

Your ref: SITE ID: 115659  
Our ref: HELAA Ref. 40152  
DD: [REDACTED]  
E: [REDACTED]  
Date: 30/01/2026

Greater Cambridge Shared Planning  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge CB23 6EA

Dear Sir / Madam,

**DRAFT GREATER CAMBRIDGE LOCAL PLAN – REGULATION 18 CONSULTATION (2015-2026)**

**LAND SOUTH OF WEST STREET AND WEST OF SOUTH STREET, COMBERTON**

- **SITE ID 115659**
- **HELAA REFERENCE 40152**

**REPRESENTATIONS ON BEHALF OF BELLWAY STRATEGIC**

These representations have been prepared by Bidwells LLP on behalf of our client Bellway Strategic Land (Bellway) in response to the Greater Cambridge Local Plan Regulation 18 Consultation (2025-2026). These representations relate to Land south of West Street and west of South Street, Comberton (the Site). This representation considers the wider strategic and development management policies proposed by the Council, before focussing on Bellway's interests at the Site (Site ID 115659, HELAA Ref. 40152).

Founded in 1946, Bellway Homes is one of the largest housing developers in the United Kingdom. Bellway has a passion for building exceptional quality homes in carefully selected locations, inspired by the needs of real families. An HBF 5-star builder, Bellway won 'Large housebuilder of the year' at the Housebuilder Awards 2025 and 'Best Sustainability Initiative'.

As a national house builder, they have considerable experience and expertise in delivering sustainable residential schemes that people want to live in. Bellway has extensive experience of regeneration, construction and property development, and of working in partnership with local authorities, government agencies, and affordable housing providers.

The remainder of this letter is set out as follows:

- **Response to the Greater Cambridge Local Plan Development Strategy:**
  - Policy S/JH: New jobs and homes
  - Policy S/DS: Development strategy
  - Policy S/SH: Settlement hierarchy
  - S/GB: The Cambridge Green Belt



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- **Response to Development Management Policies on Climate Change, Biodiversity, Homes and Infrastructure (including Safeguarding)**
- **Response to Draft Policy S/RRR (Other site allocations in the rest of the rural area): Land south of West Street and west of South Street, Comberton**
  - HELAA Addendum (2025) Response
  - Grey Belt
  - The Site Opportunity

## **Response to the Greater Cambridge Local Plan Development Strategy**

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

Bellway objects to Draft Policy S/JH.

We are concerned that the quantum of jobs and homes proposed to be delivered across the plan period is too conservative and does not reflect the aspirational targets for growth in Cambridge mandated by national, regional and local government.

In the first instance, planning for only 10,330 homes through new allocations across the plan period (2024-2045) is insufficient (remaining balance consisting of existing allocations / permissions). Significantly more housing land should be allocated to ensure a plan-led approach to the sustainable growth of Greater Cambridge.

The identified overall need of 48,195 new homes across the plan period (2024 – 2045) is underpinned by the 'Greater Cambridge Employment and Housing Needs Update 2024 – 2045' ("EHNU") (September 2025). The Report concludes at paragraph 3.55 that various scenarios modelled indicate a need 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.

Rightly the EHNU draws a relationship between job growth and housing need, on the basis that greater job growth in the region will generate a derived demand for housing, creating an interdependency between the two. The adoption of the preferred 'central growth scenario' for job growth (73,300 additional jobs) gives an output need for 48,132 dwellings across the plan period which translates a 'central scenario' for an annual need of 2,292 dwellings per annum (almost identical to the Standard Method requirement of 2,295). This is considered problematic.

The 'central growth scenario,' as outlined within the EHNU, builds in assumptions of slower periods of growth, contractions, and economic shocks. Inherently both the number of jobs and homes proposed within the Draft Local Plan are conservative rather than reflective of the full growth potential of the Greater Cambridge economy.

Growth in Cambridge remains a priority for the Government, heightening the urgency for increasing job creation and housing supply and result in a step-change in the wider policy framework within which the Draft Local Plan must be considered and must respond to. The Government's commitment to Cambridge was reinforced on 23 October 2025 where the ambition to 'supercharge growth' within the Oxford-Cambridge Corridor and realise the full potential of Greater Cambridge was set out. This statement was accompanied by the announcement of £400 million worth of funding for the Cambridge Growth Company (CGC) to establish a centrally-led development corporation which will be informed by its own evidence base, which whilst unknown at present, is anticipated to exceed that currently envisioned by GCSP.

Furthermore, Greater Cambridge 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 (C2C) and the Cambridge Eastern Access Corridor.

When considering the above, the decision to use the 'central growth scenario' for the identification of jobs and homes which, by Icen's admission, builds in assumptions of periods of slower growth, contractions and economic shocks, and is hence a conservative approach, is not considered to respect the growth agenda envisioned for Cambridge.

Specifically with regards to housing, an annual requirement that is almost identical to the Standard Method figure (which does not take into account the unique circumstances and growth envisioned for Cambridge) is condemning of the Draft Local Plan's lack of ambition in this regard.

The EHNU 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. Should the 'central growth scenario' be progressed it considered these must be identified as a minimum level of growth, not a ceiling.

For these reasons, the Local Plan should consider utilising more optimistic and realistic figures 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. As discussed below, GCSP should consider the allocation of additional sites in Greater Cambridge, particularly in sustainable village locations such as Land south of West Street and west of South Street, Comberton, to assist in realising a greater level of growth.

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

Bellway objects to Draft Policy S/DS.

Draft Policy S/DS relies heavily on allocating a significant majority of dwellings to meet the identified housing needs across the plan period within a few large-scale strategic sites. These sites rely on the timely provision of strategic scale infrastructure which often leads to significant lead in times to deliver and often delays when reviewed against the Council's delivery trajectories.

The proposed new strategic allocations at Cambourne North new settlement (13,000 dwellings) and Grange Farm (6,000) dwellings raise particular concern with regards to their deliverability, relying on a new railway station with East West Rail and significant improvement works to the A505 and delivery of South East Transport (CSET) Phase 2 Guided Busway on the adjacent side of the A505 respectively.

Whilst we do not object to the principle of seeking to deliver a large number of new homes at scale, it is considered that this approach sets the Council on a path of over-reliance on these sites to deliver and does not embed resilience into the Local Plan should these sites stall in delivery.

A review of historic Annual Monitoring (AMR) Reports indicates that large strategic sites allocated within the adopted Development Plan, whilst some may now be delivering at anticipated rates, faced considerable delays to delivery at first; in some cases, several years later than originally envisioned and did not deliver quickly once first completions were achieved.

A Housing Delivery Study has been prepared by Bidwells (**Appendix A**). The study interrogates recent delivery of housing at strategic sites across Greater Cambridge against the Council's delivery assumptions, the key findings of this report are below:

- With the exception of Waterbeach, strategic sites have taken longer to deliver their first dwelling than the Council anticipated, often considerably later;

- Once homes are delivered, often, homes are delivered at a slower rate than anticipated;
- Some sites have been in the pipeline for with no indication on when applications and delivery will commence, notably North East Cambridge and Cambridge East following Marshall's cancelled move to Cranfield Airport.

Overall, the Report identifies by virtue of the complex nature of strategic sites delivery is often significantly delayed when compared to the Council's anticipated trajectory for these sites.

It is therefore considered an over reliance on large scale sites threatens the deliverability of the Local Plan, particularly should these sites (notably Cambourne North and Grange Farm) face delays in delivery as anticipated give the above commentary. As such, the Council ought to consider allocating additional smaller sites which face shorter lead in times, kickstart the delivery of housing in the early years of the plan period in the interim whilst strategic sites progress with the delivery of relevant infrastructure and provide greater resilience to the delivery of new homes.

We are of the view that additional sites ought to be considered to address the concerns outlined above. To ensure the Local Plan is effective, justified and positively prepared we recommend additional non-strategic sites are allocated in sustainable locations. Such sustainable locations are likely to be on the edge of existing settlements, with strong transport links and proximity to transport nodes where new sites can be developed to contribute to and enhance the existing offer. For instance, and as set out in the following section, Comberton is a sustainable settlement to facilitate appropriate levels of growth.

The Site represents an opportunity to locate sensitively designed and considered development on the edge of an existing settlement with good public transport connections and services and facilities.

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

Bellway objects to Draft Policy S/SH.

Comberton village is identified as a Minor Rural Centre, which is considered appropriate.

However, we object to the use of indicative maximum scheme sizes for each settlement typology (for example, 30 dwellings for Minor Rural Centres). Windfall development that comes forward within villages should be considered on the basis of the site and its context. 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. 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.

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

Bellway objects to Draft Policy S/GB.

The *Development Strategy Topic Paper (2025)* states that GCSP consider the identified need for 73,300 jobs and 48,195 new homes across the plan period can be delivered without necessitating the allocation or release of Green Belt land within the authority area. However, given the largest change to Green Belt policy in several generations in the form of Grey Belt was introduced in the NPPF 2024, and fundamental changes regarding the Green Belt since the LUC Green Belt Assessment (2021) we now understand 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. It is noted, that GCSP'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'. Nonetheless a

consideration of Grey Belt within the Local Plan is supported and needs to form one of the considered development scenarios in the Sustainability Appraisal.

As outlined above, we consider that GCSP are not planning for sufficient levels of growth and as such require additional allocations to meet a more aspirational level of growth for housing and jobs. In turn it is argued full weight cannot be given to the Green Belt and the possibility that the Council cannot meet its needs without Green Belt release must be considered. In such event in accordance with the sequential approach set out paragraph 148 of the NPPF the release of Grey Belt land will need to be prioritised for release. It is advised the potential for Grey Belt release needs to be considered via the Sustainability Appraisal that accompanies the Regulation 19 Consultation.

Paragraph 146 (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. It is therefore noted that GCSP may require a further Green Belt review and consider the additional release of land from the Green Belt to accommodate a higher growth scenario should the Council not be able to accommodate additional growth on non-Green Belt sites.

We object to the omission of any reference to 'Grey Belt' within Draft Policy S/GB. 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 GCLP 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 regarding Appendix E of the NPPF 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 growth potential of Greater Cambridge.

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, and
- The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites.

## **Response to Development Management Policies, including Safeguarding**

In December 2025 the Government published the Consultation Draft NPPF (2025). We acknowledge that until formally adopted the Consultation Draft will have no weight, however once adopted GCSP may need to give weight to some aspect of the policy.

On the basis of paragraphs 4 and 8 in Annex A of the Consultation Draft the Greater Cambridge Local Plan will be examined against the NPPF (2024) it is worth noting that for the purposes of decision-making

Annex A also states that from the date the new NPPF is published local plan policies that are “...any way inconsistent with national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”. As such it is advocated that should the Consultation Draft be adopted unchanged that the Council may need to have regard to the national policies. Any inconsistency would render policies within the Local Plan that are not consistent with the new NPPF as redundant as soon as the Plan is adopted.

#### **Policy CC/DC: Designing for Climate Change**

Bellway objects to Draft Policy CC/DC.

We support the intent of the Draft Policy, seeking high quality, sustainable and inclusive places in order to respond to the climate crisis. However, we object to the word “must” at CC/DC(1) as this creates a requirement leaving little to no discretion for decision makers. The word “should” would be more appropriate, setting out an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement. The requirements regarding these matters are addressed through the Building Regulations and planning policies should not duplicate this legislation.

#### **Policy CC/NZ: Net Zero Carbon New Buildings**

Bellway objects to Draft Policy CC/NZ.

The policy goes above and beyond existing sustainability benchmarks without proper consideration for impacts on viability and deliverability. This impact is considered within the Local Plan Viability Report (2025) which states construction requirements that exceed Part L 2021 of the Building Regulations will have a direct impact on construction costs.

Whilst we welcome the ambition to ensure that all buildings help to meet zero-carbon targets, there needs to be greater flexibility within the policy wording. There should also be clarity regarding what is required and what is aspirational.

With regard to CC/NZ(A), all new dwellings are expected to achieve a space heating demand of 15-20 kWh per metre squared per year. This figure is in line with Climate Change Committee, LETI Net Zero definition and Passivhaus standard, which are higher than other national standards and therefore placing unrealistic expectations on developers. With regard to CC/NZ(B), the EUI targets are split between uses. For residential dwellings, the targets are set at 35 kWh per metre squared per year which is aligned with LETI Net Zero definition and the National Grid Future Energy Scenarios. Again, the policy goes above and beyond national standards.

The requirements regarding these matters are most appropriately addressed through the Building Regulations and planning policies should not duplicate this legislation.

#### **Policy CC/WE: Water Efficiency in New Developments**

Bellway objects to Draft Policy CC/WE.

Draft Policy CC/WE goes beyond national and industry guidance, mandating rainwater or greywater harvesting on all major developments, which will not always be appropriate or deliverable. National policy promotes proportionate, context-led approaches to water efficiency.

We question the use of the word “must” within the Policy as this creates a requirement leaving little to no discretion for decision makers. The word “should” would be more appropriate, setting out an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement.

With regard to potable water, the policy applies a stricter internal water-use requirement to developments of over 100 dwellings. While the aim of reducing water consumption is supported, it is unclear why development size alone justifies a higher standard. Internal water use is largely determined by occupant

behaviour and individual dwelling specifications, rather than the overall scale of a development. Residents cannot reasonably be expected to use less water simply because they live in a larger scheme. The wording of the Policy should be amended to delete any reference to development size. A 100 litre per day target is more realistic for all developments.

#### **Policy BG/BG: Biodiversity and Geodiversity**

Bellway objects to Draft Policy BG/BG.

The national statutory requirement to deliver a minimum 10% Biodiversity Net Gain (BNG) already provides a robust, outcome-based mechanism for securing ecological enhancement. Draft Policy BG/BG seeks to uplift the mandatory minimum to 20% BNG for major development in Greater Cambridge. This is considered unsound, as it is not adequately justified and is inconsistent with national legislation and guidance.

The national BNG framework provides clarity and certainty for plan-making and decision-taking. Any local requirement exceeding the statutory minimum must therefore be clearly justified, flexible, and grounded in site-specific ecological capacity and viability. The approach set out is not supported by a robust evidence base and does not sufficiently demonstrate that it is proportionate or deliverable.

A drafted, Policy BG/BG risks undermining policy certainty by imposing a fixed uplift beyond the national framework without adequate justification. Any additional BNG delivered above the mandatory 10% requirement should be treated as a material benefit in the planning balance, rather than being expected a mandatory policy requirement.

#### **Policy BG/TC: Improving Tree Canopy Cover and Tree Population**

Bellway object to Policy BG/TC.

The statutory requirement to deliver a minimum 10% Biodiversity Net Gain already provides a robust, outcome-based mechanism for securing ecological enhancement. This framework is flexible, evidence-led and capable of responding to site-specific circumstances. The proposed tree canopy requirement appears to duplicate or cut across the BNG regime, without sufficient justification, and risks prioritising a single ecological metric over a balanced planning judgement.

The requirement for major development to demonstrate a minimum of 30% tree canopy cover on site risks introducing an inflexible and prescriptive constraint that could undermine development capacity, density and viability and may not result in an efficient use of land.

The policy and supporting text state that canopy cover should be calculated using a Council-approved calculator or metric. However, neither the policy itself nor the Biodiversity and Green Spaces Topic Paper identifies what calculator or methodology is intended to be used. In the absence of a defined and agreed approach, the policy lacks clarity and certainty.

#### **Policy WS/NC: Meeting the Needs of New and Growing Communities**

Bellway object to Policy WS/NC.

Specifically, Point 4 states that proposals for residential developments of 200 or more dwellings (or multiple smaller sites that cumulatively exceed this threshold), must be informed by detailed assessments of community needs and include strategies to address those needs.

It is understood that these assessments should be prepared by the Council as part of their Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet.

Further, Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended) set out the clear tests required for obligations to be applied to planning permission, these are as follows:

- (a) *necessary to make the development acceptable in planning terms;*
- (b) *directly related to the development; and*
- (c) *fairly and reasonably related in scale and kind to the development*

It is not the responsibility of new development to address existing need, and the policy is ambiguously worded, creating uncertainty that may impose an additional burden on development through an approach that is inconsistent with CIL Regulation tests. If the Council is to pursue this policy, it needs to be clear that development only needs to address matters which meet the CIL Regulations tests set out above.

#### **Policy J/AL: Protecting the Best Agricultural Land**

Bellway object to Policy J/AL.

The current wording of criterion (1)(b) places an unduly onerous burden on land promoters and landowners, particularly where sites contain Grade 1, 2 or 3a agricultural land.

Whilst the policy appropriately reflects the principle that the irreversible loss of high-quality agricultural land should be avoided where possible, the requirement to demonstrate that *“the development cannot be located on areas of poorer quality land”* is overly prescriptive. This goes beyond national policy, which states at footnote 65 of the NPPF (2024) that, where significant development of agricultural land is necessary, areas of poorer quality land should be preferred, rather than requiring proof that no alternative location exists.

As drafted, the policy effectively introduces an agricultural land sequential test, similar to that applied in flood risk policy. This approach is not supported by national guidance and places a disproportionate evidential burden on applicants. The policy should therefore be amended to better align with national policy with the loss of best and most versatile agricultural land to be balanced against wider sustainability and development objectives through the planning balance.

#### **Policy H/AH: Affordable Housing**

Bellway supports the Council’s ambition to ensure that the GCLP supports the delivery of affordable housing. However, noting that viability testing is mentioned at point 9.15 of the supporting text, we consider that the appropriateness of viability tested route should be explicitly mentioned within the wording of the Policy instead.

#### **Policy H/CB: Self and Custom Build Homes**

Bellway objects to Draft Policy H/CB.

We object to the proposed mandatory requirement for 5% self-build homes as part of any development. Such a blanket approach across all developments is unjustified and self-build provision should only be sought on sites where there is a demonstrable need. This would be inconsistent with the Self-build and Custom Housebuilding Act, which focuses on demand registers, not quotas.

The current wording of the policy requires that even flatted developments must provide 5% custom-build units. While the supporting text clarifies that self-build flats would be delivered as custom-finish units, these are often already incorporated by developers as part of standard delivery models. As such, the requirement does not result in any meaningful additional benefit but instead places an unnecessary and disproportionate burden on developers.

### **Policy I/Sl: Safeguarding Important Infrastructure**

Bellway objects to Draft Policy I/Sl, specifically with reference to the designation of land to the southwest of Comberton on the Policies Map.

The wording of Draft Policy I/Sl sets out the important infrastructure that should be safeguarded from any adverse impacts that may arise from development. This includes a range of safeguarding matters, with Point (1b) making specific reference to land identified on the Policies Map which is subject to the East West Rail Safeguarding Direction. We accept the wording of the Draft Policy in principle.

Bellway objects to the identification of land to the southwest of Comberton under this designation (Policy I/Sl: East West Rail Scheme) on the Draft Policies Map. Bellway has made formal representations to East West Rail (EWR) during the EWR Non-Statutory Consultation, January 2025. Also prepared by Bidwells, a copy of the EWR Representations is attached for your review (**Appendix B**).

To summarise, Bellway has an Option Agreement with the Landowner, K B Tebbit Ltd and therefore a legal interest in the land. Bellway strongly objects to the EWR proposals in respect of the proposed alignment of the track to the west and southwest of Comberton, transecting their Site, and the proposed use of their Site as a construction compound. Bellway and the Landowner have been in subsequent discussions with the EWR Company regarding these matters. They will continue to pursue changes to the EWR Scheme through this route, including forthcoming formal EWR Consultations.

Any designations under Policy I/Sl on the Policies Map should be updated in advance of the Regulation 19 Consultation to reflect the latest position with EWR.

### **Policy I/ID: Infrastructure and Delivery**

Bellway objects to Draft Policy I/ID.

Draft Policy I/ID makes continual reference to the Community Infrastructure Levy (CIL) as a way to ensure that schemes are acceptable in planning terms. As CIL has not been adopted in the Greater Cambridge Area, this mechanism for securing contributions via CIL does not yet exist and therefore it is premature to reference this in policy. It is recommended that the policy instead only refers to planning obligations or contributions via Section 106 agreements. This will ensure that the policy is clear, justified, and effective as outlined within the NPPF.

The Policy seeks to ensure sufficient infrastructure capacity to support new development, requiring developers to deliver or fund infrastructure, including via Section 106 or CIL. While the objective of adequate infrastructure is supported, the policy should not allow objections from utility providers, such as water companies, to unreasonably delay or prevent the grant of planning permission. Planning permission should not be refused solely on the basis of current capacity constraints where mitigation or phased delivery is feasible. Appropriate Planning Conditions and/or Obligations should allow for capacity issues to be overcome to ensure that they do not unduly restrict housing delivery.

It is therefore requested that Draft Policy I/ID and supporting text be revised to make clear that objections from utility providers cannot automatically prevent the grant of planning permission, and that development should proceed where reasonable mitigation or planning mechanisms can address infrastructure requirements.

### **Response to Draft Policy S/RRA (Other site allocations in the rest of the rural area): Land south of West Street and west of South Street, Comberton**

Bellway objects to Draft Policy S/RRA.

We object to Draft Policy S/RRA on the basis that there are insufficient site allocations in the Rest of the Rural Area.

In the context of the representations outlined above, Land south of West Street and west of South Street, Comberton represents a suitable, deliverable and achievable site to address the acute need for housing within Greater Cambridge.

The below commentary sets out a response to the HELAA Addendum (2025) assessment of the Site and considers the merits of the Site alongside a consideration of the transformed context of national policy since the 2021; most notably the NPPF.

- HELAA Addendum (2025) Response
- Grey Belt
- The Site Opportunity

**Response to HELAA Addendum (2025)**

The Site was assessed within the HELAA Addendum (2025) (Site ID 115659, HELAA Ref. 40152). Commentary on the assessment is set out below and a revised RAG-rating is provided in line with the HELAA Methodology set out within Annex 1 of the HELAA Addendum (2025):

<b>HELAA RAG RATING AND RESPONSE 2025 (OR EARLIER DATE IF NO 2025 RESPONSE)</b>	<b>REPRESENTATION RESPONSE AND PROPOSED RAG RATING</b>
<p><b>Adopted Development Plan Policies (2025)</b></p> <p><i>Development of the site has some potential policy constraints, but these could be overcome through the planning application process</i></p>	<p>The site adjoins the existing built-up area of Comberton and aligns with the Draft Greater Cambridge Local Plan’s strategy of directing growth to sustainable villages. Although some policy constraints exist, these can be addressed through the planning application process.</p>
<p><b>Flood Risk Assessment (2025)</b></p> <p><i>Flood Zone: Whole in Flood Zone 1. Surface Water Flooding: 2% in a 1 in 30 year event. 2% lies in a 1 in 100 year event. 5% lies in a 1 in 1000 year event.</i></p>	<p>The Site lies wholly within Flood Zone 1, indicating a low risk of fluvial flooding. Although 5% of the Site at fall within areas identified as being at risk from a 1 in 1000 year surface water flooding event, this constraint can be effectively addressed through the planning application process. There is sufficient land available to design and deliver an acceptable layout, and the surface water can be appropriately addressed via a detail drainage strategy without impact to onsite or offsite flood risk. Flood risk therefore does not constrain the suitability or deliverability of the Site.</p>
<p><b>Landscape Assessment (2023)</b></p>	

<p><b>(No 2025 rating or response provided)</b></p> <p><i>New information questions the previous HELAA assessment but does not introduce alter the original proposal. Therefore it does not address concerns regarding urban expansion outside development framework, encroachment into the countryside and negative impact on landscape character and views. The RAG rating remains red.</i></p>	<p>The site occupies a village-edge location with some inherent landscape sensitivity. However, its scale is sufficient to accommodate a high-quality, landscape-led development that respects the village setting and delivers a softened southern and western settlement edge. With appropriate design measures and landscape integration, the development can be successfully integrated into the surrounding countryside.</p>
<p><b>Biodiversity and Geodiversity (2021)</b></p> <p><b>(No 2025 rating or response provided)</b></p> <p><i>Application likely to require consultation with Natural England as within 4km of Eversden and Wimpole Woods SSSI / SAC. Optimal habitats for barbastelle bats unlikely to be present on site, expect northern and eastern boundaries. Likely habitats of low ecological quality (arable), although boundary hedgerows / adjacent habitats likely to be Habitats of Principal Importance / priority habitats or of high ecological value. Pond 50m east may have potential for great crested newt. Potential for farmland bird populations.</i></p>	<p>The Site offers opportunities to deliver a policy compliant level of Biodiversity Net Gain (BNG) through future development proposals, thereby enhancing its ecological value. Further assessment will be required to demonstrate and quantify the Site's capacity to achieve the required BNG, but there is no indication at this stage that this cannot be met.</p>
<p><b>Open Space/Green Infrastructure (2021)</b></p> <p><b>(No 2023 or 2025 rating or response provided)</b></p> <p><i>Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.</i></p>	<p>The Site would provide additional open space and recreation provision.</p>
<p><b>Historic Environment Assessment (2023)</b></p> <p><i>The additional information suggests that harmful impacts can be mitigated by open space buffer. Further detailed assessment will be needed to confirm the location and extent of mitigation required. Without these further details, there can be no change to the initial site score.</i></p>	<p>The Historic Environment comments acknowledge that open space can provide mitigation in terms of heritage impacts. A sensitive layout and high-quality design will take careful account of the adjacent Conservation Area and heritage assets in proximity to the Site.</p>
<p><b>Archaeology (2021)</b></p>	

<p><b><i>(No 2023 or 2025 rating or response provided)</i></b></p> <p><i>Located in landscape of extensive late prehistoric and Roman activity. A Bronze Age barrow is recorded within the site and a moated site of probable medieval date is located adjacent.</i></p>	<p>Archaeological matters 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</b></p> <p><b><i>(2025 no response provided)</i></b></p>	<p>The Site benefits from excellent accessibility to Comberton's facilities, including schools, local services and public transport. Its location supports walking and cycling, aligning well with sustainable development objectives.</p>
<p><b>Site Access (2021)</b></p> <p><b><i>(No 2023 or 2025 rating or response provided)</i></b></p> <p><i>The proposed site is acceptable in principle subject to detailed design.</i></p>	<p>Site access can be achieved from West Street and or / South Street. The availability of multiple access points provides flexibility in design and allows impacts on the surrounding highways network to be minimised. A detailed assessment of the Site's access is required to confirm that appropriate visibility splays can be achieved and to ensure that safe and suitable vehicular and pedestrian access can be provided.</p>
<p><b>Transport and Roads (2021)</b></p> <p><b><i>(No 2023 or 2025 rating or response provided)</i></b></p> <p><i>Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.</i></p>	<p>Highway and transport impacts can be appropriately mitigated. The Site benefits from proximity to good public transport services to Cambridge (east) and Cambourne (west), and has immediate access to the cycle network via the Comberton Greenway. There are opportunities to promote sustainable and active travel options.</p>
<p><b>Noise, Vibration, Odour and Light Pollution (2021)</b></p> <p><b><i>(No 2023 or 2025 rating or response provided)</i></b></p>	

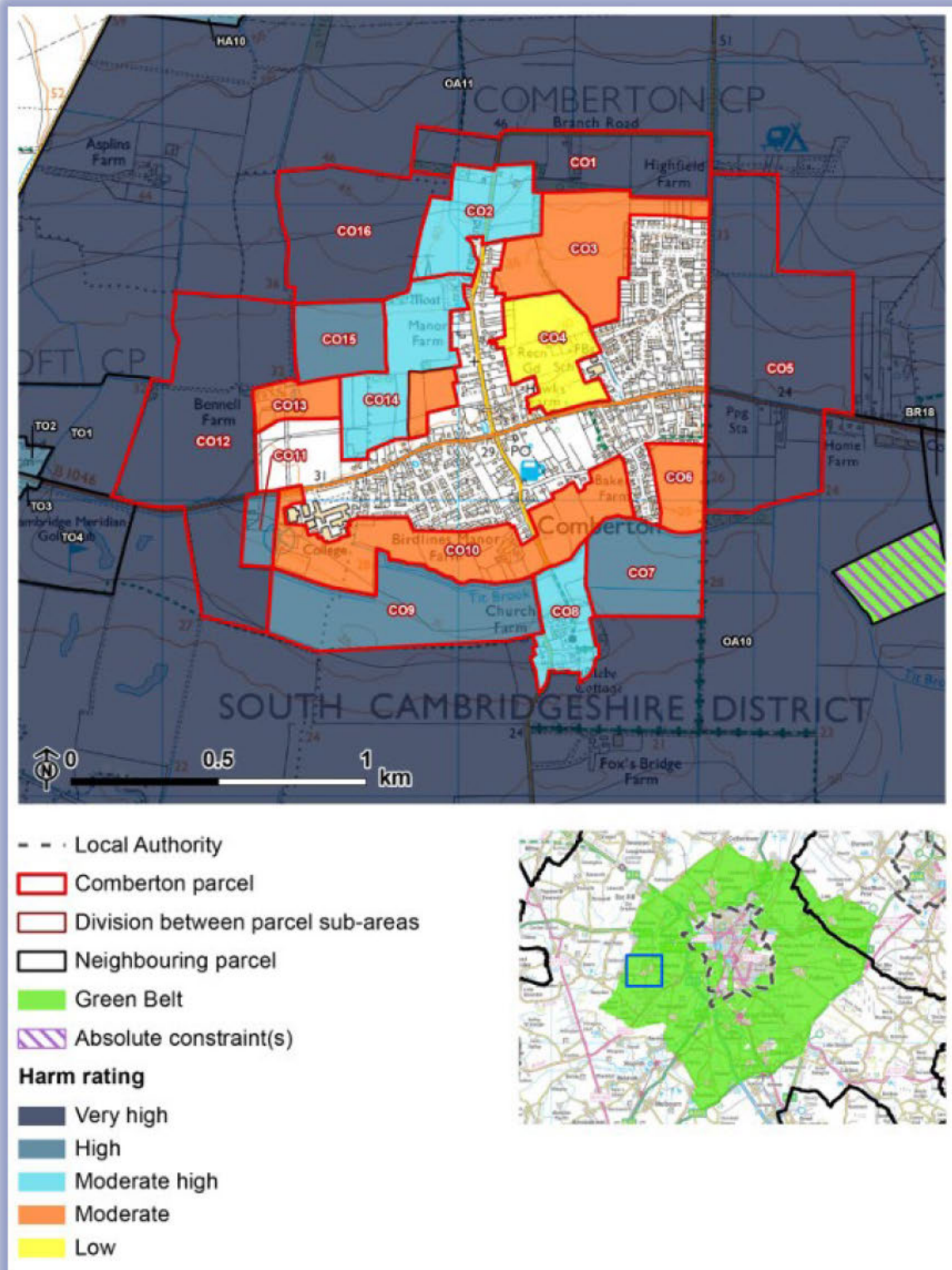
<p><i>The proposed site will be affected by road traffic noise from nearby main roads but is acceptable in principle subject to appropriate detailed design considerations and mitigation. The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration / odour / light pollution after careful site layout, design and mitigation.</i></p>	<p>The Site can be made acceptable in all these respects through detailed design, with any necessary measures secured via Planning Conditions.</p>
<p><b>AQMA (Air Quality) Assessment (2021)</b></p> <p><b>(No 2023 or 2025 rating or response provided)</b></p> <p>Site does not lie within an AQMA.</p>	<p>There are no air quality concerns that could not be addressed through detailed design.</p>
<p><b>Contaminated Land (2021)</b></p> <p><b>(No 2023 or 2025 rating or response provided)</b></p> <p>Potential for historic contamination, conditions required.</p>	<p>Contamination assessment would be undertaken to support any future application and appropriate remediation scheme secured via Planning Condition.</p>
<p><b>Overall Suitability Score RAG - RED</b></p>	<p>The above assessment demonstrates that the Site is a suitable location for development and is compatible with neighbouring uses. Where constraints exist, these can be appropriately mitigated through the design and planning process. The Site therefore merits positive consideration and allocation within the Draft Greater Cambridge Local Plan.</p>
<p><b>Available RAG - GREEN</b></p>	<p>The Site remains in single ownership and is available for development within 0-5 years</p>
<p><b>Achievable RAG - GREEN</b></p>	<p>The Site remains achievable and deliverable.</p>

As outlined above, the Site is suitable, available and achievable for residential development to contribute to the identified needs of Greater Cambridge to deliver housing.

### Grey Belt

The NPPF (2024) introduced the concept of Grey Belt which 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”, it is noted that Grey Belt excludes land where the application of policies relating to areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

The Site was assessed within Green Belt Assessment (2021) which supported the First Proposals GCLP Consultation (2021) and consists of Parcel CO9 and a *section of Parcel CO12 (south of B1046 only)*.



Parcel CO9 comprises the majority of the Site, being located to the south of the existing settlement of Comberton. CO9 is assessed as release resulting in a 'high' level of harm. Parcel CO12 comprises land to the west of Comberton, including a portion of the Site. CO12 as a whole is assessed as 'very high' in

respect of harm rating. Notwithstanding this, the Site is assessed below, as per the definition set out in the NPPF (2024):

**Parcel CO9:**

NPPF PURPOSE	GREEN BELT ASSESSMENT (2021) FINDINGS	REPRESENTATION ASSESSMENT
a) To check the unrestricted sprawl of large built-up areas	~	Parcel CO9 would represent a logical and considerate extension to the settlement of Comberton.  <b>No Contribution</b>
b) To prevent neighbouring towns from merging into each other	Lies in a wide gap between Little/Great Eversden and Comberton. Settlement gap is robust though there is strong distinction between the parcel and the inset area which increased the extent to which development would be perceived as narrowing the gap.  <b>Moderate</b>	Development of Parcel CO9 would not lead to coalescence with any neighbouring settlement. As the Assessment (2021) findings set out, there is a wide settlement gap and strong distinction.  <b>No Contribution</b>
d) To preserve the setting and special character of historic towns	~	Comberton is a village and the development of Parcel CO9 would not impact the setting of Cambridge. In respect of the village settlement itself, the layout and design of the development would mitigate any harm to the local context.  <b>No Contribution</b>

**Parcel CO12 (south of B1046 only):**

NPPF PURPOSE	GREEN BELT ASSESSMENT (2021) FINDINGS	REPRESENTATION ASSESSMENT
a) To check the unrestricted sprawl of large built-up areas	~	The partial development of Parcel CO12 would represent a logical and considerate extension to the settlement of Comberton.  <b>Limited Contribution</b>

<b>b) To prevent neighbouring towns from merging into each other</b>	<p>Land lies in a gap that maintains a clear separation between Toft and Comberton due to elevated land. Strong distinction between the parcel and inset area, overall making a significant contribution.</p> <p><b>Significant</b></p>	<p>Comberton and Toft are both village settlements, rather than towns. Whilst respecting the existing countryside gap between the villages, only the southern part of Parcel CO12 is required for release (south of B1046) and there are further parcels which also form part of the gap between the settlements. Appropriate layout and landscaping of the development will ensure that release of this section will not be perceived as resulting in coalescence with Toft.</p> <p><b>Limited Contribution</b></p>
<b>d) To preserve the setting and special character of historic towns</b>	<p>~</p>	<p>Comberton is a village and the development of part of Parcel CO12 would not impact the setting of Cambridge.</p> <p><b>No Contribution</b></p>

Parcel CO9 and the relevant section of Parcel CO12 (south of B1046) are considered to compromise Grey Belt land given the limited to no contribution they perform in relation to purposes a), b) and d) of the Green Belt.

In combination, the Site is considered to comprise Grey Belt land in accordance with the NPPF (2024) definition. It should be included in the forthcoming review of Grey Belt sites by LDA and carefully considered for release from the Green Belt under GCLP Regulation 19.

### **The Site Opportunity**

The Site has been promoted for residential development since 2019, through the emerging GCLP.

The Site extends to 29.7ha and is located to the southwest of Comberton, adjoining South Street at the easternmost extent and West Street (B1046) at the northernmost. The Site is currently arable farmland, adjoining the Cambridge Meridian Golf Club and the Mill Field Toft Footpath to the west. A public footpath follows the southern boundary of the Site, providing access westwards into Toft and eastwards into Comberton. The Site is separated from the village of Comberton to the north by sports facilities associated with Comberton Village College (CVC) and farmland to the south of Kentings/Barrons Way residential area.

The Site lies within the administrative area of South Cambridgeshire District Council. The village of Comberton is identified as a Minor Rural Centre, sitting above the Group and Infill Villages in the settlement hierarchy. Comberton is a sustainable location for further residential development, with its own village college (secondary and sixth form education) in addition to the local primary school, pre-school provision, doctors, dentists, hairdressers and convenience shops. The Site occupies an excellent location for further village expansion. With direct access to the B1046, it provides good connections via the Greenway (cycle) network and benefits from a regular bus service which connects the village to Cambridge and Cambourne.

The Site lies adjacent, but not within, a designated Conservation Area and does not contain any designated heritage assets. Located in Flood Zone 1, the Site is considered to be at a low risk of flooding.

Occupying a sustainable location within a sustainable village, the Site has been promoted for allocation to deliver a residential development of approximately 550-600 new dwellings and associated infrastructure, including new public open space, sustainable urban drainage, pedestrian links and play facilities. A Concept Masterplan was submitted during previous consultation stages (below), in addition to a range of other supporting evidence.



The Site provides an opportunity to deliver a sustainable extension to the existing village settlement of Comberton.

The key benefits of allocation, and in turn, development of the Site are summarised as follows:

- Effective use of sustainable Grey Belt land;
- Delivery of much needed housing;
- Delivery of Biodiversity Net Gain;
- Provide a logical extension to a sustainable Minor Rural Centre settlement, which the Site would both benefit from and contribute to;
- Link into existing pedestrian and cycle routes to promote active travel choices;
- Connect to the existing bus service which runs between Cambridge and Cambourne, encouraging the use of more sustainable modes of transport rather than private cars; and
- Deliver a landscape led scheme that responds sensitively to the environmental considerations of Green Belt to deliver an attractive and appropriate development.

## Summary

These representations have offered a response to Draft Local Plan pursuant to the Regulation 18 consultation.

Bellway objects to the current growth targets set out within the Draft Local Plan and the proposed development strategy. Additional housing land should be allocated for development, particularly in sustainable village locations.

Throughout these representations the Site has been demonstrated to comprise sustainable Grey Belt land which by virtue of its size is readily available and deliverable for residential development.

It is hence recommended that Land south of West Street and west of South Street, Comberton is:

- Identified as Grey Belt within the Local Plan and supporting forthcoming Green Belt Assessment
- Removed from the Policy S/GB (Green Belt) designation on the Policies Map for Regulation 19 Consultation stage
- Removed from the Policy I/SI (Safeguarding Important Infrastructure) designation on the Policies Map for Regulation 19 Consultation stage
- Allocated for Housing development for the Regulation 19 Consultation stage

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

Kind regards,



**Jennie Hainsworth**  
Partner, Planning

**Encs. Appendix A Bidwells Housing Delivery Study, January 2026**

**Appendix B Representation to EWR Non-Statutory Consultation, January 2025**

## TECHNICAL NOTE ON DELIVERY OF STRATEGIC HOUSING SITES WITHIN GREATER CAMBRIDGE: JANUARY 2026

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This Technical Note has been prepared by Bidwells LLP to assess the timescales on the planning process and delivery rates of historic strategic housing sites across Greater Cambridge.

The emerging Draft Greater Cambridge Local Plan will entirely replace the current adopted plans for South Cambridgeshire and Cambridge City and cover the 21- year period up to 2045, fourteen years beyond the current adopted Plans.

It is therefore important to understand how strategic residential allocations have historically performed given the proposed emerging development strategy of the Draft Greater Cambridge Local Plan to rely on a large number of strategic site allocations to meet the majority of the development needs to 2045 and beyond. This comprises carrying forward a number of allocations from the adopted plans, together with two new allocations (Cambourne North and Land adjacent to A11 and A1307 at Grange Farm).

The analysis undertaken in this report has relied as fully as possible upon data within publicly available Annual Monitoring Reports and Housing Land Supply reports of Cambridge City Council and South Cambridgeshire District Council. **A key trend that has been identified is that the Councils have consistently anticipated housing delivery on the large strategic residential sites to be sooner than has proved to be the case and at a delivery rate higher than has been the case.**

There are nine sites reviewed within this Note. Seven of the sites have delivered housing completions but, on average, there has been a delay of 4.9 years from when the Planning Authority first anticipated housing completions and when they actually happened. This leaves two sites that have not delivered any housing completions (Darwin Green Phases 2 and 3 and Bourn Airfield) despite them both forming allocations in respective local plan documents as far back as 2006 and 2018.

Darwin Green is one such example therefore that highlights the over optimism that has been set into historic plan making in Greater Cambridge. Further commentary on this particular site is summarised below. Full analysis of all of the other strategic sites are provided at **Appendix 1**.

### **Darwin Green**

It has been a long-held objective of both Cambridge City Council and South Cambridgeshire District Council to propose a new sustainable urban extension of Cambridge on land between Huntingdon Road and Histon Road (now known as Darwin Green). This first dates back to the Cambridgeshire and Peterborough Structure Plan (adopted in **2003**) which identified land between Huntingdon Road and Histon Road as suitable for release from the Green Belt for housing and mixed-use development, under Policy P9/2c.

That part of the area between Huntingdon Road and Histon Road which falls within the jurisdiction of Cambridge City was released from the Green Belt in the Cambridge Local Plan (adopted in 2006), under Policy 9/8 (also known as 'Darwin Green Phase One'). The allocation was followed through to the subsequent, and current, Cambridge Local Plan adopted in 2018, under Policy 20.

The remaining land within the jurisdiction of South Cambridgeshire was first allocated in the South Cambridgeshire District Council Site Specifics Policies Development Plan Document (DPD) (adopted in 2010), under Policy SP/2 North West Cambridge Huntingdon Road to Histon Road (also known as 'Darwin Green Phase Two'). The allocation was

followed through to the subsequent, and current, South Cambridgeshire Local Plan adopted in 2018, under Policy SS/2.

Darwin Green Phase One was granted Outline Planning Permission in 2013 (following submission in 2006), benefits from six subsequent reserved matters approvals and is partly occupied, with the remaining parcels under construction. Darwin Green Phases Two and Three secured Outline Planning Permission in 2024, with work currently underway on discharging conditions and preparing the initial reserved matters applications.

Darwin Green Phase One first appeared in the Cambridge City Council Annual Monitoring Report (AMR) in 2010/2011 and this anticipated the first completions to be in 2013/14. However, delivery was later than expected and the City Council AMR from 2018/2019 confirmed that the first completions were not actually delivered until 2019 – **up to 6 years later** than first expected and representing a **13-year period between the outline planning application being submitted and delivery of the first completions**. According to the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2025) only the Local Centre RMA (114 dwellings) and Parcel BDW1 (173 dwellings) have been completed (pursuant to the outline planning permission of 1,593 dwellings).

Similar levels of delay can be seen when reviewing the delivery of Darwin Green Phases Two and Three. Phases Two and Three first appeared in the South Cambridgeshire Annual Monitoring Report (AMR) in 2008/2009 and this anticipated the first completions in 2014/2015. However, no completions have yet been delivered on Site, with the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2025) estimating the first completions in 2028/29 – **up to 14 years later** than first expected.

Therefore, in summary, a strategic site that was first proposed for release from the Green Belt in 2003 (23 years ago) and has been carried forward to form allocations in consecutive local plans ever since (with an estimated capacity for circa 2,700 dwellings in total) has only delivered 287 dwellings to date.

## Summary

Whilst in principle a strategy of seeking to deliver a large number of new homes at scale within the Plan is supported, an over reliance on too few strategic sites is not supported. The development strategy set out within the emerging Draft Greater Cambridge Local Plan 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 also 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) 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) 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 based upon our review of historic delivery of strategic sites in Greater Cambridge.

An over optimistic approach to housing delivery is set again into the emerging Local Plan. The over reliance on too few sites to deliver so much of the housing need, embedded within the consistent over optimism in housing delivery, forms a housing delivery strategy that is primed to fail.

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.

# Appendix 1 : Analysis of Strategic Housing Sites within Greater Cambridgeshire

# North West Cambridge

North West Cambridge effectively comprises two sites that straddle the local authority boundary:

- Darwin Green (NIAB), which is within the control of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners; and
- Eddington, which is being brought forward by the University of Cambridge and Hill Residential.

Darwin Green was allocated in the adopted South Cambridgeshire Local Plan for 1,000 dwellings (SS/2) and within the Cambridge City Local Plan for 1,696 dwellings (R43) meaning the whole allocation was envisioned to deliver 2,696 dwellings. Eddington was envisioned to deliver 3,000 dwellings as outlined within the North West Cambridge Area Action Plan Document. However, this is now proposed to increase to 5,500 dwellings in the emerging Plan to reflect the additional 2,500 homes anticipated to be delivered under Phase 2.

Both sites are addressed in turn below.

## **Darwin Green**

Darwin Green, also referred to as National Institute of Agricultural Botany (hereafter 'NIAB') comprises two main elements:

1: Darwin Green 1 (Also known as NIAB Main), which achieved outline planning permission in 2013 for 1,593 dwellings and achieved first completions in 2018/19. According to the GC HLS Report 2025, the site is planned for completion in 2031/2032 which we have calculated would equate to an average rate of 114 dpa since first completions.

2: Darwin Green 2/3 (also known as NIAB 2 and 3), which achieved outline planning permission in 2024 for up to 1,000 dwellings, with the first RMA yet to be submitted. According to the GC HLS 2025, the anticipated first completions are due to take place in 2028 with a predicted delivery rate of 120 dpa.

Therefore, the overall Darwin Green development is considered, in total, to deliver circa 2,593 dwellings.

### **Darwin Green 1 / NIAB Main**

Darwin Green 1/NIAB Main first appeared in the Cambridge City Council ('CCC') Annual Monitoring Report ('AMR') in 2010/2011 and was identified in the Local Plan (2006) as an area of major change under 9/8 Land between Huntingdon Road and Histon Road. This anticipated the first housing deliveries in 2013/2014.

However, the CCC AMR from 2018/2019 confirmed that the first housing completions happened February 2019, which is 5/6 years after the first report had expected housing.

Outline planning permission was granted for Darwin Green 1 in 2013 (LPA Ref. 07/0003/OUT), totalling a 7-year determination period for outline planning permission. After a further 2 years, the first RMA was submitted (LPA. 15/1670/REM) and approved in May 2016, with first deliveries in 2019. This represents a 13-year period between outline planning submission and first completions.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions for Darwin Green 1. For clarity, anticipated deliveries are taken from the 2019 GC 5YHLS and Actual Deliveries are taken from the 2025 GC 5YHLS.

For Darwin Green 1/NIAB Main, this shows a considerable shortfall against the predicted levels of delivery set out in 2019, compared to the 2025 position. Of the overall 934 dwellings anticipated for completion from 2019 to 2024, only 316 homes have been delivered which equates to only 34% of the total anticipated completions.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED FIRST DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTIPCATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
1,696 dwellings	2013/2014	2019	7 years	2 years	Anticipated	154	180	200	200	200
					Actual	100	103	0	86	27
					Difference	-54 / 65%	-77 / 57%	-200 / 0%	-114 / 43%	- 173 / 13.5 %

Darwin Green 2 and 3 / NIAB 2 and 3

Darwin Green 2 and 3/NIAB 2 and 3 first appeared in the South Cambridgeshire AMR in 2008/2009 and was identified in the Local Plan (2006) as an area of major change under 9/8 Land between Huntingdon Road and Histon Road. This report anticipated the first housing deliveries in 2014/2015, whilst the later Site-Allocations DPD (2010) confirmed anticipated deliveries from 2016.

The Greater Cambridge Housing Trajectory and Five-Year Housing Land Supply 2025 confirmed that there had been no housing deliveries on the Site as of 2025 and predicts that the first completion will occur in 2028/2029. This would be 14 years after the first trajectory had expected housing.

Outline planning was submitted in May 2022 and permission was granted for Darwin Green 2 and 3 in September 2024 (LPA Ref. 22/02528/OUT). No reserved matters applications have been submitted as of 2026.

As a result of the above, the Five-Year Housing Land Supply 2025 report outlines that the delivery position has significantly worsened with first completions now anticipated in 2028/2029. The table below compares the period from 2014/2015 to 2023/2024, in terms of anticipated deliveries and actual completions for Darwin Green 2 and 3. For clarity, anticipated deliveries are taken from the South Cambridgeshire AMR 2008/2009 which predicted 630 homes and actual deliveries from the GC 5YHLS 2025.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD
1,000 dwellings	2014/2015	Not yet delivered a dwelling	2 years, 4 months	Not yet submitted

DELIVERY – ANTIPCATED VS ACTUAL	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Anticipated	270	360	360	110	0	0	0	0	0	0
Actual	0	0	0	0	0	0	0	0	0	0
Difference	- 270	- 360	- 360	- 110	-	-	-	-	-	-

## **Eddington**

Eddington is a housing-led mixed-use development located on the northwestern edge of Cambridge. The Site was originally allocated within the Cambridge Structure Plan (2006) for 1,150 dwellings and then updated in the North West Cambridge Area Action Plan ('AAP') (2009) for dwellings approximately 3,000 dwellings.

Outline planning permission was granted for the entire Northwest Cambridge Area in February 2013 for up to 3,000 dwellings. Following the grant of outline planning permission in 2013 (LPA Ref. S/1886/11 and 11/1114/OUT), the first RMA submission came forward in 2013 (LPA Ref. 13/1748/REM) and was approved in 2014, with first deliveries in 2016. This represents a 5-year period between outline submission and first completions.

However, it must be noted that the original outline planning permission has now expired and as a result, there is a current outline application for the Site (LPA Ref. 25/03753/OUT) which is under assessment and proposes to increase the total number of dwellings to 3,800 dwellings to increase scheme density.

For clarity, the wider outline area of Eddington comprises the following elements, known as 'Lots' which are individual reserved matters that have been submitted:

- Lots M1 & M2 – (240 dwellings) which achieved detailed planning permission in 2015 and was built out between 2017 and 2024 at an average rate of 32 dpa according to the GCSP 5YHLS Report 2019.
- Lot M3 - (106 dwellings) which achieved detailed planning permission in 2017 with first deliveries planned for 2025/2026 at a predicted rate of 106 dpa according to the GCSP 5YHLS Report 2025
- Lots M4 & M5 - (160 dwellings) which achieved detail planning permission in 2023 with first deliveries planned for 2025 and completion in 2028/2029 at a predicted rate of 40 dpa according to the GCSP 5YHLS Report 2025.
- Lots S1 & S2 – (373 dwellings) which achieved detailed planning permission in 2022 with first deliveries planned for 2024/2025, according to the GCSP 5YHLS Report 2025
- Lot S3 - (186 dwellings) which achieved detailed planning permission in 2019 with first delivery in 2022/2023 and completed in 2023/2024 at an average rate of 93 dpa, according to the GCSP 5YHLS Report 2025
- Lot 1 - (117 dwellings) which received detailed planning permission in 2014 and was built out in 2017 at a rate of 117 dpa, according to the GCSP 5YHLS Report 2019.
- Lot 2 - (264 dwellings) which received detailed planning permission in 2015 and was built out in 2018/2019 at a rate of 264 dpa, according to the GCSP 5YHLS Report 2019.
- Lot 3 - (232 dwellings) which received detailed planning permission in 2014 and was built out in 2017/2018 at a rate of 232 dpa, according to the GCSP 5YHLS Report 2019.
- Lot 4 - (88 dwellings) which received detailed planning permission in 2022 with first deliveries planned for 2024/2025, according to the GCSP 5YHLS Report 2025
- Lot 8 - (73 dwellings) which received detailed planning permission in 2014 and was built out in 2016/2017 at a rate of 73 dpa, according to the GCSP 5YHLS Report 2019.

Future Lots – Pursuant to 11/1114/OUT with requirements for 1,152 remaining dwellings (590 dwellings for Cambridge and 562 for South Cambridgeshire) planned for delivery from 2028/2029, according to the GC HLS Report 2025.

Reserved Matters Applications have approved for a total of 1,839 dwellings pursuant to the outline application for 3,000 dwellings. However, as the outline permission has now expired and the amended outline application seeks to increase housing to 3,800 dwellings, this leaves 1,961 dwellings to be delivered.

It is also important to consider that Eddington first appeared in the South Cambridgeshire Annual Monitoring Report in 2007-2008 and Cambridge City AMR 2010 . Both anticipated the first housing deliveries in 2013/2014 and predicted

that all dwellings would be completed by 2021/2022 at an average rate of 375 dpa. However, the Greater Cambridge Housing Trajectory and Five-Year Housing Land Supply (2019) confirmed that the first housing completions happened in 2016/2017 in Cambridge, which is 3 years after the first trajectory had expected housing.

Furthermore, the table below compares the period from 2016/2017 to 2023/24 in terms of anticipated deliveries and actual completions for all sites within the North West Cambridge Action Plan Area/Eddington. For clarity, the anticipated deliveries have been taken from the South Cambridgeshire Annual Monitoring Report in 2007-2008 and Cambridge City AMR 2010. Actual deliveries have been taken from the GC 5YHLS 2025.

This shows that since 2016 46% of the predicted housing has been delivered, with an over delivery in 2020/2021 and 2022/2023 but no completions in 2021/2022. The lack of completions in 2021/2022 was due to all RMAs at lots M1, M2, 8, 4, 3, 2 and 1 being completed with completions on Plot S3 then starting again in 2022/2023 following the grant of planning permission in 2019.

Although there has been over delivery in recent years, it must be noted that initial predictions estimated that the development would be completed by this time and this must be viewed with the history of significant underdelivery in mind.

Overall, of the 1,839 dwellings benefiting from detailed planning permission, 1,121 have been delivered, representing approximately 60% of the total as of 2025, despite original predictions of all dwellings being completed by 2017/2018.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD
3,000 dwellings	2013/2014	2016	2 years	0.5 years

DELIVERY – ANTICIPATED VS ACTUAL	16/1							
	7	17/18	18/19	19/20	20/21	21/22	22/23	23/24
<b>Anticipated</b>	400	645	615	550	215	30	0	0
<b>Actual</b>	73	353	409	22	35	0	142	87
<b>Difference</b>	- 327	- 293	- 206	- 528	- 180	+30	+142	+87

## North East Cambridge

North East Cambridge is a mixed-use development on the northern edge of Cambridge including land both within Cambridge City and South Cambridgeshire.

The general area was first allocated for development in the Cambridge Local Plan 2006, the continued delay in preparation of the site-specific AAP has meant that predictions for first deliveries have been absent from all AMR's until the Greater Cambridge Housing Trajectory and Housing Land Supply Report (2025). with first delivery planned for 2028/2029. At the time of writing, this strategic site cannot therefore be considered to demonstrate delivery. The land within Cambridge City was allocated in the Cambridge Local Plan (2018) for employment focused mixed use development with the number of dwellings not specified. The land within South Cambridgeshire was safeguarded for a

railway station and interchange facility in the Site-Specific Policies DPD (2010) and has been carried forward into the South Cambridgeshire Local Plan 2018 as an allocation for employment focussed mixed use development.

Consultation on a site-specific SPD, known as North East Cambridge Area Action Plan ('NECAPP') began in 2015 and the Council's agreed NECAPP subject to further consultation once the DCO for the Waste Water Treatment Plant ("WWTP") relocation had been approved. It was envisioned 8,350 homes would be delivered of which 5,550 would be on the WWTP site.

The Government removed the proposed funding following approval of the DCO application in August 2025<sup>1</sup>.

The Site Allocations Topic Paper (2025) submitted in support of the draft Plan outlines that if the treatment plant remains in situ, this scenario would result in a very different vision for overall development.

It states that the number of homes to be delivered would be dramatically reduced with only 90 units across the whole North East Cambridge Area (inconsistent with the 425 consented under 22/02771/OUT). Despite the Central Government decision not to fund the new treatment plant in August 2025, the draft allocation notes the delivery of the maximum 8,350 homes. As a result, the reliance on this number of homes coming forward under the draft Local Plan is considered to be entirely unrealistic.

Despite this, North East Cambridge is now included as a comprehensive site allocation within the draft Cambridge Local Plan (2025) rather than taking forwards a separate Area Action Plan. The original 2006 Local Plan housing trajectory is not available online and we can find no record as to a firm date first housing was expected. However, clearly 20-years have passed since the City Council allocated the general area for development, and in this period no homes have been delivered.

## Cambridge East

Cambridge East is allocated for major mixed-use development on the edge of Cambridge, including land within Cambridge City and South Cambridgeshire.

Outlined with the relevant Annual Monitoring Reports and 5YHLS Reports, Cambridge East effectively comprises 3 elements as part of the wider Cambridge East Area Action Plan as follows:

- **Land North of Cherry Hinton** – (1,200 homes) which is within the control of Bellway Homes.
- **Land North of Newmarket Road** (also known as WING or Marleigh) – (1,300 dwellings) which is within the control of Hill Marshall LLP. allocated within the South Cambridgeshire Local Plan for 1,300 dwellings (SS/3).
- **Land at Coldham's Lane** – (57 dwellings) which is within control of Weston Homes.
- **Land south of Worts Causeway** – (230 dwellings) which is within the control of Eddeva Park and Hill.
- **Land North of Worst Causeway** – (200 dwellings) being constructed by Cala homes.

Land at Coldham's lane, south and north of Worts Causeway have been discounted from this note. Land at Coldham's Lane is now completed and all sites are of much smaller scale of development and has therefore not been considered for the purpose of this note.

It must also be noted that the Cambridge East AAP was adopted in 2008 by both Cambridge City and South Cambridge. The plan set out a vision for 10,000 to 12,000 dwellings in the area despite the main landowner, Marshall of Cambridge, announcing in April 2010 that the relocation of Cambridge Airport would not happen before 2031 at the

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<sup>1</sup> [Government decision not to fund Cambridge Waste Water Treatment Plant relocation - Cambridge City Council](#)

earliest, as there were currently no suitable relocation options. Within the latest GC 5YHLS (2025) report, it therefore only identifies the allocations outlined above which falls short of the initial expectations of 10,000+ dwellings.

**Land north of Cherry Hinton**

Land North of Cherry Hinton is allocated within the South Cambridgeshire Local Plan for 420 dwellings (SS/3) and the Cambridge Local Plan for 780 dwellings (R47), comprising 1,200 dwellings.

Outline planning permission for up to 1,200 homes was submitted in 2018 and granted in 2020 (LPA Ref. 18/0481/OUT). The first RMA was approved in 2023 (LPA Ref. 22/05018/REM) and first deliveries on Site in 2024. This represents an ongoing 6-year period from submission of the outline consent to first completions.

The Site is being marketed as ‘Springstead Village’ and is split into the following phases:

- **First Phase (known as RMA3)** – (351 dwellings) achieved detailed planning permission in 2023 with first completions in 2024 and predicted completion of all dwellings by 2027, according to the GCSP 5YHLS Report 2025
- **Second Phase (known as RMA4)** – (136 dwellings) achieved detailed planning permission in 2024 with first completions planned for end of 2026 and predicted completion of all dwellings by 2027, according to the GCSP 5YHLS Report 2025
- **Third Phase (known as RMA5)** – (292 dwellings) achieved detailed planning permission in 2025 and first completions are planned for early 2027, according to the GCSP 5YHLS Report 2025
- **Forth Phase (known as RMA6)** – (295 dwellings) to be submitted spring 2026 with first completions predicted end of 2027, according to the GCSP 5YHLS Report 2025
- **Remainder of the site** - (713 dwellings) benefitting from outline planning permission and associated RMA’s to be submitted by 2028, according to the GCSP 5YHLS Report 2025.

The first mention of delivery of the Site can be found within the Annual Monitoring Report 2012/2013 and with estimated first completions in 2021/2022. The Greater Cambridge Housing Trajectory and Housing Land Supply Report (2025) confirmed that the first housing completions actually happened in 2024, which is 3 years after the first trajectory had expected housing.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions at land north of Cherry Hinton. This shows that since the first anticipated deliveries in 2022/2023, 39 dwellings have been completed compared to an anticipated 295 dwellings which equates to only 13.5% of total anticipated dwellings delivered. This demonstrates a significant shortfall in the number of anticipated dwelling completions.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTICIPATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
1,200 dwellings	2022/2023	2024	2 years	2 years	Anticipated	0	0	0	95	200
					Actual	0	0	0	0	39
					Difference	-	-	-	- 95 / 0%	- 161 / 19.5 %

## Cambridge East – North of Newmarket Road

Land north of Newmarket Road is allocated as Phase 1 within the wider Cambridge East AAP and is allocated within the South Cambridgeshire Local Plan (2019) for 1,300 dwellings.

Outline Planning permission was submitted in 2013 and granted in 2016 (LPA Ref. S/2682/13/OL) with subsequent RMA submission being granted in 2019 (LPA Ref. S/1096/19/RM) and first completions taking place in 2020. This represents a period of 7-years from submission of the outline planning application to first completions.

The Site is being marketed as 'Marleigh Village' and is split into 3 phases as follows:

- **Phase 1a** – (239 dwellings) achieved detailed planning permission in 2019 with first delivery in 2020/2021 and 187 dwellings complete by March 2024 at a rate of 47 dpa, according to the GC 5YHLS Report 2019
- **Phase 1b** – (308 dwellings) achieved detailed planning permission in 2020 with first deliveries in 2021/2022 and 141 dwellings complete by March 2024 at a rate of 47 dpa, according to the GC 5YHLS Report 2019
- **Phase 2** – (421 dwellings) achieved detailed planning permission in 2021 with first deliveries in 2022/2023 and 55 dwellings completed in March 2024 at a rate of 27.5 dpa, according to the GC 5YHLS Report 2019.
- **Phase 3** - (423 dwellings) split between an RMA for 332 dwellings and a full application for 91 dwellings with anticipated first completions in 2027, according to the GC 5YHLS Report 2025.

This site first appeared in the South Cambridgeshire and Cambridge City Annual Monitoring Reports in 2013/2014. Both reports anticipated the first housing deliveries in 2018/2019. The Greater Cambridge Annual Monitoring Report 2020/2021 confirmed that the first completions took place in 2020/2021 for Phase 1A which is 2 years after originally anticipated.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions for land north of Newmarket Road. This shows that since the first anticipated deliveries in 2018/2019, 383 dwellings have been completed compared to an anticipated 705 dwellings, which equates to only 54% of the total anticipated dwellings having been delivered.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTICIPATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
1,300 dwellings	2018/2019	2020	3 years	3 years	Anticipated	0	110	160	225	210
					Actual	0	62	84	108	129
					Difference	-	- 48 /56 %	- 76 / 52.5 %	- 117 / 48%	- 81 / 61%

## Northstowe

Northstowe is a new settlement of up to 10,000 dwellings to the north west of Cambridge, adjacent to the villages of Longstanton and Oakington.

Northstowe is allocated within the adopted South Cambridgeshire Local Plan for 10,000 dwellings (SS/5) and prior to this was allocated in the Northstowe AAP adopted in 2007. The AAP took 2 years from initial consultation to adoption.

The site was first allocated in the 2003 Cambridgeshire and Peterborough Structure Plan which does not provide confirmation as to first deliveries, instead these were outlined in the 2007/2008 AMR.

The wider allocation/site is comprised of several phases as follows:

- Phase 1 – Outline permission was submitted in 2012 and granted in 2014 (LPA Ref. S/0388/12/OL) for up to 1,500 dwellings, with the first RMA approved in 2016 and first completions in 2016. This represents a period of 2-years from submission of outline planning to first completions. Phase 1 is being delivered by 5 housebuilders under the following parcels:
  - Parcel H1 – (92 Dwellings) being brought forward by Bloor Homes with construction taking place from 2016 to 2019 at a rate of 31 dpa, according to the GC 5YHLS Report 2025
  - Parcel H2 – (135 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2017 and 2021 at a rate of 34 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H3 – (40 Dwellings) being brought forward by Taylor Wimpey with 33 dwellings completed between 2017 and 2019 and planned completion in 2025 at a rate of 5 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H4 – (84 Dwellings) being brought forward by Bovis Homes with construction taking place between 2017 and 2020 at a rate of 28 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H5 & H6 – (240 Dwellings) being brought forward by Bovis Homes with 167 dwellings completed between 2019 and 2023 and final completions planned for 2025/2026 representing a delivery rate of 33 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H7 – (115 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2018 and 2024 at a rate of 20 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H8 – (73 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2020 and 2023 at a rate of 25 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H9 – (130 Dwellings) being brought forward by Barrats/David Wilson Homes with construction taking place between 2021 and 2023 at a rate of 65 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H10 – (76 Dwellings) being brought forward by Taylor Wimpey with construction taking place between 2020 and 2023 at a rate of 26 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H11 – (152 Dwellings) being brought forward by Taylor Wimpey with construction taking place between 2017 and 2021 at a rate of 51 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H12 – (271 Homes) being brought forward by Linden Homes with construction taking place between 2017 and 2024 at a rate of 39 dpa, according to the GC 5YHLS Report 2025.
  - Parcel H13 – (92 Dwellings) being brought forward by Taylor Wimpey with 73 completions between 2022 and 2024 and final completions planned for 2024/2025 representing a delivery rate of 25 dpa, according to the GC 5YHLS Report 2025.
- Phase 2 – Outline planning permission was submitted in 2014 and granted in 2017 for up to 3,500 dwellings with the first RMAs granted in 2018. Phase 2 is being delivered alongside Homes England and the following Housebuilders:
  - Phase 2a – (406 Dwellings) Homes England remarketing for preferred bidder, with 43 completions between 2020 and 2024 and next completions due to take place in 2027, presenting a delivery rate of 58 dpa, according to the GC 5YHLS Report 2025

- Phase 2b – (300 Dwellings) being brought forward by Keepmoat Homes with 36 dwellings completed in 2023/2024 and the parcel due for completion by 2029 representing a delivery rate of 50 dpa, according to the GC 5YHLS Report 2025.
- Phases 2D1, 2C and TC1 – 2,794 remaining dwellings pursuant to the outline planning permission with associated RMA's anticipated for 2028, according to the GC 5YHLS Report 2025.
- Phase 3 – as a whole is anticipated to provide approximately 5,000 dwellings. Phase 3a has outline planning permission for 4,000 homes submitted in 2020 approved in March 2022 with associated RMA's to be submitted in 2027/2028, according to the GC 5YHLS Report 2025.

The wider Northstowe site first appeared in the South Cambridgeshire Annual Monitoring Report 2007/2008. This report anticipated the first housing deliveries in 2011/2012. The AMR of 2016/2017 confirmed the first housing completions actually happened by March 2017, which is 5/6 years after the first trajectory had expected housing.

Furthermore, Appendix 1 compares period 2001/2012 to 2023/2024 in terms of anticipated deliveries and actual completions at Northstowe. This shows that since 1049 dwellings have been completed compared to an anticipated 1084, this equates to circa 97% of all dwellings having been completed.

However, it is noted that it is anticipated that 2,834 dwellings are due to be delivered in remaining Phases by 2031. Due to the delay in finding a delivery partner on Phase 2 and based on the average year period from outline consent to deliver housing for phase 1, it is considered that the anticipated delivery of the remaining homes within the plan period may no longer be possible.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	FIRST YEAR OF DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD
10,000 dwellings	2011/2012	2016	2.3 years on average	1.5 years average

DELIVERY – ANTICIPATED VS ACTUAL	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
	<b>Anticipated</b>	150	400	600	650	650	650	650	650	650	650	650	650
<b>Actual</b>	0	0	0	0	0	13	140	278	243	258	219	237	92
<b>Difference</b>	-150	-400	-600	-650	-650	-637	-510	-372	+83	+44	+1	-5	-158

### Waterbeach

Waterbeach New Town is within the South Cambridge Local Plan for 8,000 to 9,000 dwellings (SS/6).

The wider site is split between the Western and Eastern Parcels as follows:

- Western parcels – (6,500 dwellings). Outline Planning Permission was granted in 2019 following submission in 2017 (LPA Ref. S/0559/17/OL) with the first approved RMA in 2021 and first completions in 2024.
- This represents 7-years from submission of outline to first completions. The Site being brought forward by Urban & Civic as Master Developer split further into the following phases:

- Key Phase 1 – permission for landscape, highways, earthworks and surface/foul drainage infrastructure approved 2020.
- Northern Woods – (89 Dwellings) being brought forward by Stonebond with detailed planning permission approved in 2021. 13 dwellings completed in 2024 and final dwellings anticipated for completion in 2025 representing a built out rate of 45 dpa, according to the GC 5YHLS Report 2025.
- Eastern Woods Parcel P2.1 – (111 Dwellings) being brought forward by Cala Homes, with detailed planning permission approved in 2021. 12 dwellings have completed as of 2024 and final dwellings anticipated for completion in early 2026 representing a build out rate of 37 dpa, according to the GC 5YHLS Report 2025.
- Eastern Woods Parcels P5.1, P5.2 and P5.3 – (90 dwellings) first completions anticipated late spring 2026, according to the GC 5YHLS Report 2025.
- Eastern Woods Parcels P4 and P4.3 – (178 dwellings) RMA awaiting submission and first completions anticipated summer 2026, according to the GC 5YHLS Report 2025.
- Eastern Woods Parcels P2.2. and P3.2 – (198 dwellings) RMA awaiting submission following named housebuilder and completion anticipated for summer 2026, according to the GC 5YHLS Report 2025.
- Eastern Parcels – outline planning permission for up to 4,500 dwellings approved in 2024 and being brought forward by RLW Estates. Anticipated delivery of 150-250 dwellings per year with first completions anticipated 2028 to 2030, according to the GC 5YHLS Report 2025.

The wider Waterbeach New Town site first appeared in the South Cambridgeshire Annual Monitoring Report 2012/2013. This first anticipated the first housing deliveries in 2026/2027. The Greater Cambridge AMR of 2024 confirmed when the first housing completions happened by March 2024, which is 2 years before initially anticipated.

Despite delivery being earlier than predicted, the table below sets out the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions at Waterbeach. This confirms that the anticipated delivery was updated in 2019, compared to when Waterbeach first appeared in 2012. In 2019, it was anticipated that 650 homes would be delivered between 2021 and 2024. However, only 25 homes have been delivered as of 2024 which equates to 3.8% and represents a significant shortfall in the anticipated quantum of homes planned for delivery.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	YEAR OF FIRST HOUSING DELIVERY	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTICIPATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
8,000 to 9,000 dwellings.	2021	2024	2 years	2 years	Anticipated	0	0	150	250	250
					Actual	0	0	0	0	25
					Difference	-	-	-150 / 0%	-250 / 0%	-225 / 10%

### **Bourn Airfield New Village**

Bourne Airfield New Village is allocated in the South Cambridgeshire Local Plan (2018) for a new village of approximately 3,500 dwellings and is subject to a site-specific Bourn Airfield New Village Supplementary Planning Document (SPD) adopted in 2019, following a 6-month consultation.

Outline planning permission was granted for 3,500 dwellings in July 2024 following submission in 2018. As of 2025, there have been no starts on Site and the agent has advised that a housebuilder is currently being onboarded to deliver the first 500 dwellings and expects the first RMA for 150-180 dwellings to be submitted in Q1 2026 with the first dwellings completed in Q2/3 2027, according to the GC 5YHLS Report 2025. This represents a potential 9-year period from submission of the outline application to first completions.

Despite the lack of progress on the Site, Bourn Airfield first appeared in the South Cambridgeshire AMR 2012/2013. This anticipated first housing delivery in 2022/2023. The latest position set out within the 2025 5YHLS report confirms that the delivery of the first units has now been significantly delayed until 2027/2028. The table below demonstrates that there have been no completions over the plan period. This represents a delay of 6 years after completions were initially anticipated.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	FIRST DELIVERIES	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTICIPATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
3,500 dwellings	2020/2021	N/A	6 years	Ongoing 2 years	Anticipated	0	0	25	100	150
					Actual	0	0	0	0	0
					Difference	-	-	-25	-100	-150

## **Cambourne**

Cambourne is a planned new settlement to the west of Cambridge, originally approved in 1996 for 3,300 new homes. The village is comprised of Lower, Great, West and Upper Cambourne. The first dwellings were delivered in Great and Lower Cambourne before the current plan period and are therefore not included within this note.

Cambourne West is allocated within the South Cambridgeshire Local Plan for 1,200 dwellings (SS/8).

Of relevance to the up-to-date housing supply position are the following sites as part of the wider Cambourne new village:

- West Cambourne – outline planning permission for 2,350 dwellings approved 2017 (LPA Ref. S/2903/14/OL) with first RMA in 2020 (LPA Ref. S/4537/19/RM) and first completions in 2021. This represents 7 years from submission of outline to first completions. West Cambourne is comprised of the following parcels:
  - Parcels 1.1a and 1.1b – (200 Dwellings) being brought forward by Vistry, with 190 dwellings completed between 2021 and 2024 with the remaining dwellings to be completed in 2025 representing a delivery rate of 50 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.2 - (190 Dwellings) being brought forward by Taylor Wimpey with 157 dwellings completed between 2021 and 2024 with the remaining to be completed in 2025 representing a delivery rate of 47.5 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.3a and 1.3d – (150 Dwellings) being brought forward by Vistry Group with 141 dwellings completed between 2021 and 2024 and the remaining to be completed by 2025 representing a delivery rate of 37.5 dpa, according to the GC 5YHLS Report 2025.
  - Parcels 1.3b, 1.3c, 1.3e, 1.4a and 1.4b (286 Dwellings) being brought forward by Taylor Wimpey with 128 dwellings completed between 2021 and 2023 representing a delivery rate of 64 dpa, according to the GC 5YHLS Report 2025.

- Parcels 1.5 – (41 Dwellings) being brought forward by Taylor Wimpey with planned completion 2026, according to the GC 5YHLS Report 2025.
- Parcel 2.1 – (118 Dwellings) being brought forward by Vistry with planned completion 2026, according to the GC 5YHLS Report 2025.
- Parcel 2.2b – (120 Dwellings) being brought forward by Taylor Wimpey with planned first completions 2026, according to the GC 5YHLS Report 2025.
- Parcel 3.2b – (122 Dwellings) being brought forward by Vistry with planned first completions by 2026, according to the GC 5YHLS Report 2025.
- Land within Business Park – (256 Dwellings) being brought forward by Hill and planned first completions by 2026 according to the GC 5YHLS Report 2025.
- Remaining parcels 2.3 and 3.2a – 203 Dwellings in Parcel 2.3 and 11 Dwellings in Parcel 3.2a with planned first completions in 2028, according to the GC 5YHLS Report 2025.

West Cambourne first appeared in the South Cambridgeshire Annual Monitoring Report in 2012/2013. This first anticipated housing deliveries in 2016/2017. Following this, the 2022 Greater Cambridge Housing Trajectory and Five-Year Housing Land Supply report confirmed that the first housing completions actually happened in 2021. Which is 6 years after initially anticipated.

Furthermore, the table below compares the five-year period 2019/20 to 2023/24 in terms of anticipated deliveries and actual completions for West Cambourne as Cambourne 950 is now complete. This shows that there has been a significant over delivery on West Cambourne from 2021 to 2024.

SIZE OF ALLOCATION	ORIGINALLY ASSUMED DELIVERY	DELIVERY OF FIRST DWELLING	OUTLINE DETERMINATION PERIOD	RESERVED MATTERS PERIOD	DELIVERY – ANTICIPATED VS ACTUAL	19/20	20/21	21/22	22/23	23/24
2,350 dwellings	2016/2017	2021	3 years	3 years	Anticipated	0	25	130	150	344
					Actual	0	93	263	200	588
					Difference	-	+68	+133	+50	+ 244

Your ref: EWR Non-stat Consultation 2024-2025  
Our ref: JB89167  
DD: [REDACTED]  
E: [REDACTED]  
Date: 24/01/2025

East West Rail Company  
The Quadrant  
Elder Gate  
Milton Keynes  
MK9 1EN

By email: [consultation@eastwestrail.co.uk](mailto:consultation@eastwestrail.co.uk)

Dear Sir or Madam

## **EAST WEST RAIL NON-STATUTORY CONSULTATION 2024-2025**

### **REPRESENTATION ON BEHALF OF BELLWAY HOMES LIMITED**

#### **RE: LAND SOUTHWEST OF COMBERTON, CAMBRIDGSHIRE**

We write on behalf of our Client, Bellway Homes Limited (“Bellway”), in response to your current public consultation relating to the emerging East-West Rail (“EWR”) proposals (Non-Statutory Consultation 2024-2015).

We are grateful for this opportunity to engage with you formally through this Non-Statutory Consultation process, which we note you are carrying out in order “to share emerging plans and obtain feedback on the early designs”<sup>1</sup>.

We are keen that our Client’s interest is taken into account, noting that “Feedback from this consultation will be considered as part of the ongoing design development to help inform our plans, which we will then present at our statutory consultation.”<sup>2</sup>

There are strong reasons why the track alignment and land-take for EWR should be reconsidered to the west of Comberton. This predominantly relates to Section 7 (Comberton to Shelford) of the route, although it is on the boundary of Section 6 (Croxtan to Toft). The changes to the route alignment would therefore include for changes within both sections.

### **Bellway**

Founded in 1946, Bellway has a passion for building exceptional quality homes in carefully selected locations, inspired by the needs of real families. An HBF 5-star builder, Bellway won ‘Large housebuilder of the year’ at the Housebuilder Awards 2023 and was also awarded ‘Best sustainability initiative’.

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<sup>1</sup> Frequently Asked Questions, November 2024, V1, page 2

<sup>2</sup> Frequently Asked Questions, November 2024, V1, page 2



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Bellway is an active developer of new-build homes in the Eastern Counties, including Cambridgeshire, Lincolnshire, Norfolk and Suffolk.

Bellway has an Option Agreement with the Landowner, K B Tebbit Ltd (represented by Bletsoes as Agent) in respect of Land Southwest of Comberton (Figure 1). Bellway therefore has a legal interest in the land and this representation should be considered in this context.

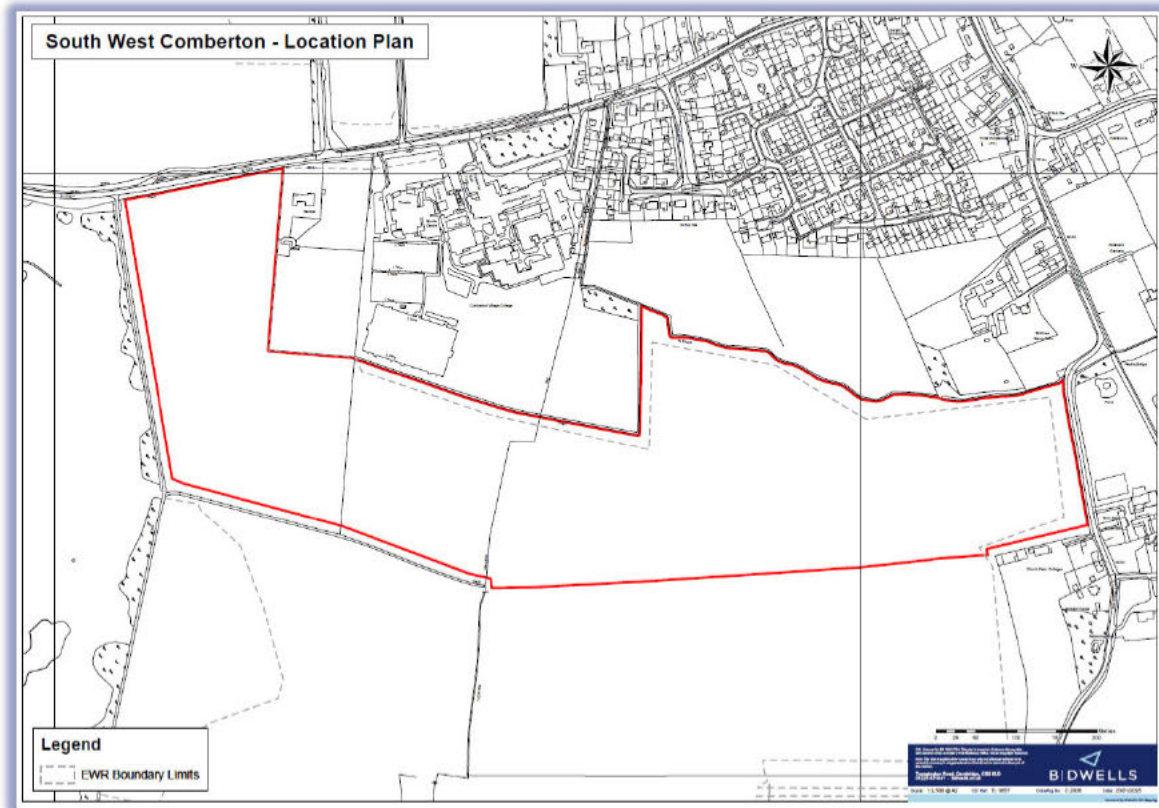


Figure 1: Site Location Plan

### Land Southwest of Comberton

The Site extends to 29.7ha and is located to the southwest of Comberton, adjoining South Street at the easternmost extent and West Street (B1046) at the northernmost. The Site is currently arable farmland, adjoining the Cambridge Meridian Golf Club and the Mill Field Toft Footpath to the west. A public footpath follows the southern boundary of the Site, providing access westwards into Toft and eastwards into Comberton. The Site is separated from the village of Comberton to the north by sports facilities associated with Comberton Village College (CVC) and farmland to the south of Kentings/Barrons Way residential area.

The Site lies within the administrative area of South Cambridgeshire District Council. The village of Comberton is identified in the South Cambridgeshire Local Plan 2018 (Policy S/9) as a Minor Rural Centre, sitting above the Group and Infill Villages in the settlement hierarchy. Comberton is a sustainable location for further residential development, with its own village college (secondary and sixth form education) in addition to the local primary school, pre-school provision, doctors, dentists, hairdressers and convenience shops. The Site occupies an excellent location for further village expansion. With direct access to the B1046, it provides good connections via the Greenway (cycle) network and benefits from a regular bus service which connects the village to Cambridge and Cambourne.

The Site lies within the Green Belt. However, it is not within a designated Conservation Area and does not contain any designated heritage assets. Located in Flood Zone 1, the Site is considered to be at a low risk of flooding.

The Site has been promoted for residential development since 2019, through the emerging Greater Cambridge Local Plan (“GCLP”). South Cambridgeshire District Council and Cambridge City Council are working together on the GCLP, which is a new Joint Local Plan which – once adopted – will form the new development plan for the area.

Occupying a sustainable location within a sustainable village, the Site has been promoted for allocation to deliver a residential development of approximately 550-600 new dwellings and associated infrastructure, including new public open space, sustainable urban drainage, pedestrian links and play facilities. A Concept Masterplan was submitted (Figure 2), in addition to a range of other supporting evidence.



Figure 2: Concept Masterplan, as promoted through the emerging Greater Cambridge Local Plan

Whilst the Site was not chosen for draft allocation in the ‘First Proposals’ in 2021 (first-stage Regulation 18 consultation document), there is a widespread expectation in the Greater Cambridge area that additional housing sites will be identified and allocated through the emerging GCLP. At the local level, baseline evidence was accepted by the Councils in early 2023 that demonstrates the need for higher housing and job numbers. Following this, the previous and current Government have set out a clear national policy for the growth of Cambridge (‘Cambridge 2050’), to include accelerated levels of economic and housing development in the Greater Cambridge area. In parallel, the updated National Planning Policy Framework (“NPPF”)(December 2024) includes for higher housing targets in both South Cambridgeshire and Cambridge City.

In short, whilst the Site is not allocated in the adopted development plan, it has excellent prospects for release through the emerging local plan and growth strategy for Greater Cambridge. It would form a sustainable extension to the existing village settlement.

**Non-Statutory Consultation EWR Proposal Impacts**

The alignment of the track that is shown in the Non-Statutory Consultation documents has a significant impact on our Client’s Site.

The Non-Statutory Consultation proposes that “After crossing beneath the B1046 Comberton Road, the route would pass to the east of Cambridge Meridian Golf Club in cutting for approximately 600m (660 yards) before emerging onto an embankment.”<sup>3</sup>

This said, both the Interactive Map and the Comberton to Shelford Route Detailed Drawing and Levels Plan (Drawing No. 133735-MWJ-Z0-XXX-DRG-CSE-700001Rev.P02) appear to show the track crossing the road rather than going under. This is unclear and confusing.

Despite this, the key issue here is that the proposed track alignment and associated permanent works (cutting, landscaping, maintenance access road, footpath overbridge, etc) occupy the entire western portion of our Client’s Site (Figure 3). In addition, construction and logistics works (temporary during the construction stage) is identified for the remainder of the Site (Figure 4).

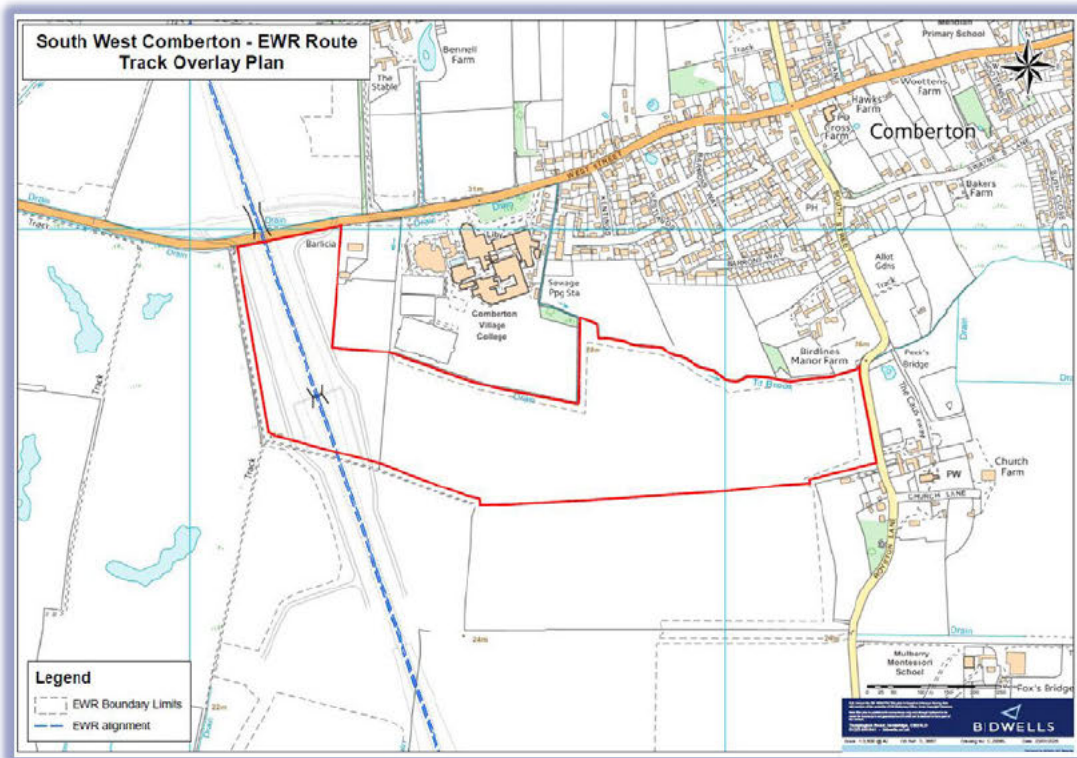


Figure 3: Overlay Plan showing EWR Track Alignment proposals and Client Site

<sup>3</sup> Technical Report V1, page 301

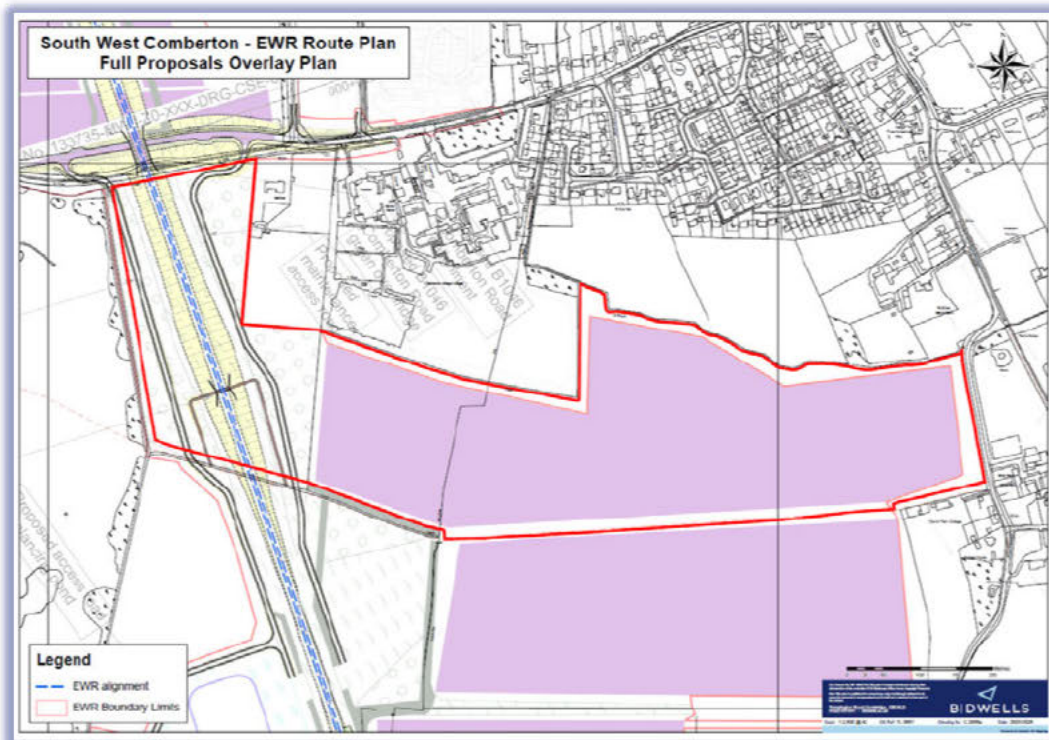


Figure 4: Overlay Plan showing Full EWR Construction Proposals and Client Site

As shown by Figure 5, below, the proposed track alignment creates a direct conflict with the proposed primary access into the Site from the B1046.

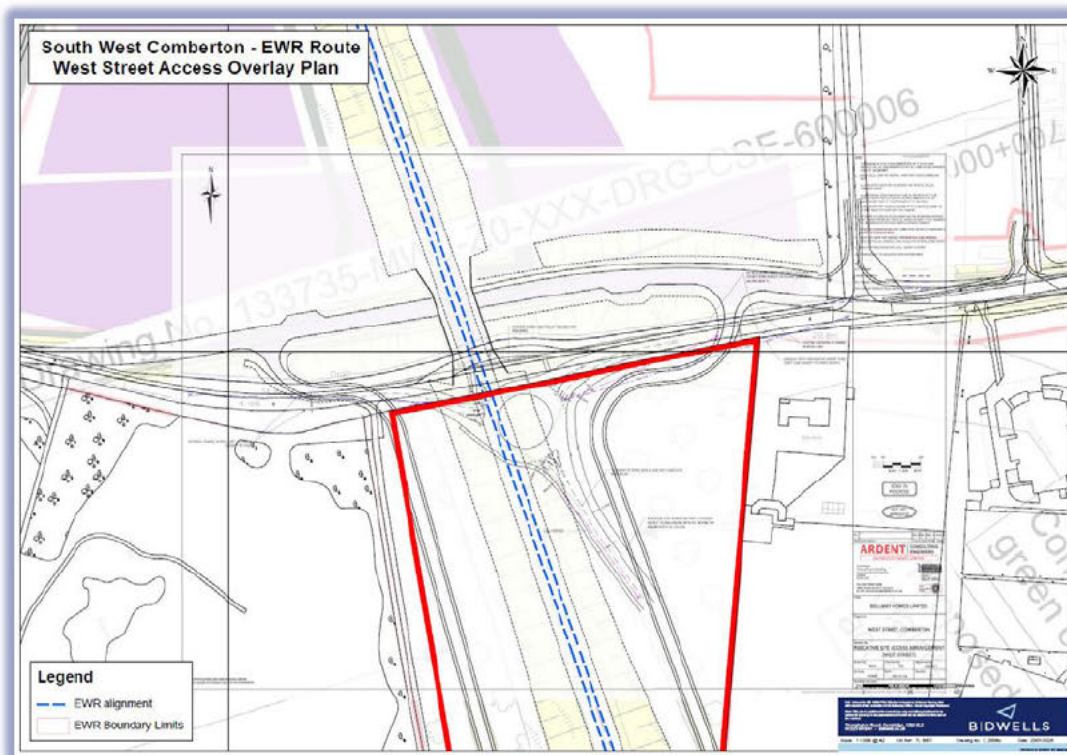


Figure 5: Overlay Plan showing EWR proposals and Clients Site Access

From the consultation documents available, and conversations with EWR Representatives at the Public Consultation Event in Comberton (10 January 2025), we assume that the detail of the proposed alignment between Toft and Comberton has been selected to avoid the existing settlement to the east (including Comberton Village College) and to avoid the Meridian Golf Club to the west. Hence the farmland in between has been selected as being of the lowest value. We note likewise in terms of construction approach that *“The proposed construction works and compounds would be predominantly located on existing farmland”*<sup>4</sup>.

Whilst a cursory desk-based mapping approach would indicate that the proposed alignment will follow the route of least amenity and lowest land value, we would highlight again that our Client’s Site is under Option Agreement for residential development. This represents a significantly different context to simply agricultural land. Figure 6 shows the direct impact of the current track alignment proposals on the Concept Masterplan for the Site.

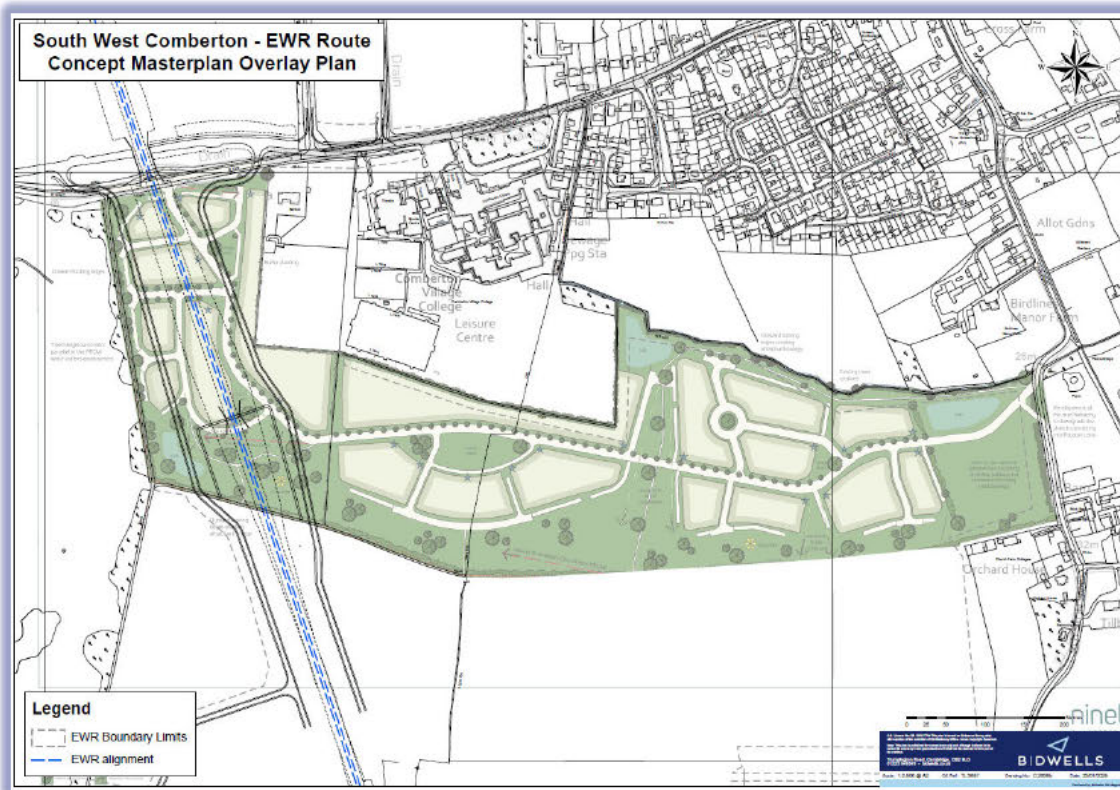


Figure 6: Overlay Plan showing EWR Track Alignment and the Concept Masterplan

### Response to EWR

As discussed above, the proposed track alignment, associated works and construction-stage requirements shown in the Non-Statutory Consultation documents would have a devastating impact on the future of our Client’s Site, Land Southwest of Comberton.

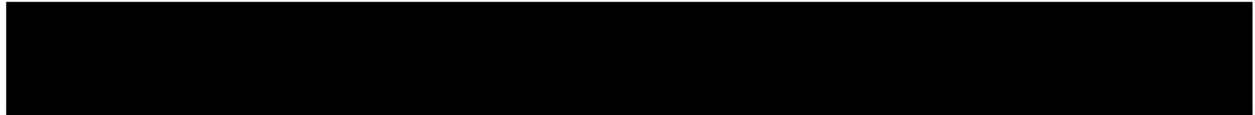
<sup>4</sup> Technical Report V1, page 304

The Site is under Option Agreement for residential development, having been promoted as a housing allocation in the emerging Greater Cambridge Local Plan since 2019 and with good prospects for future development.

Bellway strongly objects to the consultation proposals on this basis. Our Client objects to the alignment of the track and also the use of the wider Site as a construction compound. Our Client requests that EWR Company reconsiders the alignment of the track and location of construction compounds in this location.

Bellway considers that the railway should be aligned further west, transecting the Golf Course and avoiding our Client's Site. It should be an increased distance away from the existing houses and school on the western edge of Comberton.

Bellway request that the alignment is reviewed in the light of the above and enclosed information, including their Option Agreement and legal interest in the land.



Kind regards

