

Policy S/DS: Development Strategy

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/DS for the following reasons:

Firstly, policy S/DS should be read in conjunction with Policy S/JH, 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.

The proposed Development Strategy is over reliant on large scale allocations. There is a failure to consider the need to distribute growth more proportionally across a range of sites throughout Greater Cambridge. The significant reliance on large scale allocations to deliver housing numbers is a risky strategy when compared to the alternatives, because such sites take longer to set up and start delivering new homes. Should this occur, it will be very difficult to maintain the delivery rates as set out in the LPAs housing trajectory in the short to medium term where there is already an over reliance on the existing new settlements delivering housing at the very optimum level every single year without fail. As recognised in paragraph 73 of the NPPF small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly.

By including a greater number of small and medium size sites in the development strategy there is a better chance of the strategy meeting the housing needs, particularly in the short to medium term, and reducing the risk of the LPA falling below its 5-year land supply requirement. We would contend that the Development Strategy should be amended to support a more proportional distribution of growth across Greater Cambridgeshire so that all areas can benefit from growth which will contribute towards the vitality and 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.

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.

NPPF Paragraph 85 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. NPPF Paragraph 86 states that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing. Therefore, if the Plan does not address the inadequate provision of housing around the employment sites it will not be consistent with the NPPF.

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 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 the Development Strategy. 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/DS 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:

Under point 2 e, In the rest of the rural area, the policy could be amended to recognise the role that villages play in close proximity to key employment centres such as Granta Park, and introduce a policy supporting growth in these locations to support the growth of these important employment areas; villages such as Great Abington that adjoins Granta Park.

Alternatively, under point 3, the policy could be amended, or an entirely new policy could be added to include for growth in Group Villages, or allocate development to support the economic growth of those areas not covered by the current strategy. If this policy is amended to facilitate growth in Group Villages, the Settlement Hierarchy policy and Development Extents policy, need to be altered to facilitate growth.

As we have highlighted, our clients' site at Land North of Pampisford Road is situated on the edge of Great Abington (Site Id: 115179) and is an ideal candidate for allocation through a change in policy.