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	Holly Gardiner	Matt Clarke
Organisation (where relevant)	Wates Developments	Boyer
Job Title (where relevant)		Director, Head of Boyer East
Address, including Post Code	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
Telephone		01206 584750
Email address		mattclarke@boyerplanning.co.uk

* 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	Yes
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.

Policy S/DS: Development Strategy

It is noted that the 'Overview' section of the supporting text, at para. 2.53, refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported, although we have comments on the balance of supply from different sources, as well as on specific identified sites with regard to deliverability concerns.

It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and using appropriate forms which make best use of land whilst creating well-designed, characterful places. It is supported that sites should be developed at densities which make effective use of land (as specified at NPPF24 Para. 11a), alongside clarification that sensitivity to local context should also be applied.

Over-reliance on Large Sites and Existing Allocations
The proposed development strategy in the Pre-Submission Local Plan relies predominantly on large sites and existing allocations carried forward from the Adopted 2018 Local Plans and outstanding planning permissions, alongside a limited number of new sites, albeit noting that the number of new allocations has increased relative to those identified at the First Proposals stage.

The First Proposals document identified 13 'new' sites, totalling 11,640 homes, whereas the latest Reg 18 Draft Local Plan proposed a total of 19 'new' sites that were to deliver 13,463 dwellings within the plan period. The current, Pre-Submission Local Plan sets out that 19 'new' allocations will deliver 13,654 new homes, representing a slight increase in capacity across the same number of identified new sites.

Of these new sites, two sites (Eddington - North West Cambridge, and Cambridge East), are effectively existing allocations. An additional 2,500 homes are proposed to be provided through increased densities at Eddington (compared with 1,000 stated at an earlier consultation stage) and a further 3,950 new homes at Cambridge East (compared with 2,850 previously assumed).

Aside from these concerns, it should be noted, therefore, that only 17 of these 19 sites are strictly 'new'. Given the relative scale of the two sites noted above, in total the 17 sites will provide 7,204 dwellings (equating to approximately 13.85% of the total supply).

It is therefore clear that the Pre-Submission Local Plan continues to make provision for a very limited number of new sites. There is a heavy reliance on existing and previously identified sites rolled forward from the adopted Local Plans and many of these sites are on a large scale which also means they typically take longer to be brought forward.

To encourage a more reliable delivery rate across the plan area, and to ensure that this aspect of the Plan is both positively prepared and effective, we propose that additional sites are allocated to ensure the consistent delivery of dwellings to significantly boost the supply of homes as required by Paragraph 61 of NPPF24.

Additional Supply Buffer
At the First Proposals consultation stage it was indicated that there was an intention to include a 10% buffer to provide the flexibility to deal with unforeseen circumstances should any sites not be brought forward as planned. We asserted in representations at that stage that the heavy reliance on existing allocations and commitments is overly optimistic and along with the very limited number of new proposed site allocations, the 10% buffer was not considered sufficient, and consequently should be increased to a minimum of 20% alongside the allocation of further sites to ensure a robust strategy. It was noted that such an approach has been adopted in other local authority areas, including across Babergh and Mid Suffolk Local Authorities. We maintain this stance and this is reinforced by on-going concern over deliverability of the significant site allocations outlined above.

The Pre-Submission Local Plan illustrates within Table 3 that an 8.2% buffer, in excess of the minimum housing requirement, would be provided, which is clearly below the stated objective of achieving 10% headroom, and recognised best practice of ensuring between 10 and 20% contingency in this regard.

This is insufficient and therefore additional site allocations should be included at this stage in the plan-making process to ensure the plan is effective (deliverable over the plan period) as required by the NPPF.

Over-reliance on Windfall Sites
In addition, there are concerns regarding the heavy reliance on windfall sites within the development strategy, which comprises 6,600 dwellings and equates to almost 14% of the total minimum housing need. The NPPF24 definition of 'Windfall sites' is "Sites not specifically identified in the development plan" whilst the Draft Local Plan document does not include a specific definition of the term.

The Greater Cambridge Housing Delivery Study Addendum (October 2025) reports that Greater Cambridge has historically achieved a high rate of windfall development and we have not sought to interrogate this evidence at this stage to confirm whether this conforms with NPPF24 Para. 75. It is noted that the above study has considered the appropriate rate to apply, having regard to assessment of data across a further four-year period, to 2023/24. Despite a reduction over this additional period it has been determined, on balance, that the previous mid-point rate of 425 dwellings per annum should be retained.

The windfall reliance is considered high (albeit noted that this has been slightly reduced compared with the final Reg 18 figure of 7,100), particularly in light of the Councils' apparent anticipation that these will mostly comprise previously developed sites. It is also

noted that the defined settlement extents have been tightly drawn to the existing urban edges, which is unlikely to provide sufficient flexibility for (greenfield) windfall sites to come forward.

A more appropriate strategy is for the windfall requirement to be further reduced and a greater range of sites explicitly allocated, including for the lower order settlements where the current development strategy is for very limited development.

Through the positive allocation of sustainable sites at the lower order settlements, including Group Villages, this will ensure that the Greater Cambridge growth strategy is genuinely plan-led, as required by Paragraph 15 of the NPPF24 and ensure that such growth is supported by the appropriate infrastructure. In addition, by re-allocating a proportion of the anticipated windfall growth to specific sustainable sites, this will provide a greater level of certainty of the anticipated location of growth to the Councils, developers and the local community compared with the current proposed strategy that will inevitably see a range of speculative development within the rural areas.

Lack of Development within the Villages
At page 165 of the Development Strategy Topic Paper (2025), it is stated:

"Our evidence, Sustainability Appraisal and consultation responses above show that a strategy focussed on village development would be unsustainable, in particular regarding transport and associated carbon emissions, but also for supporting delivery of required infrastructure. As such we consider that villages should not be the primary focus for growth within the development strategy."

Whilst it is not disputed that villages should not be the primary focus for growth, the current strategy is too restrictive and cannot be supported. Appropriate village development can be sustainable in terms of transport and carbon emissions and provide the necessary infrastructure requirements, as would be the case for land West of London Road, Fowlmere.

In fact, the current development strategy with the high reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Councils have control over ensuring village development is located where there is good access to a high-quality public transport network and provides the required infrastructure.

Overall, we have concerns regarding the robustness of the development strategy and its ability to bring sufficient land forward for development at a sufficient rate to address the objectively assessed need over the plan period as required by NPPF24 para. 23.

The Pre-Submission Local Plan should increase the distribution of development across the plan area ensuring that a wide range of sites are proposed for development by including a greater number of site allocations in sustainable rural areas with good access to public transport and facilities, such as Land West of London Road, Fowlmere.

As identified by Paragraph 73 of the NPPF24, small and medium sized sites (such as Land West of London Road, Fowlmere) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

As acknowledged by para. 83 of NPPF24, housing in rural areas can maintain the vitality of rural communities and provide opportunities for villages to grow and thrive, especially where this will support local services. The same passage also recognises how, where there are groups of villages, development in one may support services in other nearby villages.

A growth strategy which predominantly focuses on growth within large scale settlements will also prevent the organic growth of more rural areas, which is needed in order to maintain the vitality of rural communities and support for local services.

Please provide a 100 word summary of your representation.

We have concerns regarding the robustness of the development strategy and its ability to bring sufficient land forward for development at a sufficient rate to address the objectively assessed need over the plan period as required by NPPF24 para. 23.
The Pre-Submission Local Plan should increase the distribution of development across the plan area ensuring that a wide range of sites are proposed for development by including a greater number of site allocations in sustainable rural areas with good access to public transport and facilities, such as Land West of London Road, Fowlmere.

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.

Please see accompanying statement

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 Pre-Submission Local Plan should increase the distribution of development across the plan area ensuring that a wide range of sites are proposed for development by including a greater number of site allocations in sustainable rural areas with good access to public transport and facilities, such as Land West of London Road, Fowlmere.

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.

So that the matters raised within these submissions can be developed through direct discussion in order to assist the Inspector's assessment more efficiently than relying solely on these written representations.

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