THAKEHAM

Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

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
Land East of Long Road, Comberton

These representations are made on behalf of Thakeham Homes Limited ('Thakeham') in relation to the Proposed Local Plan for Buckinghamshire Regulation 19 consultation (3 August – 25 September 2026), specifically in relation to Land East of Long Road, Comberton, a proposal for approximately 400 new homes on the edge of 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.

Land East of Long Road, Comberton

Land East of Long Road, Comberton ('the Site') is being promoted for approximately 400 new homes, on the eastern edge of Comberton, east of Long Road. Whilst located within the Green Belt, the Site is not subject to any other notable constraints. Noting the definition of grey belt within the NPPF, the site would not contribute to the coalescence of settlements, nor is it required to contribute to the setting or special character of a historic town. It therefore does not strongly contribute to purposes a), b) or d) of paragraph 143 and would therefore be considered Grey Belt under the definition.

As discussed above, Comberton is a Minor Rural Centre located within South Cambridgeshire area. It is considered to be a sustainable settlement as identified in the Council's settlement hierarchy and therefore has potential to accommodate growth. Development at the Site would not only help meet the unmet need of adjoining authorities currently not considered within the draft local Plan but would also provide vitality to the settlement to ensure existing facilities can remain viable.

It is envisaged that Land East of Long Road, Comberton, with the ability to incorporate physical, social and green infrastructure, will contribute to the vitality of the existing community at Comberton and support growth at the scale of the proposal. It is envisaged that the development could incorporate:

- Approximately 400 new homes, with the ability to make a significant contribution to much-needed housing delivery
- Ability to deliver new ecological habitat, providing biodiversity net gain.
- Inclusion of high quality, multi-functional green space across the Site, including opportunities for play, sustainable drainage and amenity, seeking to support healthy lifestyles.
- Policy compliant provision of affordable homes, in a variety of tenures
- Delivery of a suitable mix of housing, to create a vibrant thriving development suitable to its location, meeting varying needs.
- Promotion of sustainable travel through improved accessibility to existing local routes.

As discussed, Land East of Long Road, Comberton, represents a sustainable location in Greater Cambridgeshire, with opportunity for growth at a sustainable location.

Importantly, Land East of Long Road, Comberton, is available, suitable and achievable to accommodate residential focussed development, providing opportunity to make a meaningful contribution to the supply of both market and affordable housing in Greater Cambridgeshire. Importantly it is envisaged the development could be delivered entirely within the first years of the plan period.

Land East of Long Road, Comberton, has previously been promoted by Thakeham to the emerging Greater Cambridgeshire Local Plan as part of the 2019 Call for Sites. These representations are supported by a Vision Document, setting out our high-level vision for the Site.

We trust these representations are 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