

H HAYFIELD

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

30th January 2026

Submitted via email: localplan@greatercambridgeplanning.org

Dear Sir/Madam,

RE: HAYFIELD REPRESENTATIONS TO THE DRAFT GREATER CAMBRIDGESHIRE LOCAL PLAN PUBLIC CONSULTATION

This document comprises Hayfield's representation to the Regulation 19 ("Reg.19") version of the Greater Cambridgeshire Local Plan Public Consultation. These have been prepared to our land interest at Land to the south west of Hurdleditch Road, Orwell, Cambridgeshire. We therefore submit the following representations to the Greater Cambridgeshire authorities, January 2026.

I. The Site and Planning History – Orwell, Cambridgeshire

- I.1 Hayfield controls Land to the south west of Hurdleditch Road, Orwell, a greenfield agricultural parcel of land. The site is bound by Hurdleditch Road to the east, as well as some residential development which wrap around to the southern boundary. Beyond the western and northern boundaries is further greenfield land.
- I.2 The site is not subject to onerous planning constraints. It is not located within a Conservation Area or Green Belt, nor is it subject to any TPOs, Listed Buildings, or Public Rights of Way (PRoWs). The site is at very low risk of flooding due to its location wholly within Flood Zone 1.
- I.3 The site was previously assessed through the ***Housing and Economic Land Availability Assessment (HELAA) September 2021*** (ref: 40378) and was concluded to be suitable, available and achievable when scored against the relevant criteria. This assessment acknowledged that the site has *adequate accessibility to key local services, transport, and employment opportunities and is capable of being developed to provide a healthy environment.*
- I.4 Figure 1 below shows the site location plan in reference to the settlement of Orwell.

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2. Settlement Context – Orwell

- 2.1 Orwell is identified as a group village in Cambridgeshire, providing a number of facilities and services including but not limited to a primary school, post office, pub, village hall, two places of worship, a recreation ground, and employment buildings.
- 2.2 Orwell is considered to be a sustainable settlement due to the various public transport services provided, such as the bus service which runs through the village providing links between Orwell, Cambridge and Royston. Orwell is located approximately 10 miles south-west of Cambridge centre, providing access to further services and facilities typically found in a city, which can be accessed via direct link along the A603 Cambridge Road.
- 2.3 Hayfield is also committed to improving the available community and social infrastructure within each community that it proposes to construct homes. We are aware that a prior development within the community proposed to deliver a new recreation ground and improved footballing facilities within the local community to the betterment in particular of Orwell Football Club, who presently have to play matches away from the village due insufficient FA standard football pitches being available within the village. However, this did not come to fruition. Hayfield would be happy to consider redressing this issue further to an allocation for both residential development and community infrastructure improvements. This would also further enhance the sustainability of Orwell as a settlement for accommodating a suitable level of housing growth.



Figure 1. Site Location Plan Ordnance Survey Plan

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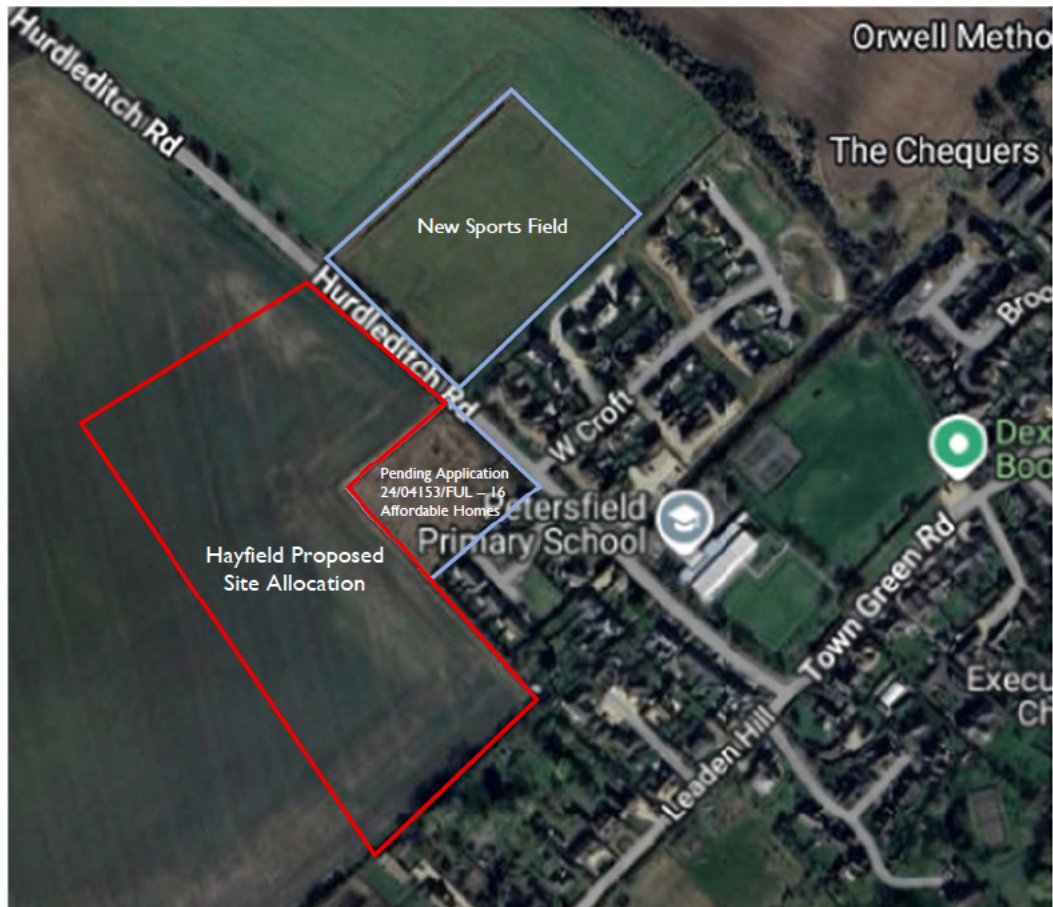


Figure 2. Site Location Plan

RESPONSE TO DRAFT LOCAL PLAN

3. Section 2 - Development Strategy

3.1 Policy SIJH: New Jobs and Homes

3.1.1 Hayfield supports the requirement of providing a minimum of 48,195 homes over the Greater Cambridgeshire area. The Housing Needs of Specific Groups in Cambridge and South Cambridgeshire Report (August 2025) concluded that there was an annual need in Greater Cambridge for 2,309 dwellings, with paragraph 7.159 stating that there is an acute need for affordable housing in both local authorities (Cambridge City and South Cambridgeshire) and that it is clear that the provision of new affordable housing is an important and pressing issue in the area (para. 7.169).

3.2 Policy SIDS: Development Strategy

3.2.1 The allocation of small sites should be recognised as a priority and supports small house builders to ensure that they benefit from having their sites identified for development. Allocations within a Local Plan take away some of the risk from a development by providing greater certainty of that site coming forward. The effect of this is that it allows the SME sector to grow, delivering homes to increase the range of new homes available. In turn, this would align with and follow the National guidance of the NPPF outlined in Paragraph 73, which states:

3.2.2 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:

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- 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.*

3.2.3 Therefore, in order for the plan to be consistent with National Policy, the Council should seek to promote the delivery of small and medium sites through allocations within the Local Plan. This is a matter which should be given further consideration further to the current National Planning Policy Framework (NPPF) consultation, December 2025, in which the notion of 'medium' sites is introduced (indicatively for sites of up to 2.5 hectares or capable of accommodating up to 49 homes). This consultation NPPF then identifies that in addition to 10% of a Council's housing requirement being met upon small sites, 20% of site allocations should include an even split of 'small' and 'medium' sites – excluding a Council's assumption around the percentage of small sites likely to come forward within any windfall allowance. Whilst the draft NPPF can be given limited weight at this moment in time, it does signal the Government's overall drive to encourage SME housebuilders back into the market-place, such as through greater planning certainty being provided for the delivery of small to medium sites. This general policy thrust and undertone would support the potential allocation of the site south of Hurdleditch Road in Orwell.

3.3 Policy S/SH: Settlement Hierarchy

- 3.3.1 Hayfield do not agree with the development caps put on each settlement tier. The application of a blanket cap of 15 dwellings for development in Group Villages, such as Orwell, is overly restrictive and limits the ability to optimise site capacity. This may undermine efficient land use and restrict the delivery of much-needed housing in sustainable village locations. Greater flexibility within the policy would support more effective site-led decision-making while still ensuring development remains proportionate and well-designed.
- 3.3.2 Orwell has been considered as a Group Village within the Settlement Hierarchy. As acknowledged within previous representations to the Council for sites within Orwell, a vast number of appeal decisions and local level decisions between the period 2015-2018 confirm that Group Villages are capable of accommodating a higher level of housing growth by virtue of their service provision and status in the settlement hierarchy.
- 3.3.3 Therefore, Hayfield request that the Council remove or certainly re-evaluate their settlement hierarchy development caps, allowing for further flexibility which considers aspects such as the local need requirement, settlement context, and surrounding settlement characteristics. This would accord with national planning policy requiring that through appropriate development in semi-rural areas, the vitality and overall level of service provision with a settlement can both be sustained and enhanced.

4. Section 4 – Climate Change

4.1 Policy CC/SD: Sustainable Development and the Climate Emergency

- 4.1.1 The proposed restriction on water use to 80 litres per person per day 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 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.
- 4.1.2 These restrictions to the LPPPD is considered unreasonable. The Policy should instead be written to reflect national regulations. Hayfield consider the Policy is reworded to reflect National Building Regulations Standards of 125 LPPPD.

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4.2 Policy CC/IW: Integrated Water Management, Sustainable Drainage and Water Quality

4.2.1 Hayfield agrees with the integration of Sustainable Drainage Systems (SuDS) into developments as a way of managing surface water runoff.

4.3 Policy CC/FM: Managing Flood Risk

4.3.1 Hayfield 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 compliance with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175.

4.3.2 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. Hayfield therefore request that this Policy be amended to reflect the updated PPG.

4.3.3 The site Hayfield are promoting for development at Land to the south west of Hurdleditch Road is at a low risk of flooding due to its location being wholly in Flood Zone 1.

5. Section 5 – Biodiversity and Green Spaces

5.1 Policy BG/BG: Biodiversity and Geodiversity

5.1.1 Hayfield do not agree with Policy BG/BG as it is not a consistent approach in relation to the National Requirements for BNG. We accept that on-site net gain delivery should followed however, the Policy requirement of 20% BNG on major sites should not be followed. The uplift of the minimum BNG requirement unfairly penalises SME developers who deliver smaller residential developments that cannot often feasibly deliver the mandatory 10% net gain in biodiversity, in full, on-site. Hayfield suggest that Policy BG/BG needs to be amended to be consistent with the national requirements for delivering a net gain in biodiversity, to be justified.

5.2 Policy BG/EO: Providing and Enhancing Open Spaces

5.2.1 Hayfield agrees that future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.

6. Section 6 – Wellbeing and Social Inclusion

6.1 Policy GP/QD: Achieving High Quality Development

6.1.1 Hayfield agrees that future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.

6.2 Policy GP/HD: Housing Density

6.2.1 Hayfield supports the Council’s decision for housing density to be appropriate in order to reflect the local character and context.

6.2.2 However, Hayfield note that no density figures have been provided. Whilst it is acknowledged and supported that character and local context should inform appropriate density levels, the absence of any benchmark figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance, alongside the policy’s design-led and context-led approach, would improve consistency in decision-making and provide greater certainty for delivery.

6.2.3 Therefore, it is recommended that Policy GP/HD be altered to include indicative density ranges that provide clarity for developers and decision-makers. While a design-led approach is welcomed, clear benchmarks would support early feasibility work, improve consistency across decisions, and reduce uncertainty at pre-application and application stages.

7. Section 9 – Homes

7.1 Policy H/AH: Affordable Housing

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7.1.1 Hayfield supports the inclusion of at least 40% affordable housing within major residential developments, and increasing to 50% on Green Belt land, in accordance with the NPPF (2024). The option for an off-site provision or financial contribution to be considered as an alternative to on-site affordable housing if it is not suitable or viable, is something that is supported by Hayfield.

7.2 Policy H/HM: Housing Mix

7.2.1 Hayfield 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 remain deliverable and can respond effectively to changing housing requirements over the plan period.

7.2.2 Whilst it is understood that there is a need for a mix of house types, tenures and sizes, it is important that such a policy is flexible and ensures that delivery of housing is not stalled due to overly prescriptive requirements that do not consider the scale and viability of sites. Hayfield supports the flexibility of this Policy, which allows home builders and developers to provide alternative housing mixes as required by the market.

7.3 Policy H/SS: Residential Space Standards and Accessible Homes

7.3.1 Policy H/SS conforms to 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.

7.3.2 However, the requirement for all new residential developments to comply with NDSS standards is not supported by Hayfield. The requirement for NDSS compliance on all new dwellings lacks flexibility and does not comply with National Guidance. There is also a lack of evidence surrounding this compliance requirement. Therefore, it not been justified and should be removed from the Local Plan.

7.3.3 5% minimum Market homes to meet M4(3) regulations and 10% minimum Affordable homes to meet M4(3) regulations within developments of over 20 dwellings is partially supported by Hayfield, in principle. However, the Council should be aware of National Building Regulation requirements and be conscious not to double count.

7.3.4 It should also be noted that if the Council are to implement such a policy in the way outlined within their draft plan, they should allow reflection of this within cost viability assessments. The implementation of such a policy may be a challenge from a viability and deliverability perspective, meaning that further flexibility would be favoured with regards to this policy in order to address these concerns. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.

8. Conclusion

3.1 Hayfield politely request that these representations are taken into account. Land to the south west of Hurdleditch Road, Orwell is readily available and deliverable within the desired timeframe. Therefore, Hayfield Homes recommend that the Council include the site within the emerging Plan as an allocation for residential development.

3.2 I trust that you will find the above acceptable.

Yours Sincerely,

[Redacted Signature]

[Redacted Name]

[Redacted Address Line]