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	Rhett Flashman	
Organisation (where relevant)	Thakeham Homes Limited	
Job Title (where relevant)	Planner	
Address, including Post Code	Thakeham House Summers Place Stane Street Billingshurst West Sussex RH14 9GN	
Telephone	[redacted]	
Email address	[redacted]	

* 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	Chapters 2, 4, 5, 6, 7, 9, and 10
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	No
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.

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.

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 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.

Please provide a 100 word summary of your representation.

The draft Local Plan overly relies on Neighbourhood Plans to provide 1,543 homes across 27 areas. Thakeham argues this approach is unsound, as many Neighbourhood Plans are recently adopted without allocating sites, they are slow to update, and face reduced support following the withdrawal of government funding. The strategy also relies heavily on large-scale developments and new settlements, with limited rural growth, risking the decline of rural services and housing supply delays. Thakeham recommends allocating more smaller rural sites and using the Government-preferred Sedgefield method to demonstrate a more robust five-year housing land supply.

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.

- 2026 25 09 Greater Cambridge Local Plan - Regulation 19 Consultation Response
- 2026 25 09 Greater Cambridge Local Plan - Regulation 19 Consultation Response - Land East of Long Road, Comberton
- Land East of Long Road, Comberton - Vision Document

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.

Proposed modifications to soundness and legal compliance has been set out in the supporting representations. As outlined within the response to Section 3, Thakeham would advise that the spatial strategy needs to change, with the Local Plan allocating rural sites Local Plan not relying on Neighbourhood Plans to deliver rural growth, and instead the Local Plan should allocate sites in rural settlements to support their growth and maintain facilities.

Thakeham also raised that the approach to meeting its housing land supply is not consistent with national policy or sound. 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.

Full detail of Thakeham's proposed modifications are set out within the submitted representations.

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.

Thakeham has raised objections to the soundness and legal compliance of the Local Plan; as well as objections to several other strategic policies and Development Management policies within the Local Plan.

As set out in the MHCLG Local Plan examination guidance, *"you have a legal right to appear before and be heard by the inspector at a hearing if:*

- *you made a comment (a 'representation'), on the final draft of the plan (the 'Regulation 19' plan) that the LPA submitted for examination, and*
- *your comment asked for a change to be made to the plan – that is, it was an objection to the submitted plan".*

Thakeham's represents accords with both requirements, and therefore gives Thakeham a legal right to appear before and be heard by the inspector at the Local Plan examination.

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