

**Boyer**

# Land East of Cambridge Road, Melbourn

Greater Cambridge Draft Local Plan Reg 18  
Consultation

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**REPORT CONTROL**

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## **TABLE OF CONTENTS**

<b>1. Introduction</b>	<b>3</b>
<b>2. Development Strategy</b>	<b>5</b>
<b>3. The Plan Themes</b>	<b>15</b>
<b>4. Land to the East Side of Cambridge Road, Melbourn</b>	<b>17</b>

## **APPENDICES**

**Appendix 1. Concept Masterplan**

**Appendix 2. HELAA Site Assessment (Site Reference: 47757)**

## 1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Wates Developments Limited and the Landowners (Annette Margaret Sheldrick and Benjamin Charles Sheldrick) in relation to the Draft Greater Cambridge Local Plan Regulation 18 Consultation document (December 2025-January 2026) (hereafter referred to as “Draft Local Plan”).
- 1.2 The representations in this document specifically relate to land to the East Side of Cambridge Road, Melbourn (“the Site”), which is being promoted for residential development. A Site Location Plan is included in the Concept Masterplan document at **Appendix One**. The site at Melbourn is located within South Cambridgeshire District.
- 1.3 Wates Developments Limited previously submitted representations to the ‘First Conversation’ consultation in February 2020 and the ‘First Proposals’ in November/December 2021. The Site was submitted to the Call for Sites at the same time, whilst updated information was also submitted to the more recent exercise in 2025. The emerging Local Plan has therefore been informed by several rounds of consultation and feedback in the form of representations from a range of stakeholders. At this further Regulation 18 stage, the Draft Local Plan proposes specific policies and an updated set of site allocations, as Greater Cambridge moves towards submission of the Local Plan for examination.
- 1.4 The consultation document identifies four ‘Big Themes’ that influence how homes, jobs, and infrastructure are planned (conveyed through the proposed development strategy) giving rise to a total of eight strategic priorities around which the Draft Local Plan document is structured, as follows:
  - Development Strategy
  - Climate Change
  - Biodiversity and Green Spaces
  - Wellbeing and Social Inclusion
  - Great places
  - Homes
  - Jobs
  - Infrastructure.
- 1.5 These representations respond to relevant parts of the Draft Local Plan, in chronological order as they appear within the document, ordered in accordance with these strategic priorities.

- 1.6 Consideration has been given to whether the policy direction meets the tests of soundness set out by paragraph 36 of the National Planning Policy Framework (NPPF, 2024), including whether the Plan is:
- a) Positively prepared;
  - b) Justified;
  - c) Effective; and
  - d) Consistent with national policy.
- 1.7 Chapter 2 of these representations sets out comments on the proposed development strategy. Chapter 3 addresses the remaining strategic priorities (themes), set against initial observations on the relationship between these policies and the government's proposed National Development Management Policies. Chapter 5 provides information on the East Site of Cambridge Road, Melbourn.

## 2. DEVELOPMENT STRATEGY

### Our development strategy for Greater Cambridge

- 2.1 The intention to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live is supported. We also consider the principle of this strategy to align with the NPPF and principles of sustainable development.
- 2.2 The Draft Local Plan states:
- “We want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services, while in smaller villages, we propose that only small-scale infill development and affordable housing would be permitted. Any development in and around villages needs to be well-designed for the rural setting, with a strong relationship to landscape.”*
- 2.3 This is subtly altered from the wording at First Proposals stage, reflecting greater emphasis on access to transport links and services, rather than the size of the rural centre or village. It is considered that Melbourn has access to a good range of facilities and services, including public transport as noted below and reflected in its identification as a Minor Rural Centre, able to accommodate additional housing growth.
- 2.4 It should also be recognised that ensuring further growth at suitable centres in the rural area will inevitably support on going investment in both new and existing services that will enhance accessibility.
- 2.5 Land East of Cambridge Road, Melbourn offers a sustainable location for accommodating residential development. The Site’s position on the edge of Melbourn, a settlement at which it is noted that two site allocations are proposed, provides local public transport connections and pedestrian and cycle links, as well as proximity to nearby local amenities including jobs, services and facilities within the rural centre. Further details are set out later in this statement, as well as within the accompanying Concept Masterplan.

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

- 2.6 Policy S/JH sets out the level of needs for jobs and homes in Greater Cambridge for the plan period of 2024-2045, whilst the supporting text discusses the basis for these, having regard to topic papers and evidence base documents.
- 2.7 It specifies that the plan will make provision for an additional 73,300 jobs in support of Greater Cambridge’s knowledge intensive sector, and a diverse range of local jobs more generally and a minimum of 48,195 new homes to meet the needs for the total population, including affordable housing and specialist accommodation needs of specific groups.

- 2.8 The principal questions at this stage are whether the plan period has been appropriately defined and, in turn, whether the quantum of both employment and housing development identified is sufficient to meet the objectively assessed needs for the Greater Cambridge area.
- 2.9 On the first of these points, it is noted that the plan period encompasses a total of 21 years, from 2024 through to 2045. Whilst, on the face of it, this appears to be a reasonable timeframe, it is important to consider whether this would meet the NPPF requirement (set out at para. 22) for strategic policies to look ahead over a minimum 15 year period from adoption, and for policies to be set within a vision that looks ahead at least 30 years, where larger scale developments such as new settlements and significant urban extensions are proposed.
- 2.10 Para. 2.42 of the Draft Local Plan suggests that adoption may not be envisaged until 2029, meaning that whilst this would theoretically provide for 16 years post-adoption, any further delay to the plan-making and examination process would risk falling below the minimum 15 year timeframe, whilst arguably a longer period should be covered on account of the large sites included in the strategy in any event.
- 2.11 National planning policy sets out that Local Plans should provide for the objectively assessed needs for housing and other uses. Para. 2.9 of the Draft Local Plan outlines the interrelationship between jobs and housing provision, explaining that in addition to ensuring that minimum housing requirements arising from application of the mandatory standard methodology, regard should be had to how many jobs this would support. This is particularly relevant in the context of the importance of Greater Cambridge's continued economic growth on a national scale, a point which is acknowledged at para. 2.8 of the Draft Local Plan.
- 2.12 Since the previous consultation on the emerging Local Plan was undertaken the government has published statements underlining this important role, including 'The Case for Cambridge' in March 2024 and 'Realising the Full Potential of Greater Cambridge' in October of the same year, which outline aspirations for delivery of 150,000 new homes by 2050 in order to support economic growth.
- 2.13 National planning policy provides information for local plans to support the Government's objective to boost the supply of homes, including the minimum provision of the number of homes informed by a local housing need assessment using the standard method in national planning guidance. Planning Practice Guidance notes that there will be times that the housing need is higher than indicated by the standard method. Greater Cambridge economy is nationally important and therefore there is clear justification for higher employment and housing figures.
- 2.14 The Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU) identifies the Government's Standard Method for the calculation of the minimum housing need and notes that this increased significantly in 2024. The calculation was combined across Cambridge and South Cambridgeshire, and the assessed needs for homes applied

together for the purposes of housing delivery including calculating housing land supply and the Housing Delivery Test.

- 2.15 With regard to jobs, the EHEU sets out a central scenario as the most likely outcome for employment growth, requiring an additional 73,248 additional jobs by 2045. However, it also identifies a higher scenario of 90,900 jobs that may be achievable. It goes on to conclude that application of the standard method requirements for housing would support 73,362 jobs (using its preferred 2011 commuting assumptions) and that the central scenario would therefore be achieved via the standard method derived housing growth levels.
- 2.16 Whilst the supporting text of the Draft Local Plan acknowledges the need for flexibility to allow for potential achievement of higher job growth, so as not to restrict employment growth, it is unclear that this has been reflected in the wording of Policy S/JH itself, given application of the lower, central scenario and acceptance of the standard method on the basis that its housing levels would meet this.
- 2.17 As such there is a potential risk of restricting job growth and failing to meet the economic objective of sustainable development included in the NPPF (para 8a). As set out in Paragraph 86a. the planning policies should set out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth. As noted above, and acknowledged elsewhere in the Draft Local Plan, this is of particular importance given the aspirations to ensure future economic growth potential of the Greater Cambridge sub-region is fully realised.
- 2.18 In order to provide flexibility to facilitate higher jobs growth, it will be necessary for the Greater Cambridge Local Plan to also provide flexibility in the delivery of additional homes to support any additional jobs and to reduce levels of in and out commuting into Greater Cambridge, and the resulting impacts this would have on climate change and congestion.
- 2.19 The latest standard method information (from May 2025) indicates a need for delivery of a minimum of 1,103 dwelling per annum in Cambridge City and 1,192 in South Cambridgeshire, equating to an annual figure of 2,295 across the joint plan area. Over the 21 year timeframe of the proposed plan period this therefore establishes a minimum requirement for 48,195 new homes, which Policy correctly identifies in Policy S/JH.
- 2.20 Whilst it is acknowledged that the Councils propose allocation of enough sites to provide a buffer to enable flexibility to deal with unforeseen circumstances (under Policy S/DS, on which we provide separate comments), flexibility to support higher jobs growth should also be incorporated in the Local Plan.
- 2.21 To provide for appropriate flexibility for unforeseen economic growth, a range of additional contingency site allocations should be included within the housing trajectory. This will ensure the Local Plan is positively prepared, justified and effective in accordance with the NPPF tests of soundness. Land to the East Side of Cambridge Road Melbourn offers a sustainable location for development and is immediately available for development, therefore able to contribute to the Councils' short to medium housing delivery rates.

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

- 2.22 It is noted that the 'Overview' section of the supporting text, at para. 2.55 refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported, although we have comments on the balance of supply from different sources, as well as on specific identified sites with regard to deliverability concerns.
- 2.23 It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and in forms which make best use of land whilst creating well-designed, characterful places. It is supported that sites should be developed at densities which make effective use of land (as specified at NPPF Para. 11a), alongside clarification that sensitivity to local context should also be applied.

#### *Over-reliance on Large Sites and Existing Allocations*

- 2.24 The proposed development strategy in the Draft Local Plan relies predominantly on large sites and existing allocations carried forward from the Adopted 2018 Local Plans and outstanding planning permissions, alongside a limited number of new sites, albeit noting that the number of new allocations has increased relative to those identified at the First Proposals stage.
- 2.25 The First Proposals document identified 13 'new' sites, totalling 11,640 homes, whereas the current Draft Local Plan now proposes a total of 19 'new' sites that are to deliver 13,463 dwellings within the plan period. Of these new sites, two sites (Eddington - North West Cambridge, and Cambridge East), are effectively existing allocations. An additional 2,500 homes are proposed to be provided through increased densities at Eddington (compared with 1,000 in the previous consultation document) and a further 3,950 new homes at Cambridge East (compared with 2,850 previously).
- 2.26 At the former of these it is noted that an outline planning application is currently under consideration which illustrates the implications of increased densities, in terms of consequent increases in the height, bulk and massing of proposed buildings (within associated parameter plans) within a sensitive context which includes adjacent Green Belt land and heritage assets. It therefore remains to be seen as to whether the proposed uplift in densities that the above figure relies upon will be acceptable.
- 2.27 The site at Cambridge East comprises land at Cambridge Airport that was safeguarded from the previous plan, which was also identified as a growth area as part of the Cambridge Local Plan (2003). As set out in greater detail below, noting the significant amount of time that this allocation has been identified within previous Local Plans, we raise significant concerns over the delivery of this site within the timescales anticipated, particularly noting larger sites by their very nature can take longer to be delivered.
- 2.28 Specifically, we have significant concerns with the deliverability of Cambridge Airport. The Airport has long been earmarked for future development and was identified in the 2003

Structure Plan and safeguarded in the 2018 Local Plans for development should the site become available. The assessment in the Cambridge Housing Delivery Study Addendum (October 2025) includes reference to assertions that Marshalls has committed to relocation of its operations to Cranfield Airfield, Bedford, for which vacant possession is anticipated by 2030.

- 2.29 However, the report also notes at para. 3.14 that *“The testing of the spatial options was undertaken ahead of the Government’s announcement that funding from the Housing Infrastructure Fund will not be made available to support the relocation of the Cambridge Waste Water Treatment Plant, and ahead of the announcement from the landowner of Cambridge airport (Marshall Group) that they are no longer proposing to relocate to Cranfield Airport. Therefore the testing of the spatial options does not take these announcements into account.”*
- 2.30 Even where there are assertions regarding vacation of the site, references remain that suggest *“The position should be kept under review during the plan making process as appropriate.”* (page 54). There is, therefore, clearly still a high degree of uncertainty regarding homes being delivered at Cambridge Airport within the plan period and even in the event that the site does come forward, it is ambitious that the site will start delivering 350 homes per year from 2031/32, as set out within the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2025) when it is only expected to become available from 2030 at the earliest.
- 2.31 Within the above passage reference is also made to the status of the site at North-East Cambridge. It is noted that the government announced (in August 2025) that it would not be funding relocation of the Cambridge Waste Water Treatment Plant (WWTP) despite the granting of the associated Development Consent Order by the Secretary of State earlier in the same year. The Cambridge Housing Delivery Study Addendum (October 2025), aside from highlighting the above, had in any event noted that further work would be required to comprehensively plan the area and secure development, *“which is tied to the timely relocation of the water treatment works”* (page 51), and should therefore be kept under review during the plan making process.
- 2.32 The Draft Local Plan includes explicit references to this matter at various points, acknowledging at para. 1.33 that *“there is uncertainty as to whether the effective delivery of the Councils’ vision for North East Cambridge can be realised in full, including the assumed delivery of housing within the plan period.”* It therefore treats the site separately (for example in the context of the calculation of a suitable buffer, as set out below), yet it remains an allocation carried forward from the previous Plan as confirmed in Policy S/DS. Given the clear lack of certainty as to the site’s deliverability at the current time it is considered that its inclusion is unsound as this does not meet the test of effectiveness.
- 2.33 To encourage a more reliable delivery rate across the plan area we propose that additional sites are allocated to ensure the consistent delivery of dwellings to significantly boost the supply of homes as required by Paragraph 61 of the NPPF.

- 2.34 Aside from these concerns, it should be noted, therefore, that only 17 of these 19 sites are strictly 'new'. Given the relative scale of the two sites noted above, in total the 17 sites will provide 7,013 dwellings (equating to approximately 12.69% of the total supply).
- 2.35 It is therefore clear that the Draft Local Plan continues to make provision for a very limited number of new sites. There is a heavy reliance on existing and previously identified sites rolled forward from the adopted Local Plans and many of these sites are on a large scale which also means they typically take longer to be brought forward.

#### *Additional Supply Buffer*

- 2.36 At the First Proposals consultation stage it was indicated that there was an intention to include a 10% buffer to provide the flexibility to deal with unforeseen circumstances should any sites not be brought forward as planned. We asserted in representations at that stage that the heavy reliance on existing allocations and commitments is overly optimistic and along with the very limited number of new proposed site allocations, the 10% buffer was not considered sufficient, and consequently should be increased to a minimum of 20% alongside the allocation of further sites to ensure a robust strategy. It was noted that such an approach has been adopted in other local authority areas, including across Babergh and Mid Suffolk Local Authorities. We maintain this stance and this is reinforced by on-going concern over deliverability of the significant site allocations outlined above.
- 2.37 The draft Local Plan illustrates within Table 4 that with the inclusion of capacity at North East Cambridge a 14.7% buffer, in excess of the minimum housing requirement, would be provided. However, with insufficient certainty over deliverability of this site it should be excluded from the calculation and therefore a resultant buffer of just 6.5% would remain.
- 2.38 This is insufficient and therefore additional site allocations should be included at this stage in the plan making process to ensure the plan is effective (deliverable over the plan period) as required by the NPPF.

#### *Over-reliance on Windfall Sites*

- 2.39 In addition, there are concerns regarding the heavy reliance on windfall sites within the development strategy, which comprises 7,100 dwellings and equates to almost 15% of the total minimum housing need. The NPPF definition of 'Windfall sites' is "*Sites not specifically identified in the development plan*" whilst the Draft Local Plan document does not include a specific definition of the term.
- 2.40 Cambridge Housing Delivery Study Addendum (October 2025) reports that Greater Cambridge has historically achieved a high rate of windfall development and we have not sought to interrogate this evidence at this stage to confirm whether this conforms with NPPF Para. 75. It is noted that the above study has considered the appropriate rate to apply, having regard to assessment of data across a further 4 year period, to 2023/24. Despite a reduction over this additional period it has been determined, on balance, that the previous mid-point rate of 425 should be retained.

- 2.41 The windfall reliance is considered high, particularly in light of the Councils' apparent anticipation that these will mostly comprise previously developed sites. It is also noted that the defined settlement extents have been tightly drawn to the existing urban edges, which is unlikely to provide sufficient flexibility for (greenfield) windfall sites to come forward.
- 2.42 A more appropriate strategy is for the windfall requirement to be reduced and a greater range of sites explicitly allocated, including for the lower order settlements where the current development strategy is for very limited development.
- 2.43 Through the positive allocation of sustainable sites at the lower order settlements, including Minor Rural Centres, this will ensure that the Greater Cambridge growth strategy is genuinely plan-led, as required by Paragraph 15 of the NPPF and ensure that such growth is supported by the appropriate infrastructure. In addition, by re-allocating a proportion of the anticipated windfall growth to specific sustainable sites, this will provide a greater level of certainty of the anticipated location of growth to the Councils, developers and the local community compared with the current proposed strategy that will inevitably see a range of speculative development within the rural areas.
- 2.44 Land to the East Side of Cambridge Road, Melbourn offers a logical and sustainable location for residential growth. The Site's position on the edge of Melbourn provides a sustainable location for new development with local public transport connections and pedestrian and cycle links, as well as proximity to nearby local amenities including jobs, services and facilities within the settlement centre. The Site also lies in close proximity to Melbourn Science Park, providing employment for a number of companies engaged in pharmaceuticals, biochemistry and mechanical engineering.

*Lack of Development within the Rural Centres and Villages*

- 2.45 At page 165 of The Development Strategy Topic Paper (2025), it is stated:
- 2.46 *“Our evidence, Sustainability Appraisal and consultation responses above show that a strategy focussed on village development would be unsustainable, in particular regarding transport and associated carbon emissions, but also for supporting delivery of required infrastructure. As such we consider that villages should not be the primary focus for growth within the development strategy.”*
- 2.47 Whilst it is not disputed that rural centres and villages should not be the primary focus for growth, the current strategy is too restrictive and cannot be supported. Appropriate development at defined rural centres and villages can be sustainable in terms of transport and carbon emissions and provide the necessary infrastructure requirements, as would be the case for land to the east side of Cambridge Road, Melbourn.
- 2.48 In fact, the current development strategy with the high reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Council has control over ensuring village development is located where there is good access to a high quality public transport network and provides the required infrastructure.

- 2.49 Overall, we have concerns regarding the robustness of the development strategy and its ability to bring sufficient land forward for development at a sufficient rate to address the objectively assessed need over the plan period as required by NPPF para. 23.
- 2.50 It is considered that there should be a greater focus on a wide range of sites being brought forward for development, by including a greater number of site allocations in sustainable rural areas with good access to public transport and facilities, such as land to the east side of Cambridge Road, Melbourn.
- 2.51 Smaller sites can often be brought forward quicker and provide greater certainty of delivery, particularly in the early part of the plan period. As acknowledged by para. 83 of the NPPF, housing in rural areas can maintain the vitality of rural communities and provide opportunities for rural centres and villages to grow and thrive, especially where this will support local services. The same passage also recognises how, where there are groups of villages, development in one may support services in other nearby villages.
- 2.52 As discussed later in this Section, it is clear that Melbourn is a sustainable location and able to support additional housing growth, which is evidenced through the two allocations proposed for the settlement. Melbourn should, however, be allocated a greater proportion of growth that is comparable to its identification as the largest rural centre in the south west of the district (within the Development Strategy Topic Paper 2025; Settlement Hierarchy Study Update Appendix, para. 3.20).

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

- 2.53 Development should be assigned across the settlement hierarchy, with development proportionate to the provision of services and facilities and the public transport network. The proposed policy approach of S/SH relating to the settlement hierarchy includes restrictions on the indicative maximum scheme sizes that will comprise acceptable windfall development for each settlement tier. Coupled with the overall development strategy for only a small number of site allocations within the rural area, the ability for sustainable developments to come forward is overly restricted. The graphic at Figure 12 of the Draft Local Plan illustrates that residential development in the Rural Area, combining both allocations and anticipated windfall sites, will represent just 16% of the total supply, significantly reduced relative to the adopted Local Plans (at 23%).
- 2.54 Para. 009 (Reference ID: 67-009-20190722) of the Planning Practice Guidance (PPG) states *“a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness”*. We are unaware of any clear and robust evidence to demonstrate that the policy direction putting a limit on development in the rural areas is appropriate.
- 2.55 Applying restrictions on the maximum amount of development that is appropriate to any particular tier is not considered to be a justified approach, as the sustainability of settlements and the availability of suitable sites for development can vary between

settlements within the same tier. A more appropriate strategy would be to make additional site allocations, considering the rural settlements on an individual basis. This would help meet with the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed (NPPF, para. 61).

- 2.56 New development can increase the sustainability of a wider settlement through the provision of additional services and facilities, or through enhancing existing services and facilities. New development that is well related to the existing settlement can also have a positive impact upon the long term viability of a place through indirect spending from future occupiers.

*Melbourn (Minor Rural Centre)*

- 2.57 Melbourn is identified in the Settlement Hierarchy as a 'Minor Rural Centre'. We do not disagree with Melbourn's position in the Settlement Hierarchy and endorse its recognition as a sustainable location and able to accommodate additional residential growth.
- 2.58 The approach proposed within Policy S/SH of the Draft Local Plan, however, is that Minor Rural Centres will support an indicative maximum scheme size of 30 dwellings. It is evident that Melbourn is capable of accommodating larger sites, with the proposed allocation for 120 dwellings at land to the west of Cambridge Road (Policy reference S/RRA/CR), underlining this point. We do not support the overly prescriptive restriction on the quantum of dwellings to come forward within this tier in the Settlement Hierarchy, which does not align with its position and identification as the largest village within the south west of the district and one which is both well served by local facilities, but also by public transport as well as provision for active modes, including further on-going investment through the Melbourn Greenway project.

**Policy S/DE: Defined Development Extents**

- 2.59 The proposed policy based on settlement boundaries (or defined development extents) around settlements is supported. Development extents play an important role in controlling development, however they should not be used as a basis for preventing otherwise sustainable development from coming forward. It is noted that the Draft Local Plan states (at para. 2.135) that boundaries will be defined to take into account the present extent of the built-up area and planned new development. However, the proposed development strategy to restrict the number of dwellings in certain tiers of the settlement hierarchy and the low number of site allocations proposed for the rural areas will prevent sustainable development from being brought forward unless further sites are allocated for development and included within the settlement boundary.
- 2.60 Should the Councils wish to continue to apply a heavy reliance on windfall development to accommodate growth, the settlement boundaries will need to be drawn more loosely around existing settlements, particularly those beyond the outer Green Belt boundary, to allow for speculative development to come forward.

2.61 Consideration should also be given to the provision of Cambridge South new station, which is anticipated to increase capacity along the existing rail line, through settlements such as Meldreth. Such infrastructure will increase the sustainability of existing settlements such as Melbourn, enabling further development to come forward within this location. Land to the East Side of Cambridge Road offers a sustainable location for residential growth located along the Melbourn Greenway, which will enhance linkages between Melbourn and Cambridge, providing green active travel options into and out of Cambridge for walkers, cyclists and horse riders. The greenway states that a key benefit is its convenient location for Melbourn Science Park, recognising the importance of this Science Park as an employment destination and its contribution to the wider Greater Cambridge area.

### **Rest of the Rural Area**

2.62 Policy S/RRA sets out the proposed policies for new site allocations in the rest of the rural area on a site by site basis. Within the Draft Local Plan there are a total of just three new housing sites proposed to be allocated within the rest of the rural area, excluding the rural southern cluster, demonstrating the restrictions of the proposed development strategy to development in the rural area.

2.63 It is noted that two of these sites are located in Melbourn as follows:

- S/RRA/ML – The Moor, Moor Lane, Melbourn – 1.08 hectare, approximately 20 dwellings
- S/RRA/CR – Land to the west of Cambridge Road, Melbourn – 6.65 hectares, approximately 120 dwellings and 8,000 sqm of employment floorspace.

2.64 It is therefore recognised that Melbourn is a suitable location for additional rural development. Land to the East side of Cambridge Road, Melbourn is located within walking distance of Melbourn Science Park, which provides employment opportunities within key knowledge-intensive industries.

2.65 The promoted site benefits from access to existing pedestrian linkages into the settlement and future improved cycle links. It is considered that development within this location will encourage future occupiers to adopt sustainable modes of transport, including walking, thereby contributing to supporting healthy lifestyles.

2.66 With appropriate masterplanning and design, the site is capable of delivering a sensitively designed scheme that could contribute to the local development needs of Greater Cambridge.

## 3. THE PLAN THEMES

### The Themes

3.1 As noted previously, the Draft Local Plan is focused on the following seven themes that will influence how homes, jobs, and infrastructure are planned within Greater Cambridge over the Plan Period. These are:

- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion
- Great places
- Homes
- Jobs
- Infrastructure.

3.2 We recognise the importance of these themes and welcome the council's addition of homes, jobs, and infrastructure to the first four big themes, as they form key considerations and tangible outcomes of sustainable development across the plan area.

### Relationship with National Development Management Policies

3.3 It is noted that the introductory section of the Draft Local Plan, 'About the Plan', includes some consideration of the potentially changing relationship between the plan and the NPPF, under the heading 'National context'. In particular, (at para. 1.15) this refers to the expectation that government will produce a set of national development management policies and acknowledges that implications of this on the Draft Local Plan will need to be considered and reflected at the next stage.

3.4 Since the current Regulation 18 consultation on the Draft Local Plan was issued for consultation the Draft revised NPPF has been released for public consultation, from 16 December 2025 through to 10 March 2026. The Draft NPPF includes proposed National Development Management Policies, although notes at this stage that these are not intended to be applied on a statutory basis.

3.5 Nonetheless, the Draft NPPF consultation does make clear that the core aims of statutory National Development Management Policies can be secured within the current legal framework having regard to the following key principles:

- Setting out much clearer policies for planning and decision-making as proposed in this consultation;
- Making explicit that these decision-making policies should not be repeated in development plans; and

- Providing for these policies to bear on the system from day one, by requiring that any inconsistent local policies are immediately given very limited weight.

3.6 Based on these clear principles (and expectation that the finalised NPPF will be in place) it is evident that, at the next stage of the Local Plan process, the Greater Cambridge authorities will need to grapple with these implications, noting in particular that such policies should not be duplicated in Local Plans, which may ultimately render many of these policies redundant.

3.7 With the expectation that the theme-based policies will therefore need to be altered or removed altogether as matters evolve with regards to the government's proposed National Development Policies, we have not commented on these at this stage.

## 4. LAND TO THE EAST SIDE OF CAMBRIDGE ROAD, MELBOURN

### Introduction

- 4.1 Wates Developments Ltd. are actively promoting Land to the East Side of Cambridge Road, Melbourn.
- 4.2 This site was submitted to the Greater Cambridge Shared Planning Service (GCSP) as a component of their Housing and Economic Land Availability Assessment in February 2020.
- 4.3 As set out in the preceding Section, Greater Cambridge assessed the Site as having an overall red rating in respect of site access, and landscape and townscape and therefore concluded that the site was not suitable for accommodating development.
- 4.4 We fundamentally object to this red rating and, as shown in **Appendix Two**, and consider that assessment of the Site should more accurately result in an overall amber rating.

### Site Description

- 4.5 The greenfield Site lies on the edge of Melbourn, to the east of Cambridge Road and is approximately 18.43ha in size and is boarded to the north by the Cambridge Road, to the west and south by agricultural land and to the east by Kingsway Golf Centre and RSPB Fowlmere. A Site Location Plan is included at **Appendix One**.

### Sustainable Location

- 4.6 Land East side of Cambridge Road, Melbourn lies along this A10 cycle route and is within walking distance of local amenities including jobs, services and facilities within Melbourn's centre.
- 4.7 Melbourn also lies in proximity to Meldreth train station, which provides frequent services between the settlement and Cambridge City.
- 4.8 Land East side of Cambridge Road also lies within close proximity to Melbourn Science Park, which includes 9 business units providing employment for a number of companies engaged in pharmaceuticals, biochemistry and mechanical engineering. This highlights the site's accessibility to employment opportunities in key knowledge-intensive industries, and its ability to contribute to South Cambridgeshire's important role in retaining itself as a world leader in research and knowledge based industry.

### Flooding/Drainage

- 4.9 The site lies entirely within Flood Zone 1 and future proposals would be anticipated to include Sustainable Drainage Systems.
- 4.10 These sustainable drainage systems will be multifunctional, providing both biodiversity and amenity benefits as supported by the Draft Local Plan and supporting evidence base.

### **Highways/Access**

- 4.11 The Site benefits from a long frontage onto Cambridge Road and can provide appropriate access points adjoining the Cambridge Road.
- 4.12 The site also benefits from pedestrian linkages to facilities and services within Melbourn. In addition, the site lies in proximity to Meldreth train station, which provides connectivity to Cambridge City to the north (recently improved under the Melbourn Greenway initiative).
- 4.13 The site's position on the edge of Melbourn provides a sustainable location for new development with local public transport connections and pedestrian and cycle links, as well as proximity to nearby local amenities including jobs, services and facilities within the village centre. The Site also lies along the Melbourn Greenway, as noted above, which will continue to provide further enhance linkages between Melbourn and Cambridge, offering green active travel into and out of the city for walkers, cyclists and horse riders.

### **Ecology**

- 4.14 The site does not contain any Priority Grassland, Wetland or Woodland Habitats although the existence of these habitats is acknowledged in close/medium proximity to the site.
- 4.15 It is acknowledged that the rear of the site is neighboured to the west by the Fowlmere Watercress Beds SSSI.
- 4.16 The proposed development will include large areas of retained open space and landscaping, contributing to an overall net gain in biodiversity and creating a landscaped buffer between Melbourn and the wider countryside. It is considered that any impacts on surrounding regional or locally designated sites would be suitably mitigated through adopting a sensitive design and layout.

### **Landscape**

- 4.17 The site falls within Landscape Character Area 3C Rhee Tributaries Lowland Farmlands. This landscape is classed as having only moderate strength with few distinguishing features, therefore it is unlikely that development would have a significant adverse impact to the wide and local landscape character.
- 4.18 As set out in Appendix Two, it is noted that the Councils have incorrectly identified the Site's Landscape Character Area.
- 4.19 Any impacts to the Landscape Character Area would be appropriately mitigated through sensitive design and layout.

### **Summary**

- 4.20 The site offers an opportunity to accommodate comprehensive development to meet the affordable and market housing demand within Melbourn and is capable of delivering a sensitively designed but comprehensive and well-connected sustainable development that could contribute to the local development needs of Greater Cambridge.

## **APPENDIX 1. CONCEPT MASTERPLAN**

## **APPENDIX 2. HELAA SITE ASSESSMENT (SITE REFERENCE: 47757)**

### Site 47757 (Land east side of Cambridge Road) Assessment Comparison

Criteria	GCSP Assessment	GCSP Traffic Light	Our Traffic Light	Our Assessment
<b>Adopted Development Plan Policies</b>	<ul style="list-style-type: none"> <li>Outside Development Framework</li> </ul>	Amber	Amber	<ul style="list-style-type: none"> <li>We are in agreement with the GCSP assessment as the site sits outside the current adopted development boundary/framework.</li> </ul>
<b>Flood Risk</b>	<ul style="list-style-type: none"> <li>Wholly in Flood Zone 1</li> <li>Minimal surface water flooding risk.</li> </ul>	Amber	Green	<ul style="list-style-type: none"> <li>The full site sits within Flood Zone 1.</li> <li>Flood risk on the site is predominantly low, although there is flood risk on limited portions of the site from surface water.</li> <li>In accordance with the GCSP methodology a green rating has been given with regards to flood risk.</li> </ul>
<b>Landscape and Townscape</b>	<ul style="list-style-type: none"> <li>Development throughout the site would have a significant adverse impact to the wide and local landscape character. It would be permanent, encroachment into the countryside, isolated and removal of the strong open rural landscape. Even with a reduction in residential units with landscape mitigation works the harm would still be adverse and unacceptable.</li> <li>Landscape Character Assessment (2021) Landscape Character Area - 4C: Hatley Wooded Claylands.</li> </ul>	Red	Amber	<ul style="list-style-type: none"> <li>The GCSP have failed to correctly identify the site's Landscape Character Area, as outlined in the 2021 Greater Cambridge Landscape Character Assessment.</li> <li>The site falls within Landscape Character Area 3C Rhee Tributaries Lowland Farmlands. This landscape is classed as having only moderate strength with few distinguishing features, therefore it is unlikely that development would have a <i>significant adverse impact to the wide and local landscape character</i>.</li> <li>Any detrimental impact could be satisfactorily mitigated through sensitive design, resulting in an overall Amber rating.</li> </ul>
<b>Biodiversity and Geodiversity</b>	<ul style="list-style-type: none"> <li>Within 200m of a Wildlife Site.</li> <li>All residential developments will require consideration of</li> </ul>	Amber	Amber	<ul style="list-style-type: none"> <li>The rear of the site is neighboured to the east by the Fowlmere Watercress Beds SSSI.</li> </ul>

Criteria	GCSP Assessment	GCSP Traffic Light	Our Traffic Light	Our Assessment
	<p>recreational impact on nearby SSSIs. Boundary habitats including woodland, watercourse, trees and hedges may qualify as Habitats of Principal Importance/be of high ecological value and support protected or notable species. Grassland quality will need to be assessed. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find off-site compensation to comply with up-coming National legislation and developing local policies.</p> <ul style="list-style-type: none"> <li>Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.</li> </ul>			<ul style="list-style-type: none"> <li>Portions of the site sit within the SSSI Impact Risk Zone for both the Fowlmere Watercress Beds and L-Moor Shepreth SSSIs.</li> <li>The site does not contain any Priority Grassland, Wetland or Woodland Habitats although the existence of these habitats is acknowledged in close/medium proximity to the site.</li> <li>A range of Farmland Bird species are shown to reside in the wider area.</li> <li>As outlined by GCSP, extensive efforts would be made to mitigate any impacts from residential development on on any designated site or those with a regional or local protection.</li> </ul>
<b>Open Space / Green Infrastructure</b>	<ul style="list-style-type: none"> <li>Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.</li> </ul>	<b>Green</b>	<b>Green</b>	<ul style="list-style-type: none"> <li>We agree with GCSP assessment.</li> <li>Development on the site would not result in the loss of any public open space or green infrastructure, and in-return would aim to provide an allocation of such an amenity.</li> </ul>

Criteria	GCSP Assessment	GCSP Traffic Light	Our Traffic Light	Our Assessment
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>There are no heritage assets within the site. Bran Ditch Environment Scheduled Monument is close by to the south east, separated by woodland; however, any detrimental impact could be reasonably mitigated with the inclusion of suitable buffers.</li> </ul>	Amber	Amber	<ul style="list-style-type: none"> <li>Agree with GCSP assessment.</li> <li>As GCSP recommend, any proposal would take consideration of local heritage assets and provide detailed strategies to mitigate impacts.</li> </ul>
<b>Archaeology</b>	<ul style="list-style-type: none"> <li>Extensive archaeology of prehistoric/Roman date is located in the area.</li> </ul>	Amber	Amber	<ul style="list-style-type: none"> <li>Agree with GCSP assessment.</li> <li>Appropriate and reasonable archaeological investigations would be undertaken to ensure the future development would not have an unacceptable impact on archaeology.</li> </ul>
<b>Accessibility to Services and Facilities</b>	<ul style="list-style-type: none"> <li>Distance to Primary School: Greater than 1,000m</li> <li>Distance to Secondary School: Greater than 900m and Less than or Equal to 2,000m</li> <li>Distance to Healthcare Service: Greater than 720m and Less than or Equal to 2,000m</li> <li>Distance to City, District or Rural Centre: Greater than 2,000m</li> <li>Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 720m and Less than or Equal to 2,000m</li> </ul>	Amber	Amber	<ul style="list-style-type: none"> <li>Distance to Primary School: 1.0 Miles</li> <li>Distance to Secondary School: 0.8 Miles</li> <li>Distance to Healthcare Service: 1.1 Miles</li> <li>Distance to City, District or Rural Centre: 3.9 Miles</li> <li>Distance to Local, Neighbourhood or Minor Rural Centre: 0.4 Miles</li> <li>Distance to Public Transport: 0.2 Miles</li> <li>Distance to Train Station: 1.6 Miles</li> <li>Distance to National Cycle Network: 8.6 Miles</li> <li>We agree with GCSP's amber assessment, based on their criteria, although we feel that the site offers very good accessibility to services and facilities, owing to its position in the settlement hierarchy and identification as the largest Minor Rural Centre in this part of South Cambridgeshire.</li> </ul>

Criteria	GCSP Assessment	GCSP Traffic Light	Our Traffic Light	Our Assessment
	<ul style="list-style-type: none"> <li>Distance to Employment Opportunities: Less than or Equal to 1,800m</li> <li>Distance to Public Transport: Greater than 450m and Less than or Equal to 1,000m</li> <li>Distance to Rapid Public Transport: Greater than 1,800m</li> <li>Distance to proposed Rapid Public Transport: Greater than 1,800m</li> <li>Distance to Cycle Network: Less than or Equal to 800m</li> <li>Adequate accessibility to key local services, transport, and employment opportunities</li> <li>Proposed development would not require delivery of accompanying key services</li> </ul>			
<b>Site Access</b>	<ul style="list-style-type: none"> <li>If over 100 dwellings two points of access are required to accord with the advice of the Cambridgeshire Fire and Rescue.</li> <li>No possibility of creating a safe access.</li> </ul>	<b>Red</b>	<b>Amber</b>	<ul style="list-style-type: none"> <li>We strongly disagree with the GCSP red rating and query what assessments have been undertaken to arrive at this.</li> <li>As demonstrated through supporting technical work, the Site can accommodate suitable access points from Cambridge Road.</li> </ul>
<b>Transport and Roads</b>	<ul style="list-style-type: none"> <li>The development will have to consider cumulative impact at local junctions. Improvements would be required to the</li> </ul>	<b>Amber</b>	<b>Green</b>	<ul style="list-style-type: none"> <li>The Cambridge Road runs parallel to the A10 as a secondary route, therefore existing pressures on the road are likely to be limited to local traffic.</li> </ul>

Criteria	GCSP Assessment	GCSP Traffic Light	Our Traffic Light	Our Assessment
	<p>signalised junction in Melbourn and possible improvements required at junctions on the A10 and A505. Contributions towards the Melbourn to Cambridge Greenway would be required to support sustainable travel to Cambridge.</p> <ul style="list-style-type: none"> <li>Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.</li> </ul>			<ul style="list-style-type: none"> <li>Development of this Site would promote sustainable modes of transport, particularly noting its accessibility to public transport and location along a greenway.</li> </ul>
<b>Noise, Vibration, Odour and Light Pollution</b>	<ul style="list-style-type: none"> <li>The site is capable of being developed to provide healthy internal and external environments in regard to noise/ vibration/odour/Light Pollution after careful site layout, design and mitigation.</li> </ul>	<b>Green</b>	<b>Green</b>	<ul style="list-style-type: none"> <li>The site's location on the edge of the Melbourn settlement would ensure minimal noise, vibration, odour and light pollution impacts due to a lack of sensitive receptors.</li> <li>We conclude that the site is at low risk in regard to noise / vibration / odour.</li> </ul>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>Reasonably large site and lots of residential units - potential for AQMA traffic impact without mitigation.</li> </ul>	<b>Amber</b>	<b>Green</b>	<ul style="list-style-type: none"> <li>The Site does not lie within an AQMA.</li> <li>The UK's Air Pollution Index shows consistently low scores in the area throughout 2021, signalling low pollution levels.</li> <li>Necessary mitigation measures would be enacted if required.</li> </ul>
<b>Contamination and Ground Stability</b>	<ul style="list-style-type: none"> <li>Previous agricultural land use. Potential for historic contamination, conditions required.</li> </ul>	<b>Amber</b>	<b>Amber</b>	<ul style="list-style-type: none"> <li>The GCSP rating is noted.</li> <li>Any potential issues regarding contamination and ground stability will be appropriately assessed and addressed.</li> </ul>
<b>Strategic Highways Impact</b>	<ul style="list-style-type: none"> <li>Within Highways England Zone 10 - South West.</li> </ul>	<b>Green</b>	<b>Green</b>	<ul style="list-style-type: none"> <li>Within Highways England East Region.</li> <li>Site is not in close proximity to Strategic Road Network, therefore development on the site will have a neutral impact on the SRN.</li> </ul>

Criteria	GCSP Assessment	GCSP Traffic Light	Our Traffic Light	Our Assessment
	<ul style="list-style-type: none"> <li>&lt;2,000 dwellings / 5,000m2 employment - Capacity for growth.</li> </ul>			
<b>Green Belt</b>	<ul style="list-style-type: none"> <li>No Comment.</li> </ul>		<b>Green</b>	<ul style="list-style-type: none"> <li>The site does not form part of Cambridge Green Belt and is comfortably located outside of its boundaries, therefore development on the site will not compromise the Cambridge Greenbelt.</li> </ul>

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