



THAKEHAM

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

By email only: localplan@greatercambridgeplanning.org

30 January 2026

Dear Sir/ Madam,

**Re: Draft Greater Cambridge Local Plan 2024 to 2042 - Regulation 18 Consultation
Land East of Long Road, Comberton**

These representations are made on behalf of Thakeham Homes Limited ('Thakeham') in relation to the Draft Local Plan for Greater Cambridge Regulation 18 consultation (1 December 2025 – 30 January 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

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

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equivalent of 80,000 plastic bottles) as well as utilise products part of the circular economy.

- We ensure that our whole supply chain is as 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 draft Regulation 18 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 48,195 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 2,295 dwellings (1,103 in Cambridge and 1,192 in South Cambridge)

Whilst the Council has used the Standard Method to derive its housing requirement, the Council has failed to consider the unmet needs of neighbouring authorities and the role the Council can play in supporting these unmet needs. The importance of this was raised within the 27 November 2025 Written Ministerial Statement ('WMS') that stated that "*Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'*". Greater Cambridge adjoins the following local authorities:

- Huntingdonshire District Council
- Central Bedfordshire Council
- North Hertfordshire Council
- Uttlesford District Council

- West Suffolk Council
- East Cambridgeshire District Council

A number of these Local Authorities cannot demonstrate a five-year housing land supply, with Huntingdonshire having a 1,562-home shortfall and North Hertfordshire having a 3,347-home shortfall. There is therefore a shortfall of 4,909 dwellings currently being unmet by adjoining local authorities.

Whilst the WMS suggests that Duty to Cooperate will cease following changes to the necessary regulations, Local Planning Authorities will still need to undertake cooperation with adjoining authorities to demonstrate 'soundness', as there will remain a policy requirement under paragraph 24 of the 2024 NPPF (which this draft Local Plan will be examined under). Draft policies PM10 and PM11 of the draft 2025 NPPF, currently out for consultation, also suggest that this policy requirement will remain. To ensure that the emerging Local Plan is positively prepared and can be found sound, the Council must ensure that it works with the above local authorities to ensure there is not an unmet housing need and to ensure that strategic cross-boundary matters are considered as part of the Local Plan.

Policy S/DS: Development Strategy

The proposed development strategy outlined within draft Policy S/DS seeks to rely on existing allocations and permissions to deliver 37,865 homes, with an additional 13,463 dwellings identified through brownfield redevelopment, new towns, large-scale strategic allocations and smaller rural development. Whilst Thakeham acknowledges and supports the Council in choosing a wide range of sources to meet its housing requirement, as set out above, the Council has failed to consider the unmet need of the adjoining local authorities. The emerging Local Plan therefore needs to identify additional homes to meet its housing requirement.

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 draft 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 draft 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 draft Policy S5 of the 2025 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.

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 recent 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 draft 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 the 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 Cambridge, 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 Cambridge. 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 Cambridge Local Plan as part of the 2019 Call for Sites. These representations are supported by a revised Vision Document, setting out our high-level vision for the Site, this supersedes the previous version provided in 2019.

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

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com