

Local Plan Consultation  
Greater Cambridgeshire Shared Planning Policy Team  
South Cambridgeshire District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambridge  
CB23 6EA

29 January 2026

Dear Sir/Madam,

## **TERRA REPRESENTATIONS TO THE DRAFT GREATER CAMBRIDGESHIRE LOCAL PLAN REGULATION 18 CONSULTATION, DECEMBER – JANUARY 2026**

This document comprises Terra's representations to the above Regulation 18 Consultation. These have been prepared in relation to our land interests at **Land at Haden Way, Willingham**. The Site is currently subject to a live planning application for a Care Home (24/04119/OUT) which is awaiting determination.

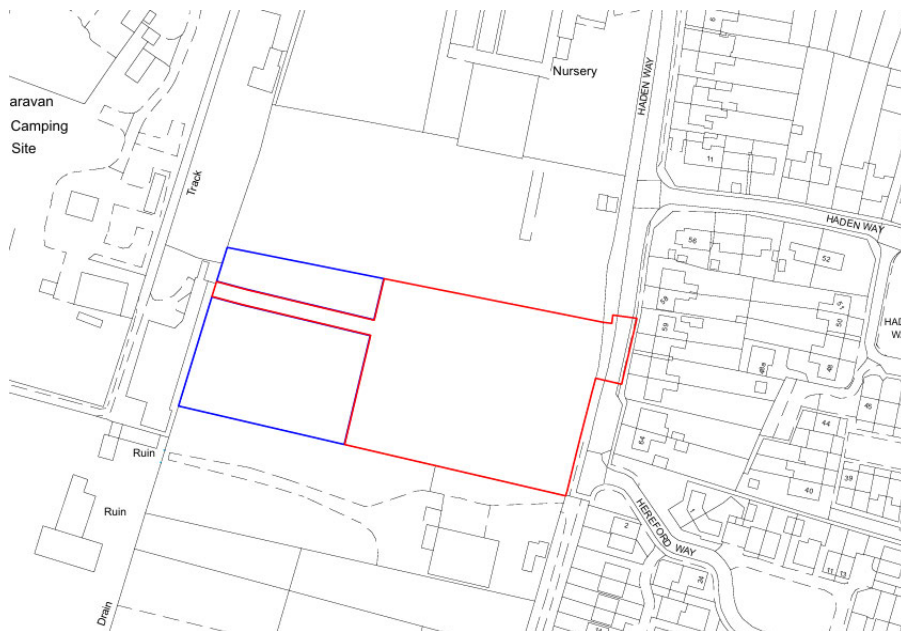
### **1. The Site – Land at Haden Way, Willingham, Cambridgeshire**

- 1.1 Terra land interests on Land at Haden Way is 1 ha in extent which is in agricultural use. Access to the Site is via a gate from Haden Way in the south east corner of the field. The Site is located to the western side of Haden Way, to the south western side of the village of Willingham. The Site is bounded to the north and south by existing commercial/ employment development. The Site's eastern boundary is formed by Haden Way and to the western boundary there is a mix of existing residential and employment uses as well as a Camping and Caravan Site, namely Alwyn Tourist Park.
- 1.2 To the eastern side of Haden Way, immediately opposite the Site there is established residential development. Planning permission was granted in 2017 for a residential development of 64 houses and an estate road, opposite the Site which is currently under construction. More recently, planning permission has been granted for 4 custom build homes immediately to the south of the Site, under Outline Application 24/02619/OUT, this has yet to be commenced.
- 1.3 The Site is not within a designated Conservation Area and does not contain any Listed Buildings. The Site is currently given over to grassland and not in any current use. The existing landscape features are limited to boundary hedgerow along the Site's frontage to Haden Way and along the Site's boundaries. There is an existing pedestrian footpath along the eastern side of Haden Way which connects to Over Road to the north and continues east on both sides of Over Road towards the village centre.
- 1.4 The Site lies immediately opposite the defined settlement boundary of Willingham. The Site is not within a designated Green Belt. The Site falls wholly within Flood Zone 1 and as such is not at risk from flooding. There are no ecological statutory or non statutory designations related to the Site or within 1km of the Site.
- 1.5 The Site is considered to be an appropriate small/ medium sized site which would be suitable to be allocated for a Care Home.
- 1.6 **Figure 1** shows the Site Location Plan and **Figure 2** shows the application Site Location Plan for the current Planning Application.

Figure 1. Site Location Plan



Figure 2. Planning Application SLP



## 2. Settlement Context – Willingham

- 2.1 Within the adopted Local Plan Willingham is identified as a Minor Rural Centre, Minor Rural Centres are identified as suitable locations to accommodate growth. Willingham is a medium size village located in South Cambridgeshire, to the west of the village of Over, to the south east of the larger settlement of Cottenham and Northstowe is approximately 3.2 km to the south, which is one of South Cambridgeshire's main new settlement where approximately 10,180 new homes and 20ha of employment development for office and research and development is proposed to take place.
- 2.2 Willingham is a sustainable settlement with a variety of employment, services and facilities including educational use, comprising of a primary school; leisure and recreation uses including a camping and caravan site and playing fields; community facilities, including Willingham Medical Practice with Pharmacy, Village Hall and Library, as well as a Co-op Supermarket, Post Office, Convenience store, Public Houses and Restaurants.
- 2.3 The village has good sustainable transport links given its rural location, with the nearest bus stop 250m from the Site on Over Road to the north. The 5A Service operates to Longstanton Park and Ride on a hourly basis. From Longstanton Park and Ride there is access to buses to Cambridge to the south east and Huntingdon to the north west, along The Busway. The guided Busway provides services operating every 10 minutes weekdays and 15 minutes at weekends. Cycle parking is provided at Longstanton Park and Ride.
- 2.4 The nearest railway station is located at Waterbeach Railway Station approximately 14km to the east with services to London Kings Cross via Cambridge to the south east and Ely to the north at half hourly frequencies, with hourly services to Kings Lynn.

## 3. Application 24/04119/OUT

- 3.1 An Outline Planning Application for a 65 Bed Care Home was submitted to South Cambridgeshire in September 2025. The application was accompanied with a full suite of Technical Reports which demonstrate that the Site is suitable for the proposed development, that there is a need for the Care Home in the area and that there are no technical constraints that would prevent the development coming forward as proposed.
- 3.2 The current layout for a 65 Bed Care Home as shown on **Figure 3** below.

**Figure 3 – Layout Plan for 24/04119/OUT**



- 3.3 Terra is currently working with Officers at South Cambridgeshire Council to advance the planning application to resolve the concerns of the LLFA and to reach a positive recommendation over the next few months.

## **RESPONSE TO GREATER CAMBRIDGESHIRE'S DRAFT LOCAL PLAN (Reg 18) CONSULTATION**

Terra welcome the opportunity to comment on the current Regulation 18 Consultation.

Terra welcome the plan period up to 2045 allows the two Council's to plan for a period of 15 years and beyond.

The below comments are made in response to the proposed Development Strategy and draft policies contained in the consultation document.

### **Section 2 Development Strategy**

There are a number of draft policies that require comments within the Development Strategy.

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

Terra supports the provision of a minimum of **48,195** new homes in the period up to 2045 to meet the objectively assessed needs in Greater Cambridgeshire.

It is noted that the current supply is cited as **37,865** with a requirement for **10,330** additional new homes to be identified as new allocations to meet the housing need.

Terra also support that within the total number of homes required, development will be provided to meet the need for specialist accommodation, including the needs for older people and people with disabilities. In this regard the supporting text to Draft Policy S/JH sets out that provision is to be made for **1,598** additional nursing and residential care bedspaces. This is supported in principle given the ageing population, the demographics of South Cambridgeshire which has seen a large increase in persons over 65 and national policy which sets out that there is a 'critical' need for all forms of housing for older people, including care home beds.

In terms of meeting the needs of older people and people with disabilities, the Plan proposes that this can be met within the existing commitments which include a number of standalone developments for specialist housing for older people as well as within the proposed strategic sites. It notes however that not all of this specialist housing are anticipated to be delivered in the plan period. If this is the case due to phasing and if the locations for specialist homes are located as part of wider/ larger proposals there is no certainty that they will come forward in the initial 5 year period or the plan period as a whole.

There is a need for the Plan to take a proactive approach given the pressing need for housing for older people. The PPG, **Planning Policy Guidance: Housing for Older and Disabled People**, emphasises that the need to provide housing for older people is 'critical'. People are living longer lives and the proportion of older people in the population is increasing. As set out in the PPG, offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.

The allocation of suitable sites for housing for older people would assist in meeting the critical and growing need that exists in Greater Cambridgeshire. In this regard the Plan should identify suitable small and medium sites for nursing and residential care provision. **Land at Haden Way, Willingham** is an appropriate Site to assist the Council in meeting its need within a sustainable settlement. The Site is available, technically suitable and sustainably located to assist the Councils in meeting their need for additional care bed spaces.

The existing live Outline Planning Application (24/04119/OUT) on the **Land at Haden Way, Willingham** demonstrates that a 65 Bed Care Home is deliverable on the Site. The application is accompanied with evidence of need within the Planning Needs Assessment for Elderly Care Home prepared by Carterwood. This concludes that the proposed Care Home will meet the market catchment need and that of the local planning authority area. The proposed Care Home will be capable of caring for residents of all dependency levels, including those who require dementia care within a specialised unit, with well-specified, flexible, care accommodation to enable care to be administered most effectively. Given the above and the live planning application, the Council should look favourably to allocating **Land at Haden Way, Willingham** for Care Home provision.

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

The proposed development strategy sets out where new homes and jobs identified in Draft Policy S/JH are to be provided to meet the visions and strategic priorities of the Plan.

The strategy is heavily reliant on carrying forward previous allocations from the adopted Plans. New strategic scale allocations are proposed (a) within the Cambridge urban area; (b) on the edge of Cambridge; (c) at New Settlements; (d) In the Rural Southern Cluster and (e) In the Rest of the Rural Area.

The remainder of the development needs are to be met at smaller sites within; a. Cambridge urban area; and b. the rural area, where further development is to be limited with allocations for jobs and housing focused on Rural Centres and Minor Rural Centres, and the settlement hierarchy policy providing for windfall development for different categories of village consistent with the level of local service provision and quality of public transport access to Cambridge or a market town.

National Policy sets out a requirement for small and medium sized sites to be identified to accommodate at least 10% of the overall housing requirement on sites no larger than one hectare, unless it can be shown that there are strong reasons why the 10% target cannot be achieved.

Allocations within a Local Plan take away some of the risk from a development by providing greater certainty of that site coming forward. Regard should be given to national policy outlined in Paragraph 73, which states:

***‘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. To promote the development of a good mix of sites local planning authorities should:***

- a) *Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.*
- b) *Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing.*
- c) *Use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
- d) *Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.*
- e) *Work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes*

The proposed Development Strategy should include an allowance for small and medium size sites in line with Paragraph 73 of the NPPF to ensure a mix of sites are provided for in the Plan. **Draft Policy HO6** of the draft NPPF published on the 16th December 2025 shows the governments intentions to support a diverse mix of sites setting out that Local Plans should:

- a. ***allocate at least 10% of the housing requirement on sites no larger than 1 hectare, and a further 10% on sites between one and two and a half hectares, unless there are strong reasons why these targets cannot be met; and***
- b. ***allocate sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services***

The supporting text to the draft Policy S/DS sets out Greater Cambridgeshire stance that allocating 10% of the housing requirement on small sites would need them to identify large numbers of small sites across the rural area which is cited as being extremely challenging, which would compromise their development strategy by directing a significant proportion of growth to less sustainable locations. The supporting text goes further, to suggest that the identification of the small sites requirement may also require more sites being released from the Green Belt, as well as suggesting it would be difficult to deliver the infrastructure needed to make the developments sustainable.

There are no strong reasons why the 10% target for allocating small and medium size sites cannot be achieved in Greater Cambridgeshire. This is a serious flaw of the current Consultation Plan.

By not including a diverse range and mix of sites, Greater Cambridgeshire’s Development Strategy conflicts with the NPPF and leaves the future supply of sites vulnerable. This will be based on existing commitments which have not delivered in the current Plan as anticipated, new allocations, which may face similar issues with delivery, and a windfall allowance which provides no certainty of coming forward.

The Draft Plan failure to include the allocation of small sites will also impact significantly on the vitality of rural communities preventing them to grow, thrive and support existing local services, which is a key objective of the NPPF and the emerging NPPF.

The Draft Plan sets out that villages should play only a limited role in meeting future development needs, as such only a limited number of smaller new sites are proposed to be allocated in what the Councils consider to be the more sustainable villages.

**Figure 12** shows the distribution of growth proposed in the Greater Cambridge Local Plan compared to previous Local Plans. The majority of growth, namely 44% is proposed to be allocated as New Settlements; whilst 29% is proposed on the edge of Cambridge; 11% at Cambridge Urban Area and only 16% to the Rural Areas. This is significantly less than previous Local Plans and would limit the growth of a number of villages across Greater Cambridgeshire.

Terra consider that a higher level of growth should be attributed to the rural villages to maintain their vitality, to support existing services and to ensure a suitable supply of homes, including specialist housing, is provided for in the rural areas.

Willingham is considered to be a sustainable village to take further growth given its population and the level of services and facilities it contains. **Land at Haden Way, Willingham** is an available and suitable site that is sustainably located for development to come forward as is proposed, for Care Home accommodation.

Our land interests at **Land at Haden Way, Willingham** are of an appropriate size to contribute to the small and medium sized housing site requirements, in line with the NPPF, which can assist the Councils to meet the needs for specialist elderly accommodation in a sustainable location.

### **Draft Policy S/SH Settlement Hierarchy**

This policy groups settlements into categories to reflect their scale, characteristics and sustainability and is used to guide development to the most sustainable locations. The policy also sets the scale of development for unallocated (windfall) sites that would be potentially be suitable in each category of settlement.

There are 6 Settlement Tiers proposed with Willingham is identified as a Minor Rural Centre, this is consistent with its current status in the adopted Local Plan.

The Consultation Document sets out that within Minor Rural Centres, residential development and redevelopment up to an indicative maximum size of 30 dwellings will be permitted within the defined development extents. There is no justification for the arbitrary figure of a maximum of 30 dwellings.

This limits the level of growth that the Minor Rural Centre could achieve and may also lead to less efficient use of land which would be contrary to national planning policy which requires proposals to make the most efficient use of land.

Terra consider that rather than an arbitrary figure, the level of development should relate to the character of the area and be of an appropriate scale to the size of the existing settlement, with any judgements made through the planning application process. Accordingly Terra requests that the maximum figure is deleted from this draft policy.

### **Section 4 - Climate Change**

A number of policies are proposed to seek to reduce the impact of development on climate change to assist the ambitions for Greater Cambridge to transition to net zero carbon by 2025.

#### **Policy CC/IW Integrated Water Management, Sustainable Drainage and Water Quality**

The proposed restriction on water use to 80 litres per person per day (LPPPD) in developments of 100+ dwellings, and 90-100 litres per person per day in developments of less than 100 dwellings is unduly onerous and is not consistent with national policy requirements.

By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day.

The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035.

Draft Policy CC/IW should be amended to reflect National Building Regulations Standards of 125 LPPPD.

## **Policy CC/FM Managing Flood Risk**

Terra are concerned that this Policy does not reflect the updated Planning Practice Guidance (“PPG”) (updated 17 09 2025) relating to sequential testing. Policy CC/FM states that development proposals will be supported where the sequential test has been passed. However, this is not in line with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175.

The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. Terra therefore request that this Policy be amended to reflect the updated PPG.

**Land at Haden Way, Willingham** is at a low risk of flooding due to its location being wholly in Flood Zone 1

## **Section 6 – Wellbeing and Social Inclusion**

### **Policy GP/HD Housing Density**

Terra supports the contention that for housing density to be appropriate it should reflect the local character and context.

Making the efficient use of land through increasing densities is an existing national planning policy requirement. The draft NPPF issued on the 16th December 2025 emphasises the need for intensification in appropriate sustainable locations through building on infill plots, building higher and at a greater density on corner plots and in the more sustainable locations. The emerging Local Plan should align with national policy in order to assist Greater Cambridgeshire in meeting their housing requirement.

Terra note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy’s design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy.

Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers.

## **Section 9 - Homes**

### **Draft Policy H/HM Housing Mix**

Terra supports the Council’s approach to securing a varied housing mix within new residential developments and welcomes the flexibility within the policy to allow for alternative mixes where this can be robustly justified. This balanced approach recognises the importance of responding to local housing needs and demographic trends, while also allowing schemes to reflect site-specific constraints, market demand and viability considerations. Such flexibility will help ensure that developments can respond effectively to changing housing requirements over the plan period.

### **Draft Policy H/SS Residential Space Standards and Accessible Homes**

Policy H/SS is in line with paragraph 135 (f) of the NPPF 2024, which states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

The requirement for all new residential developments to meet and wherever possible exceed, the residential standards set out in the Governments Technical Housing Standards – Nationally Described Space Standard (NDSS) is not supported by Terra. The requirement for NDSS compliance on all new dwellings is overly prescriptive and does not comply with National Guidance. In addition, this requirement is not supported by local evidence and would place additional financial burdens on developments which could affect viability of developments.

The policy also sets out requirements for accessible and adaptable homes requiring all new build houses to be designed in accordance with Building Regulations M4(2) standard, this is noted and in line with the separate legislation contained in Building Regulations.

On developments over 20 units, draft Policy H/SS sets out a requirement for 10% of the affordable units and 5% of the of Market homes to meet M4(3) regulations. This will have implications for the cost of development and as such could be a challenge for SME's delivering small to medium size developments. Accordingly, this should be an optional requirement, if viability allows for M4 (3) to be provided on a proportion of the units in a development. It is noted that exceptions to meeting both the M4(2) and M4 (3) will be taken into account if justification for site specific circumstances is provided however, Terra request that the policy should be drafted to include reference specifically to considerations of viability.

## Draft Policy H/SH Specialist Housing

Terra support the inclusion within the Local Plan of a specific policy relating to providing specialist housing (within both Use Classes C2 and C3) to support a variety of groups such as older people, disabled people and those that need specilaist supported housing. The policy could go further and allocate suitable sites for specialist housing as set out below.

There is a need for the Plan to take a proactive approach given the pressing need for housing for older people. The PPG, **Planning Policy Guidance: Housing for Older and Disabled People**, emphasises that the need to provide housing for older people is 'critical'. People are living longer lives and the proportion of older people in the population is increasing.

The allocation of suitable sites for housing for older people would assist in meeting the critical and growing need that exists in Greater Cambridgeshire. In this regard the Plan should identify suitable small and medium sites for nursing and residential care provision. **Land at Haden Way, Willingham** is an appropriate Site to assist the Council in meeting its need within a sustainable settlement. The Site is available, technically suitable and sustainably located to assist the Councils in meeting their need for additional care bed spaces.

**Part (2)** of the Policy sets out that Planning Permission will be granted for the development of specialist housing, subject to meeting a number of criteria. Part (b) set out that proposals are required to be supported by evidence of the demonstrable need for this form of development within Greater Cambridge. Terra consider that the need should be assessed on the basis of local need as well as a wider need.

**Part (3)** of the Policy sets out a requirement for Specialist Housing to be provided within the Development Extent of settlements, and subject to the Settlement Hierarchy (Draft Policy S/SH) with proposals for specialist housing outside of settlements only being acceptable where they meet the requirements of Policy S/DE: Defined Development Extents. This would therefore require all proposals for Specialist Housing such as Care Homes for the Elderly to be provided within the Defined Development Extents of a settlement, irrespective of need, and if the scale of development is restricted in a settlement, this would also restrict a specialist housing scheme being supported in principle.

Terras proposals for a 65 Bed Care Home on **Land at Haden Way, Willingham (Application 24/04119/OUT)** is located outside of the Development Extents of the settlement, with Willingham defined as a Minor Rural Settlement. The need for Elderly Care Homes is fully evidenced within the Planning Need Assessment, Eldery Care Home Report prepared by Carterwood which accompanies the Outline Application. The Planning Need Assessment is enclosed as **Appendix I** to these representations.

The Need Assessment is based on a 5 mile market catchment as well as the South Cambridgeshire District Council Local Authority Area. The need for the 65 Bed Care Home on Land at Haden Way, Willingham is clearly evidenced in the report given the need for:

- 45 minimum market standard bedrooms (including 90 dementia beds) in the market catchment area and 91 in the South Cambridgeshire District local planning authority area (including 248 dementia beds) and
- Care homes beds providing full ensuite wetrooms for 295 beds in the market catchment and 498 in the local authority area (including 135 and 300 dedicated dementia beds, respectively)

The Planning Need Assessment Report also concludes that there are no planned new care bed in the market catchment, that the shortfalls are expected to increase to 169 and 284 minimum market standard beds in the two catchments by 2037, which reflects the sustained and escalating nature of the need.

Terra consider that the wording of Part (3) of Draft Policy H/SH should reflect national planning policy and PPG 'Housing for Older and Disabled People' which sets out that the need to provide housing for older people is 'critical' which includes a need for all forms of housing for older people, including care home beds. In this regard the draft NPPF published on the 16 December 2025, contains Draft Policy H09: which deals specifically with the provision of Specialist Forms of Accommodation. This shows the governments commitment to the provision of specialist housing, such as elderly provision, to meet needs provided the living conditions and access to services are appropriate to the needs of the residents and users.


On the basis of the above, Part (3) of draft Policy S/SH should remove reference to such developments being in line with the defined Settlement Hierarchy and Development Extents as this would prevent suitable schemes coming forward where need has been fully demonstrated.

## **Conclusions**

Terra requests that these representations are taken into account in the preparation of the next stage of the Plan.

**Land off Haden Way, Willingham** is readily available and a 65 Bed Care Homes is deliverable within the desired timeframe as is evidenced in the current Outline Planning Application (24/04119/OUT) on the Site.

Terra recommend that the Councils include Land at **Haden Way, Willingham** within the emerging Plan as an allocation for Specialist Elderly Accommodation.

I trust that you will find the above acceptable, if you require any further information please do not hesitate to contact myself or my colleague 

Yours Sincerely,

