

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

Ref: AD/26 SPEC

Number: [REDACTED]

Email: adam.davies@ceresproperty.co.uk

Date: 30th January 2026

Dear Sir/Madam

RE: Greater Cambridge Shared Planning – Regulation 18 Consultation January 2026.

Land at Freisland Farm in Swavesey

This letter has been prepared by Ceres Property on behalf of [REDACTED] the current owner of two parcels of land at Freisland Farm in Swavesey. We would be grateful if you could update the ownership details of the previously submitted site Land North of Home Close and West of Moat Way (Site ID 115342 and HELAA Site ID 40415) as well as the agent details to the following:

Owner

[REDACTED]

Agent

Adam Davies
Ceres Property
Council Offices
London Road
Saffron Walden
Essex CB11 4RL

Tel: [REDACTED]

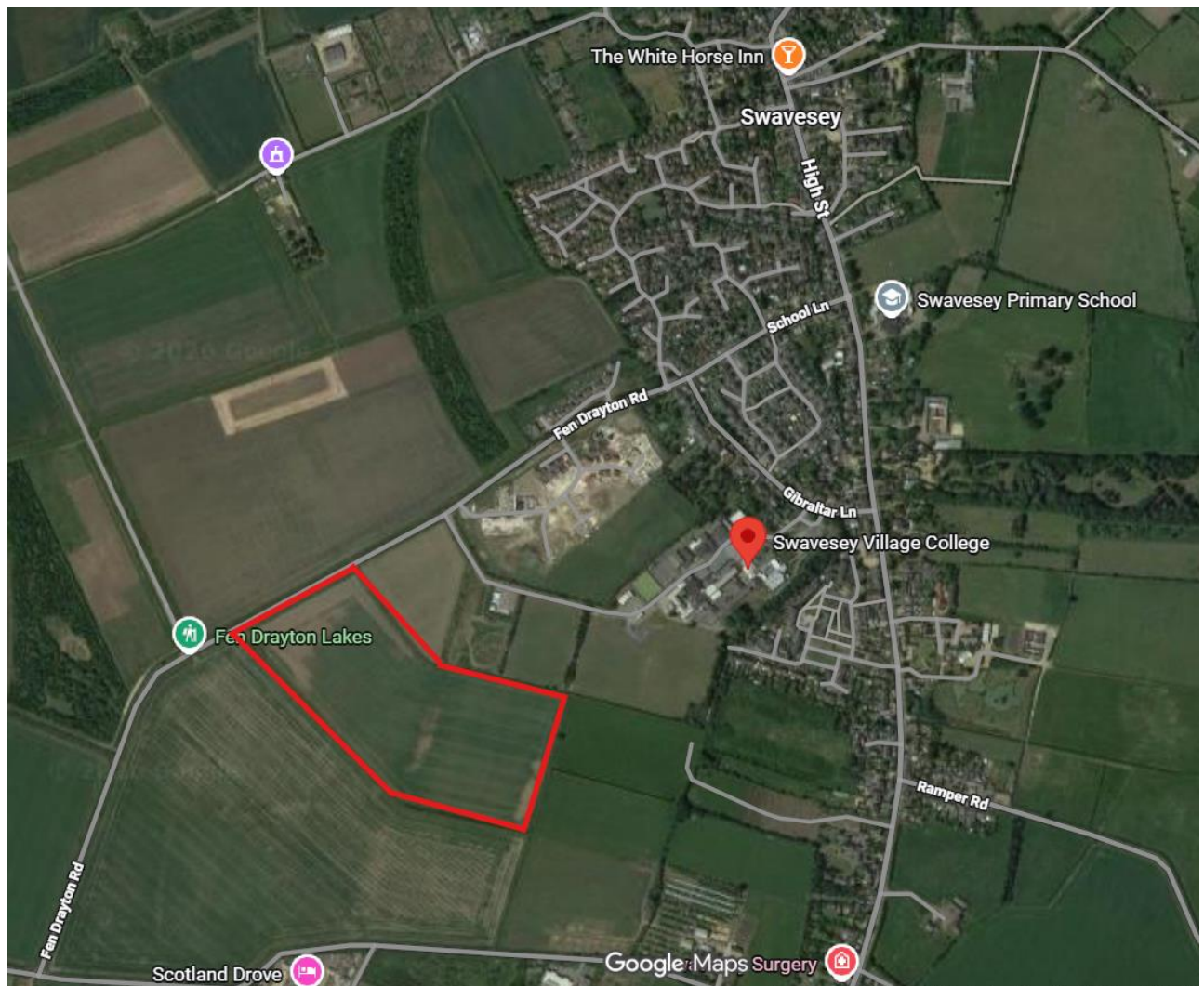
Email: adam.davies@ceresplanning.co.uk

THE SITES

This representation relates to three sites as follows:

Land on the south side of Fen Drayton Road, Swavesey (New Site)

A separate Site Submission Form has been prepared in respect of this new submission site; Land on the south side of Fen Drayton Road in Swavesey. This is a greenfield site which lies immediately to the south-west of the Swavesey Village College playing fields. While it doesn't adjoin the current settlement boundary which is the other side of the Village College it is extremely well related to the built-up area of the village. Unlike many of the other sites in Swavesey, which are constrained by the unsuitability of their access, heritage matters or fall within existing flood zones (which cover a large proportion of the settlement), it is not subject to any particular constraints.



Land on the south side of Fen Drayton Road

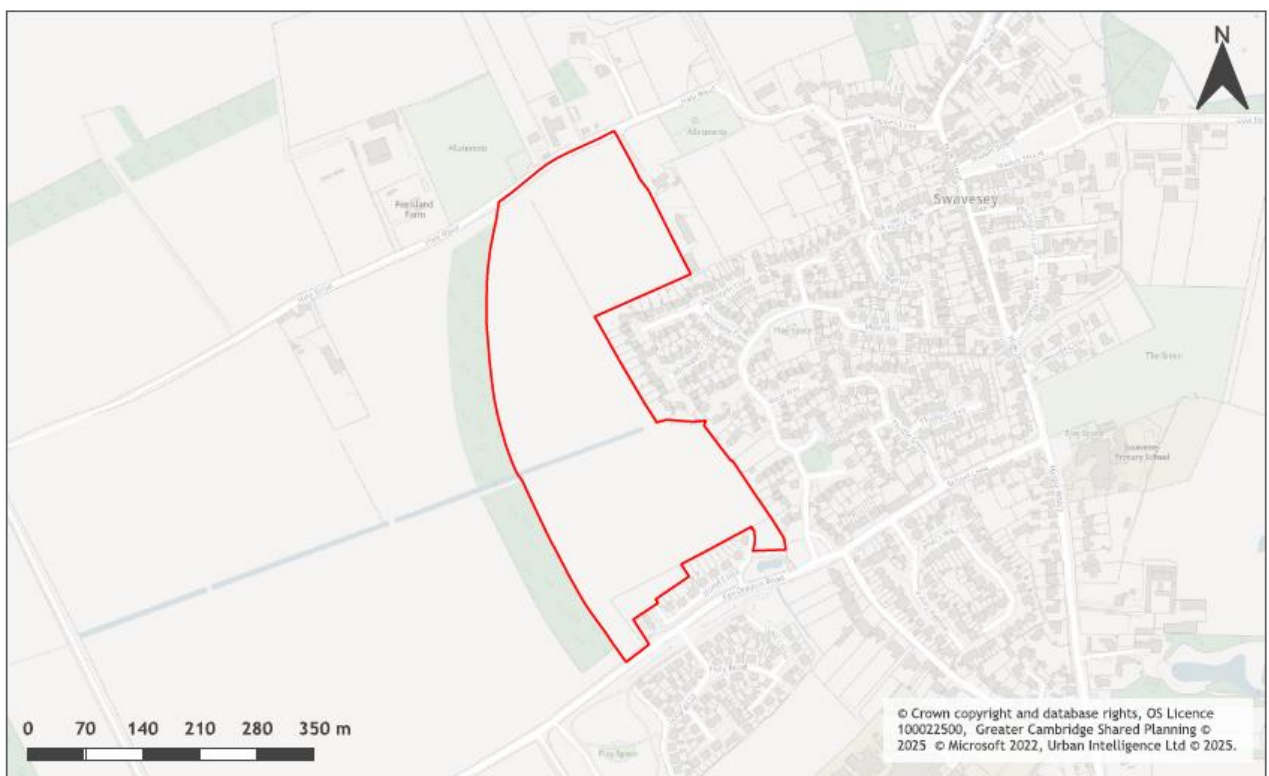
It is a flat site with no physical constraints which could be brought forward quickly to contribute positively to the Council's housing land supply, providing new homes in a sustainable settlement with good access to local services and facilities. Appropriate landscape planting and buffers can be planted along its boundaries to help its assimilation into the settlement edge and countryside beyond.

Land North of Home Close and West of Moat Way, Swavesey (Existing Site – 11.31 ha)

For clarity it might be better if this site were renamed to "Land North of Fen Drayton Road and South of Hale Road, Swavesey" as a new smaller part of the site is being put forward separately which reflects the extent of the site subject to planning application reference S/0525/17/FL which used the same name.

This site was put forward as part of the original Call for Sites and registered as follows:

- Land North of Home Close and West of Moat Way, Swavesey (Site ID 115342 and HELAA Site ID 40415)



A map of Land north of Home Close and west of Moat Way, Swavesey

This above site was put forward under the 2019 'Call for Sites' and assessed under the 2021 HELAA. It does not appear that it has updated since the original submission and no additional information has been submitted.

The HELAA Assessment (2021) identified the entire site to have an area of 11.31ha with a potential capacity of 176.

Under suitability the assessment gave the site an overall score of 'Red' despite the majority of individual subject scores being 'Green' or 'Amber'. The only item to be scored 'Red' was 'Landscape' which stated:

'Development of the site could be achieved in landscape terms if development were focused at the southern end of the site and an appropriate landscape strategy is put in place to mitigate impact on the surrounding rural landscape. However this part of the site is impacted by flooding therefore the site is unsuitable for development.'

This is an interesting comment because the landscape assessment has strayed into the realms of Flood Risk which was previously covered in the HELAA and whilst acknowledging parts of the site were in Flood Zones 3a or 3b, still scored the site 'Amber'. It is also interesting to note that the reasons for refusal associated with application reference S/0525/17/FL (referred to below) did not raise any concerns in respect of landscape impact.

The site sits within the urban context of the existing settlement with built development to the south, east the north. There is an established plantation tree belt that forms the western boundary giving the site an overall contained character. Acknowledging that it will be necessary for the allocation of greenfield sites to meet the housing needs, it is considered that the site should have been scored at least 'Amber' if not 'Green'. This assessment should therefore be reviewed.

In all other respects the site was scored to be both available and achievable, with a potential capacity of 170 dwellings with development completed within 6 to 10 years. This remains the case today.

Land North of Home Close and west of Moat Way (New Smaller Site – 4.73ha)

In 2017 a full planning application for the erection of 56 dwellings was submitted on the southern part of the site under application reference S/0525/17/FL. This followed an earlier approval of an affordable housing scheme on a section of the site frontage now built out at Home Close. The 2017 application was ultimately refused under delegated powers following the adoption of the current Local Plan in 2018 and an appeal was not progressed. As part of the technical evidence in support of that application, substantial work was done in respect of Flood Risk which demonstrated that a workable solution could be delivered for the site, which would also have positive benefits for existing housing in the village to east. The Environment Agency subsequently withdraw their original objections. The reasons for refusal appear to relate to the Council suddenly being able to demonstrate a five year housing land supply, on adoption of their new plan, and consequently the proposal being in conflict with the development plan and the 'tilted balance' no longer being engaged. Failure of the sequential test was also included, however, national policy has substantially shifted in a positive direction on this in recent years and provides greater clarity on the application of the sequential and exception tests.

The site is approximately 4.73ha with potential capacity of 56 dwellings. By comparison to previous Call for Sites submission this scale of development may be more appropriate and proportionate having regard to the scale of the existing settlement and other comments in the HELAA. In particular with

respect to 'Landscape', noting there was support for the development of this part of the site in the HELAA and there was no landscape objection to the previous application. A new Sites Form has therefore been prepared and submitted for this southern section of the previously submitted site.

COMMENTS OF THE REGULATION 18 DRAFT LOCAL PLAN

He comments in this response are provided having regard to the tests of soundness as set out within paragraphs 36 and 37 of the National Planning Policy Framework 2024 (NPPF).

The vision for Greater Cambridge set in the draft Plan to be a place where a big decrease in climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all communities, is supported.

However, to achieving this vision it is necessary for the adoption of a sound Local Plan to be based on ambitious targets for growth and to be positively prepared, justified, effective, and consistent with national policy (in accordance with the NPPF tests). As acknowledged in the Draft Local Plan (DLP), it is still very much a draft.

In its current form the DLP requires amendments to ensure that the level of growth and housing allocations reflect the Vision for Greater Cambridge as set out in the DLP and are aligned with the Local Growth Plan and National ambitions for the area.

Plan Period

The Local Development Scheme currently envisages adoption of the Plan in 2028 and the plan period is suggested to cover a period until 2045.

Paragraph 22 of the NPPF states that strategic policies should look ahead to a minimum of 15 years period from adoption to anticipate and respond to long term requirements and opportunities, such as those arising from infrastructure. Where large scale developments such as new settlements or significant extensions to existing villages or towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account of the timescale for delivery.

The emerging DLP proposes a number of new settlements and significant urban extensions, which make up the vast majority of growth in the plan. Table 2 of the emerging DLP sets out a housing trajectory for the draft allocated sites. All the larger strategic draft allocations have a growth trajectory that is well in excess of the plan period.

In October 2025 the Greater Cambridgeshire and Peterborough Combined Authority Board approved the Local Growth Plan which has a core ambition to double the size of the economy of the area by 2050. The Local Growth Plan looks ahead to 2050. The government has also set out their vision for growth in Cambridge (the 'Case for Cambridge') between now and 2050.

As part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will be

built on the Local Growth Plan and will include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028 when this DLP is due to be adopted.

There will be a requirement for the new Local Plan to align with the mayor's spatial strategy, particularly given they are both due for adoption in 2028, if it is not amended now it will be immediately out of date.

It is also relevant to note that, as a result of local government reorganisation, it is a distinct possibility that this will be the last Local Plan prepared to guide the growth and development of the Greater Cambridge area. It would seem sensible that the Councils take this opportunity to deliver a development strategy which reflects and supports the approach being taken at both the national the regional level and ensures that the area can maximise the benefits and opportunities available at the local level.

Therefore, to align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the plan, it is considered that the plan period should be extended to at least 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives. This amendment is required in order for the plan to accord with national policy and for it to be justified.

Policy S/JH: New Jobs and Homes

Policy S/JH, sets out that development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for: 73,300 additional jobs and a minimum of 48,195 new homes.

The level of employment and housing growth proposed over the plan period is underpinned by the Employment and Housing Evidence Update 2025 (EHEU 2025), which forms an evidence base document. The key driver for the proposed job and housing growth appears to be predicated mainly on how many jobs the government's mandatory minimum housing need calculation would support.

The Development Strategy Topic Paper includes three housing need scenarios; Standard Method, Central and High. For jobs, the EHEU 2025 identifies a "Central" most likely future jobs forecast. The Central forecast assumes growth of around 4,000 additional jobs per annum or more through to 2045. The EHEU 2025 also identifies a higher growth forecast, placing greater weight on what is described as '*rapid growth in the recent past*', particularly in key sectors, and recommended providing flexibility in employment land in case the market delivers more jobs than anticipated. For homes, the EHEU 2025 identifies that the outcome of the Standard Method for calculating minimum housing need, which increased significantly in 2024, would support the most likely forecast for future jobs.

It is argued that as the Standard Method figures broadly correlate with the Central (suggested most likely) job and housing projections, that adoption of these figures is appropriate. However, this level of growth does not align with either the Government's, or the Cambridgeshire and Peterborough Combined Authorities aspirations for growth within Greater Cambridge.

Paragraph 36 a) of the NPPF is clear that to be positively prepared, the Local Plan should '*as a minimum, seek to meet the areas objectively assessed housing needs.*' The standard method housing requirement should be a minimum starting point for housing growth. Therefore, it is unclear why the Development Strategy Topic Paper identifies housing figures that are marginally below the standard method requirements for both housing and job growth as a 'central growth' figure.

Paragraph 39 ID: 61-039-20190315 of the NPPG is clear that establishing the overall housing need should be conducted using the standard methodology unless specific circumstances justify an alternative.

The government's a vision for growth in Cambridge (the 'Case for Cambridge') between now and 2050 contains two ambitious growth scenarios; 100,000 new homes by 2050 to add £4.3 billion to the economy; or, 150,000 new homes by 2050 to add £6.4 billion to the economy. The current housing proposals fall way short of even the lower target.

The Local Growth Plan indicates that by 2050, to support its minimum growth aspirations would require a minimum of 214,760 dwellings to be delivered in the County during this timetable. The current draft Plan should be required to meet a reasonable proportion of this requirement as a minimum, which it currently would not.

As part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will build on the Local Growth Plan and include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028.

Paragraph 25 of the NPPF is clear that strategic policy making authorities should collaborate to identify strategic matters, which they need to address in their plans. They should engage with elected Mayors and Combined Authorities. Paragraph 26 of the NPPF then goes on to state that effective and ongoing joint working between strategic plan-making authorities and relevant bodies is integral to the production of a positively prepared and joint strategy.

In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging Local Plan is aligned to the Local Growth Plan and emerging Spatial Development Plan for Cambridgeshire. As a starting point, this will require that housing and employment growth is substantially increased to align with the national and regional objectives.

Policy S/DS: Development Strategy

Policy S/DS sets out the proposed strategy for the pattern, scale, and design quality of places created in Greater Cambridge, for the plan period to 2045 and beyond. This is one of the key strategic policies within the DLP.

However, as draft it places a very high level reliance on the delivery of growth across only four sites, all of which are 6,000 dwellings or larger in size, and all of which are predicated on significant infrastructure improvements. This approach results in substantial concerns regarding the likelihood of housing delivery being delayed, which is not unreasonable give past experience, as well as a lack of certainty around infrastructure funding and associated timing of delivery.

Based on the housing trajectory set out in the plan, the housing land supply position does not exceed 5.5 years within the plan period and upon adoption it is estimated to be 5.15 years. This is not considered to align with the growth aspirations for Greater Cambridge and, given the reliance on new

settlements and urban extensions, there is a good prospect that the 5 year housing land supply could easily slip below 5 years.

This does not align with the NPPF's objectives to significantly boost housing land supply.

CONCLUSIONS

In order to be considered as sound, the following key changes are required to the DLP:

- The level of housing and employment growth as set out in policy S/JH needs to be increase. It is imperative that housing supply is boosted to address the very acute housing affordability crisis in the area and to readdress the imbalance with job and employment growth. Higher housing and employment growth would align with the Local Growth Plan and the government's growth vision set out in the 'Case for Cambridge'.
- The Local Plan period should be increased to 2050 as a minimum, in order to align with the Local Growth Plan and to accord with the requirements of paragraph 22 of the NPPF.
- There is a clear need to increase the number of new allocated sites both to increase housing delivery and to ensure a suitable supply of sites. The current housing buffer of 6.5% is considered inadequate, particularly given that the vast majority of new allocated growth is limited to 3 new sites, all of which have substantial and complicated infrastructure requirements in order to be delivered.
- It is imperative that additional small and medium sized sites are allocated that can be delivered within the first 5 to 10 years of the plan period. This would significantly boost housing land supply and provide choice and competition for market land. It will also ensure that a continuous 5 year housing land supply can be maintained.

In summary, it is considered that there are substantial benefits with a more dispersing growth strategy to both support a thriving rural economy and the maintenance of services and facilities in the villages, which the current draft Plan has ignored, but also to maintain continuity of housing delivery.

In respect of our client's sites in Swavesey these are located adjacent to a sustainable settlement situated on the Cambridgeshire Guided Busway within the A14 corridor. They are suitable, available and could be developed relatively quickly without the need for any major infrastructure improvements. There are not any site-specific constraints for which mitigation cannot be delivered. Therefore in our opinion these sites, and similar sites in the other sustainable rural villages, should be allocated in the plan to help deliver the growth ambitions for Greater Cambridge in a timely and effective way.

We wish to stress the site owners desire to work collaboratively with the Council in respect of their proposed site allocations, and to emphasise the flexibility that exists in respect of this land, to respond to potential local development needs. Accordingly, we would welcome the opportunity for further

discussions with the Council with regard to these potential allocations and would be happy to provide any additional support/evidence we can offer to help bring them forward.

Yours sincerely



Adam Davies
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