Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Marc Francis	
Organisation (where relevant)	Habinteg Housing Association	
Job Title (where relevant)	Policy & Public Affairs Officer	
Address, including Post Code	Chapman House, Unit 1 Adwalton Business Park 132 Wakefield Rd, Drighlington, Bradford BD11 1DR	
Telephone		
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/SS
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**

Legally compliant	Yes
Sound	Yes

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

As a specialist social housing provider, Habinteg welcomes the opportunity to comment on the Cambridge City and South Cambridgeshire draft Local Plan. Habinteg is a housing association that champions inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone. With over 50 years' experience in housing and disability, we manage around 3,300 accessible properties across England. We believe that people are disabled by barriers in society and negative public attitudes, rather than by their own impairments.

Habinteg strongly supports that this draft local plan includes clear accessibility design standards, specifically Building Regulations M4(2) and M4(3). We believe that 'Policy H/SS: Residential Space Standards & Accessible Homes' as set out in the extract below is an exemplary policy that sets a high ambition for providing homes for older and disabled people and provides clarity for developers, housing associations, planners and residents alike.

6. "All new build residential units (including residential annexes) must be designed to be accessible and adaptable in accordance with the Building Regulations M4(2) standard.

7. For development proposals providing 20 or more new build dwellings, 10% of the affordable units (the majority being within the social/affordable rented units) and 5% of the market units must be 'wheelchair user' dwellings in accordance with the Building Regulations M4(3) standard. These homes should be delivered as Building Regulations M4(3)(a) 'wheelchair adaptable' dwellings unless the Council has identified a need for Building Regulations M4(3)(b) 'wheelchair accessible' dwellings.

8. Exceptions to meeting the Building Regulations M4(2) and M4(3) standards as set out above will only apply where robust justification is provided that sets out how site-specific circumstances, in addition to the other requirements for the development, make the proposed development impractical, unachievable or unviable."

The simple language used alongside clear percentages leaves little room for doubt in the local authorities' commitment to securing more accessible and adaptable homes. This ambition is essential in responding to the changing needs of our ageing population

and providing suitable homes for disabled people. It is especially welcome that Cambridge City Council and South Cambridgeshire District Council have gone significantly beyond the minimum threshold for 40 per cent of new homes to be at M4(2) standards that is specified in the Government's National Planning Policy Framework (NPPF). Habinteg agrees this is the only way to meet actual needs as is evidenced in the estimate of a 54 per cent increase in people with disabilities and impaired mobility in Cambridge and South Cambridgeshire that is noted in the supporting 'Housing Needs of Specific Groups' research.

The approach adopted at this stage of the plan not only supports inclusive communities but also reduces long-term costs which may otherwise fall to the local authority, for example, stairlift installation in an M4(2) home costs significantly less (£2,500–£4,000) than in a home built before the standards came into effect (£9,000–£10,000). The benefits of M4(2) homes are plentiful, and amongst them, new homes that meet category M4(2) will deliver:

- faster hospital discharges
- less costly and speedier adaptations when required
- reduced local authority expenditure on domiciliary care packages by supporting individual independence within the home
- delay or avoid moves to more expensive residential care settings
- provide a better environment for ongoing independence when needs change.

Mandating for 10 per cent of new social homes and 5 per cent of new 'market' homes to be built to the higher M4(3) wheelchair user standards will also generate significant social and economic value – by reducing reliance on social care, minimising accidents in the home and maximising the potential for disabled people to be economically active and take up employment. (See Habinteg's 2023 report with London School of Economics: *Living not Existing*)

The benefits of M4(3) standard new homes are plentiful, and will deliver:

- For a working age wheelchair user, the benefit of living in a wheelchair user home can be valued at around £94,000 over a 10-year period.
- For a later years wheelchair user household (aged 65 and over), the benefit could be around £100,000 over a 10-year period.
- For a household with a child who is a wheelchair user, the benefit of living in a suitable wheelchair user home could be around £67,000 over a 10-year period.
- Removes or reduces the cost of care assistance in the home
- Improves confidence, independence, and self esteem
- Having a secure and appropriate home enables greater social inclusion and community participation
- Reduction in trips and falls in the home.

Overall Policy H/SS is an excellent accessible housing policy. With it included as drafted, the Local Plan could play a key role in ensuring that accessible homes are delivered. We strongly recommend that the local planning teams track and report the number of homes approved under the M4(2) and M4(3) standards. This data will support more effective strategic planning and ensure that delivery aligns with local needs.

Transparent monitoring of the number of accessible and wheelchair user homes being delivered would provide a stronger evidence base for future planning decisions. It would enable Cambridge CC and South Cambridgeshire DC to better understand whether current housing delivery is meeting the needs of disabled people, older residents and others who require accessible housing.

Regular reporting would also identify any shortfalls in provision and enable the authorities to take proactive steps to meet unmet needs. This is particularly important given demographic trends, including an ageing population and a growing number of people with long-term health conditions who may benefit from accessible and adaptable homes.

Publishing this information as part of regular housing delivery monitoring arrangements would improve accountability and help ensure that Local Plan policies are delivering intended outcomes. Over time, a clearer picture of accessible housing supply would support informed policy development, resource allocation and investment decisions, helping to create inclusive communities where people can live independently and safely for longer.

Dwelling mix and quality for older people
Considering the wide range of needs experienced by older people Cambridge CC and South Cambridgeshire DC should ensure that the local plan stipulates a proportion of older persons housing, where newly developed, to be designed to fully wheelchair accessible standard. Habinteg also recommends referring would be developers to the recently published 'Inclusive Housing Design Guide' which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people.

Location and context of developments
Disabled and older people also frequently tell Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and amenities are all important to providing places that are truly liveable which enable people go participate int their local community.
Consideration should therefore be given in the Local Plan as to how Cambridge and South Cambridgeshire wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity to existing amenities.

Please provide a 100 word summary of your representation.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	No

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes