft Local Plan and been published as part of and the Regulation 18 Consultation.

Thirdly, the omission of any reference to 'Grey Belt' within the Draft Policy S/GB is challenged. The NPPF (2024) introduced a clear duty for Grey Belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). The direction of travel towards authorities being required to identify Grey Belt land within local plans is further evidenced within the forthcoming Consultation Draft NPPF (2025) (GB2[3]) and at Appendix E where the criteria for undertaking Green Belt Assessments is outlined). Hence, regardless of whether the Draft Local Plan can meet the identified needs for growth without Green Belt release, the relevant Plan Policy (S/GB) should include explicit reference to Grey Belt (consistent with the NPPF) and the identification of Grey Belt land within Greater Cambridge. To ensure the longevity of the Local Plan, it is recommended the revised Green Belt Assessment is undertaken with regard to Appendix E of the NPPF 2025.

Lastly, Bidwells understand that the Council's consultants (LDA) are currently considering the process of examining Grey Belt issues and possibly Grey Belt sites across Greater Cambridge. Officers have stated at various committees that Grey Belt sites are not required to accommodate housing allocations and the Draft Local Plan 'is not configured for this'. However, the fact LDA are considering an assessment of Grey Belt suggests the Draft Local Plan does need to cover this important issue given the increasing importance of Grey Belt policy in the current NPPF (2024) and the Consultation Draft (2025).

Identifying Grey Belt land within the revised Green Belt Assessment and Draft Local Plan is hence both a policy requirement and crucial to ensuring the Local Plan promotes sustainable patterns of growth (as required by the NPPF) and is robust and flexible in providing a sufficient supply of suitable land in order to meet the 'supercharged growth' mandated for the Greater Cambridge by Government.

Overall, it is considered that Draft Policy S/GB is not consistent with national policy, does not reflect a positively prepared plan and is not justified. Pertinent to ensuring the Plan is sound will require:

- The publication of a revised Green Belt Assessment to support the Local Plan
- A consideration of higher growth targets and subsequent review of the Green Belt / Grey Belt where necessary
- The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites.

The Council must take a positive approach to the preparation of the Plan. Its failure to engage properly with the Green Belt has not led the plan to an effective spatial strategy. There is a superior sustainable plan to be formed by properly considering Green Belt (Grey Belt) sites that can better underpin sustainable development.

The Council needs to properly consider the inclusion of well-performing sites in the Grey Belt. For example, Land to the land South of Station Road, Harston (ref: 115742) was assessed within the Council's Green Belt Assessment (2021) which supported First Proposals (2021) Draft Local Plan (Parcel HS9). The Council need to release additional Green Belt sites in line with the hierarchy set out in paragraph 148 of the NPPF (2024) to lead to a sustainable spatial strategy.

### **Policy S/RRA: Site allocations in the rest of the rural area**

Jesus College object to Policy S/RRA.

Whilst Jesus College support the principle of policy S/RRA in allocating sites for housing and employment in the rural area, the Draft Plan makes very few additional allocations in the rural area and

Jesus College **objects** to this approach. This approach threatens the vitality of villages within the rural area and on the edge of Cambridge and stifles opportunities for further growth and supporting local services. As such, as referred to in representations to Policy S/DS, the Development Strategy should include for further allocations in the rural area to ensure that a sound spatial strategy is developed and delivered.

Sustainable development in rural areas makes an important contribution to ensuring the vitality of villages and supporting existing rural services and facilities. This approach is supported by the National Planning Policy Framework (NPPF), which at paragraph 83 states 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.

Notwithstanding this clear direction in national policy, the Draft Local Plan makes very few additional allocations in the rural area. This approach threatens the vitality of villages within the rural area and stifles opportunities for further growth and supporting local services. The allocation of additional small sites in the rural area will also help to ensure that the housing supply for the Local Plan is balanced and robust, reducing the reliance on strategic sites and the limited allocations in villages.

The ability of new development to support rural communities is especially important given the loss of rural services experienced in recent years. The impact of these service losses on rural communities is accentuated when considering pre-existing low service levels compared to better served, urban areas.

The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Harston, whilst it is a relatively small village, it benefits from being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.

To fully support the rural area and develop a sound spatial strategy with a mixture of deliverable and suitable rural allocations, Land to the south of Station Road, Harston should be identified as an allocation for residential development in the Plan, under Policy S/RRA.

Harston is considered a suitable location for further residential development to support an existing rural community. The site is considered to represent a sustainable location for development which will help to meet the housing needs of Greater Cambridge in the next Local Plan period. With the right design, including a suitable layout and design concept, the proposed development on the site could be accommodated without having a significant impact on the surrounding heritage context of the site or landscape setting.

The land is considered to be available, achievable and suitable and the development proposals will bring a number of tangible social, economic and environmental benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:

- Representing appropriate development in the Green Belt and effective use of sustainable, Grey Belt land;
- Development in a sustainable location with good transport links north into Cambridge via the A10;
- Close proximity to existing services including primary school; doctors surgery;
- Development between existing built development;
- Development within Flood zone 1;
- Access to local green space;
- Contributions to affordable housing in accordance with Local Plan Policy;

- Improved transport hub at Foxton railway station (3km from the site);
- Proposed improved transport interchange at Trumpington A10/M11 junction (3.2 km from the site);
- Park and ride site at Hauxton;
- Off road cycle links along the A10; and
- Walking and cycling links to Melbourn and Bassingbourn Village Colleges.

### **Policy GP/LC: Protection and enhancement of landscape character**

Jesus College object to Policy GP/LC.

Policy GP/LC states that Important Countryside Frontages are “*identified on the Policies Map and are in village where land with a strong countryside character either:*

*a) Penetrates or sweeps into the built-up area providing a significant connection between the built environment and the surrounding rural area; or*

*b) Provides an important rural break between two nearby but detached parts of a development framework”*

Policy GP/LC advises that planning permission for development would be refused if it would compromise these purposes.

The Great Places Topic Paper (2025) states that a Protected Open Spaces Review (2025) was a desk-based review which demonstrated that the open spaces identified for protection are reasoned and justified by meeting the relevant policy criteria. The Protected Open Spaces Review (2025) is then provided in Appendix 2 of the Biodiversity and Green Spaces Topic Paper (2025). The Review states that the criteria used to determine whether a site should warrant designation as an Important Countryside Frontage (ICF) consisted of two tests;

- **The first test** asked whether it was land on a frontage with a strong countryside character that provides an important rural break between two nearby but detached parts of the defined development extent.
- **The second test** asked whether the frontage allows land with a strong countryside character to penetrate or sweep into the built-up area providing a significant connection between the street scene and the surrounding rural area.

If a site scored green to at least one of the two tests, the conditions to be designated as an ICF was met.

Jesus College question the robustness of the Protected Open Spaces Review (2025) being only a desk-based review and considers a more detailed assessment is needed that includes a site visit to understand the site specific context and landscape character. This should be undertaken to inform the preparation of the Regulation 19 consultation of the Plan.

### **Summary**

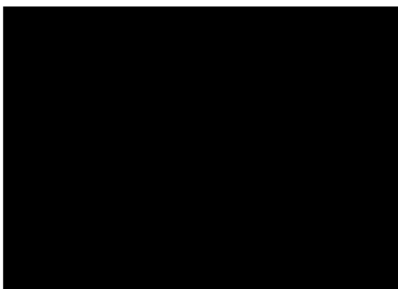
These representations have been submitted to supplement previous information submitted in support of the Site through previous Call for Sites and consultation submissions and the conclusions and findings remain correct. This submission has addressed and responded to the transformed policy context of the Site both in terms of the emerging Draft Local Plan and reforms to the NPPF within the 2024 revision. Bidwells have identified the Draft Local Plan over relies on large strategic sites which have historically failed to start their delivery in a timely manner and then at much slower rates than the Council anticipated

and relied upon. The absence of smaller sites in rural communities that can deliver early in the plan period to meet the acute housing need of Greater Cambridge is also considered a serious a flaw of the Draft Local Plan to achieve a sustainable spatial strategy.

The Site is highly sustainable and remains suitable, available and achievable for residential development to meet the growing housing needs of Harston and Greater Cambridge and represents a suitable, sustainable and deliverable Grey Belt site which should be prioritised for allocation.

Should you require any further information regarding the Site or these representations please do not hesitate to contact me.

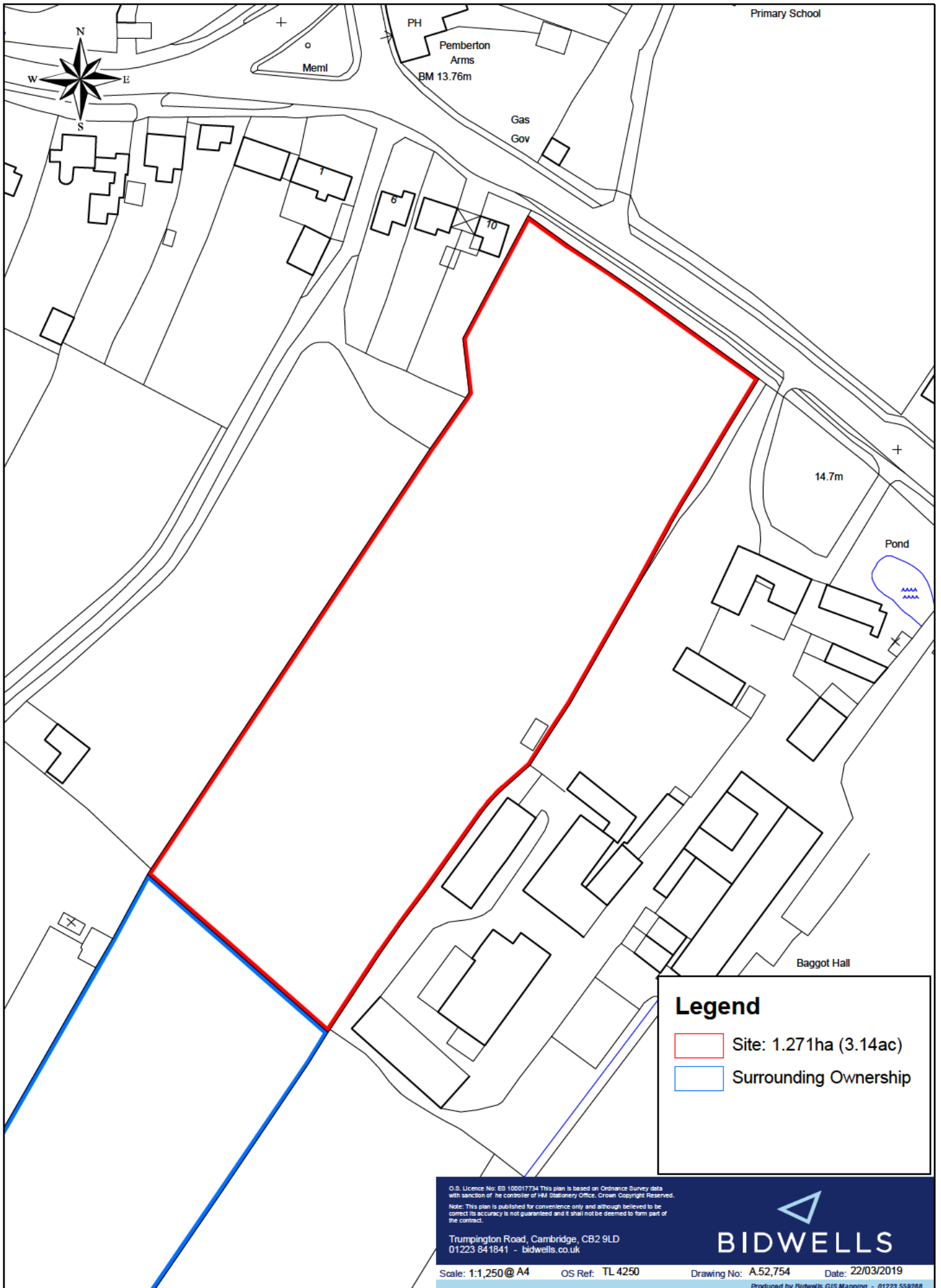
Kind regards



**Appendix 1**

**Site Location Plan : Land to the south of Station Road, Harston**

# Land at Station Road, Harston



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