



**WRITTEN REPRESENTATIONS TO
GREATER CAMBRIDGE SHARED
PLANNING**

**DRAFT GREATER CAMBRIDGE
LOCAL PLAN**

**LAND AT BROAD LANE,
COTTENHAM**

**ON BEHALF OF WOOLSINGTON
ONE LTD**

29 January 2026

Our Ref: S&R015

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1 INTRODUCTION

1.1 Background

- 1.1.1 Claremont Planning is instructed by Woosington One Ltd to prepare and submit representations to the Regulation 18 consultation on the draft Greater Cambridge Local Plan in respect of the land under their control located at Broad Lane, Cottenham. Woosington One Ltd are now the promoters of identified site at Cottenham.
- 1.1.2 The latest version of the Local Plan that is now published for consultation follows on from the previous 'First Proposals' consultation that was held in 2021. The draft Local Plan seeks to build upon the sites already identified in the adopted Local Plans for Cambridge City and South Cambridgeshire whilst identifying additional sites for development with a focus on maximising the use of previously developed land, safeguarding the Green Belt and the region's villages.
- 1.1.3 These representations identify fundamental concerns regarding the ability of the Draft Local Plan to deliver a sound and justified strategy for growth across the Greater Cambridge area. These representations will identify that the proposed housing requirement identified by the Draft Plan falls approximately 240 dwellings short of the Government's standard method housing requirement, whilst the spatial distribution of growth proposed is overly concentrated on Cambridge and the urban areas immediately surrounding it, undermining the Council's own Plan objectives of achieving balanced and inclusive growth.
- 1.1.4 These representations will also identify concerns with the evidence base supporting the draft Plan, in particular the assessment of the land promoted by Woosington One Ltd at Cottenham. The conclusions reached are considered to misrepresent the site, and has resulted in the site being discounted inappropriately, and should be reconsidered along with the review of the draft Plan as a whole to ensure that consistency with the Framework and soundness requirements.
- 1.1.5 Given the importance of Local Plan documents in determining the framework for future development across Greater Cambridge, it is respectfully requested that Artificial Intelligence tools are not used to review and summarise the content of these representations. It is considered that this will undermine the statutory Local Plan preparation process and fail to adequately consider the issues presented.

1.2 Scope of Submission

- 1.2.1 These representations provide an overview of Woosington One Ltd's promoted site located off Broad Lane, Cottenham. The structure of these representations follows that of the Draft Local Plan document and includes consideration of the emerging Plan's themes, before continuing to address the emerging development strategy proposed by the Plan. The content contained within the thematic policies is addressed at Chapter 5 of these representations, whilst a response to the updated Housing & Economic Land Availability Assessment of the promoted site is provided at Chapter 6. The key recommendations and conclusions of these representations are provided at Chapter 7 of this Report.

2 LAND OFF BROAD LANE, COTTENHAM

2.1 Site Context

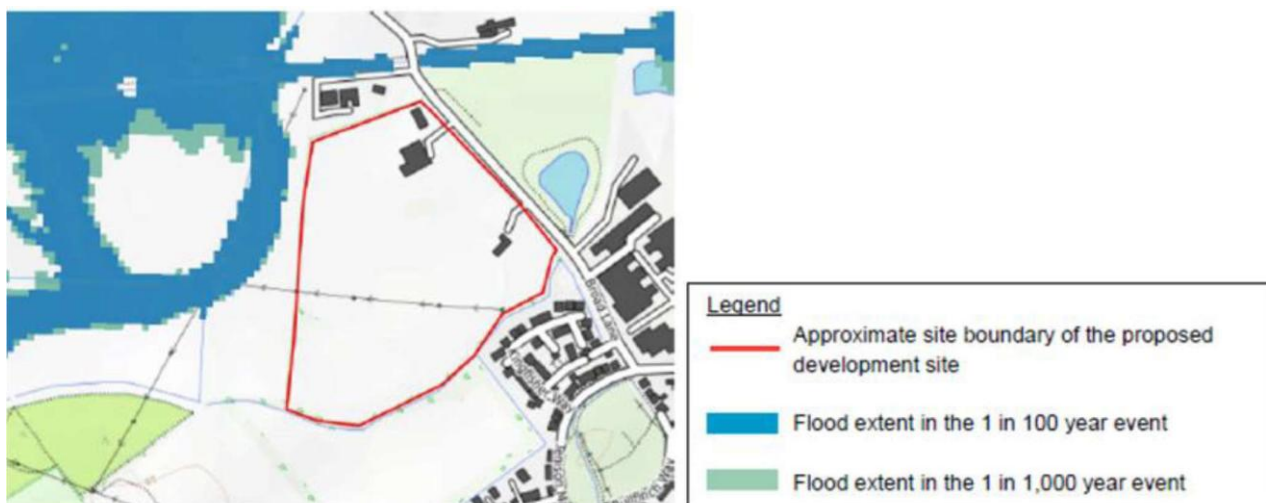
- 2.1.1 The promoted site extends to approximately 3.5 hectares of land located to the north of Cottenham. The extent of the promoted site is confirmed by the Site Location Plan provided at **Appendix 1**. Located to the west of Broad Lane, the site relates well to the existing development framework for the settlement with established residential development located immediately to the south of the site at Kingfisher Way.
- 2.1.2 Committed developments at Cottenham, located off Rampton Road will cumulatively deliver an additional 410 dwellings at the settlement, as approved under planning application references 21/01881/REM (140 dwellings) and S/2413/OL (270 dwellings) will further contribute towards establishing a developed context for the promoted site that will assist in containing the landscape impact of any future development delivered on the promoted site. These committed developments also assist in establishing a direction of growth for future development at Cottenham, establishing a precedent for the further expansion of the settlement to the north.
- 2.1.3 Cottenham benefits from a good local service base which includes a pharmacy, a Co-Operative food shop, a village hall, and a small college. These local services are principally concentration along the High Street and Lambs Lane within the village centre, and are accessible from the promoted site off Broad Lane within a 15-20 minute walk. The 8, 8A and 110 bus routes also operate along the High Street and Lambs Lane and provide services to Cambridge via Histon and Impington, approximately every 30-45 minutes.

2.2 Promoted Site

- 2.2.1 The eastern part of the land west of Broad Lane is occupied by a single storey L-shaped stabling block and a fenced manège associated with the established riding school use of the site, with paddocks comprising the remainder of the site area to the west. The boundaries of the site are defined by trees and hedgerows. This vegetation is sparse along the site's Broad Lane frontage, but becomes more established along the southern and western boundaries of the site. It is envisaged that any residential development of the site would seek to retain the existing mature vegetation along the southern and western boundaries which would assist with the achievement of statutory biodiversity net gain requirements whilst also a landscaped buffer that would screen longer range views of the site from the west.
- 2.2.2 The promoted site contains no designated heritage assets, and the nearest listed buildings are located within Cottenham Conservation Area, which is approximately 250m to the south of the site. The site is also unconstrained by Tree Protection Orders.
- 2.2.3 The site benefits from an existing access located off Broad Lane, associated with the established riding school use of the site which is capable of being upgraded to provide a safe and suitable means of vehicular access to serve any future residential development of the site. In respect of pedestrian access, the site presents an opportunity to provide connections into the Public Right of Way network whilst works to widen Broad Lane and the potential for a new Traffic Regulation Order to extend the 30mph zone past the site access are also achievable as part of any development realised on the site.

2.2.4 It is acknowledged that the Environment Agency's Flood Map for planning presently identifies the site as being located within Flood Zone 3. However, the Flood Map does also identify that this location benefits from strategic flood defences at the New Cut Drain and Cottenham Lode. The Environment Agency commissioned a model to represent the flood risk more accurately in the area, known as the Lower Ouse old west model 2015. The EA's preliminary results from this model indicated that the site was not influenced by surface waters or functional floodplain, and was defended as illustrated by the extract of the 2015 model below:

Figure 2.1 – 2015 EA Lower Ouse old west Model Extract:



2.2.5 A more accurate assessment of the hydraulic modelling over the site has established that the current modelling utilised by the Environment Agency is not representative of the potential fluvial flood risk over the site. Importantly the current flood risk maps of the site issued by the Environment Agency do not take account of existing flood defences, as was taken into account through the 2015 model. It is considered that whilst there remains some areas of Flood Zone 3 and therefore areas of high risk of fluvial flooding, the renewed modelling suggests that **a substantial area of the site actually falls within Flood Zone 1.**

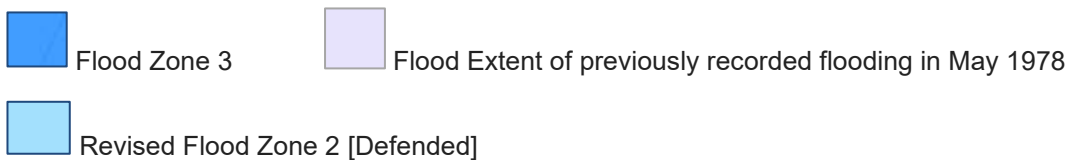
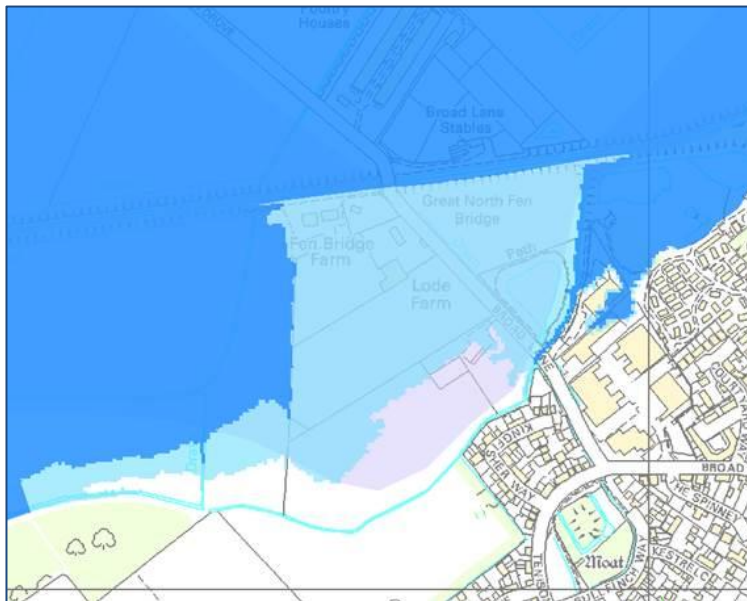
2.2.6 Following re-assessment of the modelling using a defended scenario, along with an additional 35% risk factor added to the calculation to recognise increased risk associated with climate change, approximately 3.5ha of the site is deemed as developable and outside of Flood Zones 2 or 3. The site specific modelling therefore demonstrates that part of the site is suitable to accommodate development alongside the potential for flood mitigation works on the remaining area.

2.2.7 The site-specific hydraulic modelling study undertaken by WSP demonstrates that the EA Flood Map for Planning is not wholly representative of the potential fluvial flood risk to the Site, particularly with respect to the existing flood defence that the Cottenham Lodes provides. A challenge of the flood map was initiated with the Environment Agency in 2022 and is ongoing through which the Environment Agency has identified the flood map below as a truer representation of the site's flooding influence.

Figure 2.2 – Extract of WSP Model for Cottenham



Figure 2.3 - Extract of EA Revised Flood Mapping 2022 in response to Flood Map Challenge



2.2.8

This latest modelling and site specific assessment is more up to date than the modelling relied upon for the Cottenham Neighbourhood Plan and Environment Agency as illustrated by the Environment Agency Map at **Appendix 2**. The site should not be identified within the extents of Flood Zone 3 and is considered appropriate for residential development, in accordance with the NPPF and PPG.

3 LOCAL PLAN THEMES

3.1 Local Plan Themes

3.1.1 The introductory chapter to the Draft Local Plan identifies the four key themes; climate change; biodiversity and green spaces; wellbeing and social inclusion; and great places; which underpin the Draft Plan's strategy.

Theme 1: Climate Change

3.1.2 The climate change strategic priority seeks to transition Greater Cambridge to net zero carbon by 2050, by ensuring that development is sited in places that help to limit carbon emissions and is designed to the 'highest achievable' standards for energy and water use.

3.1.3 The supporting text to this priority identifies that the emerging spatial strategy has been informed by carbon assessments that have highlighted the impact that transport emissions can have on the climate. This part of the strategic priority is supported in principle and is considered to be consistent with Paragraph 110 of the National Planning Policy Framework (the Framework) which promotes the management of growth to concentrate significant development on locations which are, or can be made, sustainable. However, these representations will identify that Paragraph 110 of the Framework has been misapplied through the refinement of the spatial strategy, which seeks to heavily restrict new development at the rural settlements within the region and instead is proposing to concentrate growth to within, or adjacent to, the Cambridge Urban Area and at new settlements. Paragraph 110 of the Framework is clear that significant development should be directed to sustainable locations, but requires recognition that the opportunities to maximise sustainable transport solutions will vary between urban and rural areas and advises that this should be taken into account in plan making. As such, it is recommended that this strategic priority and the emerging spatial strategy is amended to recognise the opportunity presented by sustainable rural settlements, such as Cottenham, to deliver new growth that would benefit from access to sustainable and active modes of transport.

3.1.4 With regards to the energy and water efficiency standards that are alluded to in the strategic priority text, the Council is reminded of the requirement for Local Plan policies to be aspirational but deliverable in accordance with Paragraph 16 of the Framework. The current strategic priority text is considered to be ambiguous, and lacks clarity as to what the 'highest achievable' water and energy standards would mean in practice for new developments. It is requested that the strategic priority text is amended to confirm the standards which new developments will be expected to achieve with reference to the relevant building regulations and any subsequent updates to these in accordance with Government guidance. This is necessary to ensure that the viability and delivery of new developments is not compromised by onerous building standards that have not been mandated by the Government.

Theme 2: Biodiversity and Green Spaces

3.1.5 The second strategic priority contained within the Draft Plan identifies the Councils' intention to 'double nature' by 2050. This is not supported, and the current wording of the strategic priority and supporting text fails to provide any clarification on how this is proposed to be achieved. The strategic priority text continues on to identify that the Local Plan will seek a higher level of biodiversity net gain, in excess of the statutory 10% requirement. It is acknowledged that it is within the remit of Local Plans to identify uplifted net gain requirements, however these must be

evidenced with reference to the specific need for the higher requirement; identification of local opportunities for a higher percentage achievement; and consideration of the impacts of achieving the uplifted requirement on the viability of developments in accordance with Paragraph 006 (Reference ID: 74-006-20240214) of the Planning Practice Guidance (PPG). It is therefore recommended that the strategic priority text is amended to include reference to the relevant evidence base documents which have informed this requirement.

Theme 3: Great Places

- 3.1.6 The third strategic priority identified by the Draft Plan identifies the Councils' intention to sustain the unique character and identifies of Cambridge and South Cambridge and complement this with 'beautiful' and 'distinctive' developments. The use of terms such as 'beautiful' and 'distinctive' is not supported as they are considered to be ambiguous, lacking clarity as to how developers and decision makers are intended to respond to proposals thus conflicting with Paragraph 16 of the Framework. To ensure clarity in the application of this strategic priority, it is recommended that the text is amended to make reference to an expectation for developments to contribute positively towards establishing a positive sense of place, which responds to features of the built environment and landscapes that have been identified as being of local or regional importance through evidence base documents.

Theme 4: Wellbeing and Social Inclusion

- 3.1.7 The fourth strategic priority identified by the Draft Plan seeks to improve equality of access and opportunities for people in Greater Cambridge to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs. Whilst this priority is supported in principle, these representations will identify that the emerging spatial strategy seeks to concentrate growth to locations within, or adjacent to, the Cambridge Urban Area or at new settlements. It is therefore unclear how the Councils envisage this strategic priority will be achieved when the emerging spatial strategy seeks to restrict new housing development within the rural area, including at sustainable rural settlements such as Cottenham.

3.2 Other Strategic Priorities

- 3.2.1 The Draft Local Plan continues on to identify three further strategic priorities relating to homes, jobs, and infrastructure, which fall outside of the key themes identified. For clarity, it is recommended that these further strategic priorities are identified as key themes for the Plan.
- 3.2.2 The strategic priority for homes simply identifies the Councils' intention to plan for 'enough housing to meet our need', including 'significant' quantities of affordable housing. It is considered that the wording of this strategic priority is vague and fails to address the central purpose of Local Plans which is to provide a framework for meeting housing needs, as established by Paragraph 15 of the Framework. It is also not considered sufficient for this strategic priority to identify the intention to plan for enough housing to meet the identified need. Instead, the strategic priority should go further and identify that the Local Plan will provide for at least 48,195 new homes, in accordance with the 'tests for soundness' outlined at Paragraph 36 of the Framework. The reference to the Councils' intention to deliver significant quantities of affordable housing is also considered to be insufficient. This reference should be clarified to include reference to the target percentage of dwellings in new developments that will be required to be delivered as affordable housing.

4 DEVELOPMENT STRATEGY

4.1 Policy S/JH – New Jobs and Homes

- 4.1.1 Policy S/JH of the Draft Plan identifies that the Councils are planning to deliver a minimum of 48,195 new dwellings across the Plan period from 2024-2045. Part 1b of the Policy identifies that this overall housing requirement figure includes the provision of affordable housing, and specialist accommodation to meet the needs of specific groups such as Gypsies, Travellers, Travelling Showpeople, looked after children, boat dwellers, older people, students, and those with disabilities.
- 4.1.2 The proposed housing requirement is not supported, whereby it fails to meet the objectively assessed housing requirement for the region in full. The Government's published standard method housing requirement data identifies a cumulative housing requirement of 2,309 dwellings per annum for Cambridge and South Cambridgeshire. Across the 21-year Plan Period that is proposed, this figure equates to an overall housing requirement of 48,489 dwellings based upon the standard method requirement. Paragraph 2.13 of the supporting text to Policy S/JH identifies that the Government's standard method for calculating minimum housing need would support the most likely forecast for future jobs, thus supporting the continued economic growth of the region. However, the overall housing requirement identified by the Draft Plan falls 294 dwellings short of the Government's standard method requirement. This is not acknowledged within the Policy or accompanying supporting text. This shortfall, whilst modest, represents a fundamental conflict with the requirement of Paragraph 36 of the Framework, which is explicit that in order to be found sound, Local Plans must provide a strategy which seeks to meet the areas objectively assessed needs, as a minimum.
- 4.1.3 Notwithstanding that the Draft Plan presently fails to plan to meet the regions objectively assessed housing need; Paragraph 36 of the Framework is clear that the objectively assessed housing need is the minimum amount of new housing which must be planned for in order to be found. As will be identified in later sections of these representations, the Councils' emerging spatial strategy concentrates upon the development of large scale developments, including the development of new settlements. The challenges associated with planning for, and realising the delivery of, large scale housing allocations are well documented with such developments often subject to considerable lead in times, whilst the complex land assembly required for these developments also presenting challenges in respect of bringing sites forward comprehensively. The emerging Local Plan fails to acknowledge this and accordingly does not provide for any contingency in the event that sites do not come forward as envisaged. Whilst reconciling the proposed housing requirement with the Government's standard method requirement is essential in order for the Plan to be found sound; it is strongly advised that further additional sites, such as the land at Broad Lane, Cottenham, are allocated for development in order to provide contingency in the Local Plan's implementation.
- 4.1.4 It is notable that the housing requirement identified by Policy S/JH of the Draft Plan includes the provision of specialist housing accommodation. It is acknowledged that Paragraph 61 of the Framework advises that the housing needs of specific groups are taken into consideration when planning for the delivery of new homes. Policy S/JH of the Draft Plan however identifies that the housing needs of specific groups are accounted for within the overall housing requirement of

48,195 dwellings. As set out above, the proposed housing requirement falls short of the Government's standard method requirement, the calculation of which does not evidence how it has included consideration of the housing needs of specific groups, such as older people and boat dwellings. The Draft Plan is not accompanied by a Housing and Economic Needs Assessment, such that no evidence is provided identify how the housing needs of specific groups have been calculated, or the implication of this on the overall housing requirement for the Plan. The Councils are respectfully reminded that the Government's standard method housing requirement represents the starting point for calculating the housing requirement for new Local Plans and therefore that any identified needs of specific groups should be considered in addition to the standard method. The Council has published an Employment and Housing Needs Update (September 2025) in support of the consultation; however the published assessment only considers the link between housing and economic growth. Evidence must be published by the Council to robustly assess the needs of specific groups and the relationship of this identified need to the standard method requirement. This is necessary in order for the emerging Local Plan to be capable of being found justified and sound in accordance with Paragraph 36 of the Framework.

4.2 Policy S/DS – Development Strategy

- 4.2.1 Policy S/DS of the Draft Plan identifies that the needs for jobs and homes will be met, in an order of preference which priorities development within the Cambridge Urban Area; on the edge of Cambridge; at an expanded Cambourne; at other new settlements; and within the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres. The supporting text to the draft Policy clarifies that residential development within the rural southern cluster is proposed to be restricted to two sites, located at the Wellcome Genome Campus and the Babraham Research Campus and notably that these homes would be provided for workers at the campuses. Part 3b of the supporting text identifies that development in the rest of the rural area will be limited, with Table 2 continuing on to identify that only three housing sites totalling 205 dwellings are proposed to be allocated within the rural area of the region.
- 4.2.2 It is considered that the proposed development strategy fundamentally conflicts with the strategic priority relating to wellbeing and inclusion. The wellbeing and inclusion strategic priority identifies the Council's intention to ensure that '*everyone benefits from the development of new homes and jobs*'. However, it is evident that this priority will not be achieved through the implementation of the proposed spatial strategy whereby the vast majority of growth is proposed to be located within the area between the A11 and A14. Figure 8 of the Draft Plan (reproduced below) illustrates how a significant proportion of the region will not benefit from any jobs or employment growth, demonstrating that the rural area of the region will not see the benefits of new development.

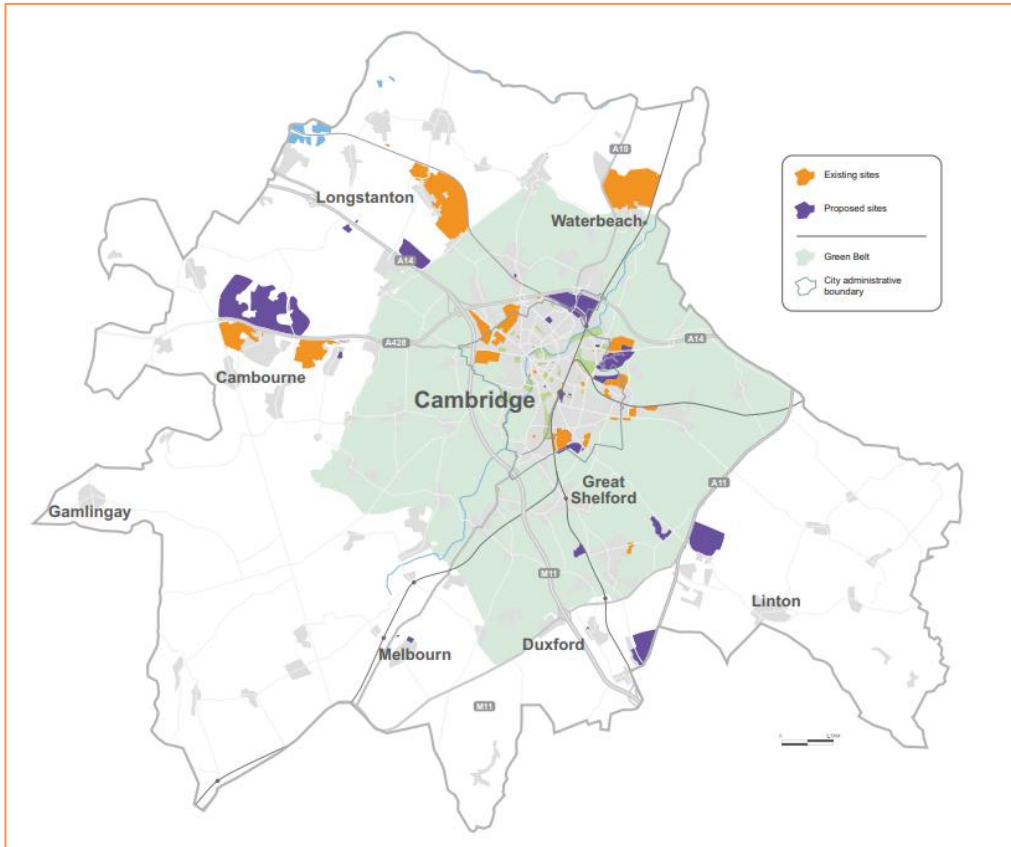


Figure 4.1 – Extract of Figure 8 of the Draft Local Plan ‘Map showing proposed development strategy for Greater Cambridge’.

- 4.2.3 Paragraph 2.43 of the Draft Plan affords consideration to the ‘small sites’ requirement established by Paragraph 73 of the Framework and identifies that only 1,694 dwellings are proposed to be delivered on small sites of less than one hectare. This equates to 3.5% of the proposed housing requirement, falling substantially below the 10% requirement identified by the Framework. Paragraph 2.43 of the Draft Plan alleges that it is not possible for the 10% small sites requirement to be met as this would require the allocation of a large number of sites for development within the rural area, which the Councils consider to be unsustainable. Accordingly, it is evident that the Councils are seeking to restrict growth at rural settlements, and in doing so are progressing with a Plan which does not meet the requirements of Paragraph 73 of the Framework, on the basis that the Councils do not consider these settlements to be sustainable locations for growth.
- 4.2.4 Paragraph 73 of the Framework establishes that the requirement to accommodate at least 10% of their housing requirements on small sites must be met, unless there are strong reasons for why this target cannot be achieved. As set out above, the Councils’ justification for not meeting the 10% small sites requirement is advanced solely on the basis that the rural settlements are not considered to be sustainable and that delivering growth at these settlements would increase reliance on the private car. However, the Council have failed to provide robust evidence to support this conclusion. It is notable that the implications of meeting the small sites requirement through the allocation of growth at the rural settlements has not been tested, and indeed that the updated Sustainability Appraisal has assessed only four or the eleven spatial strategy options against the proposed strategic objectives. It therefore considered that there is insufficient evidence accompanying the Draft Plan to robustly demonstrate why the dispersal of growth to villages as necessary to meet the Framework’s small sites requirement would result in the sustainability

implications alleged by the Draft Plan. As such, it is not considered that the strong reasons required by Paragraph 73 of the Framework for not meeting the small sites requirement exist, and it is recommended that the Plan is amended to identify additional sites to meet this requirement. This revision to the Plan is considered necessary in order for the Plan to be capable of being found sound at Examination in accordance with the tests for soundness provided at Paragraph 73 of the Framework.

- 4.2.5 It is also considered that the spatial strategy advanced by the Draft Plan fails to recognise the opportunities associated with the delivery of development at rural villages. The Sustainability Appraisal identifies the rural character of much of the South Cambridgeshire district as representing a key issue, whereby a large proportion of residents drive to work and have limited access to bus services and other public transport links. Continuing on, the Sustainability Appraisal identifies that:

“The new Local Plan presents the opportunity to further address the issue of car dependency especially within South Cambridgeshire. This can be achieved by promoting sustainable and active transport... sustainable development locations, and integrating new and more sustainable technologies.”

- 4.2.6 Rather than seeking to implement the mechanisms identified by the Sustainability Appraisal to address car dependency concerns within South Cambridgeshire’s rural villages through the emerging Local Plan; the Councils have instead chosen to adopt a restrictive approach to growth at these settlements. This does not represent the positive approach to plan making that is expected by Paragraph 16 of the Framework. It is maintained that there are villages within the rural area that could suitably accommodate new growth, that would not result in the levels of car dependency alleged by the Councils. This is the case in respect of Woosington One Ltd’s promoted site located to the west of Broad Lane, Cottenham. As set out at Chapter 2 of these representations, Cottenham benefits from a good local service base which is accessible within a 15 minute walk of the promoted site, whilst the settlement also benefits from bus services that provide direct and regular access to Cambridge. The grant of planning permission for major housing development at the settlement in recent years is considered to provide further demonstration of Cottenham’s sustainability to accommodate further growth.

- 4.2.7 In this regard, in determining the spatial strategy it is considered that the Councils have overlooked the opportunity presented by new development to improve sustainable and active transport linkages within the rural settlements. These opportunities should be recognised in respect of the promoted site located west of Broad Lane, Cottenham. Chapter 2 of these representations identified how the promoted site could come forward to deliver new pedestrian and cycle linkages into the existing Public Rights of Way network, alongside the provision of a new pedestrian footway along Broad Lane to improve the site’s connectivity and access to the local services and facilities provided along the High Street. Furthermore, it must also be recognised that financial contributions could be secured from any development realised on the site, which could be used towards improving the frequency of the existing bus services to Cambridge from the settlement and further enhance access to sustainable transport.

4.3 Policy S/SH – Settlement Hierarchy

- 4.3.1 Policy S/SH of the Draft Plan outlines the proposed settlement hierarchy, identifying Cambridge as the principal settlement, followed by the towns of Cambourne, Northstowe, and Waterbeach

New Town. Cottenham is identified as a Minor Rural Centre within the proposed hierarchy, above the Group and Infill Villages which comprise the lower order settlements within the hierarchy. The recognition of Cottenham as one of the more sustainable villages within the rural area is welcomed.

4.3.2 Within the adopted South Cambridge Local Plan 2019, Cottenham is however identified as a Rural Centre under Policy S/8. As such, through the emerging Local Plan, Cottenham is proposed to be reclassified as a lower order settlement as a Minor Rural Centre. The proposed reclassification of Cottenham as a Minor Rural Centre is not supported and it is considered that insufficient evidence has been provided by the Council to justify this proposed change.

4.3.3 The Council has published a Development Strategy Topic Paper as part of the evidence base supporting the consultation. The Topic Paper identifies that Cottenham should be reclassified as a Minor Rural Centre in order to reflect the Councils' vision for all Rural Centres to have high quality public transport in the form of a segregated public transport route, such as the Cambridgeshire Guided Busway. It is considered that the Councils' emphasis on Rural Centres benefitting from a segregated public transport route to Cambridge is not justified, particularly given that the Topic Paper identifies this as representing a vision for Rural centres, rather than the established position in respect to accessibility to Cambridge. Notably, draft Policy S/SH identifies Sawston as a proposed Rural Centre, despite Sawston similarly not benefitting from a segregated busway into Cambridge. This demonstrates that the Council is not applying the proposed criteria for settlements to be classified as Rural Centres consistently. It is also notable that the journey from Sawston into the centre of Cambridge is less than ten minutes faster than that from Cottenham to Cambridge via bus which evidently does not represent a material difference in the sustainability of the two settlements. As such, the proposed re-classification of Cottenham as a Minor Rural Centre solely on the basis that the settlement does not benefit from a segregated public transport route to Cambridge is considered to be wholly unjustified, given the identification of other settlements which similarly do not benefit from a segregated public transport route as Rural Centres. It is maintained that the Draft Local Plan should be amended to identify Cottenham as a Rural Centre with this amendment necessary to ensure that the emerging Local Plan can be demonstrated to be justified and based upon proportionate evidence as required by Paragraph 36 of the Framework.

4.3.4 With regards to new development at the Minor Rural Centres, such as Cottenham, draft Policy S/SH identifies that residential development and redevelopment up to an indicative maximum scheme size of 30 dwellings will be permitted within the defined development extents. The proposed restriction in the size of new developments and requirement for these to be located within the defined development extents is objected to. It is notable that Appendix D of the Draft Local Plan identifies housing requirements for neighbourhood areas within Greater Cambridge, with a housing requirement of 130 dwellings identified to be delivered at Cottenham between 2024-2045. However, it is unclear how the Councils envisage this number of dwellings being delivered at the settlement, if the size and location of new developments at Cottenham are proposed to be restricted to a maximum of 30 dwellings located within defined development extents. The draft Policies Map which is published for consultation alongside the Draft Local Plan identifies the defined development extent for Cottenham as being drawn tightly around existing development at the settlement, such that there no obvious development opportunities within the defined developed extent that would be sufficient, either on their own or cumulatively, to deliver the 130 dwelling neighbourhood area requirement identified by the Draft Plan.

4.3.5 As set out at Paragraph 2.22 of the Draft Local Plan, it is acknowledged that it is the Council's intention for the neighbourhood area housing requirements to be delivered through neighbourhood plans. However, it must be recognised that these housing requirements are not binding and that there is no requirement for local communities to progress with a Neighbourhood Plan to meet the housing requirement apportioned by the Local Plan or indeed to undertake a review of any made Neighbourhood Plan to identify new sites for housing. This is notable in respect of Cottenham, for which there is no information publicly available to indicate that the Parish Council intends to progress with a review of the made Cottenham Neighbourhood Plan 2021 to meet emerging housing needs. It is therefore maintained that there is no certainty that the neighbourhood area housing requirement will be delivered at Cottenham through a review of the made Neighbourhood Plan. In this context, it is considered that the policy restrictions on the scale and location of new development at Minor Rural Centres, as proposed by Policy S/SH, should be relaxed to enable suitable sites that are located adjacent to the defined development extents, such as Woosington One Ltd's promoted site located to the west of Broad Lane, Cottenham, to come forward for development. The proposed restrictions on scheme size should also be removed as this is considered to be arbitrary in the context of the neighbourhood area requirement of 130 dwellings. Instead, the opportunity that is presented by larger scale developments to deliver comprehensive, rather than piecemeal development, that is supported by the requisite infrastructure should be recognised by the Councils and facilitated in the event that a Neighbourhood Plan review to meet the emerging neighbourhood area requirement is not forthcoming.

4.4 Policy S/DE – Defined Development Extents

4.4.1 Policy S/DE of the Draft Local Plan seeks to establish that development outside of the defined development extents will not be permitted unless it comprises a made Neighbourhood Plan allocation; a Rural Exception Site; or development for agriculture or other uses which need to be located in the countryside. In keeping with the approach advised within Section 4.3 of these representations above, it is considered that the policy approach to development outside the defined development extents should be relaxed to facilitate the development of land located outside, but adjacent to, the defined development extents for housing where this is required to meet an identified neighbourhood area housing requirement. As set out above, this amendment to the draft policy text is considered necessary to facilitate the effective implementation of the local plan strategy in the event that the neighbourhood area housing requirements are not proposed to be provided for by new or reviewed Neighbourhood Plans. Woosington One Ltd's promoted site located to the west of Broad Lane, Cottenham represents a suitable, available, and deliverable site that is located adjacent to the defined development extent which could come forward for development in the early years of the Plan period and contribute towards meeting the neighbourhood area housing requirement for Cottenham of 130 dwellings.

4.5 Site Allocations – Rest of the Rural Area

4.5.1 Part 3 of the Draft Plan sets out the proposed site allocations, and vision for the 'rest of the rural area'. Section 3.5.1 of the Draft Plan establishes that the Councils are seeking to support the vitality of the rural settlements in the region, however that there is an aspiration to ensure that 'lots of new homes' are not delivered in locations where car travel is the easiest or only way to travel such that development within the rural area is proposed to be concentrated in and around the villages that benefit from good transport links and other services.

- 4.5.2 Only one site allocation is identified at Cottenham under draft Policy S/RRA/OHD relating to the land at Old Highways Depot, Twenty Pence Road, Cottenham for approximately 1,500sqm of office, light industrial, and storage and distribution floorspace to replace the existing employment floorspace on site. The identification of the land at Old Highways Depot for new employment floorspace is supported, as the provision of new, higher quality, employment development will contribute towards Cottenham's economic vitality through the provision of new employment opportunities for residents.
- 4.5.3 Whilst the proposed allocation of the land at the Old Highways Depot for employment uses is supported, it is maintained that the emerging Local Plan should also identify land to meet the requirement for residential development at Cottenham to complement the economic growth at the settlement. Paragraph 83 of the Framework establishes that, new housing at rural settlements should be located where it will enhance or maintain the vitality of rural communities. Whilst proposed site allocation S/RRA/OHD will contribute towards the economic sustainability of Cottenham, it is maintained that the identification of sites for new housing is essential to ensure that the social objective of the Framework is realised, by ensuring that a sufficient number and range of homes are also delivered at the settlement. Woosington One Ltd's promoted site located to the west of Broad Lane is located within a five minute cycle or twenty minute walk from the new employment opportunities located at the Old Highways Depot, such that Woosington One Ltd's promoted site should be considered as a sustainable and suitable opportunity to allocate land to meet the housing needs of Cottenham that would be well located in respect of the employment opportunities provided at the settlement.

5 THEMATIC POLICIES

5.1 Climate Change Policies

5.1.1 The Draft Plan includes a total of nine policies which identify design standards which are proposed to be required from all new developments within the region. In total, the proposed climate change policies and their corresponding supporting text extends across 37 pages of the Plan. It is considered that both the number of climate change policies that are included in the Draft Plan is excessive, whilst the supporting text is overly verbose and goes into a level of design detail that is not appropriate for inclusion within the Local Plan. The Councils are respectfully reminded of the requirements of Paragraph 16 of the Framework, which requires that Local Plan policies and clearly written and unambiguous, whilst also serving a clear purpose and avoiding any unnecessary duplication of policies. It is strongly advised that the climate change section of the Draft Plan is revised and consolidated into one or two policies relating to climate change. If further detail regarding the proposed design standards is considered to be necessary by the Councils, this should be provided through a Supplementary Planning Document.

Policy CC/SD – Sustainable Development and the climate emergency

5.1.2 Policy CC/SD of the Draft Local Plan proposes to require that all new development proposals demonstrate and embed the principles of climate change mitigation and adaptation into the development. Schemes will be required to demonstrate how this has been achieved through the submission of a Sustainability Statement, with the level of detail provided to be proportionate to the scale of the development. Draft Policy CC/SD is supported insofar as it reflects the aspirations of Paragraph 162 of the Framework which establishes that Local Plans should take a proactive approach to mitigating and adapting to climate change. However, the draft Policy text is considered to be ambiguous in its current format, whereby the measures that the Councils are expecting developments to implement are not identified. To ensure that this policy is capable of being implemented as intended, it is considered essential that a supplementary planning document is prepared to provide clarification of the climate change mitigation and adaptation measures that the Council is seeking from new developments. This is necessary to ensure that the Policy satisfies the requirements of Paragraph 16 of the Framework which requires policies to be clearly written and unambiguous so that it is evident how a decision maker should react to the proposals.

5.1.3 Part 1 of Policy CC/SD is clear that the Councils are seeking, all new developments, including minor development proposals to demonstrate and embed the principles of climate change mitigation and adaptation. However, the draft Policy text fails to recognise that the type of climate change mitigation and adaptation measures that are suitable for implementation will vary based upon the nature of development and site specific considerations. Whilst the Council's positive approach to responding to climate change is welcomed, it must also be recognised that viability and / or site specific considerations may restrict a developer's ability to implement the measures sought. To ensure that the requirements of Policy CC/SD do not unduly constrain the viability and delivery of new developments; it is advised that the Policy text is amended to establish flexibility in the Policy's application to allow for viability and / or site specific justifications to be presented in circumstances where certain measures cannot be implemented.

Policy CC/DC – Designing for a changing climate

5.2.1 Policy CC/DC of the Draft Local Plan seeks to identify how developments should take account of the changing climate. However, the draft Policy text is considered to be overly vague, and references only the use of ‘design solutions’ in order to positively respond to the changing climate and reduce climate risks. As set out in the response to Policy CC/SD above, it is considered essential that a supplementary planning document is prepared to provide further detail, and certainty, for developers as to the design solutions and measures that are expected to be implemented by new developments.

5.2.2 It is considered that the content of Policies CC/DC and CC/SD could be rationalised into a single policy, to address sustainable development and design requirements for a changing climate. This amendment would ensure that any resultant policy would serve a clear purpose and would avoid any unnecessary duplication of policy, in accordance with the requirements of Paragraph 16 of the Framework.

Policy CC/NZ – Net zero carbon new buildings

5.2.3 Draft Policy CC/NZ seeks to require that, where appropriate, new development must achieve net zero operational emissions, which is required to be demonstrated through the submission of an appropriate energy assessment. This requirement is strongly objected to. Whilst the UK’s legally binding requirement to achieve net zero carbon by 2050 is recognised; it is considered that the proposed requirement for new development to achieve net zero operational carbon emissions far exceeds current building regulations requirements. It should be recognised that the UK is currently in the process of transitioning towards net zero carbon, through the implementation of the Future Homes Standard which will require new dwellings to be designed to be ‘zero carbon ready’, rather than net zero carbon as is proposed by the emerging Local Plan. The Councils are respectfully reminded of the Written Ministerial Statement made in December 2023 by Baroness Pen¹ established that any planning policies which propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not provide a well-reasoned and robustly costed rationale which ensures that development remains viable. The evidence base supporting the consultation includes the a Policy Cost Analysis Report for the net zero policy, which identifies that the policy’s implementation would result in a cost uplift of between 6-7% in the construction of terraced and semi-detached houses. However, no consideration of how these uplifted build costs would affect the viability of new development has been provided. In accordance with the December 2023 Written Ministerial Statement, it is maintained that the Councils have failed to demonstrate how development would remain viable following the implementation of emerging Policy CC/NZ, and therefore is not capable of being found sound at Examination.

¹ Baroness Penn (2023) Planning - Local Energy Efficiency Standards Update. Statement UIN HLWS120. Available at: <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hlws120#:~:text=Statement%20made%20on%2013%20December%202023&text=As%20a%20Government%2C%20we%20continue,the%20homes%20and%20building%20sector.>

Policy CC/WE – Water efficiency in new developments

- 5.2.4 Policy CC/WE of the Draft Plan proposed to apply enhanced water efficiency requirements for new developments. Developments of 100 or more dwelling are proposed to be required to achieve water usage of no more than 80 litres/person/day, whilst schemes of less than 100 dwellings will be required to restrict water usage of between 90-100 litres/person/day. The proposed water efficiency standards far exceed those that are required to be met through building regulations, and even exceed the revised Water Efficiency Standard of 125 litres/person/day that was consulted on by the Government in December 2025. The Government's proposed revisions to the Water Efficiency Standard are being undertaken in consultation with DEFRA and has been informed by independent research regarding the infrastructure that needs to be in place to enable the tighter water efficiency standards that the Government is consulting on to be achieved. It is notable that the Government's target is to achieve a reduction in water use to 110 litres/person/per day by 2050. In light of this national target, it is unclear how the Council considers that the achievement of a water efficiency target 30 litres below the proposed national 2050 target will be achievable. The evidence base accompanying the Draft Plan does not address the viability, of feasibility of achieving these enhanced standards.

5.2 Biodiversity and Green Spaces

Policy BG/BG – Biodiversity and Geodiversity

- 5.2.5 This draft Policy sets out the Council's requirements with respect to the achievement of biodiversity net gain. Whilst the requirement for developments to achieve at least a 10% net gain in biodiversity is supported, in accordance with statutory requirements; it is recommended that the policy text is reviewed to rationalise its content and ensure that there is no unnecessary duplication of material that is already contained within national policy and legislation as required by Paragraph 16 of the Framework.
- 5.2.6 Draft Policy BG/BG proposes that major development proposals in Greater Cambridge must provide a minimum 20% net gain in biodiversity, representing a 10% uplift against the statutory requirement which is not supported. The Planning Practice Guidance (PPG) Paragraph 006 (Reference ID: 74-006-20240214) establishes that plan-makers should not seek a higher percentage of net gain than the statutory objective unless the uplifted requirement is justified with regards to the local need for a higher percentage, identification of opportunities for a higher percentage, and any impacts of this on the viability of development. Whilst the evidence base supporting the Draft Plan identifies opportunity for green infrastructure provision (Greater Cambridge Green Infrastructure Mapping Baseline Report 2020); the Councils' justification of the need for the uplifted net gain requirement is wholly reliant upon the Cambridgeshire Doubling Nature Vision. This document is not considered to represent an appropriate piece of evidence on which to base the justification for the uplifted net gain requirement proposed, as this document presents a vision for doubling nature, rather than an assessment of the locally specific need for implementing uplifted net gain requirements. Additionally, the evidence base supporting the draft Policy does not include consideration of the viability implications for major developments to apply the proposed 20% net gain requirement. On this basis, it is not considered that the proposed uplifted net gain requirements for major developments has been robustly justified by the Draft Plan and therefore conflicts with Paragraph 16 of the Framework and Paragraph 006 of the PPG.

5.2.7 Draft Policy BG/BG also requires that biodiversity net gain is delivered on-site, unless all options for on-site provision have been demonstrated to be exhausted. In such circumstances, the draft Policy then advises that off-site options of net gain provision can be explored. This is already dealt with by the mitigation hierarchy within the Environment Act, thus this part of the Policy represents an unnecessary duplication of existing requirements contained within legislation. This element of the draft Policy text should therefore be removed to ensure that the Policy is concise and serves a clear purpose, as required by Paragraph 16 of the Framework.

Policy BG/GI – Green and Blue infrastructure

5.2.8 It is considered that the provisions of draft Policy BG/GI of the Draft Plan conflict with the proposed requirements of Policy BG/BG through identification that, in addition to the biodiversity net gain requirements identified, all major residential developments must meet a minimum Greening Factor of 0.4. This would require major residential developments to achieve at least 40% green space provision. Whilst the application of a Greening Factor of 0.4 is consistent with Natural England guidelines, it should be acknowledged within the policy text that this is an aspirational target to be achieved where possible, rather than a requirement which must be met. It is recommended that the policy text is amended to reflect this to ensure that the policy is applied in accordance with Natural England guidance and to ensure that it is clear to both developers and decision makers how they should react to development proposals, whilst providing a reasonable and robust policy framework that supports development being realised.

Policy BG/TC – Improving tree canopy cover and tree population

5.2.9 Policy PG/TC of the Draft Plan proposes to require that all major development proposals must demonstrate, via a Tree Canopy Cover Assessment, how it will achieve a minimum future canopy cover of 30%. It is considered that this proposed requirement is onerous, and fails to appropriately acknowledge that this requirement will not be achievable on all development sites. Whilst the draft policy text acknowledges that there may be ecological, historical, landscape, or operational reasons to justify why a canopy cover of less than 30% is achievable; the policy must also recognise that there may be viability reasons why that level of tree canopy cover sought is not achievable for developments. To ensure that the application of this policy does not unduly constrain the viability, and resultant delivery of development, it is recommended that the policy is reframed as an aspiration that should be achieved wherever possible. A similar approach has been advocated by the Inspector examining the Dudley Local Plan recently, where modifications have been suggested to 'encourage' delivery of a minimum level of tree canopy cover, rather than require as the Plan originally suggested prior to examination, with the modification suggested to ensure soundness.

5.3 Wellbeing and Social Inclusion

Policy WS/HD – Creating healthy new developments

5.2.10 The aspirations of Policy WS/HD are supported in principle in accordance with the provisions of Chapter 8 of the Framework. However, Part b of the draft Policy text requires new developments to deliver community and health facilities to meet the needs generated by the development. Whilst it is recognised that it is essential that development is supported by the requisite infrastructure, it is recommended that the policy text is amended to identify that this infrastructure could be secured through on-site provision or by financial contribution towards off-site provision. It is considered

that the reference at Part f of the Policy towards ensuring that developments are designed to mitigate the impact climate change is removed, given that the Draft Plan already contains extensive policies relating to climate change and the mitigation measures that are required of development.

Policy WS/NC – Meeting the needs of new and growing communities

- 5.2.11 Policy WS/NC of the Draft Plan identifies the requirement for new developments to include or contribute to the delivery of services and facilities necessary to meet the needs of the development. Whilst this is supported, it is considered that Policy WS/NC represents an unnecessary duplication of Policy WS/HD which already incorporated the requirement for developments to address the infrastructure requirements they generate. As such, it is recommended that the requirements of these policies is consolidated into a single policy, to ensure that each of the policies contained within the Draft Plan serves a clear purpose as required by Paragraph 16 of the Framework.

5.4 Great Places

- 5.4.1 The ‘Great Places’ part of the Draft Plan includes three policies which relate to the historic environment; Policy GP/HE – Historic Environment; Policy GP/HA – Designated heritage assets; Policy GP/ND – Non-designated heritage assets. It is not considered necessary for the emerging Local Plan to contain three distinct policies relating to the historic environment and heritage assets, particularly given that each of these policies largely seeks to replicate the relevant paragraphs of the Framework’s guidance in regard to developments affecting designated and non-designated heritage assets. This represents an unnecessary duplication of national planning policy such that it is recommended that Policies GP/HE; GP/HA; and GP/ND are rationalised and condensed into one overarching policy relating to the region’s historic environment. This revision to the Draft Plan is considered necessary to remove the unnecessary duplication of national planning policy and ensure that the policies are clearly written and unambiguous as required by Paragraph 16 of the Framework.

5.5 New Homes

Policy H/AH – Affordable Housing

- 5.5.1 Policy H/AH of the Draft Plan sets out the Councils’ position with respect to the provision of affordable housing on new developments, and seeks to secure 40% of new homes on major developments as affordable units of accommodation. The draft Policy text however identifies that all schemes are required to deliver affordable housing on site, which is not supported and this policy approach fails to recognise that there may be circumstances in which provision of affordable housing off-site may be preferable. It is therefore recommended that the Policy text is revised to identify a preference for on-site affordable housing delivery, however that off-site affordable housing provision will be accepted where robust justification for this approach is provided.
- 5.5.2 Policy H/AH also seeks to prescribe a tenure mix for the affordable housing element of major residential development schemes. Whilst this is supported, it should be recognised that market information and housing needs are subject to change over time. As such, it is advised that the policy text is amended to require compliance with the affordable housing tenure mix identified by the policy, unless a deviation from this is justified with reference to any updated Housing and

Economic Development Needs Assessment, or similar document, published by the Council, or alternative evidence that may justify provision of a different mix of tenures.

5.5.3 The reference contained within Part 4 of the draft Policy text to the 50% affordable housing provision on Green Belt sites should be removed. This represents an unnecessary duplication of national planning policy, as the requirements for affordable housing provision on land released from the Green Belt and / or grey belt sites are already set out at Paragraph 156 of the Framework. This amendment is necessary to ensure that the Policy is compliant with Paragraph 16 of the Framework and ensure that the Policy serves a clear purpose.

5.5.4 Part 5 of draft Policy H/AH continues on to identify requirements in respect of securing the provision of affordable housing in perpetuity; phasing of affordable housing delivery on major developments; design; and the number of bedspaces required to be accommodated in affordable houses of different sizes. Further guidance in respect of the distribution of affordable units across development sites is also provided at Part 6 of the draft Policy text. The level of detail contained within the draft Policy text is considered to be excessive, with the Policy text extending across several pages of the Plan. It is recommended that the level of detail contained within the Policy is reviewed, and the Policy text rationalised to ensure clarity in its application. This is necessary to ensure that the Policy can be found to be clearly written and unambiguous so that it is evident how a decision maker should respond to the proposals as is required by Paragraph 16 of the Framework. It is maintained that any additional detail which the Councils consider to be necessary to provide should be set out within an Affordable Housing Supplementary Planning Document.

Policy H/ES – Exception sites for affordable housing

5.5.5 Policy H/ES of the Draft Plan makes provision for the development of rural exception sites within parishes on small sites adjoining a defined development extent of Minor Rural Centres, such as Cottenham, which is supported. Whilst it is appreciated that evidence of the social or economic need for affordable housing is required to be demonstrated as part of rural exception site proposals; the identification at Part a of the draft Policy that the need identified should be expected to persist in the long term is objected to. Paragraph 82 of the Framework establishes the national policy position in relation to rural exception sites, and simply requires that such schemes demonstrate that they will contribute towards meeting identified local needs. The proposed requirement within the Draft Plan for the need identified to be expected to persist in the long term is considered to conflict with the provisions of the Framework in this regard. Moreover, the Councils should be seeking to support rural exception schemes which address identified local needs for affordable housing at the time of submission, regardless of whether such needs are envisaged to persist in the longer term. It is therefore requested that the draft Policy text is amended to remove this requirement.

5.5.6 Draft Policy H/ES continues on to provide further detailed guidance in respect of occupancy restrictions on any new affordable homes delivered under the rural exception site provisions. It is not considered that this level of detail is necessary to be included within the Local Plan. Instead, it is recommended that the draft Policy text is rationalised and detailed guidance relating to occupancy restrictions is included within an Affordable Housing Supplementary Planning Document.

Policy H/SS – Residential space standards and accessible homes

- 5.5.7 Draft Policy H/SS seeks to identify internal and external residential space standards. With regards to internal residential space standards, the draft Policy identifies that the Councils will apply the Government's Technical Housing Standards – Nationally Described Space Standards to all new residential units. Whilst the implementation of the Nationally Described Space Standards is supported, the draft Policy text replicates the detailed requirements and guidance relating to the application of these standards. It is not considered necessary for this guidance to be replicated within the draft Policy text, given that is already provided within the Government's Technical Housing Standards document. To ensure that the draft Policy does not include unnecessary duplication of national planning policy and guidance, this additional detail should be removed from the Policy text and the Policy amended to refer to the Government's technical Housing Standards document as providing the requisite clarification of how the standards are to be implemented.
- 5.5.8 Part 3 of the draft Policy identifies standards for external private amenity space provision in new residential development. Whilst the numerical standards identified are considered to be acceptable in principle, it is considered that the draft Policy text fails to have regard to circumstances in which the provision of private outdoor amenity space for flatted schemes may not be achievable. For example, circumstances in which air quality, noise, and daylight considerations would result in a poor standard of amenity space being provided. To ensure that the application of these standards does not unduly constrain the delivery of new developments, or result in the provision of poor quality outdoor amenity spaces; it is recommended that the Policy text is amended to identify flexibility where robust justification is provided to demonstrate why the standard is not achievable. Part 5 of the draft Policy text provides detailed guidance relating to the design and location of private amenity space in new developments, and consideration should be given as to whether the level of detail provided within the Policy text could be refined. It is maintained that it would be more appropriate for detailed design guidance for new residential developments to be provided within a Design Guide Supplementary Planning Document.

Policy H/CB – Self and custom build homes

- 5.5.9 Policy H/CB contained within the Draft Plan seeks to introduce a requirement for all development proposals of 20 or more dwellings to provide at least 5% of new homes as serviced plots for custom and self build houses or flats. Whilst the Council is seeking to adopt a positive approach to meeting the need for self and custom build housing in accordance with Paragraph 63 of the Framework; it is considered that the proposed policy requirement for at least 5% of homes on schemes of 20 or more dwellings to be provided for self or custom build housing is excessive, and the delivery of these plots is likely to be onerous for small and medium sized sites. The requirements to deliver more Self Build plots / units through relatively small developments and related small to medium sized house builders is likely to detrimentally influence the viability of schemes of such scale and harm the success of these smaller developers. This could have a knock-on effect on the delivery of windfall dwelling delivery, to the detriment of overall housing provision.
- 5.5.10 The Council's Housing Topic Paper (2025) which is published as part of the Draft Plan's evidence base identified that there is a total demand for 700 self and custom build plots within Greater Cambridge, which will likely be far outstripped by supply if the proposed 5% requirement is applied to all developments of 20 dwellings or more. Rather than requiring all developments of 20 dwellings or more to deliver self-build housing, it is instead considered to be more appropriate to

identify the proportion of self-build plots which larger site allocations of 100 or more dwellings will be expected to provide. This will contribute towards establishing sustainable and mixed communities on allocated sites, and will also assist in providing certainty to developers.

- 5.5.11 In this regard, it is notable that the supporting text to the Policy provided at Paragraph 9.67 of the Draft Plan identifies that this requirement will be relaxed in the event of a 1 year over-supply of custom and self-build housing with reference to the Greater Cambridge Self and Custom Build register. This proposal is counter-productive where a housing need is to be positively provided for in response to identified needs and then negatively constrained as soon as the immediate need pressure is relieved, whilst the attractiveness of self-build homes is likely to remain. These provisions require further clarification and justification, with additional requirements inserted into the Policy text to ensure that the delivery of self and custom building housing is not priorities over other housing types and tenures for which there is an identified need in the event of a surplus of self and custom build housing.

5.6 Infrastructure

Policy I/ST – Sustainable transport and connectivity

- 5.6.1 Draft Policy I/ST seeks to promote sustainable transport and connectivity through new developments, which is supported in accordance with Paragraph 110 of the Framework. However, Part 3 of the draft Policy text identifies that developments will only be permitted where they do not have an unacceptable impact on transport and highway safety. This part of the Policy must be amended, whereby the proposed wording presently conflicts with Paragraph 116 of the Framework which is explicit that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. This amendment should be implemented to ensure that the Draft Plan is capable of being found sound at Examination in accordance with Paragraph 36 of the Framework which requires that Local Plans must be consistent with national policy.

Policy I/EV – Parking and electric vehicles

- 5.6.2 Policy I/EV outlines the proposed parking standards that are to be applied to new developments. Accordingly, the draft Policy provides guidance with regards to the design considerations to inform car and cycle parking provision, as well as the quantitative parking standards to be applied. Whilst the proposed parking standards are considered to be acceptable in principle; the draft Policy text is lengthy and consideration should be given as to whether it may be appropriate to include reference to the compliance with the parking standards within the parking text with the parking standards themselves instead provided within an appendix to the Local Plan or alternatively within a separate Parking Standards Supplementary Planning Document.
- 5.6.3 It is notable that Part 6 of the draft Policy identifies a requirement for the submission of a site-wide electric vehicle charging strategy for large-scale major development. This requirement is not supported as it is not considered necessary for developments to be required to provide these details given that the provision of electric vehicle charging in major residential developments is governed by Building Regulations. To ensure that the Draft Plan does not unnecessarily duplicate national planning policy and guidance, as required by Paragraph 16 of the Framework, it is therefore recommended that Part 6 of draft Policy I/EV is removed.

6 HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT

6.1 Housing & Economic Analysis

- 6.1.1 Appendix 1 of the Draft Local Plan contained updated site assessments for all sites considered within the Housing & Economic Land Availability Assessment (HELAA) (2025). Woolsington One Ltd's promoted site is considered within the HELAA assessment under site reference 115451. It is disappointing that the promoted site has been scored as 'red' with regards to its overall suitability which the assessment provided identifies has principally arisen as a result of flood risk, landscape, and site access considerations.
- 6.1.2 With regards to flood risk and drainage, the updated Flood Risk Officer comment (2025) identifies that the site assessment scoring remains red due to the site's location within Flood Zone 2 and 3, resulting in the site being considered to be a 'dry island' for which all accesses to the public highway would require crossing areas of Flood Zones 2 and 3. The Flood Risk Officer's comments acknowledge that further technical work has been undertaken to produce an updated model showing the site as located outside of the Flood Zone 3 extent. It is confirmed that Woolsington One Ltd are undertaking further engagement with the Environment Agency in order to secure an amendment to the Flood Map which reflects the updated modelling undertaken. Confirmation of the outcome of this engagement with the Environment Agency and any subsequent amendment made to the Flood Map for Planning will be provided to the Council as demonstration of the site's suitability for development in respect of flood risk and drainage considerations, and confirmation that access to the site will not be required to cross Flood Zones 2 or 3.
- 6.1.3 The promoted site at Cottenham has been scored red in respect of landscape considerations. However, it is notable that this scoring of the site has been informed by comments from the Landscape Officer that were provided in 2023. No updated comments from the Landscape Officer have been sourced by the Council as part of the 2025 HELAA update. The 2023 comments allege that the site occupies an exposed, and very rural location where the Cottenham 'fen island' meets the fens. Whilst the site's edge of settlement location is acknowledged, it remains that any new development at Cottenham is required to be delivered on land that is currently outside of the developed extents of the settlement, given the limited availability of land for development within the existing settlement limits. It is notable that major residential developments have been approved in similarly 'exposed' edge of settlement locations to the north and west of Cottenham at Rampton Road, which are now largely built out and from which extensive long distance views across the fens landscape are facilitated, which has evidently been found to be acceptable by the Council. The promoted site at Broad Lane positively relates to existing residential development at Kingfisher Way to the south and industrial development located to the south east, which provide an urbanising influence on the site that reduces the contribution made by the site to wider landscape character. The Landscape Officer's comments fail to acknowledge this, and also fail to demonstrate any regard to opportunities to provide landscape mitigation as part of future development proposals, such as through the provision of planting along the northern boundary of the site to assist in containing longer distance views of the development. It is considered that any proposals delivered on the site could provide a high-quality and carefully considered landscaping scheme that would positively respond to the landscape character of the site and its surroundings.

It is disappointing that this has not been taken into consideration in the Officer's assessment of the promoted site.

- 6.1.4 Updated comments from the Site Access Officer have also not been sought by the Council to support the 2025 HELAA update. However, the site is scored red in respect of site access based upon the contention that there is no possibility of creating a safe access into the site. The Officer's assessment is considered to have overstated the challenges associated with providing a suitable access into the site. Woolsington One Ltd have received technical advice in respect of pedestrian access, public transport access, and vehicular access to the site. The advice received confirmed that in respect of pedestrian access there are opportunities to connect to Public Rights of Way in the site's vicinity that will assist with the site's permeability, there are also further opportunities to provide additional pedestrian and cyclist accesses across the site. In terms of public transport access, the site has access to bus services running through the High Street. The nearest bus stop is located approx. 500m from the site's Broad Lane frontage with the potential for additional bus infrastructure to come forward as part of any development proposals advanced on the site. In terms of vehicular access, it has also been confirmed that there is an opportunity to provide a safe and convenient access arrangement subject to details design, which could be supported by a new TRO to extend the 30mph zone past the new site access. It is requested that this additional clarification is taken into consideration, and that an updated assessment of the site access opportunity is provided by the Site Access Officer.
- 6.1.5 It is respectfully requested that the HELAA assessment in respect of Site Access, Flood Risk, and landscape is updated to recognise that these considerations do not represent an absolute constraint to the site's development, and that the red scoring that is currently assigned to the site is updated accordingly.

7 RECOMMENDATIONS & CONCLUSIONS

7.1 Recommendations

7.1.1 Claremont Planning is instructed by Woosington One Ltd to prepare and submit representations to the Regulation 18 consultation on the draft Greater Cambridge Local Plan in respect of the land under their control located at Broad Lane, Cottenham.

7.1.2 The latest version of the Local Plan that is now published for consultation follows on from the previous 'First Proposals' consultation that was held in 2021. The draft Local Plan seeks to build upon the sites already identified in the adopted Local Plans for Cambridge City and South Cambridgeshire whilst identifying additional sites for development with a focus on maximising the use of previously developed land, safeguarding the Green Belt and the region's villages.

7.1.1 These representations have established that the Draft Local Plan is not capable of being found sound in its current format. To reconcile this, it is considered essential that the Draft Plan's housing requirement is increased to ensure that the Councils are providing for sufficient housing to meet the Government's standard method housing requirement as a minimum. Throughout these representations it has been identified that the distribution of growth should be rebalanced to facilitate development at sustainable rural settlements, such as Cottenham. This would also assist in ensuring that the Draft Local Plan can satisfy the small sites requirement at Paragraph 73 of the Framework and would provide contingency in the event that the delivery of large new settlements, and strategic urban extensions are delayed.

7.1.2 It has been identified throughout these representations that the Draft Local Plan is excessively long, compromising its ability to be read coherently as a framework for directing the scale and location of new development across the Greater Cambridge area. The Draft Local Plan must be refined and consideration given as to whether some of the policy text would be better suited for inclusion within a Supplementary Planning Document.

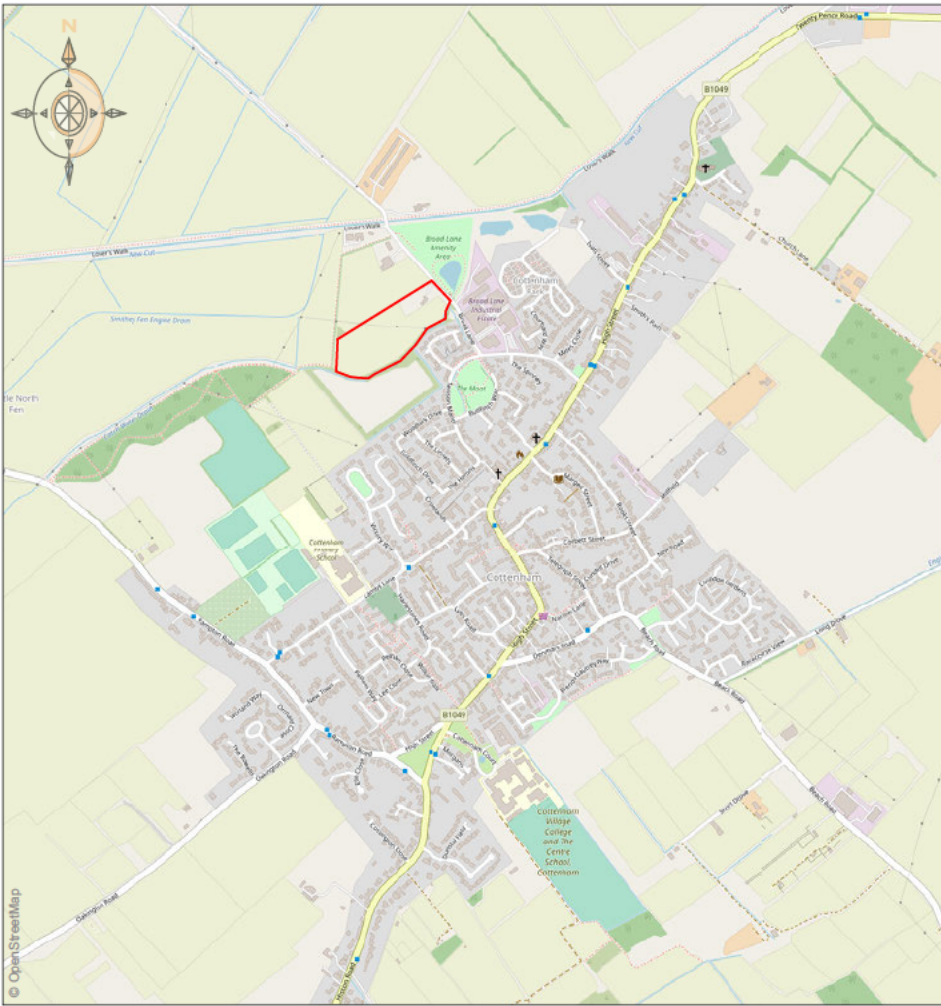
7.1.3 Concerns have also been identified through these representations with the evidence base supporting the draft Plan, in particular the assessment of the land promoted by Woosington One Ltd at Cottenham. The conclusions reached are considered to misrepresent the site, and has resulted in the site being discounted inappropriately, and should be reconsidered along with the review of the draft Plan as a whole to ensure that consistency with the Framework and soundness requirements.

7.1.4 Given the importance of Local Plan documents in determining the framework for future development across Greater Cambridge, it is respectfully requested that Artificial Intelligence tools are not used to review and summarise the content of these representations.

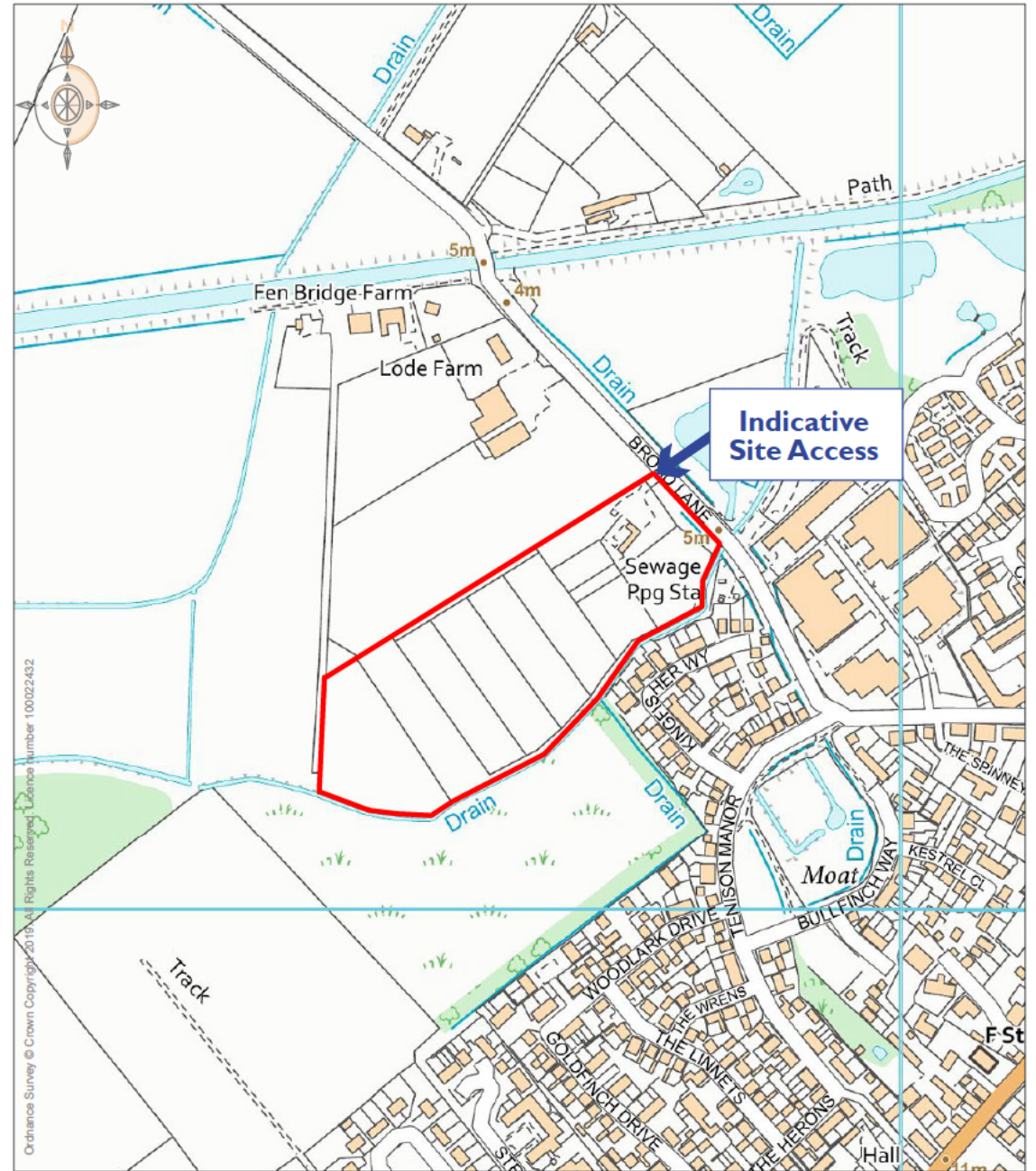
7.2 Conclusion

7.2.1 The Council are therefore respectfully requested to positively receive these representations, and take them into consideration as the emerging Local Plan is further refined.

APPENDIX 1 – SITE LOCATION PLAN



The site in context



The site in detail

Project Cottenham, Cambridgeshire
 Title Site Plan
 Client Southern & Regional Developments

Drawing Number
04120-1.1
 REV
01

Status FINAL	Drawn By JC	PM/Checked by TR	Approved Approved
Job Ref 04120	Scale @ A4 (Detail) 1:5000	Date Created 20/03/2019	

APPENDIX 2 – EA INITIAL FLOOD MAP CHALLENGE RESULT




Flood Map for Planning (Rivers and Sea) centred on Cottenham Lode

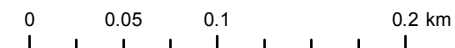
Created 26/04/2022

Environment Agency
Bromholme Lane,
Brampton,
Cambridgeshire
PE28 4NE



Legend

-  Flood Zone 3
-  Flood Zone 2
-  May 1978



Information

Flood Map for Planning (assuming no defences)

Flood Zone 3 shows the area that could be affected by flooding:

- from the sea with a 1 in 200 or greater chance of happening each year
- or from a river with a 1 in 100 or greater chance of happening each year.

Flood Zone 2 shows the extent of an extreme flood from rivers or the sea with up to a 1 in 1000 chance of occurring each year.

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