THAKEHAM

Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
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Cambridge
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By email only: localplan@greatercambridgeplanning.org

25 September 2026

Dear Sir/ Madam,

Re: Proposed Submission Greater Cambridge Local Plan 2024 to 2045 - Regulation 19 Consultation

These representations are made on behalf of Thakeham Homes Limited ('Thakeham') in relation to the Proposed Local Plan for Greater Cambridge Regulation 19 consultation (3 August – 25 September 2026). This consultation response is to be read in conjunction with our two site-specific representations, South West Cambridgeshire ('Wetherbrook') and Land East of Long Road, Comberton.

About Thakeham

Thakeham build for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on quality and sustainable development, looking ahead of current housing standards where possible. We have recently partnered with Octopus Energy to deliver pioneering 'zero bills' homes at our Templegate site in Sussex. These homes feature additional sustainability measures such as solar panels, air source heat pumps, and a battery – enabling customers to live in a comfortable, warm home with no energy bills for at least five years.

All Thakeham developments consider incorporation of sustainable energy features, and where appropriate these can include a combination of air source heat pumps, solar PV panels with links for battery storage, renewable energy tariffs, and highly efficient heating and hot water systems as well as wastewater recycling measures ensuring incorporate sustainable features, which ensure we exceed the requirements set out in Building Regulations.

Furthermore, Thakeham's sustainability approach is not just focussed on the final buildings, but starts with our approach to the whole construction process, including:

- Following industry best-practice by taking a 'fabric first approach,' which looks at how design and materials can contribute to the energy performance of the completed building.

- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality and reduced carbon emissions.
- Our sustainable Procurement Policy encourages the use of recycled materials such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles) as well as utilise products part of the circular economy.
- We ensure that our whole supply chain is a local as possible. We have gold membership with the Supply Chain Sustainability School.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption and are registered with the Considerate Constructors Scheme.

Consultation Response

Thakeham has reviewed the consultation documents and generally supports the principles of the Proposed Submission Regulation 19 Local Plan. As outlined within the representations, Thakeham recognises the Council's ambition to plan for:

- Climate change
- Biodiversity and green spaces
- Great places
- Wellbeing and social inclusion
- Homes
- Jobs
- Infrastructure

These representations comment on key observations where relevant to Thakeham's current and potential future interests within the authority area. Therefore, for ease, the below responses have been made to specific questions/policies as indicated, where Thakeham has no comment to make at this stage, questions have been omitted.

Chapter 2: Development Strategy
Policy S/JH: New Jobs and Homes As set out within draft Policy S/JH, the emerging Local Plan seeks to deliver at least 48,069 new homes within the Plan Period (2024-2045). In accordance with paragraph 62 of the National Planning Policy Framework (NPPF), this has been derived through the use of a standard method, which sets an annual requirement of 2,289 dwellings. Whilst Policy S/JH seeks to meet its Local Housing Need (LHN), it is noted in paragraph 5, that the delivery is made up through the delivery of Neighbourhood Plans. Appendix C sets out that that the Local Plan is requiring 27 Neighbourhood areas to deliver 1,543 homes through Neighbourhood Plans. Whilst Thakeham supports Neighbourhood Plans being used to deliver benefits to the local community, it does not support the Council's intention for Neighbourhood Plans to be relied

upon to deliver rural growth. Instead, the Council must plan positively and ensure that the emerging Local Plan allocates sufficient sites to meet its housing need in full and ensure the vitality of rural settlements which the current emerging Local Plan does not seek to do.

The draft policy does not ensure the Local Plan is positively prepared as required under paragraph 36 of the 2024 NPPF, and also fails to recognise that some Neighbourhood Plans which have housing requirements within the draft Local Plan, have recently been 'made' and therefore are unlikely to be renewed in the short to medium term. An example of this would be the Fulbourn Neighbourhood Plan which was 'made' in March 2023. Appendix C identifies that the Neighbourhood Plan should allocate a minimum of 101 dwellings; however, the 'made' Neighbourhood Plan does not allocate a single allocation, therefore significantly short of the housing requirement set out within Appendix C. Despite the Neighbourhood Plan being three years old, Appendix C is suggesting that the Parish Council will need to go through the Neighbourhood Plan process again to allocate this requirement.

It should also be noted that following the Ministry for Housing, Communities and Local Government's (MHCLG) announcement in June 2025, MHCLG has withdrawn Neighbourhood Plan funding and planning support services from 2025 onwards. This announcement means that Neighbourhood Plans are now less likely to come forward, bringing doubt on the delivery of homes through Neighbourhood Plans. Furthermore, Neighbourhood Plans are slow to produce and will therefore not facilitate and enable the delivery of housing in the initial years of the plan. If the Council continues with its current approach, it is difficult to see how it will have five-year housing land supply at the point of adoption, leading to an immediate review and speculative planning applications, which undermines the purpose of the plan-led system

Considering the above, the current reliance on 1,543 being delivered through Neighbourhood Plans is an unsuitable method of ensuring housing delivery and results in the draft Local Plan not being prepared positively in accordance with paragraph 15 of the NPPF.

To ensure the prosperity of rural areas and ensure that key community facilities are delivered, the emerging Local Plan should seek to allocate additional sites within the rural area.

Policy S/DS: Development Strategy

The proposed development strategy outlined within Policy S/DS seeks to rely on existing allocations and permissions to deliver 38,378 homes, with an additional 13,654 dwellings identified through brownfield redevelopment, new towns and large-scale strategic allocations. Whilst Thakeham acknowledges and supports that the Council has sought to meet its Local Housing Need (LHN) in full and provide an 8.2% buffer, the spatial strategy is heavily reliant on the delivery of new settlements and large-scale development on the edge of Cambridge. As outlined in figure 9, previous growth has looked to be fairly evenly split across the different growth distributions. However, the proposed distribution in the emerging Local Plan seeks to deliver nearly half of its growth through 'new settlements' with only 15% delivered within the rural area. The underutilisation of the rural area leaves rural settlements vulnerable to seeing community facilities become unviable and therefore close

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down. By not supporting growth in rural areas, the Local Plan could see rural settlements become less sustainable and more reliant on travel to access key facilities.

As well as the underutilisation of rural growth, the emerging Local Plan seeks to deliver 81% of the homes on sites of 1,000 or more homes. The heavy weighting on largescale strategic sites does not support small and medium sized house builders, and also could impact the ability for sites to come forward in a timely manner to enable a rolling five-year housing land supply.

Appendix D of the Local Plan states that upon adoption (2028), Greater Cambridge will be able to demonstrate a 5.47-year housing land supply. However, this based on the Liverpool method to assessing housing land supply which is not the method preferred by Government. Paragraph 68-031 of the Planning Practice Guidance (PPG) states that *"the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period* ***(the Sedgefield approach)****, then the appropriate buffer should be applied"*.
With the emerging Local Plan using the Liverpool method, the approach taken is not consistent with the PPG.

If the Local Plan were to use the Sedgefield approach, Greater Cambridge would only be able to demonstrate a 5.03 year supply, which does not provide a suitable buffer. The use of this Method therefore further highlights the issue of the development strategy by using larger strategic sites which would not be delivered until later in the Plan Period. With the approach not being sound or consistent with national policy, the Local Plan should use the Sedgefield method for assessing five-year housing land supply and allocate additional smaller sites to ensure a robust five-year housing land supply can be justified.

Policy S/SH: Settlement Hierarchy

Thakeham supports the inclusion of a settlement hierarchy within the emerging Local Plan, that reflects the size and sustainability of the settlements within the District. Whilst a settlement hierarchy is included within the draft Local Plan, the policy seeks to limit the size of new development at 'minor rural centres' and lower tiers.

Whilst new development should reflect the size and scale of existing developments, the policy should not restrict the scale of growth for rural settlements, as this may affect the settlement's ability to maintain its existing facilities and support necessary growth.

For existing facilities to remain viable, and for additional services and facilities to be delivered to meet new and growing needs of a settlement, there needs to be strategic growth; which the current drafting of the policy does not support.

As seen across the county, where settlements have not been able to grow, they have lost facilities such as primary schools or local shops, as there has not been the need within the settlement to keep the facilities viable and therefore, operational.

The Council should therefore consider the delivery of services and facilities alongside the planned strategic growth of settlements to ensure new facilities remain viable and work with Parish Council's and the local community to ensure these facilities are appropriately located,

meet the needs and demands of a locality, as well as emphasising that new development is required to be able to deliver these improvements.

Policy S/DE: Defined Development Extents

Whilst the emerging Local Plan will be assessed against the 2024 National Planning Policy Framework (NPPF), draft Policy S/DE should seek to accord with Policy S5 of the 2026 NPPF. This would ensure that the Local Plan, upon adoption would not conflict with National Policy, but also widen the scope of where the principle of development would be applied allowed outside of settlements. This would subsequently allow housing to come forward where the Local Plan fails to ensure a five-year housing land supply is maintained, but also allow for the continued delivery of housing to deliver above the minimum housing requirement.

Policy S/GB: The Cambridge Green Belt

The 2024 NPPF included the introduction of Grey Belt, with this defined as 'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes a), b) or d) in paragraph 143'. These purposes are:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another; and
- To preserve the setting and special character of historic towns

Thakeham supports and endorses to the Government's desire to see land which does not contribute fully to the purposes of Green Belt, make a meaningful contribution to housing supply. In a letter to The Planning Inspectorate (PINS) dated 9 October 2025, Matthew Pennycook MP, the Minister of State for Housing and Planning, emphasised the important of Green Belt reviews in the plan making process, increasing the powers of PINS to enable recommendation of Green Belt reviews during Local Plan examination to identify additional sites where necessary.

The NPPF sets out within paragraph 146 that land outside of the Green Belt should be utilised to meet a Councils LHN. Where it is not possible to achieve this, Council should first seek to release previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.

Whilst the Policy S/GB aligns with National Policy, the Council should ensure that consideration is given to promoted sites within the Green Belt that can come forward to meet the Local Housing Need, whilst not strongly contributing to purposes a), b) or d) of the Green Belt.

Chapter 4: Climate Change

Policy CC/NZ: Net zero carbon new buildings

Thakeham object to the inclusion of Policy CC/NZ which seeks to require all new development to achieve net zero operational emissions, with this achieved through a range of targeted measures.

Whilst the Local Plan is being assessed under the 2024 NPPF, the Local Plan should take the 2026 NPPF into consideration. Policy PM13 of the 2026 NPPF states that polices should not cover matters that are already addressed by Building Regulations, other than in relation to *"energy efficiency, for which any standards that go beyond the current or proposed Building Regulations should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development."*

When reviewing the published viability assessment (Greater Cambridge Local Plan Viability – July 2026), the assessment fails to demonstrate a clear and robust costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development. Whilst it recognises on page 121 that *"meeting Net Zero carbon on new buildings will have a direct cost impact"* it works on the assumption that the reduced energy use would enable the build cost increase to be reflected in sales values.

From Thakeham's experience the delivery of net zero carbon homes does not result in increased sales value as there is not the market demand for that product. This therefore results in properties being left on the market for longer at a high price or reduced prices comparable to non-zero carbon to enable the sale of the properties.

The viability assessment also fails to recognise that where higher sale prices could be used to recover the additional build costs, that would further impact affordability in the plan area. South Cambridgeshire has a housing affordability ratio of 8.8, with Cambridge being 11.3. The inflation of house prices to therefore recover the cost of delivering zero carbon homes would therefore further increase the affordability ratio and make it harder for working people to afford market homes.

As the inclusion of the policy has not been clearly and robustly assessed, the policy should be removed from the Local Plan.

Policy CC/WE: Water efficiency in new developments

Thakeham recognises that Greater Cambridge is officially designated as an area of serious water stress, and therefore water efficiency is required. However, the proposed 80 litres/person/day (for development over 100 dwellings) and 90 litres/person/day (for development under 100 dwellings) is significantly lower than the standard Building Regulation requirement of 125 litres per person per day, and the optional 110 litres per person per day which looks to be used in water scarce areas.

The Cambridge Area Water Supply Evidence paper (October 2025) references 'Eddington' development in northwest Cambridge as an example of how development can be delivered to achieve a water efficiency of 80 litres/person/day. However, as widely reported in August 2026, the water reuse system which enabled the development to meet the 80 litres/person/day has had to be switched off and has not been operational for over five years as the Drinking Water Inspectorate (DWI) deems it is not in line with the Water Industry Act 1991 and later water quality regulations.

As highlighted within the Water Supply Evidence paper, the target of 80 litres/person/day *"could not be met solely through demand management and water efficiency, but required development-scale water recycling to supply non-potable water"*. The efficiency could

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therefore not be achieved whilst complying to the relevant legislation and is therefore an impossible task.

With the required mechanism to achieve 80 litres/person/day not being legally compliant and therefore being unachievable the policy should instead align with the optional Building Regulation standard of 110 litres per person per day for all residential developments.

Chapter 5: Biodiversity and Green Spaces
Policy BG/BG: Biodiversity and geodiversity Thakeham support the delivery of Biodiversity Net Gain (BNG) and ecological enhancements on residential developments. However, whilst paragraph 1 recognises that all development must deliver statutory BNG, providing a minimum of 10% BNG against the baseline (unless exempt under the Environment Act 2021); the policy requires major development to deliver a minimum 20% BNG, doubling that required under the Environment Act 2021. Whilst examined under the 2024 NPPF, the emerging Local Plan needs to ensure consistency with the 2026 NPPF. Policy N2.3 of the 2026 NPPF states that *"Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations".* An increase above the national requirement would raise concerns with the viability of requiring a target above 10% and the impact this could have on delivering other public benefits. The policy should therefore remain consistent with legislation and remain at 10%. Going beyond 10% will have implications on the viability of schemes, as offsetting is expensive. If the Council exceeds statutory requirements, scheme deliverability and affordable unit numbers will likely decrease. It is therefore recommended that the policy is amended to align with national policy and require a minimum of 10% BNG on major schemes, with allocation specific requirements where it has been vigorously tested.
Policy BG/UGF: Urban Greening Factor Thakeham supports that Policy BG/UGF seeks to ensure that proposals conserve and enhance any existing tree, woodland, hedge or hedgerow of value that would be affected by the proposed development both within and immediately adjacent to a site. Whilst supportive of protecting and enhancing trees and hedgerows within developments, Thakeham would raise concern with the policy requirement for major new development to meet an 'Urban Greening Factor' (UGF). UGF have historically been used in urban areas such as City of London, Portsmouth City, and Southampton City. It is therefore not an appropriate measure that should be applied to rural areas as currently proposed within Policy BG/UGF.

Alongside UGF not being appropriate for rural areas, Thakeham would raise concern that the use of UGF would not allow for developments to be designed to reflect the local character or ensure efficient use of land as required under paragraph 129 of the NPPF.

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

Whilst Thakeham is supportive of the objective of Policy BG/TC, Thakeham raises concern with paragraph 7 of the policy, which seeks to provide 50-meter buffers to Ancient Woodland.

The current buffers proposed do not align with the published guidance from Natural England, nor the PPG. As stated within the policy's supporting text, standing advice from Natural England and the Forestry Commission states that at least a 15-metre buffer should be provided from both veteran trees and Ancient Woodland. The PPG *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions* also states that, for ancient woodlands, proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). The current draft policy extends this beyond the Natural England, Forestry Commission and PPG requirements, proposing a 50-metre buffer.

Chapter 6: Wellbeing and Social Inclusion

Policy WS/NC: Meeting the needs of new and growing communities

Thakeham recognises that development should contribute to the delivery of sports, recreation, culture and community uses which meet an identified need. However, Thakeham raise concern with the drafting of the policy. As drafted, the policy requires applicants to identify facilities which are ether required or need upgraded within the vicinity of a development proposal; whether this is for sport, recreation or community facilities. Whilst development would look to contribute to the delivery of the services and facilities necessary to meet the needs of the development either through on-site delivery or financial contributions, it should not be the applicant who identifies this shortfall and instead should be identified through the emerging Local Plan.

As part of the preparation of the Local Plan, the Local Plan should identity where there is a lack of existing facilities and allocate sufficient growth at the settlement to enable to delivery of the identified facility. The delivery of the required community facility can therefore be secured as part of an allocation and ensure its delivery is viable as it would be tested through the produced viability assessment.

By taking the current policy approach, settlements would only receive community facilities where speculative development is delivered, and therefore reliant on a Local Plan failing to maintain a five-year housing land supply, representing poor plan making. This therefore links into wider issues around spatial strategy which Thakeham has raised in this representation.

When considering the above, Thakeham advises that the policy should be amended to remove reference of applicants undertaking need assessments, with the policy ensuring all new development includes or contributes to the delivery of the services and facilities

necessary to meet the needs of the development and mitigate the impact of development on existing local facilities.

Policy WS/HS: Pollution, health and safety

Whilst supportive of the inclusion of Policy WS/HS to ensure development does not have a negative impact health and safety through pollution, paragraph 7 requires all major and minor planning applications (excluding householder developments) must submit an Air Quality Statement. This requirement is not representative of the scale of development or the impact that development could have Air Quality.

To ensure that the requirements for submitting a planning application align with the impact on Air Quality, paragraph 7 should be amended to the following:

"7. Major planning applications (excluding householder developments) which propose a use which is likely to impact air quality or lie within a AQMA must submit an Air Quality Statement. This must identify the existing air quality at the site, qualitatively identify sources of emissions to air arising from the proposed development with any likely impact on air quality and identify any mitigation measures. It must consider both the operational and the development phase. A full Air Quality Assessment will be required for applications where air quality is likely to be a significant issue."

Chapter 7: Great Places

Policy GP/HD: Housing density

Thakeham support the inclusion of Policy GP/HD which seeks to ensure that Development proposals must make efficient use of land. As required under paragraph 129 of the 2024 NPPF *"planning policies and decisions should support development that makes efficient use of land"*. This is also supported within the 2026 NPPF with policy L1 supporting effective and efficient use of land, and L3 ensuring that appropriate densities are delivered, including setting a minimum density of at least 35 dwellings per hectare where located within reasonable walking distance of a well-connected train station, or 45 dwellings per hectare where the service frequency is at least twice that of the minimum required for a well-connected station.

Chapter 9: Homes

Policy H/AH: Affordable housing

Thakeham support the delivery of affordable housing with draft Policy H/AH, and notes the requirement of a minimum of 40% affordable housing on major schemes, as well as reflecting the NPPF which requires that developments within the Green Belt deliver 15 percentage points above the affordable housing requirement, subject to a cap of 50%.

Whilst table 6 provides an affordable housing tenure, the Policy should seek to retain flexibility on the tenure to allow developments to reflect localised need for affordable housing. Thakeham would therefore propose the following change:

2. Within the affordable housing secured on major developments for housing (except for within Build to Rent and Co-living developments), the proportions of each affordable housing tenure should look to be provided broadly in line with Table 6. Developments providing a higher overall proportion of social and affordable rented homes, with no or a smaller proportion of shared ownership homes, will be allowed as exceptions.

Policy H/HM: Housing mix

Thakeham support the inclusion of Policy H/HM and the provision of a housing mix which has been based upon the Council's latest evidence-based Greater Cambridge Local Plan: Homes Topic Paper (2026). Thakeham also supports that the policy recognises that the housing needs within Cambridge and South Cambridge vary and therefore a blanket mix for both areas would not be acceptable. Thakeham therefore supports the use of a split housing mix for Greater Cambridge.

The policy wording also allows flexibility to ensure that where more up-to-date evidence is published, applications can be determined positively in accordance with that evidence.

Policy H/SS: Residential space standards and accessible homes

Thakeham does not support the requirements of Policy H/SS and the blanket application of NDSS requirement across Greater Cambridge. Footnote 51 of the 2024 NPPF and Policy PM13 of the 2026 NPPF is clear that such requirements need to be justified by need, and it is unclear how the Council have determined the requirement for a blanket policy requiring all homes to meet NDSS.

Whilst Thakeham acknowledge and support the role such standards have in ensuring some dwellings, particularly affordable housing, deliver sufficient space for future occupiers. Flexibility needs to be adopted within local policies, to ensure that market housing reflects the market needs of Greater Cambridge. Market homes should be provided across a variety of sizes, and particularly in key locations around urban areas or transport hubs, there may be market demand for smaller dwellings that do not necessarily meet NDSS standards, but importantly provide market choice and increase affordability for first-time buyers providing opportunity such buyers to step onto the property ladder in a home that suits their individual needs.

Thakeham therefore propose that Policy H/SS is amended to ensure that there is no blanket NDSS requirement on all homes and instead the policy is amended to reflect flexible NDSS requirements, where deviation from standards can be explored with the support of the Council.

As well as setting internal space standards, Policy H/SS requires all new dwellings to have direct access to private external amenity space that is immediately outside their living accommodation. Thakeham would question the 'Outdoor Amenity Space' requirement that each dwelling must have access to private outdoor space. Whilst Thakeham recognises the importance of access to outdoor space, the delivery of private outdoor space is not always

possible depending on the house types used within developments, with these including flats and maisonettes. This is due to the physical practicality of providing private outdoor space.

Where flatted development is provided, communal outdoor space can be provided to allow residents access to outdoor space. providing an area for residents to access open space which encourages physical activity, a connection to nature and community cohesion. It also offers the benefit to residents who may not be able to physically maintain a private open space with open space that they are not required to maintain.

Therefore, the policy should be amended to allow for the delivery of varying types of private open space to reflect the range of house types used to meet the market need.

Policy H/SS also seeks to require all homes to meet M4(2) standards, with 10% of affordable homes and 5% of market homes meeting M4(3) standards, on schemes above 20 homes.

Firstly, the requirements set out within the policy are not supported by the Council's own evidence base. Paragraph 1.91 of the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire (August 2025) states that *"there is a need for around 970 dwellings to be for wheelchair users (meeting technical standard M4(3))".* However, when applying the requirement to only a selection of the new proposed draft allocations, the draft policy requirement already delivers a surplus of the evidenced need. When considering all the draft allocations and existing allocations which are yet to be delivered, the delivery of M4(3) plots would significantly over deliver on unmet need.

The Council's evidence base therefore shows that there is not the demand to justify the current policy requirement for M4(3). Such policy requirements should only be based on evidenced need. Considering the above, the Council should revise Policy H/SS to reflect the current evidenced need for M4(3) and incorporate flexibility to ensure that such policies do not require quantum's of M4(3) which outstrips demand in a particular location.

Policy H/CB: Self and Custom Build homes

Thakeham recognises that there is a need for self and custom build homes, the requirement within Policy H/CB does not reflect the Council's evidence base. Paragraph 12.74 of the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire (August 2025) states that there is an unmet need of 456 plots. Since October 2022, there has been a significant decrease in the number of people being added to the register, with only 32 people being added in base period 9 and 23 people being added in base period 10. This therefore suggests the demand for self and custom-built homes is significantly decreasing.

The draft policy requirement of at least 5% over 20 dwellings would therefore significantly over supply the current evidenced demand.

As well as the policy not reflecting the Council's evidence base, the Council also needs to consider the practicality and desires of those on the register. In our experience, residents who register interest in self and custom-build homes are seeking plots that are more isolated in location and are part of a small-scale development; rather than seeking a self-build plot on a larger housing scheme. The draft policy would therefore not only deliver a significant

over supply but would also result in the delivery of plots that are not desirable by those on the register.

Thakeham has seen this firsthand within our own developments, where self-build plots have been delivered on our developments with there being no interest from those on or off the register for those plots. Thakeham has therefore had to go back to the Council on these schemes to change the plots from self-build to help meet the market need.

Thakeham considers that the policy should be revised to reflect the Council's own evidence base with the policy supporting applications for self-build plots rather than setting a percentage which the development must deliver.

Chapter 10: Infrastructure and delivery
Policy I/EI: Energy infrastructure masterplanning

Policy I/EI requires proposals for over 250 dwellings to provide Energy Masterplans of a scale and nature that would allow for the benefits of smart energy management to be identified and secured. These masterplans would look to include an assessment of:

- The capacity of infrastructure to support the development;
- Any necessary reinforcements to grid infrastructure;
- The approach to energy provision to support net zero carbon development; and
- Measures to help reduce peak demands on the electricity grid.

Whilst this has been included to ensure there is a sufficient energy supply, the burden should be on the National Grid and Distribution Network Operators (DNO's) to ensure they plan for increased energy demands and undertake upgrades as necessary. By preparing a Local Plan which meets its need in full, National Grid and DNO's can see where growth is planned and what upgrade works will be required and when.

This also aligns with Section 16 of the Electricity Act 1989, which places a duty on the electricity distributor to provide a connection and any associated electrical plant and lines necessary for that connection. The DNO must provide the infrastructure.

Based on the above, the requirement for residential developments of over 250 homes should be removed with the requirement instead applying to data centres only.

We trust that our representation is useful and clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any further queries or require any further information.

Yours faithfully,



Rhett Flashman
Planner