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		Stacey Rawlings
Organisation (where relevant)	Gt Shelford (Ten Acres) LLP	Roebuck land and Planning Ltd
Job Title (where relevant)		Director
Address, including Post Code		3 High Street, Stoke Goldington, Bucks MK16 8NP
Telephone		[redacted]
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 S/DS – Development Strategy**
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	
Sound	No

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.

GSTA generally supports the vision and objectives of the plan. However, given the reliance on large-scale development allocations and new communities at strategic locations such as Cambourne which pace of growth will be reliant on key infrastructure delivery, and new locations such as a new settlement at Grange Farm, to the south of Cambridge, the spatial strategy should ensure that development targets can be met and sustained through the plan period to 2045. The spatial strategy relies heavily on growth options that are potentially prone to issues around viability, complex land ownerships and enabling infrastructure – all matters that affect the pace of delivery. The addition of smaller sites to support and strengthen the overall development strategy is critical to support a plan-led system throughout the entire period to meet the housing needs in full.

The housing trajectory set out in the **Housing Delivery Study: Addendum Update 2026** states that the strategy and housing trajectory set out in the plan to meet the Standard Method for calculating housing need (including providing a five-year housing land supply at plan adoption and throughout the majority of the plan period up to 2040/41) only assumes a 5% buffer. The plan headroom is stated as 8.2% (Aecom, June 2026, para 4.1.7,pg.28). The reliance on extensive infrastructure improvements and the authorities past lead-in times for new communities suggests that a 5% buffer is not reliable. The potential for slippage is extremely high. A strong buffer is important to ensure that there is flexibility should sites deliver homes slower than expected. GSTA consider a minimum 10% should be included and based on the spatial strategy and continued emphasis on larger sites in the Regulation 19 draft, 20% would be more appropriate.

The matter of housing need and affordability has worsened in the time spent preparing a replacement Local Plan. The recent years 'cost of living crisis' and increased interest rates have hit young adults in particular looking to buy their own homes. This has also affected the opportunity to provide older persons housing or adaptive homes and purpose-built housing to meet specific needs of local businesses and in particular the bio-medical industry. For homes, the objectively assessed need of 2,289 homes per year (considering Greater Cambridge as one area), or 48,069 homes over a 21-year period, represents a 37% increase on the average level of annual completions over the period 2011/12 to 2023/24 of 1,683 homes. The June 2026 Addendum Update that accompanies the Regulation 19 Plan prefers the Liverpool method taking into account that '*it is very difficult for Greater Cambridge to deliver a sustained increase of 37% in annual completions before adoption of the Plan*' (para4.1.10, pg33, Aecom June 2026).

The Councils advisors, AECOM, previously noted (at Reg18) that there has been a reduction in housing market activity nationally since 2020/21 due to challenging market conditions, and that the overall fall in annual completions is almost entirely due to a drop in new-build completions. Additionally, the number of housing starts on site continues to lag behind the volume of permissions granted. Despite this, AECOM consider that this

reported fall in annual housing completions is a short-term impact within Greater Cambridge and will not be a permanent reduction over the plan period as planning reforms and interventions from the Government are aimed at restoring confidence and certainty to the development industry. GSTA recognises the changes to the planning system and the August 2026 changes at the national policy level are designed to support and accelerate growth but these changes will still take time to come through and there is still no guarantee they will happen at all and a cautionary approach is essential in these circumstances. The market impacts must be considered and the housing trajectory be kept under review whilst the Regulation 19 plan is being examined.

One objective of the spatial strategy is to protect the historic core of Cambridge city, and the city centre to be supported by active, compact neighbourhoods. Gt Shelford village is close to the urban area of the city and is one of the best-connected locations at the urban edge. It benefits from being highly accessible to the city centre via local bus links and active travel modes, including dedicated cycleways. It is close to the employment opportunities at the biomedical campus and key shopping and leisure hubs whilst also being well, placed to offer choice for new residents who may want to benefit from a village environment for schools and local facilities. GSTA had supported the Rural Southern Cluster approach to include consideration of sites at Gt Shelford in the earlier stages of plan production, however the submission plan has drawn back from that approach and opted to favour the expansion of villages beyond the outer Green Belt in less sustainable locations - citing a change in the approach to 'exceptional circumstances' at/around Gt Shelford & Stapleford. GSTA disagrees with this approach. It is already established that greenbelt release will be required. This should properly consider sustainable locations. In addressing the scale of the buffer and delivering the necessary additional homes/sites on non-strategic sites (under 200 homes) in the most sustainable locations, this would meet the exceptional circumstances test previously advanced.

In terms of character, the GTSA site (HELAA reference 115766) can provide additional homes quickly and in the early years of the plan. It would help accelerate the delivery of homes in a sustainable and accessible location and is on a scale that would also support small-medium sized builders.

In terms of the approach to assessing sites within the Rural Southern Cluster on an individual basis, this methodology was generally supported. However, the failure to update the HELAA assessments for site 115766 at Cambridge Road, Gt Shelford continues to artificially constrain the process and as a result, the site opportunity has not been correctly tested. The site should have been 'sifted in' from the 2021/2023 assessment processes as a matter of principle. The 2026 Development Strategy Topic Paper (Appendix 8, Para 1.6 and 1.13) shows that sites that were not considered suitable, achievable have not been subject to re-appraisal as they were not considered reasonable options.

Accordingly, there has been no robust re- consideration of alternative approaches. The preferred growth strategy needs to ensure ample buffer is provided so that the Councils can deliver against the identified housing need to 2045. Greater certainty is required to provide the necessary confidence that the housing requirement will be met in full by 2045.

There are also substantial 'secondary benefits' that could be realised from a higher buffer, including supporting local jobs and economic prosperity for the most sustainably

located villages, and better meeting specialist and older person's housing needs (all of which is in line with the Local Plan Vision). The Sustainability Appraisal recognises these and other benefits of a robust growth strategy as well, such as for health and wellbeing and the vitality of communities.

The Reg 18 Development Strategy Topic paper stated that there was an intention to identify grey belt land. The 2026 updated topic paper that accompanies the Reg 19 Plan states at Appendix 7, para 2.2 '*Noting the lack of a strategic exceptional circumstances case for Green Belt review based on NPPF paragraph 146, further in-depth consideration of areas that could provisionally be considered grey belt has not been undertaken at this time*'.

Only site-specific exceptional circumstances have been considered. This needs addressing for soundness. Again, as HELAA Site 115766 for Land at Cambridge Road, Gt Shelford was sifted out too early, it has not been considered as grey belt Annex 1 of the 2026 Development Strategy Topic Paper Appendix 4.

Small sites:
The Plan only accounts for 4.3% of the housing requirements to be met on small sites under 1hectare. This is significantly below the 'at least 10%' required by national policy, further demonstrating that the development strategy is not fully justified.

Response to HELAA:
Regarding the latest HELAA Site Assessment reference 115766 for Land at Cambridge Road, Gt Shelford (previous HELAA Site ID -2023- 40413), we comment as follows:
Site Access - RAG Rating RED - 2023 and changed to AMBER in 2026.

GSTA welcomes the fact that the site assessment has finally been updated to reflect further information provided. The site is the subject of an outline planning application for up to 100 homes (application reference 26/01933/OUT). A full transport assessment has been carried out for the site and was summarised in the additional information under the 'Sites Form' at Regulation 18. Access is not a constraint to development, and the RAG rating should have been upgraded to Green. This change in status could have enabled the site to be considered for allocation to support/accelerate housing delivery.

Fire Services – RAG Rating Red 2021 – GSTA has received feedback from CCC Highways as submitted in the Reg 18 Call for Sites, demonstrating that the access is suitable for emergency services including fire and rescue. In any event, the HELAA acknowledges that up to 100 homes is supportable from one point of access and having assessed the site for 96 homes, the RAG rating should have been updated to GREEN.

Accessibility – RAG Rating AMBER – 2026 - *Adequate accessibility to key local services, transport, and employment opportunities.* Whilst GSTA welcome the updated assessment to acknowledge the site is in an accessible location, the general location for sites at Gt Shelford were considered 'highly sustainable' at the First Proposals stage. The principle of whether this site is located in a 'highly sustainable' location should be treated the same as other sites, such as land at Hinton way/Mingle Lane for assessment purposes which all scored good on 'accessibility'. Accordingly, the rating should be recorded as GREEN for consistency and fairness.

Landscape – RAG Rating Amber – 2021. GSTA notes that the landscape assessment has not been revisited since the 2021 assessment. The previous rating of amber reflected a higher density option. The summary guides that a reduction in residential units would lessen the harm. Accordingly, as the HELAA has assessed the site for 96 homes – a reduced amount – the Landscape assessment should have been updated from Amber to GREEN. Further landscape assessment work has been carried out by GSTA and was summarised in the submission at Regulation 18 Stage. The outline planning application includes a landscape assessment and the RAG rating should have be adjusted to reflect the updated information.
Archaeology – RAG Rating GREEN – GTSA welcomes the updating of this section to reflect the fact that there is no archaeological constraint to development.

Flood Risk – RAG Rating AMBER – 2026. The Amber rating from 2021 arose from an incorrect assessment that the site was within FZ2 and/or in an area at risk from surface water flooding. The Flood Risk Officer has updated the assessment in 2026 and correctly reported the site is wholly in FZ1 and low risk of surface water flooding. GSTA do not understand why the RAG rating has not improved to GREEN as a result. This should be corrected.

The overall 'Suitability Score' is has improved from Red to Amber. However this is incorrect and must be updated as per the above comments. The site access is not a constraint to development and is still being misrepresented. The other Amber ratings have been assessed and the evidence submitted to the 'Sites Form' demonstrates that a GREEN score is more appropriate. The fact that not all parts of the suitability assessment were updated to 2026 means that the site has continued to be overlooked in any of the assessments and consideration of alternative approaches.

Please provide a 100 word summary of your representation.

The spatial strategy relies heavily on growth options that are potentially prone to issues around viability, complex land ownerships and enabling infrastructure – all matters that affect the pace of delivery. The addition of smaller sites to support and strengthen the overall development strategy is critical to support a plan-led system throughout the entire period to meet the housing needs in full by 2045.

A strong buffer is important to ensure that there is flexibility should sites deliver homes slower than expected. GSTA consider a minimum 10% should be included and based on the spatial strategy and emphasis on new settlements and strategic sites, 20% would be more appropriate.

There are instances where site assessments were not updated until the 2026 HELAA. As a result the evidence base to consider the development strategy and reasonable alternatives is not robust.

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.

The provision of additional allocations is necessary to sustain the delivery of housing throughout the plan period and to meet the needs in full. Non-strategic sites should be considered as a priority to aid early delivery in the most sustainable locations.

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	yes

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

To participate in the discussion on the issues raised.

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