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	Michelle Simpson-Gallego	
Organisation (where relevant)	Hayfield Homes	
Job Title (where relevant)	Senior Planning Manager	
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* 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 **Policy S/SH** Settlement Hierarchy **Omission Site**: Land to the south west of Hurdleditch Road, Orwell – current site ID:115798 (2023 HELAA site ID: 40378)
Proposed Submission Policies Map	Orwell inset to include the allocation of Land to the south west of Hurdleditch Road, Orwell as a housing allocation
Sustainability Appraisal	Exclusion of site and treatment of reasonable alternatives as well as reasoning for not selecting the site for allocation
Habitats Regulations Assessment	Implications arising from the outstanding Air Quality Assessment work

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

Test	Yes / No
Legally compliant	No, on the published evidence, legal compliance in relation to the assessment of reasonable alternatives has not been demonstrated
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.

Hayfield Homes objects to the omission of Land to the south west of Hurdleditch Road, Orwell, Site ID 115798/HELAA Site ID 40378); and seeks its allocation as a suitable site for residential development. The full extent of the Site extends to 4.46ha and is shown on the extract below.



Figure 3.1 Site Location Plan OS Base

Policy S/DS Development Strategy (Delivery and Resilience)

The Plan identifies in Policy S/JH a need for 48,069 homes reflecting an annual need for 2,289 homes to meet the local housing needs.

Policy S/DS (Development Strategy) identifies a total housing supply of 52,032 dwellings to be delivered over the plan period (2024-2045). This is defined as providing a 8.3% headroom against the minimum housing need.

Appendix D of the GCLP Reg 19 Plan sets out the Housing Trajectory for the plan period, whilst the site specific schedules underpinning the trajectory are set out separately, in the *Development Strategy Topic Paper Appendix 10: Housing Trajectory for the Local Plan*.

The Development Strategy is based on a number of new Settlements some (44% of growth) with 30% of growth proposed on the edge of Cambridge; 11% at Cambridge Urban Area and only 15% to the Rural Areas.

The Proposed Development Strategy relies heavily on Urban Extensions and New Settlements where there is a need for the provision of a significant level of infrastructure which requires a long lead in time and has an associated risk in terms in term of deliverability, particularly in light of current economic conditions.

The reliance on a relatively small number of very large scale Urban Extensions and New Settlements, notably Northstowe, Water Beach New Town, Bourne Airfield New Village, Cambridge East, North West Cambridge, Cambourne North and Grange Farm New Settlement is a fundamental part of the Plan, which are projected to deliver around 24,000 new homes by 2045. The delivery of these allocations is critical to the implementation of the development strategy. Any delay in these sites coming forward which make up a substantial amount of the supply, would therefore have a significant effect on the overall Housing Trajectory which reinforces the need to have more flexibility in the supply of sites, particularly in the early part of the Plan period.

The Development Strategy already acknowledges that sustained delivery at or above the annual requirement is not anticipated until the second half of the Plan period due to the scale of the strategic sites and due to wider infrastructure constraints such as water and transport.

In terms of delivery, within ***Appendix D*** the Council have applied peak build out rates of 300 dwellings per annum for the new settlements and 350 dpa for the other urban extensions adjacent to Cambridge. These assumptions should be tested against the circumstances and evidence for each site and phase.

The **Housing Land Supply Report** prepared by Tetra Tech provides an assessment of the deliverable supply in Greater Cambridgeshire which is attached as **Appendix 2** to these representations. This highlights that the deliverability assumptions contained in the Plan are not robust with the assumptions made on 17 sites (or parcels within larger sites) disputed, due to a number of factors, including lack of firm progress on a number of the large strategic sites and unrealistic delivery assumptions.

In this regard the projected 'peak' annual delivery on the large scale allocations pre-dates evidence recently issued by the Home Builders Federation (HBF) in '*The Viability Crunch'* in May 2026 which estimates that cumulatively policy costs, taxes and inflation have added around £76,000 per home over the past five years, significantly more than the average house price inflation in the same year. This has implications for both the viability and the pace of delivery of new homes, as where costs rise, but land values do not or

cannot adjust sufficiently, Section 106 and affordable housing contributions may need to be reduced to ensure development can still come forward. Addressing these and other site specific issues could lead to a slow down or delay sites or phases of sites from coming forward, which would undermine delivery projections.

The earlier 250 dpa benchmark for strategic sites is drawn from historic delivery. The question is whether the higher peak rates now assumed are supported by current site-specific evidence, including the number of outlets, infrastructure dependencies and timing of phases.

It is also pertinent to note that the GC Housing Delivery Study Addendum 2025 (update) recognises that 'market absorption' is a real issue for Greater Cambridgeshire, given the concentration of large scale allocations adjacent to Cambridge City (see para 5.40 of the report). The update also accepts that providing development in the villages, (alongside urban extensions and new settlements) will provide a wider choice of housing in the market for people in terms of size of location and will increase the market absorption rate.

On the basis of the above, the use of 'peak' delivery rate is not considered to be a robust approach for the plan period supply projections over the medium to long term and is not soundly based. The trajectory should be revised where the Tetra Tech site-by-site evidence identifies unsupported assumptions; higher rates should be retained only where justified by evidence for the particular site and relevant phases.

The allocation of a range of sites, including small and medium sites, would provide a more robust strategy and certainty of delivery as set below.

Proportion of Growth to Rural Areas and Provision of a Small and Medium Sites

As set out previously Hayfield Homes consider that a higher level of growth should be directed to the Rural Areas to maintain their vitality, to support existing services and to ensure a suitable supply of homes, including affordable housing and specialist housing. This is contrary to the strategy in the Plan which sets out that villages should play only a limited role in meeting future development needs.

Orwell is a settlement defines as Group Village in the GCLP which are sets out as being generally less sustainable than the Rural Centres and Minor Rural Centres. Orwell does however benefit from a Primary School, Petersfield CE Primary School, with capacity for up to 210 pupils and also benefits from a number of other services and facilities as well as a regular bus service providing links to other villages and Cambridge. Orwell is therefore considered to be a sustainable settlement to accommodate further growth given the services and facilities it offers and the ability for development to support these facilities, including the Primary School.

The Sustainability Appraisal (July 2026) recognises at paragraph 4.34 that infrastructure delays, competition between major sites and similar housing products may reduce build-out rates of sites in Greater Cambridgeshire. This should be addressed as set out in these representations through with the provision of a wide range of sites within the Strategy, in different locations with the inclusion in particular of small and medium size sites consistent with paragraph 73 of the December 2024 NPPF, which can provide a greater degree of resilience rather than a heavy reliance on few strategic sites will mya not deliver precisely as forecast.

Lichfields' Start to Finish', Edition 3, published in March 2024 provides evidence that smaller and medium-sized sites are likely to provide earlier delivery, while large strategic developments typically have longer lead-in periods due to a number of economic factors including substantial infrastructure requirements.

As previously set out in Hayfield Homes representations to the Reg 18 Plan, small and medium size sites can make an important contribution to meeting the housing requirements of an area, they are also are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly. There is also a need to allocate a diverse range of sites to support and enhance the vitality of rural communities and enable services to grow and thrive as reflected in paragraphs 73 and 83 of the December 2024 NPPF.

The SA accepts at paragraph 4.41 that village growth can support the viability of existing services and facilities, but that benefit is not properly reflected in the growth proposed to Rural Areas in the Plan, such as Orwell.

The allocation of small and medium sites such as *Land to the south west of Hurdleditch Road, Orwell* would assist the Council in meeting its housing needs in the short and medium term. The site is within a sustainable location, immediately adjacent to residential development and its allocation for housing development would support the existing services and facilities in Orwell.

Policy S/SH Settlement Hierarchy

The Policy S/SH sets out that an indicative maximum size of 8 dwellings will be permitted within the Group Villages which may exceptionally consist of about 15 dwellings where this relates to a brownfield site. This artificially constrains supply and limits the potential for sites to come forward and deliver appropriate housing in the Group Villages, such as Orwell.

There is a need for a range of sites to be provided, particularly within the Rural Area as set out in response to the Development Strategy (Policy S/DS) to support and enhance the vitality of rural communities and allow them to grow and thrive as reflected in paragraphs 73 and 83 of the December 2024 NPPF. The restrictive approach of Policy S/SH fails to take account of rural housing need and sustaining the vitality of rural communities. It also prevents the most efficient use of land and the ability to deliver other benefits that would arise through development such as affordable housing, the enhancement of services and facilities as well as the provision of new community facilities.

Failure to assess Land to the south west of Hurdleditch Road as a Reasonable Alternative

The site has not been considered as a reasonable alternative in the Sustainability Appraisal. Paragraph 2.26 states that all reasonable alternative site options arising from the 2022. 2025 and 2026 HELAA work have been subject to SA. Land to the south west of Hurdleditch Road, Orwell is not identifiable in the comparative appraisal of the schedule of sites selected or rejected.

There is no clear site specific evidence as to why the site was not treated as a reasonable alternative. Paragraph 4.137 confirms that the SA assessment used the HELAA data provided from the Councils. The conclusions from the HELAA which considers the site to be suitable does not appear to be taken into account witing the Submission documents.

A modest housing allocation on ***Land to the south west of Hudleditch Road, Orwell*** would support a more balanced distribution of development. This would assist in maintaining the vitality of Orwell and that of the other villages within the Group Villages.

The omission of the Hurdleditch Road site is not justified unless the Council can demonstrate that it has:

- assessed the site using the same criteria and evidence applied to comparable sites;

- assessed an appropriate development capacity rather than rejecting the whole site where a smaller developable area could be suitable;
- considered the benefits of small-site delivery and spatial diversification;
- assessed cumulative growth and infrastructure effects at Orwell proportionately; and
- tested a reasonable alternative involving additional small village allocations through the Sustainability Appraisal.

Without that evidence, the Plan has not been demonstrated to be justified as the most appropriate strategy when considered against reasonable alternatives.

The Plan is not **effective**, as the development strategy does not provide for a diverse supply of sites which will deliver consistently throughout the Plan period. The heavy reliance on a small number of Urban Extensions and New Settlements which require substantial infrastructure delivery, will be tents because insufficient diversification of its housing portfolio increases the risk that delays to strategic sites will undermine delivery.

The Plan has not been positively prepared, as suitable opportunities to provide additional homes in sustainable village locations, such as Land to the south west of Hurdleditch Road, Orwell have not been maximised. It is also not clearly consistent with national policy, including the objective of maintaining a sufficient supply and mix of housing sites, as there is a lack of small and medium size sites housing allocations in the Plan.

The Council should reassess ***Land to the south west of Hurdleditch Road, Orwell*** as a potential housing allocation. The initial work that has been carried out on the site demonstrated that there are no environmental or technical constraints that would prevent the site coming forward for residential development.

Please provide a 100 word summary of your representation.

The Plan is unsound on the basis that it does not allocate sufficient small and medium sized housing sites in the Rural Areas, and in particular, in the Group Villages, which will undermine the vitality of rural communities in villages such as Orwell.

The Development Strategy is too heavily reliant on large Urban Extensions and New Settlements which places the Plan strategy at risk due to the significant infrastructure required and lead in time associated with large strategic developments.

Land to the south west of Hurdleditch Road, Orwell - site 115798 and 2023 HELAA site 40378, should be allocated as a medium sized housing site in the GCLP. Its omission has not been transparently justified given the findings of the HELAA and against the reasonable alternatives or comparable sites. Allocating this site for residential development would diversify housing supply, improve delivery resilience, support local housing needs and help sustain village services in Orwell including Petersfield Primary School as well as the services and facilities

within the other villages in the surrounding rural area. The Sustainability Appraisal and site-selection evidence should be amended accordingly.

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.

Concept Layout Plan (Appendix 1)

Housing Land Supply Assessment Report prepared by Tetra Tech, dated September 2026 (Appendix 2)

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.

Policy S/DS Development Strategy

-Modify Policy S/DS and its supporting text to include a broader range of sites to specifically include small and medium site allocations to provide a greater degree of flexibility to the housing land supply, certainty for SMEs and more resilience to the Plan.

- Modify Policy S/DS to increase the level of growth proposed to the Rural Areas of South Cambridgeshire to support the vitality of existing rural communities

- Allocate 'Land to the south west off Hurdleditch Road, Orwell for residential development with an indicative capacity of 60 dwellings in line with the evolving masterplanning, landscape, ecology and transport work that has been undertaken to date.

-Amend the **Policies Map** to identify the proposed allocation and make the necessary amendments to Orwell's defined development extent.

This modification would make the Plan more positively prepared, justified and effective by including a small housing allocation which is available now and deliverable which would increase the diversity and resilience of housing supply and reduce overdependence on the large strategic sites.

Policy S/SH Settlement Hierarchy

- Reassess the housing distribution and allocate a larger number of suitable small and medium-sized sites in villages, including Orwell. The site selection process should take into account the contribution small and medium housing site can make to deliverability, settlement sustainability and sustaining serviced and facilities and meeting local housing need.

Sustainability Appraisal (SA)

-Undertake a supplementary Sustainability Appraisal of land to the south west of Hurdleditch Road, Orwell as a reasonable alternative, comparing it consistently with the other sites in SA and explaining transparently the reasons for selection or rejection.

Habitat Regulations Assessment (HRA)

If the site is considered for allocation, undertake proportionate HRA screening of Land to the south west of Hurdleditch Road, Orwell.

Update the Housing Trajectory

Review the Housing Trajectory using realistic site-specific lead-in times and build-out rates.

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.

Participation is necessary as this representation raises strategic and site-specific matters concerning the development strategy and housing distribution particularly with the Rural Areas, the absence of small-site allocations, the deliverability and resilience of the Housing Trajectory, the assessment of reasonable alternatives, and the omission of land to the south west of Hurdleditch Road, Orwell.

Oral participation would allow the representor to respond to the Councils' evidence, explain the site's circumstances and assist the Inspector in considering whether the Plan is positively prepared, justified, effective and consistent with national policy.

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

Section 3: Continuation Sheet

Representations by Hayfield Homes concerning Site 40378

Land to the south west of Hurdleditch Road, Orwell



Figure 3.1 SLP

Land to the south west of Hurdleditch Road, Orwell is available and the work undertaken to date has not identified a technical constraint that would prevent a residential scheme coming forward with an indicative capacity of up to 60 dwellings subject to detailed design and technical assessment which will support the services and facilities in Orwell. The emerging proposals for the site as shown in Figure 3.2 demonstrate that that through a landscape led approach, as is proposed, the site can come forward in the short term.

The evolving masterplan shows how the site could come forward with an indicative capacity of up to 60 dwellings including 40% affordable housing.



Figure 3.2 Concept Plan

The proposals can also address the need for a new recreation ground and improved football facilities in the village which would benefit residents and Orwell Football Club who currently play matches away from the village due to insufficient FA standard football pitches being available in the village.

The proposals for the site would also support the existing Petersfield Primary School which has capacity for up to 210 pupils with a Pupil Admission Number (PAN) of 30 pupils per year. The school serves Orwell and surrounding villages and has capacity for additional pupils. The 2026 intake into reception is 20 pupils which leaves capacity for a further 10 pupils.

Environmental and technical work is currently ongoing and will be used to further refine the proposals.