WRITTEN REPRESENTATIONS TO GREATER CAMBRIDGE SHARED PLANNING

REGULATION 19 GREATER CAMBRIDGE LOCAL PLAN CONSULTATION

LAND AT BROAD LANE, COTTENHAM

ON BEHALF OF WOOLSINGTON ONE LTD

25 September 2026

Our Ref: S&R031

Claremont Planning Consultancy Ltd

Somerset House
37 Temple Street
Birmingham
B2 5DP

Tel: 0121 803 7902
Email: info@claremontplanning.com

QUALITY MANAGEMENT

Prepared and Authorised by:	**Victoria Lowe**
Date:	**25 September 2026**
Project Number/Doc Reference:	**S&R015 / Representations**

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1 INTRODUCTION

1.1 Background

1.1.1 Claremont Planning is instructed by Woolsington One Ltd to prepare and submit representations to the Regulation 19 consultation on the draft Greater Cambridge Local Plan in respect of the land under their control located at Broad Lane, Cottenham.

1.1.2 The Regulation 19 version of the Local Plan has been informed by two previous stages of consultation; comprising a 'First Proposals' consultation that was held in 2021 and a subsequent Regulation 18 consultation on the draft Local Plan that was completed in January 2026. Woolsington One Ltd has actively promoted their site throughout the preparation of the emerging Local Plan, and it is maintained that the promoted site at Cottenham represents a suitable, available, and achievable opportunity to deliver new growth within the rural area of Greater Cambridge.

1.1.3 These representations have been prepared having regard to the Regulation 19 Local Plan, the supporting evidence base and relevant national planning policy. The representations focus on the soundness of the emerging Plan, including whether it has been positively prepared, is justified, effective and consistent with national policy, as required by the National Planning Policy Framework. Fundamental concerns are identified in these representations in respect of the emerging spatial strategy which is not considered to provide a justified or effective mechanism through which the housing need of Greater Cambridge can be met. It is identified that the emerging spatial strategy places a disproportionate reliance on large-scale urban extensions and new settlements, with insufficient recognition given to the role that sustainable rural settlements can play in contributing towards achieving timely housing delivery, maintaining community vitality and supporting sustainable patterns of growth.

1.2 Scope of Submission

1.2.1 These representations provide an overview of Woolsington One Ltd's promoted site located at Broad Lane, Cottenham. The structure of these representations follow that of the Regulation 19 Local Plan document, firstly addressing the overall vision and strategy of the Plan before continuing on at Chapter 3 to respond to the proposed housing requirement, the settlement hierarchy, development strategy and relevant thematic policies respectively. A response to the site's assessment within the updated Housing and Economic Land Availability Assessment 2026 is then provided at Chapter 6, whilst Chapter 7 identifies recommended changes necessary to ensure that the Plan is capable of being found sound at examination.

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:

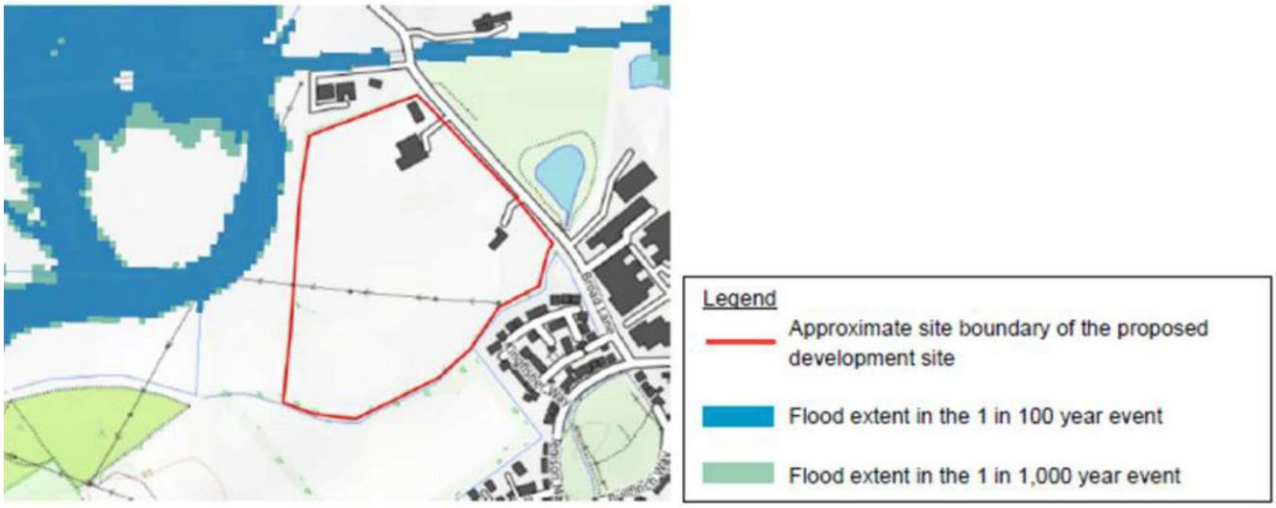


Figure 2.1 – 2015 EA Lower Ouse old west model extract

2.2.5 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 the 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

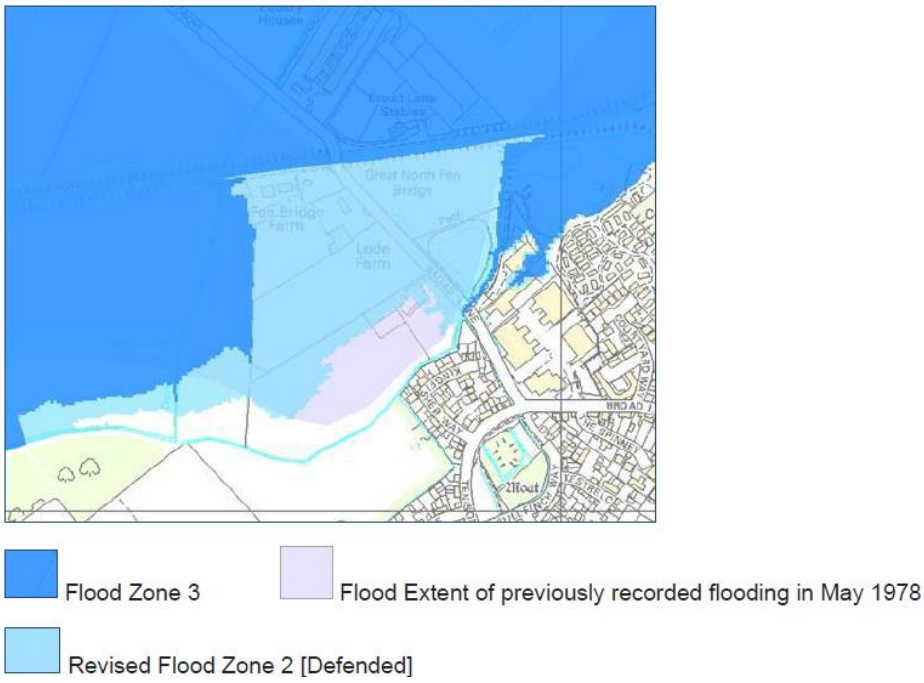


Figure 2.3 – Extract of EA Revised Flood Mapping 2022 in response to Flood Map Challenge

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. Correspondence received from the Environment Agency in March 2026, a copy of which is provided at **Appendix 3** of these representations, confirms the revised model presented above should be included in the Flood Map for Planning. The Environment Agency are

working to update the Flood Map for Planning to reflect this, and it is expected that this amendment will be implemented by Autumn 2026.

3 LOCAL PLAN VISION & THEMES

3.1 Vision for Greater Cambridge

3.1.1 The introduction chapter of the Regulation 19 emerging Local Plan (eLP) establishes the vision for Greater Cambridge through to 2045. The draft vision places significant emphasis on the Councils' climate change aspirations. This is supported insofar as it reflects the proactive approach to mitigating and adapting to climate change that is required to be taken by Paragraph 161 of the National Planning Policy Framework.

3.1.2 However, it is considered that in concentrating on climate change, the proposed vision fails to adequately reflect the purpose of the eLP which is to provide a positive vision for the area and a framework for meeting housing needs and other social, economic, and environmental priorities. The eLP vision as it is currently drafted fails to set out the positive vision that is required by Paragraph 15 of the Framework, and addresses the environmental priorities for the area only. It is particularly notable that the eLP vision omits any reference to the requirement for the eLP to plan to deliver a sufficient number and type of homes to meet Cambridgeshire's needs. In order to provide a vision that is positively prepared and capable of being found sound in accordance with Paragraph 36 of the Framework, it is considered essential that the vision is reframed so that it positively addresses the social, economic, and environmental priorities for the Cambridgeshire area over the emerging Plan period to 2045.

3.2 Strategic Priorities

3.2.1 The eLP identifies that the proposed vision leads into the seven strategic priorities of the Plan which relate to climate change; biodiversity and green spaces; wellbeing and social inclusion; great places; jobs; homes; and connectivity and infrastructure. As identified above, the eLP's vision concentrates almost exclusively on climate change with consideration of any other matters within the vision limited to the contribution that these can make towards achieving the Council's environmental priorities. As such, it is not considered that the eLP vision appropriately reflects, or leads in to, the strategic priorities of the Plan.

3.2.2 It is considered that the strategic priorities broadly address the social, economic, and environmental priorities for Cambridgeshire, as required by Paragraph 15 of the Framework. However, it is considered that the language used throughout each of the strategic priorities is vague. This is particularly evident in respect of the 'homes' strategic priority which simply identifies the intention to plan for enough housing including significant quantities of housing affordable housing and different types of homes to suit diverse communities. In order to be found sound at examination, the eLP must be demonstrated to be positively prepared and effective in accordance with Paragraph 36 of the Framework. It is not considered that this is achieved by the strategic priorities in their current format. In respect of the 'homes' strategic priority, this should be amended to be more precise, confirming that the Councils will plan to meet at least their identified housing needs and that this will include the delivery of a range of housing types and sizes to ensure that the identified housing needs of groups with specific housing needs are met. These amendments would ensure that the strategic priority directly aligns with Paragraph 61 and will contribute towards realizing the Government's objective of significantly boosting the supply of homes.

4 NEW JOBS AND HOMES

4.1 Policy S/JH: New Jobs and Homes

4.1.1 Policy S/JH identifies that the eLP is proposed to cover the period from 2024-2045 however, it is questionable whether the proposed Plan Period is consistent with the requirements of Paragraph 22 of the Framework. The July 2026 Local Development Scheme published by the Greater Cambridge Shared Planning Unit confirms the intention for the eLP to be submitted for examination by December 2026, with timescales for the eLP's adoption to be determined during the course of the eLP's examination. It is therefore considered unlikely that the eLP will be adopted until late 2027 or early 2028, given that Local Plan examinations under the legacy plan-making system typically last between 1 to 1.5 years. Based upon these timescales, it is acknowledged that the proposed Plan period would ensure that the strategic policies of the eLP would look ahead over the minimum 15 year period post-adoption that is required by Paragraph 15 of the Framework. However, the eLP seeks to propose strategic allocations that would include new city districts and settlements. In these circumstances, Paragraph 15 of the Framework requires that policies are set within vision that looks further ahead, at least to 30 years, to take the likely timescales for delivery in to account. Policy S/JH does not identify that any consideration has been given to the requirement for the eLP to be set within a longer term vision, such that the Framework's requirements in this regard are not met. The timescale proposed to be covered by the eLP is therefore contrary to the requirements of national planning policy and is not capable of being found sound at examination. If the Council is reliant on these larger strategic forms of development, the Plan should be framed with a plan period that reflects the delivery of these, and the longer timescales prescribed by national policy.

4.1.2 Part 1b. of Policy S/JH identifies that the eLP will provide for the delivery of 48,069 new homes. The proposed housing requirement has been reduced from that identified by the previous Regulation 18 Local Plan requirement of 48,195 dwellings based upon the publication of updated Standard Method Housing Requirement figures in May 2026. The updated Standard Method requirement for the Greater Cambridgeshire area is 48,069 dwellings, equating to 2,289 dwellings per annum, whilst the proposed housing supply is set out in Table 3 as 52,032, providing a marginal headroom of 8.2%. The proposed approach to housing requirement and supply is not supported by Woolsington One Ltd. In order for the eLP to be found sound at examination, Paragraph 36 of the Framework is clear that the eLP must provide a strategy which as a minimum seeks to meet the area's objectively assessed housing need, and furthermore the Planning Practice Guidance is clear that the standard method for calculating housing need represents a starting point when preparing a housing requirement.

4.1.3 The housing requirement identified by Policy S/JH seeks to provide a strategy which would meet the area's objectively assessed housing need exactly, with limited flexibility and buffer identified in the supply to provide for situations where allocated sites do not come forward in the manner or timescale that is envisaged by the eLP. 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 eLP fails to acknowledge this and accordingly does not provide for sufficient flexibility or contingency in the event that the larger, strategic sites do not come forward as envisaged, or indeed at all. In the event that even a single allocation does not come forward for the amount of housing for which it is allocated, or within the timescales envisaged; the eLP will struggle to meet its statutory requirement of providing a sufficient number of homes to meet its needs and is not capable of being found sound at examination.

4.1.4 It is notable that the eLP proposes to deliver a level of housing that is sufficient to meet the housing needs of the Cambridge City and South Cambridgeshire authority areas only. The Councils are respectfully reminded that the requirements of Paragraph 36 of the Framework also stipulate that the housing requirements set by Local Plans are informed by agreements with other authorities so that unmet need from neighbouring areas will be accommodated. The eLP is supported by a Duty to Cooperate Compliance Statement and Interim Statement of Common Ground, however these documents concern only the engagement that has been undertaken between Cambridge City and South Cambridgeshire Councils. Neither of these documents presents evidence to demonstrate that meaningful engagement has been undertaken with neighbouring authorities to identify whether there is a requirement for unmet housing needs to be addressed by the eLP. Although the statutory requirement to satisfy the Duty to Cooperate has been removed, Paragraph 36 of the Framework upholds this requirement. The Councils must ensure that the evidence provided in respect of the Duty to Cooperate is robust, as the Duty to Cooperate cannot be retrospectively addressed during the course of the eLP's examination.

4.1.5 Part 3 of Policy S/JH identifies that the total housing requirement proposed also includes the requirement for specialist accommodation needs for older people and people with disabilities. This approach is strongly objected to. The standard method housing requirement calculation does not include consideration of specialist housing requirements. As such, the needs of older people and people with disabilities are not addressed by the standard method housing requirement and the needs of these groups should be considered in addition to the Plan's minimum standard method housing requirement.

4.1.6 In order to provide a robust and positively prepared strategy, it is considered essential that the eLP's housing requirement is uplifted to plan for the delivery of a greater level of growth to ensure that there is a level of contingency built into the Local Plan's strategy, and that this also addresses requirements for specialist housing. It is noted that the eLP's spatial strategy concentrates upon delivering new homes within, or adjacent to the main urban area of Cambridge through strategic urban extensions. Rather than further intensifying this strategy to meet any uplifted housing requirement; the Councils should recognise that there are suitable, available, ,and achievable sites located within the Cambridgeshire rural area that should be positively considered for allocation. This is evident in respect of Woolsington One's promoted site at Cottenham which benefits from a location that is immediately adjacent to a sustainable rural settlement. Moreover, the promoted site is immediately available for development such that there are no constraints to the site being brought forward for delivery in the early years of the Plan period.

4.2 Policy S/DS: The Development Strategy

4.2.1 Policy S/DS of the eLP seeks to prioritise the delivery of new development within and adjacent to Cambridge and through the delivery of strategic expansions to Cambourne and the delivery of other new settlements. Paragraph 2.67 of the eLP identifies that rural villages are proposed to

make a limited contribution towards meeting the housing needs of Cambridgeshire, such that only a small number of housing allocations are identified at the most sustainable villages.

4.2.2 As set out in Woolsington One's representations to the previous Regulation 18 consultation on the eLP, 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 Councils' 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 which proposes to concentrate growth within the area between the A11 and A14. Figure 5 of the eLP, which is reproduced below, demonstrates that much of the Greater Cambridgeshire area will not benefit from <u>any</u> new development.

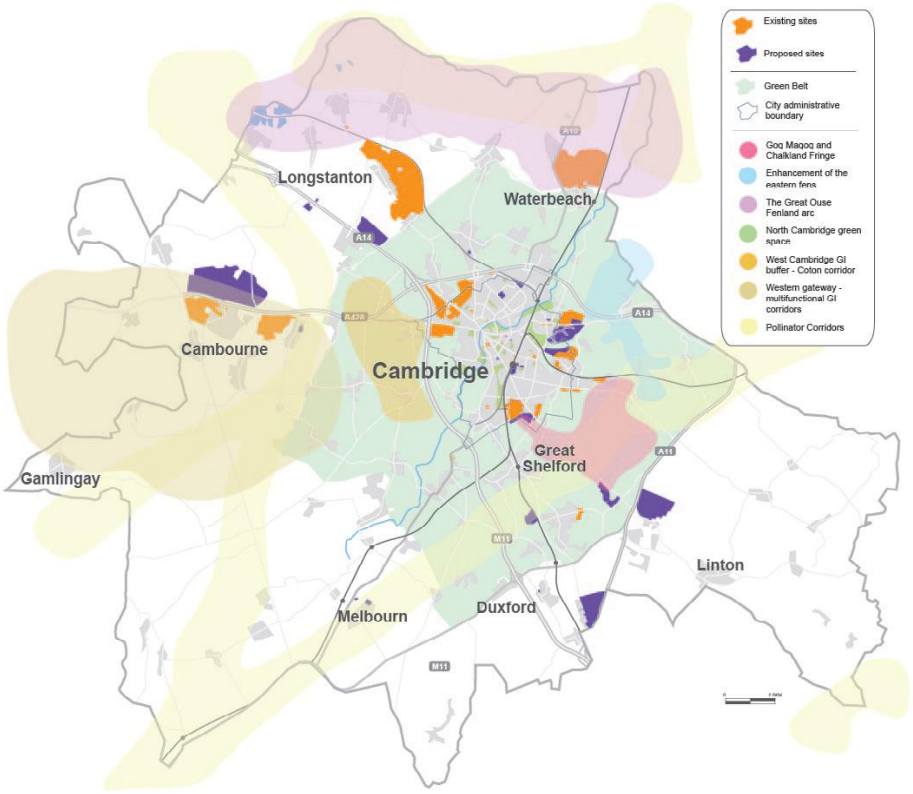


Figure 4.1 – Map showing the proposed development strategy for Greater Cambridge (Figure 5 of the eLP).

4.2.3 Paragraph 2.53 of the eLP seeks to provide justification for the proposed development strategy, identifying that a key principle for the development strategy was the need to limit climate impact and support thriving communities by locating development where active and public transport is a natural choice. It is recognised that Paragraph 110 of the Framework broadly supports this approach. However, it is essential to recognise that Paragraph 110 of the Framework specifies that it is only 'significant' development that should be focused on locations which are, or can be made, sustainable. It is considered that the Councils have misapplied the approach advocated by national planning policy, and instead have prioritised directing growth to only the most sustainable locations in the area. This approach overlooks the other objectives set out in national policy, namely the provisions of Paragraphs 82 and 93 of the Framework which identify the importance of delivering sustainable growth within rural areas to support, maintain, and enhance the vitality of rural communities. The approach taken by the Councils directly conflicts with the justification provided for the development strategy in relation to supporting thriving communities.

4.2.4 Paragraphs 2.41-2.43 of the eLP establish that the proposed development strategy will not meet the national planning policy requirement for 10% of the overall housing requirement to be delivered on small sites of less than one hectare. The eLP instead proposes that only 4.3% of homes will be delivered on small sites. Paragraph 73 of the Framework is clear that strong reasons are required to justify circumstances in which this requirement cannot be met. The justification provided at Paragraph 2.42 of the eLP, that meeting this requirement would necessitate the allocation of sites within the rural area which are determined to be less sustainable. The Councils have prepared a Development Strategy Topic Paper which considers the small sites requirement set by the Framework at Appendix 2 which claims that it is not necessary for the eLP to identify specific sites to meet the small sites requirement, as there is a good prospect that the requirement to deliver 4,807 homes on small sites will be delivered through windfall development during the course of the plan period. By their very nature, the Council does not have control over the size of sites that come forward as windfall opportunities, such that windfall development cannot be relied upon as a credible means of addressing this requirement. The wording of Paragraph 73 of the Framework requires certainty that 10% of the overall housing requirement will be met on small sites, and in this regard is clear that such sites must be identified through the development plan or by the brownfield register. The proposed reliance on windfall opportunities to meet this requirement is therefore in direct conflict with Paragraph 73 of the Framework and does not constitute a sound or positive approach to delivering new development.

4.2.5 Through both the proposed development strategy and the Council's position on the Framework's small sites requirement, it is apparent that a highly restrictive approach to growth in the rural area is proposed to be taken that is predicated upon alleged sustainability grounds. It is considered that the Councils have failed to recognise the opportunities associated with the delivery of development at rural areas. Notably, the Sustainability Appraisal which supports the eLP specifically identifies that the new Local Plan provides an opportunity to address the issue of car dependency within South Cambridgeshire.

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 Woolsington One Ltd's promoted site located at 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.

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 at Broad Lane, Cottenham which is well located to provide convenient access to the bus stops located along High Street and Lambs Lane. 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 eLP establishes the emerging settlement hierarchy for the area. Cottenham is identified as a Minor Rural Centre, one of the higher order settlements within the rural area. This is welcomed however, it is noted that the adopted South Cambridgeshire Local Plan identifies Cottenham 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. The representations submitted on behalf of Woolsington One Ltd to the previous Regulation 18 consultation identified concern regarding the conclusions of the Development Strategy Topic Paper which identified that Cottenham was to be reclassified as a Minor Rural Centre 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. Through the previous representations it was identified that the emphasis on Rural centres needing to benefit from a segregated public transport route to Cambridge was not justified, whereby other settlements such as Sawston were identified as Rural Centres despite not benefiting from a segregated public transport route into Cambridge. The Councils have published Consultation Statement summarising the responses received to the Regulation 18 consultation in relation to the development strategy, which recognises the concerns raised with respect to the re-classification of Cottenham as a Minor Rural Centre. However, it is disappointing that the Councils have not provided any substantive response, or further evidence, to demonstrate why the proposed re-classification of the settlement is justified. It is therefore maintained that the eLP must 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.

4.3.2 Despite the sustainability of Minor Rural Centres that is recognised by the draft Policy, Policy S/SH seeks to restrict windfall development to within the development boundary only and imposes a maximum scheme size of 30 dwellings. This approach is not supported. The maximum scheme size of 30 dwellings appears to be an arbitrary limit that is not justified within the Policy or supporting text. Critically, Figure C1 of the eLP identifies a housing requirement of 130 dwellings to be delivered at Cottenham. However, 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 inset map for Cottenham that is published alongside the eLP 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.

4.3.3 It is acknowledged that it is the Councils' 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 Woolsington 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 is not forthcoming.

4.4 Policy S/DE: Defined Development Extents

4.5.1 Policy S/DE seeks to establish restrictions on the delivery of new development outside of the defined settlement boundaries. As identified in respect of Policy S/SH above, it is considered that the restrictive approach that is taken by Policies S/SH and S/DE of the eLP will frustrate the delivery of development at sustainable rural settlements, such as Cottenham, that is required to meet the housing requirement apportioned to that area. This is particularly relevant in respect of Cottenham, for which no Neighbourhood Plan review is being actively progressed and the proposed settlement boundary is drawn tightly around existing development at the settlement. It is strongly recommended that the wording of Policy S/DE is amended to enable sites that are immediately adjacent to the settlement boundary to come forward for development in the absence of a Neighbourhood Plan to deliver the apportioned levels of growth. This is considered necessary to ensure that the Local Plan strategy is capable of being implemented effectively and will achieve the levels of growth envisaged within the rural area. As identified, Woolsington One Ltd's promoted site located off 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 identified.

4.6 Policy S/MO: Monitoring

4.6.1 Arrangements for monitoring the implementation and performance of the plan, and identifies that if it appears that policies and allocations are not being achieved, a review of housing and employment land supply and allocations will be triggered. These representations have identified fundamental concerns regarding the soundness of the eLP's approach to determining the housing requirement for the Plan and the reliance on strategic scale urban extensions and new settlements to deliver the housing requirement. The recommendations set out within these representations, chiefly that the eLP should be planning to provide a greater level of housing and deliver this through a more even distribution of growth, would assist in safeguarding the Council from having to undertake a review of housing allocations by building contingency into the Local Plan Strategy. It is not considered that the Councils have shown due regard to the opportunity presented by suitable sites within the rural area to contribute to delivering new housing to meet the eLP's housing requirement, and the benefits of such growth in supporting the vitality of rural communities. It has been identified that Woolsington One's promoted site at Cottenham is a suitable and achievable site for development to meet rural housing needs that is immediately available for development and would assist in ensuring flexibility in the eLP's strategy.

4.6.2 The identification at part g. of the policy that the Council would consider seeking to address deficiencies through cooperation with other local authorities under the duty to cooperate. These representations have identified concerns that the Duty to Cooperate has not been satisfied in the Plan's preparation to date, with insufficient evidence provided to demonstrate that meaningful engagement has been undertaken with neighbouring authorities to understand any cross boundary issues to be addressed by the eLP. It is maintained that the Duty to Cooperate and assistance from neighbouring authorities should not be identified as a fallback in the event that the eLP does not perform as envisaged by the Councils, but instead that the Duty to Cooperate and engagement with neighbouring authorities should have been positively undertaken to inform the preparation of the eLP from the outset.

4.7 Policy S/RRA/OHD: Old Highways Depot, Cottenham

4.7.1 Policy S/RRA/OHD of the eLP allocates the land at the Old Highways Depot, Cottenham to provide approximately 1,500sqm of commercial and storage and distribution floorspace. 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. Paragraph 3.5.1 of the eLP identifies that the Councils are seeking to support the vitality of rural settlements, but that the Councils 'do not want to encourage lots of new homes in places where car travel is the easiest or only way to get around'. However, the Councils' should recognise that providing new homes to complement the proposed employment development at the settlement would assist in reducing car dependency within the rural area by reducing the need for residents to travel elsewhere to access employment opportunities. It is maintained that there are suitable opportunities to deliver new housing growth at Cottenham, that have not been recognised through the eLP's preparation. Woolsington One's promoted site at Cottenham is located within a five minute cycle or twenty minute walk from the new employment opportunities located at the Old Highways Depot, such that Woolsington 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 Policy CC/DC: Designing for Climate Change

5.1.1 Policy CC/DC proposes to require that the design of new buildings reflect the cooling hierarchy, and provides detailed guidance as to how this is required to be achieved. It is considered that the wording of this policy should be amended to provide for flexibility in its applications. Specifically, the draft policy text states that developments 'must' reflect the cooling hierarchy, representing a departure from the Framework's guidance at Paragraph 164 which identifies that developments 'should' be planned for in ways that help to reduce greenhouse gas emissions through its location, orientation and design.

5.1.2 Consideration should also be given as to whether the policy text itself can be refined. The Councils have adopted a Sustainable Design and Construction SPD in January 2020 which already provides detailed guidance on the implementation of the cooling hierarchy, such that it is not considered necessary for this guidance to be restated within Policy CC/DC. The Council are reminded that Paragraph 16 of the Framework requires that Local Plans should avoid the unnecessary duplication of policy that applies to a particular area. As such, it is recommended that the policy text is amended to reduce the level of detail that is provided and instead direct developers and decision makers to the adopted Sustainable Design and Construction SPD.

5.2 Policy CC/NZ: Net zero carbon new buildings

5.2.1 Woolsington One Ltd's representations to the previous Regulation 18 consultation identified fundamental concerns regarding the proposed requirement for all new development to achieve net zero operational emissions. It is concerning that due regard has not been given to the concerns previous raised by Woolsington One, and that the draft policy has been carried forward to the Regulation 19 Local Plan unamended, and inconsistent with national policy.

5.2.2 As previously identified, the requirement for all new development to achieve net zero operational emissions far exceeds current and forthcoming 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 Pen[1] 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 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]

5.3 Policy CC/WE: Water efficiency in new developments

5.3.1 Policy CC/WE proposes to require that all developments achieve a water efficient design to minimise the consumption of water and protect water resources. This policy identifies a restriction on water usage for developments of less than 100 dwellings of 90 litres/person/day. This requirement is strongly objected to, whereby this requirement significantly exceeds building regulations requirements for new developments.

5.3.2 The Government consulted on proposed changes to water efficiency standards between September and December 2025 through which it was proposed to strengthen water efficiency standards under Building Regulations 2010 Part G from 125 litres/person/day to 105 litres/person/day, with an optional standard of 100 litres/person/day. The proposed requirement of Policy CC/WE for developments to achieve water efficiency standard of 90/litres/person/day therefore represents a significant reduction below the optional standard that is under consideration by the Government. Whilst it is recognised that water scarcity is an issue in Greater Cambridge, it remains that the eLP or its supporting evidence base does not provide any justification for why such a significant reduction is being sought, or demonstration that such water efficiency standards can be viably achieved by new developments. The supporting text to the policy provides at Paragraph 4.27 of the eLP identifies that the Councils consider that water efficiency can be achieved by new developments by implementing fixtures and fittings that used water efficiently and introducing measures that recycle water. However, the Councils have not provided evidence to demonstrate that the standards proposed by the eLP can be achieved through the use of such water-efficient fixtures alone such that the viability implications of achieving these requirements are unproven. The Councils have failed to demonstrate that draft Policy CC/WE provides a justified strategy that is based upon proportionate evidence, such that this policy is not considered to be capable of being found sound at examination.

5.4 Policy BG/GB: Biodiversity and Geodiversity

5.4.1 Policy BG/GB of the eLP seeks to introduce a requirement for major developments to achieve a 20% net gain in biodiversity, requiring a further 10% uplift in the level of net gain to be achieved against current legislative requirements. 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 opportunities 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

[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.

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 or supporting evidence base and therefore conflicts with Paragraph 16 of the Framework and Paragraph 006 of the PPG.

5.5 Policy BG/UGF: Urban Greening Factor

5.5.1 Policy BG/UGF of the eLP seeks to require that all major developments outside of the Cambridge Defined Development Extent achieve an Urban Green Factor score of 0.5. The requirement to achieve this standard is objected to whereby the Urban Green Factor was developed by Natural England to be a voluntary standard to improve the provision of green infrastructure in urban areas. The Councils should recognise that all qualifying developments are now subject to a statutory requirement to achieve a 10% net gain in biodiversity, and the eLP does not afford any consideration to the relationship between the Urban Greening Factor and biodiversity net gain. Notably, features that contributes strongly to the Urban Greening Factor score do not always contribute strongly towards the achievement of biodiversity net gain. As such, implementing the requirement for development to both achieve biodiversity net gain and a minimum Urban Greening Factor score could frustrate the delivery of new developments by requiring that competing green infrastructure interventions are pursued. It is recommended that the voluntary nature of the Urban Greening Factor is recognised by the eLP and draft Policy BG/UGF is reframed to identify that developments should aspire to achieve the Urban Greening Factor scores identified where feasible and viable.

5.6 Policy BG/TC: Tree canopy cover and the tree population

5.6.1 Part 2 of Policy BG/TC seeks to require the provision of replacement planning where the felling of existing trees or hedgerows is proposed as part of new developments. It is not considered necessary for this requirement to be entrenched within policy. The Councils should recognise that all qualifying new developments are subject to a statutory requirement to achieve a 10% net gain in biodiversity. In order to satisfy this statutory requirement, developments are already required to comply with trading rules where existing habitats, including trees and hedgerows, are proposed to be lost through a development. The biodiversity net gain trading rules accordingly require the replacement of lost habitats with the same type and distinctiveness, or with a higher distinctiveness. As such, the biodiversity net gain regulations already require, and provide a mechanism for securing, the appropriate replacement of trees and hedgerows where these are proposed to be lost through development. It is therefore unnecessary for this to be established as a requirement of Policy BG/TC of the eLP, and doing so represents the unnecessary duplication of policy that Paragraph 16 of the Framework seeks to avoid.

5.7 Policy BG/PO: Protecting open spaces

5.7.1 Policy BG/PO of the eLP seeks to protect designated open spaces, as defined on policies map which accompanies the eLP. This approach is supported. However, Part 1 of the draft policy text identified that other areas of open space, that are not identified on the policies map, will be

protected where they are also considered to fulfil the criteria that is used to assess protected areas of open space. Woolsington One Ltd strongly object to this approach. Through the process of identifying and designating protected open spaces within the Greater Cambridge area, the Council has clearly identified those open spaces that are of a suitable quality and amenity value to warrant policy protection. Paragraph 103 of the Framework is clear that it is the role of the development plan to identify opportunities and the need for open space, sport, and recreation facilities, and that any such policies should be based upon robust and up-to-date assessments. As such, it is not considered appropriate for the Council to reserve the right to apply the same level of policy protection to other, undesignated open spaces within the area that have not previously been assessed as warranting protection and safeguarding as open space.

5.8 Policy GPP/PP: People and place responsive design

5.8.1 Policy GPP/PP of the eLP identifies that development proposals are required to sustain and enhance the unique qualities of their local context and the Greater Cambridge area. This approach is supported in accordance with the aspirations of Paragraphs 131 and 132 of the Framework which establish the creation of high quality and beautiful buildings and places as fundamental to what the planning system should aim to achieve, and provides a clear design approach to be implemented through the eLP. Part 1(a) of the draft policy identifies how development proposals are required to achieve this. However, included within this is a requirement for development proposals to encourage local groups to prepare Neighbourhood Plans to set out design principles which respond to the local context. This approach is not supported and the Councils should recognise that it is not appropriate to require developers, or their development proposals, to encourage local communities to prepare Neighbourhood Plans. There is no obligation for local communities to prepare Neighbourhood Plans and as such whether or not communities progress with Neighbourhood Plans falls entirely outside of the control of developers, and communities should not feel pressured to do so by developers. As such, it is essential that this element of the policy is removed to ensure that development proposals are not identified as being in conflict with the policy simply by virtue of the fact that a Neighbourhood Plan for the area has not been progressed. There may also be circumstances where a Neighbourhood Plan has already been progressed, that does not provide design principles and where there is no intention to reivew or update the Neighbourhood Plan; and development proposals should not be penalised where that is the case.

5.8.2 Part (c) of the draft Policy seeks to require that developments support the climate emergency response. It is not considered necessary for this requirement to be included within the policy, given that the eLP already contains a broad suite of climate change policies that are supported by the Greater Cambridge Sustainable Design and Construction SPD. It is recommended that Part (c) of the draft Policy is removed to prevent an unnecessary duplication of policy, as required by Paragraph 16 of the Framework.

5.9 Policy GP/QD: Achieving high quality development

5.9.1 Policy GP/QD of the eLP continues on to establish design requirements for new developments, and restates the expectation for developments to deliver a design that is responsive to the local context. It is recommended that consideration is given to consolidating Policies GP/QS and GP/PP as both policies seek to achieve the same objective of delivering a high quality and locally responsive design. It is considered that consolidating both policies into a single, overarching design policy would assist in providing certainty to developers as to the design requirements that

are required to be met by their developments. Paragraph 132 of the Framework confirms that this would represent the most appropriate approach, whereby it recommends that Local Plans should set out a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable. Separating design requirements over multiple policies, as is currently proposed by the eLP, is not considered to achieve this. Preparing a single design policy would also assist in removing any unnecessary duplication of policy throughout the eLP, as required by Paragraph 16 of the Framework.

5.10 Policy GP/QP: Establishing high quality landscape and public realm

5.10.1 Policy GP/QP of the eLP identifies a further design policy and associated set of requirements that are required to be met by new developments relating to landscape and the public realm. As set out above, it is considered that the provision of multiple design related policies results in the unnecessary duplication of policy throughout the eLP. In this regard, it is notable that Policy GP/QP identifies further detailed requirements on how development proposals are expected to respond to climate change. As noted previously, the eLP contains a broad suite of detailed climate change policies that are supported by the Greater Cambridge Sustainable Design and Construction SPD. As such, it should not be necessary for the Council to establish further climate change requirements through draft Policy GP/QP. It is strongly advised that the design requirements for new developments are consolidated into a single design policy and, where further guidance is determined to be necessary by the Councils, this should be provided through supplementary planning documents. This amendment is considered necessary to ensure that the eLP is consistent with national policy, which requires that policy is not unnecessarily duplicated, and is capable of being found sound in accordance with Paragraph 36 of the Framework.

5.11 Policy H/AH: Affordable Housing

5.11.1 Policy A/AH of the eLP establishes a requirement for all major housing developments to deliver at least 40% of homes as affordable housing, and identifies that this requirement must be met on site. This approach is not supported, that element of the policy as currently drafted fails to recognise that there may be circumstances in which provision of affordable housing off-site may be preferable, despite this being acknowledged through criteria 7 of the policy. 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.

5.11.2 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, whilst housing needs may also vary geographically across the Plan area. 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 site-specific evidence that may justify provision of a different mix of tenures.

5.12 Policy H/ES: Exception sites for affordable housing

5.12.1 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.

5.13 Policy H/SS: Residential space standards and accessible homes

5.13.1 The identification within Policy H/SS of the eLP that all new homes will be expected to comply with the Nationally Described Space Standards is supported, and will assist in ensuring that new residential dwellings provide a good standard of living accommodation for their residents. Part 2 of the draft policy however restates the requirements set out within the Government's Technical Housing Standards. This represents an unnecessary duplication of policy, contrary to Paragraph 16 of the Framework and should be removed.

5.14 Policy H/CB: Self and custom build homes

5.14.1 Policy H/CB of the eLP proposes to require that all residential developments of 20 or more dwellings provide at least 5% of new homes as serviced plots for custom and del-build houses.

5.14.2 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 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.

5.15 Policy I/ST – Sustainable transport and Connectivity

5.15.1 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.

6 HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT

6.1 Housing and Economic Land Availability Assessment

6.1.1 The evidence base published in support of the Regulation 19 consultation includes an updated Housing and Economic Land Availability Assessment for 2026. Woolsington One Ltd's promoted site is considered within the HELAA assessment under site reference 115451. The previous representations submitted on behalf of Woolsington One Ltd to the Regulation 18 Local Plan provided a detailed response to the assessment of the site made in the 2025 HELAA. The 2026 updated assessment continues to score the site 'red' with regards to its overall suitability which is disappointing given that the previously submitted representations demonstrated that such an assessment of the site was not justified.

6.1.2 With regards to flood risk and drainage, the Flood Risk Officer comment (2025) identified 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 acknowledged that further technical work has been undertaken to produce an updated model showing the site as located outside of the Flood Zone 3 extent. These representations are accompanied by correspondence provided by the Environment Agency (**Appendix 3**) which confirms that the revised flood risk extent identified through the modelling undertaken by WSP is accurate and is to be reflected in an amendment to the Flood Map for Planning.

6.1.3 The updated assessment continues to score the site 'red' in relation to landscape impact. Updated comments have been sourced from the Landscape Officer in 2026 to inform this assessment. However, the Landscape Officer's comments allege that no information was provided within Woolsington One Ltd's Regulation 18 representations in respect of landscape impact or mitigation. This is incorrect. The previous Regulation 18 representations identified that major residential developments have been approved in similar 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 previous Regulation 18 representations also confirmed that the promoted site can accommodate landscape mitigation, 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 evident that Woolsington One Ltd's representations have not been properly reviewed by the Council in the preparation of the updated HELAA assessment. This is disappointing and further confirms Woolsington One Ltd's position that the delivery of growth at rural settlements has not been given any credible consideration by the Councils in the preparation of the Local Plan Strategy.

6.1.4 The updated 2026 comments provided by the Site Access Officer continue to allege that there is no possibility of establishing a safe access into the site. It is maintained that the Officer's

assessment continues to overstate 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.

6.1.5 Accordingly, Woolsington One Ltd maintain that the HELAA assessment has not been appropriately informed by the information provided through previous representations submitted in respect of the site. It is maintained that matters relating to site access, flood risk, and landscape do not represent absolute constraints to the site's development.

7 RECOMMENDATIONS & CONCLUSIONS

7.1 Recommendations

7.1.1 Claremont Planning Consultancy has been instructed by Woolsington One Ltd, to prepare and submit representations to the Greater Cambridge Regulation 19 Local Plan consultation. These representations relate under Woolsington One Ltd's control located off Broad Lane, Cottenham.

7.1.2 These representations have identified fundamental concerns regarding the soundness of the emerging Local Plan, which must be addressed prior to the Plan's submission for examination. To ensure that the Plan is capable of being found sound at examination, the following recommendations have been identified:

- Housing Requirement – The emerging Local Plan proposes to meet the standard method housing requirement for the Greater Cambridge area exactly, providing no contingency in the event that the strategic allocations identified underdeliver, or do not come forward for development within the timescales envisaged. It is imperative that the emerging Local Plan plans to provide for a greater level of housing to ensure that the Plan can be found to be positively prepared and as providing a robust and justified strategy to meet, as a minimum, the objectively assessed housing need Greater Cambridge.

- Reliance on strategic sites – The proposed reliance on strategic urban extensions or new settlements to meet the emerging housing requirement, chiefly around the Cambridge urban area is not considered to be robust or justified, given the well-documented challenges and significant lead in times associated with planning for this scale of development. It is recommended that additional site allocations of small and medium sized sites are identified to support housing delivery, particularly in the early years of the Plan period following adoption.

- Rural spatial strategy – The emerging Local Plan adopts an overly restrictive approach to growth within the rural area which has not been robustly justified within the evidence base documents that support the Local Plan. It is recommended that additional site allocations are identified at rural settlements, such as Cottenham, to ensure that opportunities to deliver growth that supports the vitality and viability of rural settlements are realised in support of the Local Plan's strategic priorities.

- Duty to Cooperate – It has been identified that insufficient evidence to demonstrate that positive and ongoing engagement with neighbouring local planning authorities has been undertaken in support of the emerging Local Plan. The Councils must ensure that the Local Plan has been informed by a robust consideration of cross boundary matters and that this engagement is clearly documented through additional or updated evidence base documents to ensure that the Plan can be considered to satisfy the Duty to Cooperate.

7.1.3 In addition to the above, these representations have identified concerns regarding the thematic based policies contained within the Local Plan. In particular, the proposed climate change policies seek to implement energy and water efficiency requirements that greatly exceed current and forthcoming building regulations requirements whilst insufficient evidence has been provided to

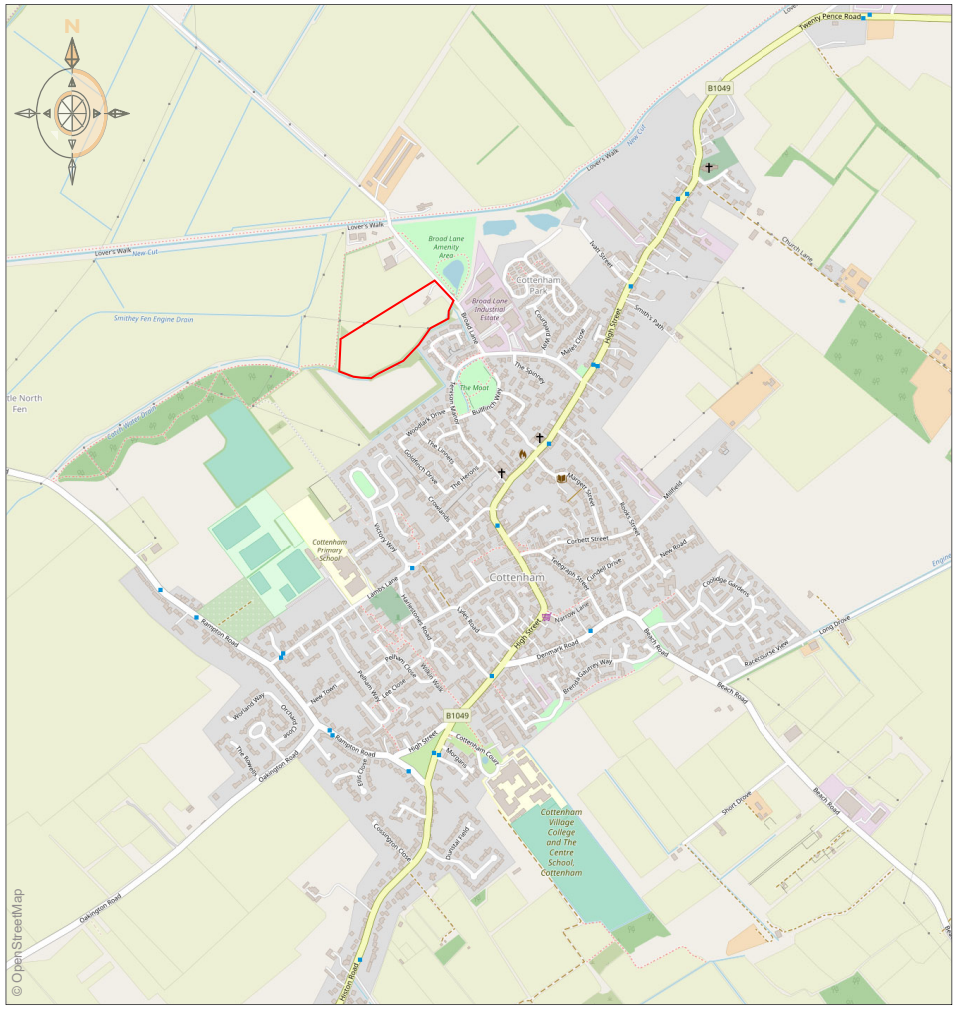
demonstrate how such requirements can be achieved without compromising the viability of new development.

7.2 Conclusion

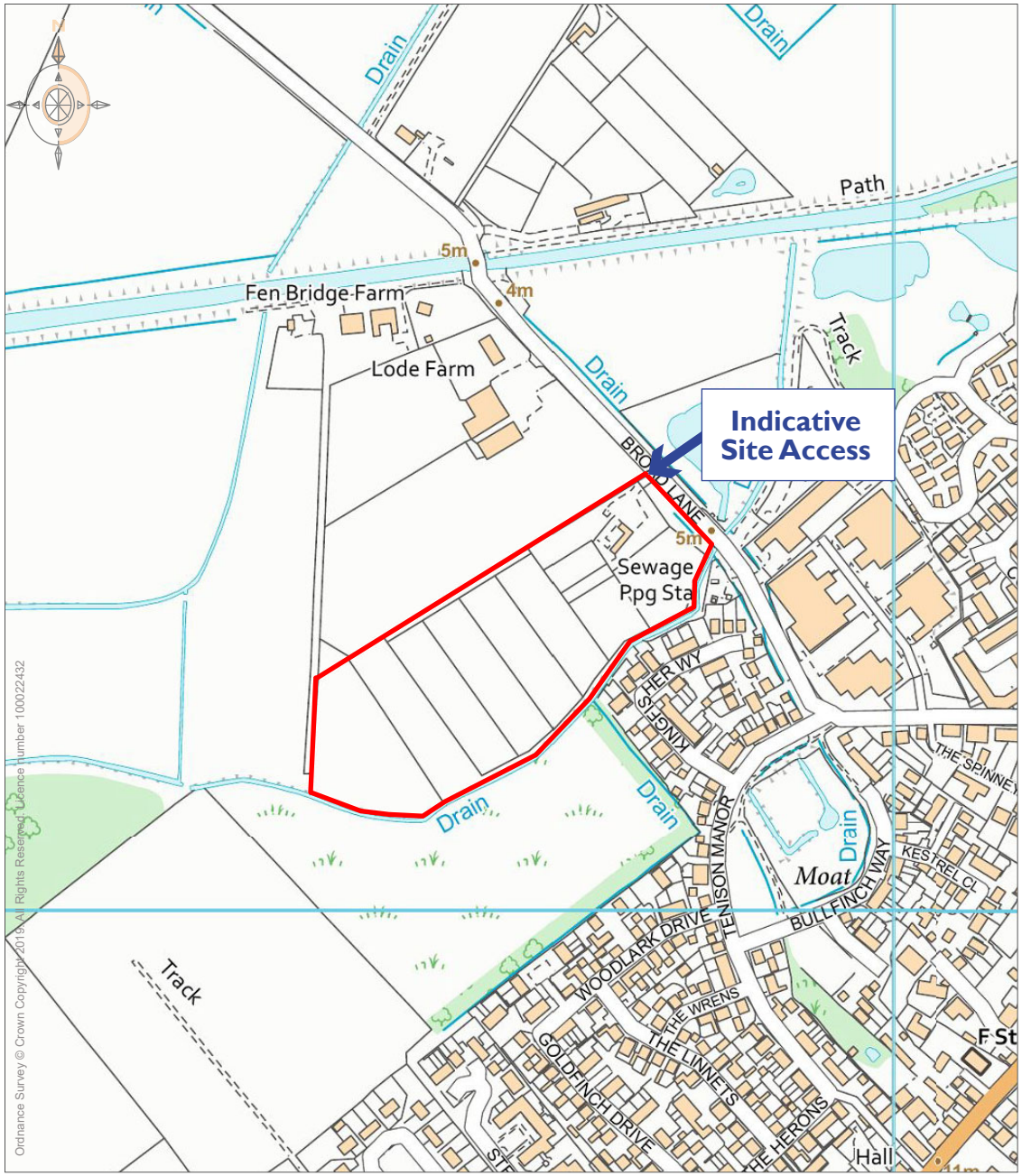
7.2.1 It is not considered that the emerging Local Plan is capable of being found sound in its current format. The emerging Local Plan fails to demonstrate that a positive approach to the delivery of new growth has been taken, and insufficient consideration has been given to the reasonable alternative of delivering growth within the rural area, such as at Cottenham, to support and maintain the delivery of housing throughout the emerging Plan period. The emerging Local Plan strategy must be reviewed, and additional growth identified within the rural area to ensure that the Local Plan provides a robust and effective strategy for meeting the housing needs of Greater Cambridge to 2045.

7.2.2 The Council are therefore respectfully requested to positively receive these representations, and implement the recommendations contained within this report prior to the Local Plan's submission for examination.

APPENDIX 1 – SITE LOCATION PLAN



The site in context



The site in detail

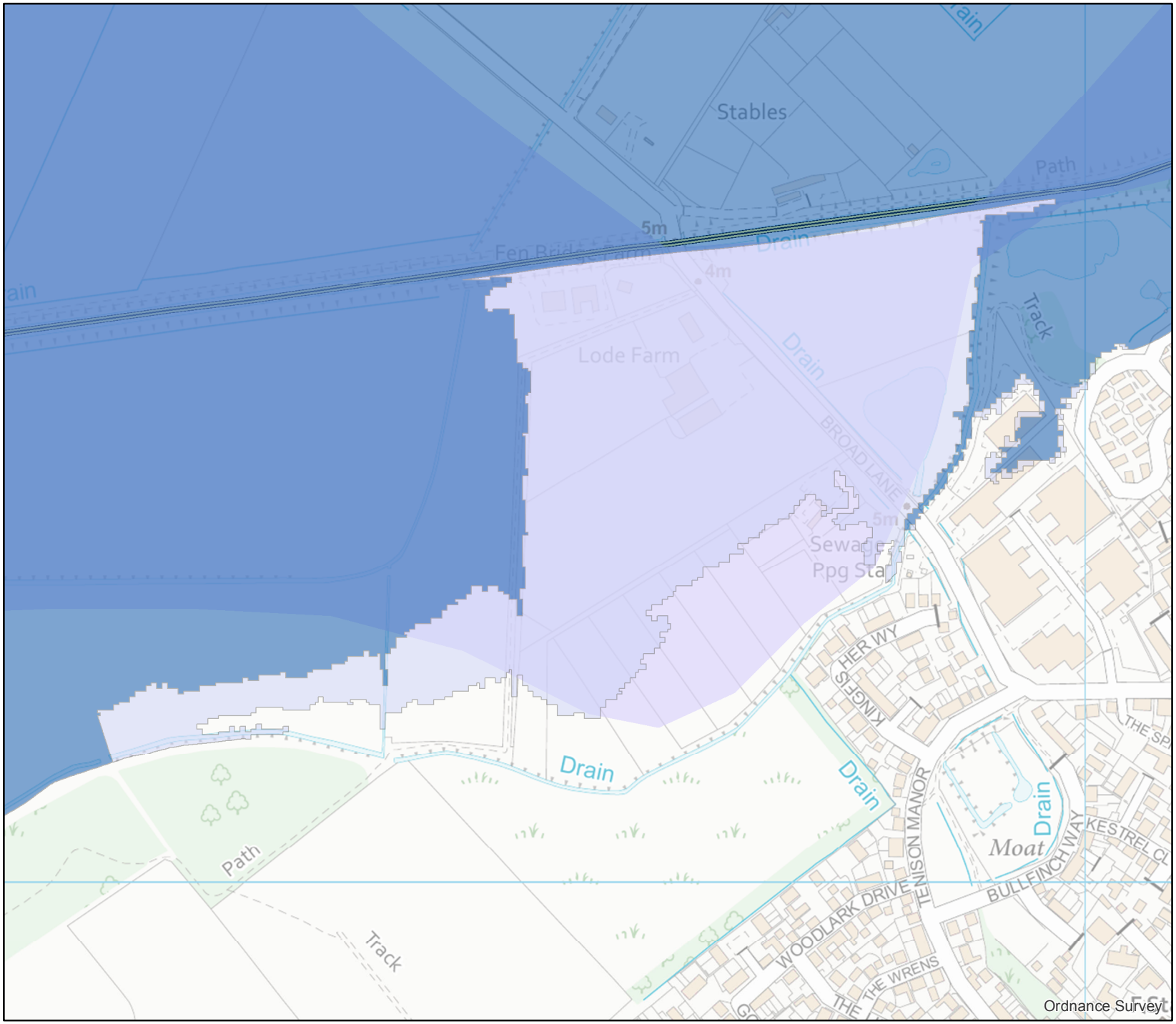
Project	Cottenham, Cambridgeshire	Drawing Number	Status	Drawn By	PM/Checked by	Approved
Title	Site Plan	04120-1.1	FINAL	JC	TR	Approved
Client	Southern & Regional Developments	REV 01	Job Ref 04120	Scale @ A4 (Detail) 1:5000	Date Created 20/03/2019	

Claremont Planning Consultancy
Suite 205 - Second Floor, 2 Snow Hill, Snowhill Queensway, Birmingham B4 6GA
T: 0121 231 3610 M: 07779112641

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

Environment Agency

Legend

- Flood Zone 3
- Flood Zone 2
- May 1978

0 0.05 0.1 0.2 km

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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Contact Us: National Customer Contact Centre, PO Box 544, Rotherham, S60 1BY Tel: 03708 506 506 (Mon-Fri 8-6).
Email: enquiries@environment-agency.gov.uk

APPENDIX 3 – EA CORRESPONDENCE 2026

From: Daniel Cheney [redacted]
Sent: 12 March 2026 16:39
To: Katherine Else [redacted]
Cc: Victoria Morrison [redacted]
Subject: RE: Pre App - Cottenham Flood Map Challenge AC/2021/129995 (Re-charge Agreement ENVPAC/1/EAN/00377)

Some people who received this message don't often get email from [redacted] Learn why this is important
Hi Kathy,

Thank you for your email.

My apologies it has taken me a while to respond. It has been a very busy month or so for me!

You are correct – your model should be included in the Flood Map for Planning (FMfP). The reason it is not currently is due to our switch to our new National Flood Risk Assessment 2 (NaFRA2)system which is now responsible for generating the FMfP. In short, I missed this model when we were preparing for the new NaFRA2 system to be released. I apologise for the inconvenience this may have caused. I am currently working on the model now to upload it into our new systems. This should mean that it returns to the FMfP on the subsequent publication which should be late summer 2026.

Having reviewed all of the submitted model files, I believe we have everything we need to include the model in the NaFRA2 system, however if there are any other files required, I will be in touch.

If you have any questions, please do not hesitate to ask.

Kind Regards

Dan Cheney
FCRM Advisor
Partnerships and Strategic Overview Team
East Anglia Area, Great Ouse Catchment
✉ Environment Agency I Brampton Office I Bromholme Lane I Brampton I Huntingdon I PE28 4NE
[redacted]