

S/JH: New Jobs and Homes

Do you consider the Local Plan is:

- **Legally Compliant – YES**
- **Sound – NO**
- **Complies with Duty to Cooperate – YES**

We are writing on behalf of our client, Rosconn Group, with regard to Site: 115179 (HELAA Site: 40256) known as Land North of Pampisford Road, Great Abington. Our client wishes to **OBJECT** to Policy S/JH for the following reasons:

Firstly, policy S/JH should be read in conjunction with Policy S/DS, to which our clients have also raised an objection. The two policies are clearly interlinked and provide the overarching policy structure for future growth in the Greater Cambridge area.

While there is support for the objectives of the policy to deliver the objectively assessed housing need, given the scale of the new homes required at a minimum of 48,195 new homes, the proposed distribution of this growth and the over reliance on large sites, will undoubtedly result in a failure to deliver the step change in housing supply required by the NPPF, particularly in the short and medium term. This continues a trend within Greater Cambridgeshire that has stifled growth across the wider district to the detriment of those communities.

The draft plan seeks to address this matter through identifying levels of growth to be delivered within designated Neighbourhood Plan Areas. However, this is a superficial concession to the need to bring forward a range of sites include smaller and medium sized sites under para 73 of the NPPF.

We would contend that the plan should not rely upon Neighbourhood Plans coming forward as set in S/JH (5), as this limits growth to those areas that have been designated and are bringing forward, or are reviewing an existing Neighbourhood Plan. This therefore limits the geographical location and range of sites that can be delivered through this approach. We would argue the plan fails to tackle this issue directly by leading through example and would recommend that the plan directly allocate more smaller and medium sized sites, especially where there is no Neighbourhood Plan.

Furthermore, as set out in the policy commentary at paragraph 2.22, the Planning Practice Guidance makes clear that housing requirements for designated neighbourhood areas cannot

be binding, as Neighbourhood Plans are not required to plan for housing. Therefore, whilst the LPA has assessed housing requirements for the 27 designated Neighbourhood Plan areas, there is no mechanism to ensure that this identified need will be met.

We would encourage the LPA to revisit the Housing and Employment Land Availability Assessment and examine the availability of deliverable sites adjoining existing sustainable settlements. Such sites can make a positive contribution to the proportional growth of villages which will help to maintain the viability of existing services.

For example, Great Abington is a sustainable settlement, sitting at the heart of the Rural Southern Cluster adjacent to major business park and employment area of Granta Park, but it is not designated a Neighbourhood Plan Area and therefore does not have a Neighbourhood Plan in place, nor has one been advanced. The Former Land Settlement Association Estate is designated and has an adopted Neighbourhood Plan, and the housing requirement in Appendix D is only for 5 dwellings. The key issue is that there is no mechanism for growth which is essential for maintaining the vitality and viability of the existing settlement.

A Housing Affordability & Productivity report (June 2025) was undertaken by Homes England to assess the role of housing affordability in the context of economic growth and productivity. The report concludes that industrial clusters are important for driving productivity growth, however these clusters rely on local conditions. It was found that the industrial clusters which are responsible for driving productivity growth of a region, such as life sciences in Cambridge are place-based. They require the right local conditions to grow, which includes having access to the right talent which in turn requires affordable housing to be available to workers. The case study analysis also found that building houses in locations where there are growing industrial clusters that benefit from agglomeration effects is important. Analysis showed that productivity growth of key sectors is linked to increased inward migration, which leads to greater housing demand and a reduction in affordability.

The lack of availability for affordable housing could constrain the future expansion of the sectors and future productivity growth. Within the case study analysis, it was highlighted by stakeholders that the level of availability of housing was a key factor in whether businesses decided to relocate or stay in the area. It was noted that when housing availability was low, it was difficult to recruit skilled workers which could constrain future growth. It was concluded that building more homes in areas with growing sectors benefitting from agglomeration effects could support future growth. There therefore needs to be the delivery of affordable housing within close proximity to employment hubs.

The Greater Cambridge Growth Sectors Study (September 2024) prepared by Icenii identifies that Greater Cambridge has one of the least affordable housing markets in the country. The delivery of new housing is perceived as not keeping pace with employment growth – demand for housing is outstripping supply. The report highlights the requirement for affordable housing within easy access to workplaces is important to attract and retain workers across all sectors. Although workers in high paying roles can achieve home ownership, there are a diverse range of roles across the sectors including technical and entry level which need to be catered for.

The allocation of Grange Farm New Settlement will no doubt be argued as addressing the needs of the neighbouring settlements, but that is the long term prognosis, not the short or medium term, with the new settlement likely to take 7 to 10 years to start delivering the new homes needed to support the continued growth of employment at places like Granta Park and the Babraham research Campus.

The LPA should take a more proportionate approach to growth and directly allocate a greater number and range of small and medium sites, particularly around areas of planned employment growth.

Our client's site at Land North of Pampisford Road is situated on the edge of Great Abington (Site Id: 115179) is an ideal candidate for allocation to meet this need in the short term. This is a medium sized greenfield site which can accommodate approximately 40 dwellings and is in a sustainable location on the edge of the settlement. The HELAA Site Assessment (Site 40256) identified that the *“Development of the site has some potential policy constraints, but these could be overcome through the planning application process.”* The assessment also acknowledged that there is *“Adequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.”*

The HELAA supports our contention that this site is suitable, available, and achievable, and therefore deliverable. We contend that the site should be allocated to assist the LPA with meeting the aims of Policy S/JH. The site also has the benefit of being able to be built out quickly and so can make an early contribution towards meeting the housing needs of Greater Cambridgeshire.

The site is also in close proximity to the Granta Park life sciences development, and would provide much needed housing, including affordable housing, for employees working at Granta Park in a range of occupations.

In conclusion, Policy S/JH will exacerbate the delays in the delivery of housing and for that reason this policy is not justified, as it is not the appropriate strategy taking into account the alternatives, and will not be effective, failing to deliver the minimum level of growth over the plan period. The plan is therefore not sound, contrary to para 36 of the NPPF.

What changes do you think need to be made to the plan? Please try to be clear and concise as to what you would like this part of the plan to say:

If the policy is to retain a section setting out the housing requirement for neighbourhood areas, then an additional section should be added to include provision for housing in areas that are not neighbourhood plan areas. This could set out projected growth in other villages within the hierarchy and offer a greater structure to growth across the district.

We would request that the policy includes for growth in the village of Great Abington, a location that is not a designated neighbourhood area, and that the level of growth is proportionate to the existing settlement and responds to the availability of suitable sites.