



GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS

Land to the North of Station Road West and East of Duxford Road,
Whittlesford

– Representation on behalf of landowners

Client and Landowner:

F. C. Butler Trust

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1. Representations on Land to the North of Station Road West and East of Duxford Road, Whittlesford

- 1.1 Cheffins has been instructed by the F. C. Butler Trust to promote their interests in 'Land to the North of Station Road West and East of Duxford Road, Whittlesford' (herein referred to as "the site").
- 1.2 We propose a phased development that will deliver approximately 250 dwellings of mixed type and tenure, including affordable housing and self-build plots, in a sustainable location proximal to major employment centres, and create attractive open spaces for the Whittlesford Bridge.

Site Location and Context

- 1.3 The site extends to 8.07 hectares and comprises greenfield land located within the built-up area of Whittlesford (currently classified as a Group Village). The site is located to the north of Station Road West and West of Duxford Road. The location of the site is shown on the site location plan, which accompanies this representation.
- 1.4 The site is located within the Cambridge Green Belt and any allocation for residential use at the site would have the effect of removing the site from the Green Belt.
- 1.5 The site can be access from two points, the first access to and from the site would be taken from Duxford Road. This section of Duxford Road is in the 30mph zone but adjacent to the 40 mph. Traffic calming measures are in place (as marked on the accompanying plan) which will not be impacted by the new access. Duxford is a straight and there is a high level of visibility in both directions.
- 1.6 The second access to and from the site would be via the access stub, included in permission S/0746/15/OL, shown in the indicative site layout plan, at the southern boundary of the site. This access would be contingent on the developer of this site implementing this development and once this is undertaken he/she is obliged, by legal agreement, to provide the relevant access.
- 1.7 The site is located wholly in Flood Zone 1 and there are no physical constraints that would prevent residential development coming forward on this site.

Comments on the Scoring Methodology and System

- 1.8 The performance of sites proposed for the Greater Cambridge Local Plan (GCLP) have been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the particular performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.
- 1.9 According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. It is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be addressed

through further detailed technical work or masterplanning. The current scoring matrix indicates deliverability issues where there are none. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the matter is unlikely to constrain development, then a green rating would be more appropriate.

- 1.10 Ultimately, the key question that needs to be answered by a site assessment would be, “is development of this site acceptable in planning terms?”. A revised scoring system based on the following key principles would be easier for stakeholders to understand a site’s suitability for development:
- **Red:** NO. This is a major concern which would likely result in planning permission being refused.
 - **Amber:** POSSIBLY. This is a potential concern for which there may be a design solution (i.e. further site-specific work is needed).
 - **Green:** YES. This is unlikely to be a significant concern or constraint on development.

Suitability for Development

- 1.11 At present, the proposed site is partially within the current settlement boundary for Whittlesford Bridge (as defined in the South Cambridgeshire Adopted Policies Map). However, the boundaries are due to be reviewed as part of the plan-making process for the GCLP, “with boundaries defined to take into account the present extent of the built-up area as well as planned new development” under proposed policy *S/SB Settlement Boundaries*. The site is well related to the existing settlement with the current development framework boundary bordering the site on two sides. The inclusion of the site would constitute a logical extension to Whittlesford Bridge and comprise a ‘rounding off’ of the settlement.
- 1.12 The site is located in a highly sustainable location, adjacent to the settlement framework for Whittlesford Bridge and in easy walking/cycling distance of local facilities and services, including Whittlesford Parkway railway station – only 100m from the site’s entrance.
- 1.13 We note that Whittlesford Parkway station has been subject to consultation by the Greater Cambridge Partnership¹, with proposals outlining investment into extensions of the station building and additional car parking spaces for the facility. At its meeting on 19 February 2020, the GCP Executive Board agreed to support a draft delivery plan for the Whittlesford Station Transport Investment Strategy as a basis for further engagement with key stakeholders.
- 1.14 The Partnership’s commitment to the improvement of Whittlesford Parkway Station will ensure that there is enhanced capacity for increased patronage. As such, residential development at Whittlesford Bridge is ideally placed if the goal is to maximise public use of the improved Whittlesford Parkway Station, and there is some guarantee that the enhanced facility will be able to accommodate additional footfall generated by such developments. We would emphasise that rail services are by far the most sustainable form of public transport and development should be situated in conurbations with rail connections (e.g. Whittlesford Bridge) to ensure that incoming residents can travel sustainably.

¹ Whittlesford Parkway Station Transport Masterplan. The Report was issued October 2021 with an addendum added January 2020.

- 1.15 The subject site was promoted in the Council's call for sites consultation in 2012 and was assessed by the Council under site 271 (Land adjacent to Station Road and Duxford Road). The SHLAA assessment states the following in respect of the principle of development at Whittlesford:
- 1.16 "A major attraction for choosing this area for housing development is the close proximity of the railway station which has services to Cambridge, London and intermediate stations. In addition, along its western boundary, a frequent bus service (approx. every 60 minutes) operates to Cambridge via Whittlesford and Sawston. The site is within walking and cycling distance of Duxford (1.5km), Hinxton (2.5k) and Whittlesford (1.5km). It has easy access to the A505 and M11, and fast links to international destinations via the rail service to Stansted Airport. A hotel with bar facilities lies close to the edge of the site, to the east of the railway station with an adjacent conference centre. The settlement of Whittlesford Bridge is within a few miles of several major centres of employment in the South Cambridgeshire region; namely: The Human Genome Campus at Hinxton, Science Parks at Abington and Babraham and Hexcel at Duxford."
- 1.17 This is a positive endorsement of the sustainability of the site and the principle of development proximal to Whittlesford. Whilst any development at the site would be determined on its own merits, we consider that the Council's own assessment of development in this location demonstrates that it meets the three strands of sustainability, as established in the National Planning Policy Framework. This means that development at the site would have far-reaching positive economic, social and environmental benefits.

Technical Assessment

- 1.18 Only limited work has been carried out to date in relation to the proposed development of this site, however, there is every reason to believe that an acceptable scheme could be devised which was sympathetic to the existing built forms of the settlement and nearby heritage assets. There are indications that safe and convenient accesses could be provided to the site, and no known highway capacity constraints.
- 1.19 The following sections outline how development of the site may impact locational factors assessed within a HELAA; the GCLP's traffic light scoring system is used as the basis for the suggestions outlined below.

Landscape and Townscape

- 1.20 It is clear that the site is not in an especially exposed location; existing built development bounds the site to the south and west, while the site's eastern boundary abuts the railway. This grants the site a strongly defined boundary. We do not anticipate any significant adverse impact on the countryside setting and Green Belt as a result of the development of the site. The outlined proposals constitute a proportionate, logical extension to Whittlesford Bridge's built form. Public open space provided through development could be located towards the northern boundary of the site, thereby mitigating any impact on the openness of the Green Belt, and the character and setting of the wider countryside.
- 1.21 Development of this site would have a limited impact upon the settlement character. The proposed development would constitute a logical continuation of Whittlesford Bridge as the site is bounded by existing residential buildings to the south and west. Local views are highly unlikely to be impacted by development as existing views are already limited by

Whittlesford Bridge's urban form. Indeed, the site could be enhanced by the development in combination with detailed landscape design measures.

- 1.22 Based on the above comments, we recommend that a 'Green' rating for landscape and townscape impacts would be appropriate.

Flood Risk

- 1.23 The site is located wholly in Flood Zone 1 and there is no evidence of surface water flooding. Appropriate drainage measures can be outlined during a planning application.
- 1.24 As such, we advise that the site receive a 'Green' rating for flood risk factors.

Accessibility to Services and Facilities

- 1.25 The proposed site is conveniently situated to make good use of the ample amenities in Whittlesford Bridge and other nearby settlements. The site would benefit from the amenities already present in Whittlesford Bridge, which includes local shops, a village veterinary practice, a hotel, cafés and restaurants, and the Whittlesford Parkway station – a train station which offers frequent, direct services to Cambridge, London, and Stansted Airport. Furthermore, the site is only a 15-minute walk or a 5-minute cycle from the core of Whittlesford which offers additional local services, including local shops and professional services, a post office, two public houses (The Bees in the Wall and The Tickell Arms), a village hall, a large park (The Lawn) containing playgrounds and sports playfields, a local church, and a primary school.
- 1.26 *The Settlement Hierarchy Study* (Appendix 1H of the Development Strategy Topic Paper) notes that Whittlesford Bridge is served by "good sustainable transport links" and, thus, "performed well using the sustainability scoring system". The site would benefit from existing bus services to Saffron Walden (via the 101 bus service) and Trumpington (via the 7A bus service), with the nearest existing stops being roughly 0.3 miles from the proposed southern access. The site's connectivity will also benefit from a new travel hub near the A11/A1307/A505, which will connect Whittlesford Bridge to multiple areas with key amenities and employment opportunities, including the Babraham Research Campus and Granta Park. Meanwhile, the site's active transport connectivity will benefit from the forthcoming Sawston Greenway (as envisioned by the South East Cambridge Transport scheme), granting residents safe access to services and facilities in Sawston and Cambridge by foot or bicycle.
- 1.27 In terms of the site's connectivity to major employment opportunities, the nearby Whittlesford Parkway station provides direct rail links to Cambridge and London, and international networks via Stansted Airport. Whittlesford Parkway station will also grant incoming residents direct access to Cambridge Biomedical Campus once the planned Cambridge South train station has been completed. The site is also a short distance away from Granta Park – a major business park that currently comprises 30 companies employing approximately 3,700 people. Permission has been granted for a 34,220m² expansion to Granta Park (ref: S/1110/15/OL), which will provide additional sites for research and development (R&D) and, subsequently, further employment opportunities to surrounding conurbations (e.g. Whittlesford Bridge).
- 1.28 Overall, the site has excellent accessibility to key local amenities, transport services, and employment opportunities. Development of the site would also provide a significant number of dwellings – including affordable and starter homes – proximal to public transport services and rapidly expanding employment hubs south of Cambridge. This would make commuting

via sustainable modes of travel a more viable option for incoming employees that move to the local area – an outcome sought after by proposed policy I/ST: *Sustainable Transport and Connectivity*.

- 1.29 However, notwithstanding this assessment, it is clear that the current scoring system is in need of updating. The scoring system needs to reflect changes in modern living and technological advancements, including increased homeworking, more widespread use of remote services (e.g. GP and pharmacies), increased online shopping (including groceries), and the growth in micro-mobility (e.g. e-bikes and electric scooters).

Access

- 1.30 The site can be access from two points, the first access to and from the site would be taken from Duxford Road. This section of Duxford Road is in the 30mph zone but adjacent to the 40 mph. Traffic calming measures are in place (as marked on the accompanying plan) which will not be impacted by the new access. Duxford is a straight and there is a high level of visibility in both directions.
- 1.31 The second access to and from the site would be taken from the 'reserved' access through the land subject to permission S/0746/15/OL. This application was made in outline with all matters reserved and the specification of the access would be confirmed through a reserved matters application. The road would be built to adoptable standards and it is reasonable to assume that at least 35 dwellings could be served via this access. Whilst construction of the proposed residential development at Lion Works, Station Road West has not yet commenced, the Council should note that outline planning permission was only granted in August 2018 and an application for reserved matters, including access, was only submitted in May 2021 (see ref: 21/02476/REM). However, it is reasonable to assume that the site could be implemented within 18 months and the access put in place in the meantime.
- 1.32 Masterplanning and design exercises are yet to be complete, however, provision of pedestrian and cycle access to and from the site would be achievable.

Transport and Roads

- 1.33 Whittlesford Bridge is very well connected in transport terms. The A505 runs to the south, the A1303 to the east, the M11 is 2km to the west and the A11 is 3km to the east. Whittlesford Parkway Station has connections to both Cambridge and London and is located approximately 100m from the site's entrance.
- 1.34 *The Settlement Hierarchy Study* (Appendix 1H of the Development Strategy Topic Paper) notes that Whittlesford Bridge is served by "good sustainable transport links" and, thus, "performed well using the sustainability scoring system". The site would benefit from existing bus services to Saffron Walden (via the 101 bus service) and Trumpington (via the 7A bus service), with the nearest existing stops being roughly 0.3 miles from the proposed access. The site's connectivity will also benefit from a new travel hub near the A11/A1307/A505, which will connect Whittlesford Bridge to multiple areas with key amenities and employment opportunities, including the Babraham Research Campus and Granta Park. Meanwhile, the site's active transport connectivity will benefit from the forthcoming Sawston Greenway (as envisioned under the South East Cambridge Transport scheme), granting residents safe access to services and facilities in Sawston and Cambridge by foot or bicycle

- 1.35 As part of an application, the applicant will consider the cumulative impacts onto the local highway network and any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.
- 1.36 As such, a 'Green' rating would be appropriate in this context.

Archaeology

- 1.37 An appropriate archaeological investigation strategy can be undertaken to assess the impact of development on any archaeological factors, which can be agreed with the Local Planning Authority. It should be noted that Cambridgeshire County Council's Historic Environments Team foresaw no archaeological detriment as a result of development on land directly adjacent to the site (see ref: 21/02476/REM).
- 1.38 As such, a 'Green' or 'Amber' rating would be appropriate in this context.

Historic Environment

- 1.39 The site is not located within any conservation areas. The closest heritage asset to the site – The Red Lion Hotel – is a Grade II listed building <200m from the site's southern access, but this is located on the opposite side of the railway. Therefore, it is highly unlikely that development of the site would have any detrimental impact on any heritage assets; indeed, detailed design measures could be implemented at the planning application stage to ensure the site's development has a positive impact on any heritage assets.
- 1.40 Considering the site's location and the mitigation measures that can be implemented through detailed design, a 'Green' rating in the context of historic environment factors would be appropriate.

Biodiversity and Geodiversity

- 1.41 The site is an arable field and, in itself, appears to be of low ecological value. There are no apparent priority habitats within the site, though vegetation along the site's boundary may be of ecological value. Development of the site could be designed in such a way that there is ample public open space, which would contribute biodiversity net gains. To mitigate any possible detriment to the environment and ensure that development can deliver a 10% net gain in biodiversity, ecological assessments can be undertaken as part of a planning application. Furthermore, consultations with Natural England can be undertaken to further ascertain how ecological impacts may be reasonably mitigated and further environmental benefits may be facilitated by the development.
- 1.42 Therefore, we recommend that the site be granted a 'Green' rating in relation to impacts on the site's biodiversity and geodiversity.

Air Quality

- 1.43 The site is not situated within an AQMA. We anticipate that the site will have a minimal impact on traffic if developed. Therefore, we advise a 'Green' rating for air quality factors.

Noise, Vibration, Odour, and Light Pollution

- 1.44 While the site may be impacted by noise and vibration caused by the nearby railway, these can be mitigated through a planning application. Matters of noise and vibration were considered on an outline planning application for a residential redevelopment of the Lion Works site – directly east of our proposed site – that will abut the railway (see ref: S/0746/15/OL). This application was approved with conditions in 2018. Therefore, similar to existing developments in Whittlesford that have been granted planning permission, a noise survey can be undertaken, and appropriate mitigation measures can be secured via planning conditions.
- 1.45 Based on the above, we advise that the site be granted a 'Green' rating in this context.

Contamination and Ground Stability

- 1.46 The site comprises greenfield land, so it is unlikely that significant contamination is present. Sites of this nature would normally receive a green rating in a sustainability assessment. If contamination was found, this should not preclude development as any necessary conditions can be applied at the planning application stage. Therefore, a 'Green' rating for contamination and ground stability would be appropriate for this site.

Site Density

- 1.47 The proposed development would deliver a density of 31 dwellings per hectare, implying a moderate-density development. A residential development of this density would deliver housing in a quantum needed to satisfy local housing needs. Considering the nature of the site, this density would allow the development to be compliant with the aesthetic of the surrounding settlement, as well as provide much-needed housing in a sustainable location.

The Proposed Policy Framework

- 1.48 The following section includes comments on the emerging policy direction as published in the Greater Cambridge Local Plan First Proposals.

Policy S/JH: New Jobs and Homes

- 1.49 The widespread promotion of Neighbourhood Plans (page 24) is likely to act as a constraint on development in the rural area. Research on the progress and effectiveness of neighbourhood plans² found that 55% of the draft plans published for consultation have 'protectionist' agendas and many are openly anti-development. Therefore, there is a likelihood that this agenda will create inevitable conflicts between the national aim to significantly boost housebuilding and local community NIMBYism. The idea of 'top down' housing targets being set by the local authority may also dissuade some areas from engaging with the neighbourhood planning process altogether.

Policy S/SB: Settlement Boundaries

- 1.50 Although much of the Greater Cambridge area has a dispersed settlement pattern, the draft plan does not support the 'organic' growth of smaller settlements. To ensure that local

² Turley Associates (2014). Neighbourhood Planning: Plan and Deliver?
Available at: [www.turley.co.uk/sites/default/files/uploads/news/Turley %20Neighbourhood%20Planning_March_2014.pdf](http://www.turley.co.uk/sites/default/files/uploads/news/Turley%20Neighbourhood%20Planning_March_2014.pdf)

housing needs can be fulfilled and prevent any further loss of key local services, a more flexible and tolerant approach is needed towards development in the rural area.

- 1.51 Through the application of tightly drawn settlement boundaries, development is strictly controlled on sites in the 'open countryside'. But it is not logical to treat all sites equally in policy terms. Although sites within sensitive valued landscapes and the green belt should receive a high level of protection, the sensitive development of some sites on the edge of a village would cause no significant harm (e.g. Whittlesford). Such a pragmatic approach is often taken at appeal; rounding off development where there is a defensible physical boundary or allowing a high-quality development with extensive landscaping that would soften an existing harsh area of built form can be acceptable in certain locations.
- 1.52 Furthermore, for Group Villages such as Whittlesford and Whittlesford Bridge, the current strategy to restrict developments to an indicative maximum of 8 dwellings (or 15 dwellings where this would make the best use of a single brownfield site) within settlement boundaries will not deliver the quantum of development required to meet the existing need for affordable homes or the projected need that could follow nearby business park expansions. As a result, the affordability crisis will deepen in the rural area. For example, to deliver 25 affordable homes within Whittlesford, a minimum of 63 dwellings will need to be permitted as part of major developments. With limited scope for development within the tightly drawn settlement boundary, it will be necessary to find suitable locations on the edge of the village. To discourage the development of less suitable sites and assist in the delivery of much-needed affordable housing, the most logical approach is to allocate further sites on the edge of sustainable settlements such as Whittlesford Bridge.
- 1.53 Overall, a carefully worded criteria-based policy which was supportive of organic growth adjacent to existing built-up areas should not perpetuate unfettered incremental growth.

Policy CC/NZ: Net Zero Carbon New Buildings

- 1.54 Draft Policy CC/NZ sets a high threshold of 150 homes for calculating whole life carbon emissions. Support should also be expressed for developments of <150 dwellings where this information is provided voluntarily.
- 1.55 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in a supplementary planning document (SPD).

Policy CC/WE: Water Efficiency in New Developments

- 1.56 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

Policy BG/GI: Green Infrastructure

- 1.57 The adoption of a green infrastructure standard should be a recommendation, not a requirement. Developments should not be opposed where all reasonable steps have been taken to protect and incorporate green infrastructure.
- 1.58 Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

Policy WS/HD: Creating Healthy New Developments

- 1.59 Health Impact Assessments should be a requirement for major developments only. For minor developments, this information should be optional or simplified, for example through the use of a short questionnaire (similar to the Cambridgeshire Biodiversity Checklist).

Policy GP/PP: People and Place Responsive Design and Policy GP/QD: Achieving High-quality Development

- 1.60 Firstly, it is unusual to have two separate policies on design.
- 1.61 It is accepted that good design is highly subjective. However, the planning system has allowed the steady homogenisation of built environments, with a dominance of bland, monotonous "identikit" housing estates from major housebuilders.
- 1.62 Design Guides/Codes are acceptable on large scale, strategic developments, but should not be imposed on smaller scale developments where other mechanisms, including parameter plans, can adequately achieve similar and proportionate outcomes. Local community input will also be as stated, and a robust consultation process will be needed since the 'devil will be in the detail'; these documents must go well beyond broad requirements for new homes to be 'in keeping' with the character and appearance of the area.
- 1.63 However, it will take time for these design guides to be drafted and adopted. In the interim, developers could be signposted towards an alternative framework, such as the National Design Guide, which includes 10 characteristics of a well-designed place: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan. Developments which can demonstrate a high standard of design should be fast-tracked through the application process.
- 1.64 Additional measures should be introduced for strategic scale development to avoid monotony. For example, the policy could introduce a minimum number of individual house types, appropriate to the scale of development.

Policy H/AH: Affordable Housing

- 1.65 The First Proposals plan sets a challenging target for affordable housing to reflect the acute and substantial need for affordable housing across Greater Cambridge. This places a great responsibility on all major developments to provide an element of affordable housing.
- 1.66 Policy H/AH will have a significant bearing on the viability of individual residential developments, so it is vital that the affordable housing requirement is achievable in practice. Although the First Proposals plan indicates that viability evidence will be reviewed as appropriate as part of the plan-making process, this is not sufficient. Planning Practice Guidance indicates that plans should set out circumstances where review mechanisms may be appropriate, as well as a clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of a development to ensure policy compliance and optimal public benefits through economic cycles. Draft Policy H/AH does not do this – changes in affordable housing tenure models or continued increases in build costs may render the viability evidence which underpins the affordable housing requirement out-of-date relatively quickly.
- 1.67 In relation to the development of Land to the North of Station Road West and East of Duxford Road in Whittlesford, consultation from the Greater Cambridge Housing Strategy Team on a recent planning application in Whittlesford (see ref: 21/02476/REM) indicated an existing need for 32 affordable dwellings in the village. However, this does not account for

projected housing needs that may arise from major expansions to employment hubs proximal to the settlement. Recent analyses of local property market dynamics indicate that affordable housing demands are still a focal concern for local authorities across the Greater Cambridge area. According to recent housing needs projections, an annual net need of 435 affordable rental units and 105 affordable units for homeownership³ will be needed across South Cambridgeshire to satisfy housing demands. Indeed, these projections do not account for local variegation in housing needs, which may be higher for conurbations closer to epicentres of business growth or those served by frequent public transport services (e.g. Whittlesford).

- 1.68 Dependence on the allocation of strategic sites with already high infrastructure burdens is unlikely to offer sustainable, long-term solutions to the chronic and worsening affordability issues manifesting across the Greater Cambridge area. Strategic sites alone do not deliver policy-compliant levels of affordable housing, so, if this is the target, more smaller sites that are far more likely to deliver a policy-compliant level of affordable homes at a faster rate need to be allocated.
- 1.69 Draft Policy H/AH of the First Proposals plan requires 40% affordable housing on sites of 10 or more dwellings. With a total of 250 dwellings proposed on **the site**, 100 would be sought for affordable housing under this policy (of which at least 25 will be allocated as 'First Homes' under the national First Homes initiative). As well as helping to address the current shortage of affordable housing over the Greater Cambridge area, the delivery of up to 100 affordable dwellings would represent a significant positive for the social sustainability of the region.

Policy H/CB: Self- and Custom-build Homes

- 1.70 The proposed policy approach will require continual updating of the self and custom build register(s) to reflect the permissions that have been granted with a self- or custom-build element. Close monitoring on sales and completions will also be necessary in case plots earmarked for self- or custom-build revert to market dwellings at the end of the prescribed 12-month marketing period.
- 1.71 It is also unclear if the current registers for Cambridge City and South Cambridgeshire are to be combined, with delivery of plots across the wider area. This would not be logical since many prospective self-builders will have preferred locations and few will have a search area as wide as Greater Cambridge. A more focused policy, perhaps split across the two administrative areas, would encourage the development of self-build plots in the right locations to meet local demand. For example, if all the need for plots was in and around Cambridge, it would not make sense to burden developers in other parts of the area.

Availability and Deliverability

- 1.72 The First Proposals plan is heavily reliant on the delivery of a handful of strategic developments, particularly large and complex sites which, on average, would take 5–8 years for the first home to be delivered⁴. To ensure that housing delivery does not stall, and the affordability crisis worsened as a result, a pipeline of smaller developments which can deliver homes quickly will be needed in the short-to-medium term. Our proposed site on Land West of 40 Station Road West in Whittlesford is suitable, available, and deliverable within 0–5 years.

³ GL Hearn (2021). Housing Needs of Specific Groups: Cambridgeshire and West Suffolk. Available at: <https://cambridgeshireinsight.org.uk>

⁴ Lichfields (2020). Start to Finish: What Factors Affect the Build-out Rates of Large-scale Housing Sites? Second Edition