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)
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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: Rest of the Rural Area and Housing Trajectory; **Policy S/SH** Settlement Hierarchy: Rural Centres and Minor Rural Centres; **Policy S/DE** Defined Development Extents Rest of the Rural Area: **Omission of Land north of Oakington Road, Cottenham, Site 208866** (formerly site 40417 and adjoining land parcel),
Proposed Submission Policies Map	Cottenham inset and omission of Site 208866 from the Policies Map
Sustainability Appraisal and Sustainability Appraisal Non-Technical Summary	Paragraphs 2.26, 4.34, 4.41-4.44, 4.137 and 4.177; Table 4.8; Non- Technical Summary Paragraphs 1.22- 1.27; Appendix E in relation to the exclusion of sites and treatment of reasonable alternatives
Habitats Regulations Assessment	Paragraphs 6.1-6.6; 6.7-6.11 in terms of the implications from outstanding Air Quality Assessment work that will form an addendum to

	the HRA; Appendix C: Development Areas assessed in the HRA

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 - the Plan is not justified, effective or consistent with national policy in the respects identified below

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.

Terra Strategic objects to the omission of ***Land north of Oakington Road, Cottenham***, Site ID 116520/ HELAA Site ID 208866 (formerly Site 40417 and adjoining parcel of land north of Oakington Road and Clarke Close); and seeks its allocation as a suitable site for residential development. The full extent of the Site which extends to 4.82 ha is shown on the extract below.



Fig 3.1 Site Location Plan

The complete representation is provided on the attached Section 3 continuation sheets and forms part of this response.

Please provide a 100 word summary of your representation.

We object to the omission of the two parcels that form ***Land north of Oakington Road, Cottenham*** which have been identified in previous submissions by Terra Strategic to early iterations of the GCLP (now known as site ID 116520 and HELAA Site ID 208866) as a suitable site for housing. The Council have failed to assess the site in its assessment of suitable sites. We also object to the failure to allocate the site for housing development.

The Sustainability Appraisal does not assess ***Land north of Oakington Road, Cottenham***: Site 208866 (formerly 40417), alongside other alternative sites in Cottenham.

The Development Strategy in ***Policy S/DS*** of the Plan has an overreliance on Urban Extension and New Settlements which fails to make provision for growth in the rural parts of South Cambridgeshire. The strategy also does not allocate sufficient small and medium housing sites for development which leave the housing land supply vulnerable.

The downgrading of Cottenham's settlement status from a Rural Centre to a Minor Rural Settlement in ***Policy S/SH*** understates the level of services and facilities contained within Cottenham. Cottenham contains a range of services and facilities and the Guided Busway is accessible from the site by cycling. Moreover, Cottenham's relationship with Northstowe and Waterbeach will significantly increase the service offer to residents in Cottenham and the sustainability credentials of the site.

Land to the north of Oakington Road, Cottenham would provide a deliverable medium-sized housing allocation which would assist in supporting village services, diversify housing supply and improve the overall resilience within the Plan which currently relies heavily on a small number of large urban extensions and New Settlements which will not deliver significantly until the later part of the Plan period.

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.

The supporting documents comprise of:

- **Concept Plan CP01** illustrating how the development can come forward with a landscape led approach (Appendix 1)

- **Appeal decision** APP/W0530/W/25/3360199 relating to application 24/02654/OUT, July 2025 (Appendix 2).

- **Housing Land Supply Report** prepared by Tetra Tech, dated September 2026 (Appendix 3)

- **Lichfields, Start to Finish**, third edition, March 2024.

- **Landscape and Visual Appraisal** dated April 2026 demonstrates that the site is suitable for residential development and that a landscape led approach to the proposed development which would include the retention of existing landscape features and new landscaping would enable the development to be assimilated within the site (Appendix 4) .

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 following modifications are necessary:

Policy S/DS Development Strategy

-Modify Policy S/DS and its supporting text to include a broader range of sites to specifically include a 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 communities.

Allocate '***Land north of Oakington Road, Cottenham'***, for residential development with an indicative capacity for up to 96 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 amendment to Cottenham's defined development extent, this should also reflect the consented development immediately to the east of the Site.

- Add the site to the housing trajectory with a realistic contribution during the first five years following adoption, given the site's suitability, immediate availability and the intentions of Terra Strategic to bring forward residential development on the site as previously set out in previous representations to the GCLP.

Policy S/SH Settlement Hierarchy

- Modify **Policy S/SH** and its supporting text to retain Cottenham as a Rural Centre. The hierarchy methodology should also be updated in the Settlement Hierarchy Study and supporting text so that Cottenham's role is assessed in light of its proximity and accessibility to the existing Guided Busway, as well as its functional relationship with Northstowe and Waterbeach over the Plan period with the existing and planned infrastructure. The Guided Busway provides a fast public transport corridor for journeys to Cambridge, Huntingdon, St Ives and the rest of Cambridgeshire, which is a significant sustainable benefit accessible, particularly in terms of sites located on the western side of Cottenham.

HELAA

- Update the **HELAA** to assess the full extent of the site as submitted previously to the Council, in particular Terra Strategics representations in January 2026 to the Regulation 18 consultation and take account of appeal APP/W0530/W/25/3360199 rather than relying on the previous landscape characterisation of the site made by the Council of the location of the site being isolated.

Sustainability Appraisal (SA)

- Undertake a supplementary Sustainability Appraisal of ***Land off Oakington Road, Cottenham*** as a reasonable alternative, comparing it consistently with the other Cottenham sites and explaining transparently the reasons for selection or rejection.

Habitat Regulations Assessment (HRA)

- If it is considered for allocation, undertake proportionate HRA screening of Land to the north of Oakington Road, Cottenham

- Complete the outstanding Air Quality Assessment of the Local Plan in the HRA, publish the assessment as part of the evidence base to understand the impact of the increase in traffic from the

proposed plan strategy and to establish if any changes are required to the Plan and its mitigation requirements.

Summary

The above changes would address the identified legal-compliance concern and make the Plan more justified, effective, positively prepared and consistent with national policy.

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 because the representation raises substantive questions and raise concerns in relation to the deliverability and resilience of the housing strategy given its reliance on a small number of Urban Extensions and New Settlements as detailed within the accompanying Housing Land Supply Assessment of Sites, prepared by Tetra Tech; the Councils assessment of reasonable alternatives; the Settlement Hierarchy and manner in which the settlement of Cottenham is proposed to be downgraded to a Minor Rural Centre from its current status as a Rural Centre; with the failure to have regard to a relevant recent appeal decision for 9 dwellings immediately adjacent Land to the north of Oakington Road, Cottenham.

Terra Strategic can assist the Inspector with site-specific evidence concerning the sites landscape and visual character, its integration within Cottenham, accessibility and active travel, infrastructure and delivery, and with the practical modifications required to make the Plan sound.

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

Representation by Terra Strategic concerning site 208866

Land north of Oakington Road Cottenham - proposed residential allocation

1. Introduction

Terra Strategic objects to the omission of ***Land to the north of Oakington Road, Cottenham*** (site ID 116520/ HELAA Site ID 208866) from the Proposed Submission Local Plan.

The land should be assessed as a suitable site that can deliver housing development within the plan period to assist the Council in meeting its housing requirement. The Council have failed to consider the site against all other reasonable alternatives in the Plan in its Sustainability Assessment as discussed in these submissions.

The site is available and evidence assembled to date has not identified a technical constraint that would prevent a residential scheme coming forward, with an indicative capacity of up to 96 dwellings subject to detailed design or technical assessment which will support the services and facilities in Cottenham. The emerging proposals for the site demonstrate that through a landscape led approach, as is proposed, the site can come forward in the short term.

Objections are made in relation to the Development Strategy (Draft Policy S/DS) , in particular the reliance on Urban Extensions, New Settlements with limited growth to the Rural Areas and an absence of a small and medium housing allocations which would provide a greater degree of flexibility in the housing land supply.

These representations also object to the proposed downgrading of Cottenham from a Rural Centre to a Minor Rural Centre and the failure of the Settlement Hierarchy in Draft Policy S/SH of the GCLP and Sustainability Appraisal to reflect Cottenham's present and future strategic context. Cottenham is a substantial and well-served village which lies between Northstowe to the west and Waterbeach New Town to the east. It is not an isolated rural location, indeed Cottenham which will become increasingly integrated into a wider network of homes, employment, education, retail, community facilities and sustainable transport during the Plan period when the strategic developments at both Northstowe continue to be delivered and Waterbeach comes forward.

2. Failure to assess Land to the north of Oakington Road, Cottenham 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 2021, 2025 and 2026 HELAA work have been subject to SA. Table 4.8 assesses a number of alternatives in terms of the options for dispersal at Cottenham, including sites 40014, 40108, 40296, 40251 and 40218. Appendix E then gives reasons for rejecting several Cottenham sites. Land north of Oakington Road, whether identified as Site 208866

or former Site 40417, is not identifiable in the comparative appraisal or the schedule of sites selected or rejected.

There is no clear site-specific explanation provided as to why the site was not treated as a reasonable alternative. Paragraph 4.137 confirms that the SA assessments used HELAA data provided by the Councils. The adverse HELAA conclusions appear to have been used to exclude the site from SA, in that the landscape and settlement-relationship judgement made prevented the site from receiving the comparative assessment through which that judgement should be tested.

This is especially important because the July 2025 appeal decision on the adjoining site was available before the final July 2026 SA and directly addresses the relationship of the adjoining land and its relationship to Cottenham and its landscape context.

The submission documents do not demonstrate that this evidence was taken into account when deciding whether Site 208866 (formerly part being site 40417) was a reasonable alternative. The Council should explain transparently why the enlarged site was screened out despite the subsequent appeal evidence. On the evidence currently published, legal compliance with the requirement to identify, describe and evaluate reasonable alternatives has not been demonstrated. If the site is a reasonable alternative, a supplementary SA should assess it on the same basis as the other Cottenham alternatives with any necessary consultation before adopted.

3. Site Context and Suitability

Land to the north of Oakington Road, Cottenham extends to approximately 4.82 hectares and is located on the western side of Cottenham. It includes two land parcels, site formerly 40417 together with additional land to the north east which was not included in the earlier Call for Sites submission.

The site wraps around the northern side of a consented nine-dwelling site allowed on appeal and adjoins existing and committed residential development to the east. It is therefore immediately adjacent to and not detached from the settlement.

The HELAA accepts that access is achievable in principle, that the site is available and achievable, and that it could be delivered in the first five years. The land is within Flood Zone 1. Areas of mapped surface-water risk require further assessment and an integrated drainage strategy as the proposals develop.

The HELAA notes in terms of ecology, that the development of the scale proposed would not provide any specific ecological risks to statutory or non-statutory sites. Ecology survey work is currently ongoing; this has not noted any ecological constraints that would prevent the development coming forward on the site.



Figure 3.2 Extract of PEA Habitats Plan

The proposals for the site provide opportunities for ecological enhancement to the existing site which is in arable use and use for horse grazing as shown in the extract of the Habitat Plan above.

The Historic Environment comments note that development of the site would not have a detrimental impact on any designated or non-designated heritage assets which are well removed from the site.

The site adjoins existing and consented housing to the east and south, which is not noted in the HELAA's description of the location of the site. The HELAA refers to **Site 208866** as being '***on the edge of the extents of Cottenham and well beyond the Settlement Framework, which if developed would continue a poorly planned trend of development creep along Rampton Road***, this conflicts with the 2025 appeal decision for the development of 9 Custom Self Build houses on land immediately to the east of the site.

In terms of **Site 40417,** which was the parcel of land to the west before it was incorporated into the larger land parcel, the HELAA states that ***the site remains isolated and poorly connected and is a further expansion of ribbon development into the open countryside.***

The site as a whole appears in the 2026 HELAA update, however the attributed landscape comments which have led to the site being attributed a RED RAG score are based on the contention that the site lies well beyond the Development Framework, which is clearly not the case.

The principal adverse HELAA conclusion is based on the suggestion that the site is isolated, poorly connected and would form an inappropriate ribbon extension beyond the existing settlement edge. That conclusion is not the case given the appeal decision in July 2025 on land immediately to the east of the site which the site surrounds for nine custom and self-build dwellings (application 24/02654/OUT; appeal APP/W0530/W/25/336019). The Inspector found here that that the adjoining land was immediately adjacent to the built-up area, related reasonably well to Cottenham and would not cause material harm to settlement character or the landscape. The Council also accepted that the appeal proposal would not cause sustainability harm. Those findings concern the smaller appeal site and do not determine the suitability or capacity of the whole promoted site. They nevertheless call the HELAA assessment of its settlement relationship effects to be revisited.

The access, footway and crossing improvements for the appeal development are also relevant to the promoted site's physical and functional relationship with Cottenham.

A Landscape and Visual Appraisal of the site has been undertaken by Tetra Tech, contrary to the HELAA, it considers that the site has a low to medium landscape value and concludes that the development of approximately 96 dwellings would entail result a marked change from that of a green field to that of a development site, however the proposed mitigation measures would work in conjunction with the retained vegetation to assimilate the development, and as such any perceived changes, would not be considered incongruous when viewed within the wider context and landscape setting. The Landscape and Visual Appraisal is enclosed as part of these representations.

The Concept Plan CP01 indicates a capacity for up to 96 dwellings, subject to further masterplanning and technical assessment, retaining the landscape features of the site and providing new green infrastructure, biodiversity enhancement, sustainable drainage and safe pedestrian and cycle connections as shown on Concept Plan CP01 which accompanies these representations and in **Fig 3.3 below.**



Figure 3.3 Concept Plan

4. Policy D/DS Spatial Housing 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 3** 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 Terra Strategic 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.

Cottenham is considered to be a sustainable settlement to accommodate further growth given its population, the services and facilities it offers, its proximity to the Bus Gateway/ Rapid public transport corridor and its close proximity to both Northstowe and Water beach as set out earlier in these representations.

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 Terra Strategic' 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, which supports a variety of sites and housing that enables villages to grow and thrive, particularly where it supports local services.

The provision of a diverse range and mix of sites, in the rural areas would complement, rather than compete with, Northstowe and Waterbeach, whilst benefitting from the services and facilities in those new settlements. 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 such as Cottenham in the Plan.

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

5. Policy S/SH and Cottenham's Strategic Role

The proposed changes to Cottenham's settlement status through **Policy S/SH Settlement Hierarchy** are not justified or robust. The Council's evidence records that Cottenham scored 15 points in the Settlement Hierarchy Study and has 28 shops and services, a primary school and GP surgery, recreation and community facilities and local employment. By comparison, Gamlingay and Girton each scored 7 but are placed in the same Minor Rural Centre tier.

Cottenham's proposed downgrading is primarily due to the reduction in frequency of the number 8 bus to a 40-minute service and the conclusion that Cottenham has no segregated public transport route.

This approach fails to take account that Cottenham occupies a strategic position between two of Greater Cambridge's principal growth locations: namely Northstowe to the west and Waterbeach New Town to the east. Both will deliver substantial housing alongside employment, education, retail, leisure, community and transport infrastructure with the Plan period. These developments will materially alter the level of services and facilities available to Cottenham over the Plan period.

The Site has a strong functional relationship westward towards Northstowe, Longstanton and the Guided Busway. The site is approximately 2.5 km as the crow flies from Longstanton Guided Busway/Park and Ride, this is significant in that the Guided Busway/ Park and Ride provides frequent bus services and bus rapid transit which connects Cambridge to Huntingdon, St Ives other parts of Cambridgeshire. Cyclists can connect to the Guided Busway via direct, safe cycle route adjoining the Guided Busway.

The Sustainability Appraisal itself recognises at paragraph 4.43 that increased delivery rates at Northstowe and Waterbeach could enable the critical mass for new services and facilities to come forward more quickly. It also takes future rail, public transport and service provision into account when assessing Cambourne and new settlements. It is inconsistent therefore not to consider the corresponding effect of committed growth and infrastructure on Cottenham's future role in South Cambridgeshire.

In this regard it is pertinent to note that both New Towns are existing allocations where development is coming forward, with Northstowe being a mixed-use allocation of 10,180 homes, including 6,201 in the Plan period, specialist accommodation and 20 hectares of employment land which is the closest and Waterbeach New Town a mixed-use development of 11,000 homes, including 5,629 in the Plan period, with employment, retail and transport infrastructure. The above reinforces the need to assess Cottenham's role over the Plan period as a whole given the wider opportunities that exist from its close proximity to Northstowe and Waterbeach and the planned improvements to infrastructure associated with these areas, rather than through a snapshot of present bus frequency. Notwithstanding the above, Cottenham benefits from a wide range of existing services and facilities including a Primary School and has good connectivity to public transport provision, in particular Cambridgeshire's Guided Busway providing for journeys to Cambridge and wider Cambridgeshire.

6. Habitats Regulations Assessment

The HRA does not assess the promoted omission site as a proposed allocation. The Council should assess Land to the north of Oakington Road, Cottenham as a reasonable alternative, and if the site is considered for allocation, undertake proportionate HRA screening and further assessment require on the same basis as comparable proposed allocations.

The HRA of the Submission Plan is not yet complete. Paragraphs 6.5-6.11 in the HRA state that ***the adverse effects from vehicle emissions cannot yet be ruled out and that an air-quality assessment will be provided in an addendum***. This is a critical element of the evidence base of the Plan that has not been completed and will not be available until a later date, with no indication of when this will be available. The absence of this assessment and the likely implications on the spatial strategy and policies of the GCLP are therefore not known. The Councils will need to provide an appropriate opportunity to comment, particularly if the addendum materially changes the evidence or conclusions of the HRA.

7. National Policy and Tests of Soundness

The below summarises the key considerations in terms of conflict with the tests of soundness:

Justified: The omission of ***Land to the north of Oakington Road, Cottenham*** (site 40417) has not been shown to follow a proportionate assessment of reasonable alternatives. The evidence does not reconcile the HELAA judgement with the subsequent appeal findings and that the site lies immediately adjacent to the built up residential area of Cottenham, and the accessibility assessment does not consistently take account of the site's proximity to the Guided Busway as well as the planned infrastructure and nearby strategic growth at either Northstowe or Waterbeach.

Effective: The Plan's reliance on large strategic sites which have not delivered as previously anticipated and the delivery assumptions in the Housing Trajectory are overly ambitious, the limited headroom does

not provide sufficient flexibility and contingency in the supply risks. The allocation of ***Land to the north of Oakington Road, Cottenham*** which is suitable, available and achievable, would assist in providing a more resilience housing supply particularly in the short to medium term.

Consistent with National Policy: The strategy does not secure a sufficiently responsive supply or properly recognise the contribution that small and medium-sized sites can make to meeting housing needs and sustaining rural communities. Paragraph 73 and 83 of the December 2024 NPPF support a varied supply of sites and housing that enables villages to grow and thrive. Additional suitable smaller sites would provide flexibility and resilience in the supply and support SME builders.

Positively Prepared: The Plan should provide a diverse mix of sites and sizes including small and medium size housing allocation in difference locations, including in the Rural Areas rather than placing a heavy reliance on few strategic sites whose delivery depends on major infrastructure, extended lead-in periods, market conditions and other economic conditions.

8. Conclusion

Land north of Oakington Road, ***Cottenham*** presents an opportunity for a well-designed and deliverable residential development to be provided in a sustainable settlement whose services, strategic accessibility and future role have been understated. The Plan should be modified to:

- undertake an assessment of the site as a reasonable alternative within an addendum to the SA and HRA assessment of the Plan;
- allocate small and medium size housing sites in the Plan;
- make provision for growth in the Rural Areas and in particular in Cottenham which benefits from a range of services and facilities and which will benefit in the Plan period from its proximity to Northstowe and Water Beach
- restore Cottenham to its former Rural Centre tier acknowledging the existing services and facilities within Cottenham; its location within 2.5km of the Cambridgeshire Guided Busway providing rapid public transport connections throughout Cambridgeshire; recognising its strong role in the Rural area which will be strengthened further in the Plan period through the Plan Strategy with the strategic level of development committed to and coming forward at both Northstowe and Waterbeach;
- allocate the site for housing with an indicative capacity of up to 96 dwellings subject to landscape-led masterplanning and proportionate technical assessment;
- update the Policies Map to take account of the recently approved scheme of 9 dwellings to the east of the site;
- update the housing trajectory to take account of more realistic delivery assumptions and the discounted numbers set out the accompanying **Tetra Tech Housing Land Report, September 2026.**