

**DRAFT GREATER CAMBRIDGE LOCAL PLAN REG.18 CONSULTATION – DECEMBER 2025  
MANOR OAK HOMES  
LAND AT BEACH ROAD, COTTENHAM  
REPRESENTATIONS**

## **INTRODUCTION**

The consultation on a Reg.18 Draft Greater Cambridge Local Plan (draft GCLP) is taking place between 1<sup>st</sup> December 2025 and 30<sup>th</sup> January 2026. This document provides draft representations to the consultation. The final version of the representations will be uploaded into the online consultation system.

## **REPRESENTATIONS TO DRAFT GCLP**

### **Vision for Greater Cambridge**

#### Comment

Manor Oak Homes has promoted the Land at Beach Road, Cottenham. The Vision for Greater Cambridge in the Reg.18 Draft Greater Cambridge Local Plan (draft GCLP) refers to increasing quality of life for communities, minimising carbon emissions, reducing car use, providing housing, supporting infrastructure and increasing green spaces.

As set out in these representations, the preferred housing target, the development strategy and the selected allocations for the draft GCLP are unlikely to fully deliver the Vision for Greater Cambridge. The housing requirement is not aligned with jobs growth, which would lead to more people commuting into Cambridge to work mostly by car. The development strategy is too focussed on the delivery of large strategic sites including an expanded Cambourne, existing new settlements at Northstowe, Waterbeach and Bourn Airfield, and a proposed new settlement at Grange Farm. The delivery timetable for infrastructure to support an expanded Cambourne and at Grange Farm is uncertain. For all of the large strategic site allocations the predicted housing delivery rates are unrealistically high, and the delivery of policy compliant levels of affordable housing is often not achieved. The development strategy avoids directing development to the larger villages, including Cottenham regardless of their sustainability credentials, existing services and facilities, accessibility by sustainable modes of transport, or affordable housing needs.

It is considered that the Vision for Greater Cambridge would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development at the more sustainable villages including Cottenham.

### **Strategic Priorities**

#### Comment

Manor Oak Homes has promoted the Land at Beach Road, Cottenham. The draft GCLP identifies seven strategic priorities relating to climate change, biodiversity and green spaces, wellbeing and social inclusion, great places, jobs, homes, and connectivity and infrastructure. As set out in these representations, the preferred housing target, the development strategy and the selected allocations for the draft GCLP are unlikely to fully deliver the strategic priorities.

The housing requirement is not aligned with jobs growth, which would lead to more people commuting into Cambridge to work mostly by car. This outcome would not meet the climate change strategic priority. The development strategy is too focussed on the delivery of large strategic sites, where the timetable for the delivery of necessary infrastructure is uncertain in some cases, the predicted housing delivery rates are unrealistically high, and the delivery of policy compliant levels of affordable housing is often not achieved. It is considered that housing and affordable housing needs would not be met by a development strategy based on this approach and would not meet the homes strategic

priority. The development strategy avoids directing development to the larger villages, including Cottenham, regardless of their sustainability credentials, existing services and facilities, accessibility by sustainable modes of transport, or affordable housing needs. This approach does not support the residents or services and facilities in those villages, and would not meet the great places, homes, connectivity and infrastructure strategic priorities. It is noted that some green infrastructure opportunity areas identified in draft GCLP, including close to Cottenham, are unrelated to strategic development allocations that could support their delivery. In these circumstances those proposed green infrastructure opportunity areas are unlikely to be delivered, and this outcome would not meet the biodiversity and green spaces strategic priority.

It is considered that the strategic priorities for the draft GCLP would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development at the more sustainable villages including Cottenham.

## **Policy S/JH: New Jobs and Homes**

### Object

Policy S/JH of the draft GCLP sets out the targets for jobs and housing during the plan period from 2024 to 2045. The jobs target is 73,300 additional jobs, and the housing target is a minimum of 48,195 dwellings. The proposed housing target is derived from the national standard method figure for calculating local housing needs, which for Greater Cambridge is 2,295 dwellings per annum. In summary, the housing target is not consistent with national policy because upward adjustments for growth and affordable housing have not been considered.

It is noted that the job target is not aligned with the housing target. It is considered that a job target that is higher than the housing target would require potential employees to commute into Greater Cambridge to fill those jobs. This outcome would lead to an increase in in-commuting to Greater Cambridge. It is anticipated that most of the in-commuting would be by car, particularly if public transport options are not available or the delivery of transport infrastructure projects are subject to unconfirmed funding decisions and associated development.

The housing target identified in the 2023 'Greater Cambridge Employment and Housing Evidence Update Employment Land, Economic Development and Relationship with Housing' Report was based on a Central Growth Scenario, the preferred 2011 Census commuting data, and included a 1:1 commuting patterns adjustment. This previous approach sought to better align the job and housing targets. The 2025 Greater Cambridge Employment and Housing Needs Update 2024-2045 Report does not include a similar commuting patterns adjustment, which is an inconsistent approach. It is requested that the housing target is recalculated to include the previous commuting patterns adjustment.

Paragraph 61 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 62 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 63 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need. Paragraph 69 states in part that "*The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment*". Paragraph 008 (ID. 67 - Housing needs of different groups) in the Planning Practice Guidance states in part that "*An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes*". The housing target in Policy S/JH is based on the standard method only, with no adjustments for growth linked to economic development and infrastructure investment or to meet affordable housing needs, all of which are relevant to Greater Cambridge.

The Greater Cambridge City Deal recognised the relationship between housing and economic growth, and that the shortage of available and affordable housing within Greater Cambridge has had an impact on house prices, commuting patterns, and recruitment and retention of employees. The

Cambridgeshire and Peterborough Devolution Deal included a commitment to deliver substantial economic growth and to double economic output during the next 25 years. The National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership have previously acknowledged and supported the economic growth potential of the Greater Cambridge area and concluded that there is a need to substantially increase housing delivery in order to support that economic growth and address the significant housing affordability issues that exist. At present there is an imbalance between rates of economic growth and housing delivery in Greater Cambridge. The housing target in Policy S/JH ignores the commitments made in the Greater Cambridge City Deal and the Cambridgeshire and Peterborough Devolution Deal. It also ignores the findings of work undertaken by the National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership.

In 2024 the Government established a Cambridge Growth Company to maximise Cambridge's full economic potential and to deliver nationally significant growth. The Growth Company will seek to unlock and accelerate development for Cambridge, and to deliver the homes, jobs and infrastructure needed for the long-term and sustainable growth of the City. It will seek to deliver more ambitious levels of growth than are proposed in the emerging Greater Cambridge Local Plan. In order to deliver more ambitious levels of growth, the Growth Company will need to tackle some of the barriers to growth including water and transport infrastructure, traffic congestion, and housing affordability. It is acknowledged that the draft GCLP does not need to take into account the levels of growth to be addressed by the Cambridge Growth Company. However, it does indicate that there are growth ambitions for Greater Cambridge and there should be some upward adjustment to the housing target in Policy S/JH to reflect this future growth during the plan period for draft GCLP.

There are a number of proposed and planned infrastructure projects in Greater Cambridge that should have been taken into account in deciding whether adjustments should be made to the housing target in Policy S/JH. The list of infrastructure projects includes East West Rail, Cambourne to Cambridge Busway, Cambridge South East Transport project, Waterbeach to Cambridge Busway, Cambridge Eastern Access project, and Cambridge South Station. In addition, the Greater Cambridge Partnership is delivering greenways to connect surrounding villages to Cambridge by walking and cycling. The funding for some of these projects have not been confirmed, but it is anticipated that they will need to be supported by associated development.

The 2025 'Housing Needs of Specific Groups in Cambridge and South Cambridgeshire' Report identifies the housing needs of different groups, including the need for affordable housing. Chapter 7 of the Report deals with affordable housing need. The Report identifies an acute need for affordable housing in Greater Cambridge. It estimates an annual need for 1,083 affordable homes for households unable to buy or rent housing across Greater Cambridge, excluding those that can rent but not buy – see Paragraph 7.62 in the Report. It includes an analysis of the affordable housing need if those households already living in accommodation are excluded, which would be an affordable need for 425 homes per annum in Cambridge and 318 dwellings per annum in South Cambridgeshire – see Paragraph 7.63 in the Report.

A combined figure for Greater Cambridge would be 743 affordable homes per year. It is acknowledged that the affordable housing data is complex, households needs will change over time, and the annual affordable housing needs should not be multiplied to generate a figure for the whole plan period. The Report concludes that no adjustments are required to the housing target for the draft GCLP to address affordable housing needs. This cannot be correct. The annual monitoring data shows that affordable housing delivery in Greater Cambridge does fluctuate each year, but does show that c.500 affordable dwellings are provided on average each year, which is less than the current need. In addition, some of the existing strategic sites are not able to deliver policy compliant levels of affordable housing (e.g. Northstowe and Waterbeach new settlements) because of the need to provide significant amounts of new infrastructure, and it is anticipated that the outcome would be the same for the proposed strategic sites at North Cambourne and Grange Farm. If affordable housing needs are to be met, then a higher housing target and additional allocations should be identified in the draft GCLP to address the shortfall in the delivery of affordable housing from the existing and proposed strategic sites. It is considered that the housing target in Policy S/JH should include some upward adjustment to address affordable housing needs.

The representations to Appendix D deal with the part of Policy S/JH that relates to the housing requirements for neighbourhood plan areas.

## Requested Change

The following changes to Policy S/JH are requested.

It is requested that the housing target is recalculated to include the previous commuting patterns adjustment, consistent with the adjustment made in the 2023 'Greater Cambridge Employment and Housing Evidence Update Employment Land, Economic Development and Relationship with Housing' Report.

It is requested that the housing target includes some upward adjustments for growth ambitions, that reflect the Greater Cambridge City Deal and the Cambridgeshire and Peterborough Devolution Deal, and the Cambridge Growth Company.

It is requested that housing target include some upward adjustment to address affordable housing needs.

Consistent with the representations to Appendix D, a new policy is required in the draft GCLP to ensure that the housing requirements for neighbourhood plan areas are delivered.

## **Policy S/DS: Development Strategy**

### Object

Policy S/DS of the draft GCLP sets out the development strategy. In summary, the development strategy comprises delivery at the following locations: sites within Cambridge; existing urban extensions on the edge of Cambridge; existing new settlements; proposed new settlements; housing and employment at employment sites in the rural southern cluster; proposed new strategic employment allocations; and, a limited number of sites at villages in the rural area. It is acknowledged that the principle of development at most of the strategic sites is already established through adopted development plan documents e.g. Eddington, Cambourne West, Northstowe, Waterbeach, Bourn Airfield, and Cambridge East. The proposed strategic sites at Cambourne North (related to the proposed East West Rail and new station for Cambourne) and proposed new settlement at Grange Farm (related to a new stop on the proposed Cambridge South East Transport project) are new strategic allocations for draft GCLP.

It is considered that there are a number of risks associated with the development strategy in Policy S/DS. It is proposed that 44% of the housing target would be delivered at new settlements. It is very reliant on the delivery of the existing strategic sites, but there is no evidence that delivery at these sites will increase above current rates. It is assumed that housing delivery at some of the strategic sites would be 300 dwellings per annum, but this rate has not been achieved at existing strategic sites in Greater Cambridge or delivered at these rates for a sustained period. The housing delivery rates at some of these strategic sites appear to be optimistic and not based on evidence from other similar developments. The delivery of the proposed strategic sites at Cambourne North and at Grange Farm are reliant on the delivery of transport projects that are not approved, and where funding and delivery timescales are uncertain. Most of the existing new settlements will deliver less affordable housing than the normal policy requirement of 40%, mainly because of the need for these developments to also deliver significant levels of new transport and community infrastructure in initial phases. It is anticipated that affordable housing delivery at Cambourne North and at Grange Farm would also be reduced for the same reasons. It is requested that the housing delivery assumptions for all of the strategic sites are reassessed.

The Minor Rural Centres, including Cottenham, are referred to as part of the development strategy but there are limited allocations in this category of settlement. It is considered that the growth of the more sustainable villages should be part of the development strategy for draft GCLP, and particularly those villages that contain a very good range of services and facilities, are accessible by a range of

modes of transport, and where there is an identified need for affordable housing for those with a local connection to the village. Cottenham falls within this category.

Manor Oak Homes has promoted the Land at Beach Road, Cottenham over a lengthy period of time. In April 2018 it submitted an outline planning application (S/0012/18/OL) with all matters reserved except for access for the erection of up to 50 dwellings (use class C3) and associated works including access, car and cycle parking, open space and landscaping.

The promoted development would support and boost the existing services and facilities in the village. It is a medium sized site that could be delivered relatively quickly. It is accessible by sustainable modes of transport. The site would deliver affordable housing to meet the identified needs for the village.

### Requested Change

The requested changes to the development strategy in Policy S/DS are as follows.

It is requested that the housing delivery assumptions for all of the strategic sites are reassessed, taking into account realistic annual housing delivery rates and the delivery of critical infrastructure required for those sites.

It is requested that additional allocations are made in the more sustainable villages, including Cottenham.

### **Policy S/SH: Settlement Hierarchy**

#### Comment

Policy S/SH of the draft GCLP defines the settlement hierarchy. Manor Oak Homes has promoted the Land at Beach Road, Cottenham.

Cottenham is defined as a Minor Rural Centre in the settlement hierarchy. Minor Rural Centres have an indicative maximum scheme size of 30 dwellings within the defined development extents of those villages.

Cottenham contains a good range of services and facilities, and employment opportunities. Key village facilities include a doctor's surgery, pharmacy, primary school, village college, church, shops, village hall, library, and a community sports centre, and access to the Guided Busway for wider transport.

Cottenham possesses the following bus route services:

- 8: Cambridge - Cottenham
- 8A: Cambridge – Orchard Park
- 8A: March – Milton P&R
- 110: Ely – Cottenham - Impington

The village is well-related to significant employment opportunities:

#### Immediate Local Employment & Industrial Areas

- Cottenham Village: Local demand exists for care work (e.g., Bupa Cottenham Court), education (Chestnut Nursery School), and retail/services.
- Waterbeach (approx. 3 miles): Home to the Cambridge Research Park, which hosts various tech, scientific, and office-based firms.
- Milton (approx. 4 miles): Offers significant employment opportunities, including the Cambridge Science Park and various retail/industrial roles.

- Longstanton (approx. 4 miles): Nearby business parks and specific employer sites, such as the Village Vet Group.

## Major Regional Hubs (Accessible by Road/Bus)

- Cambridge Science Park & Northern Fringe: Located just south of Milton, this is a major hub for science, technology, and engineering, easily accessed from the A10.
- Cambridge City Centre: 6-7 miles south, offering a broad range of jobs in education, healthcare (Cambridge University Hospitals), retail, and professional services.
- Ely (approx. 10 miles north): Provides industrial and logistics employment, with a busy recruitment market (e.g., Busy Bee Recruitment).
- Huntingdon (approx. 10-12 miles west): A significant hub for warehouse, logistics, and manufacturing roles, including businesses like Dreams Ltd.

However, there has been no review of the capacity of settlements to accommodate additional development for draft GCLP, or whether the development threshold limits remain relevant if no sites are available. There appears to be no major residential development opportunities within the development framework boundary of Cottenham.

Any development opportunities that do exist would be small scale and would not deliver affordable housing or provide any meaningful support to existing services and facilities. In these circumstances, the indicative maximum scheme size of 30 dwellings for Minor Rural Centres is irrelevant to Cottenham.

As set out in these representations, amendments should be made to the development strategy for draft GCLP, which directs development to the more sustainable villages including Cottenham to support existing services and facilities, deliver additional facilities, and meets identified affordable needs of villages.

## Requested Change

It is requested that a review is undertaken of the capacity of the more sustainable settlements in South Cambridgeshire, including Minor Rural Centres such as Cottenham, to determine whether additional development can be accommodated within the existing development framework boundary, and whether the development threshold limits remain relevant if no sites are available. If the indicative maximum scheme size limits are no longer relevant, they should be deleted.

If the capacity assessment identifies no suitable sites to meet identified affordable housing needs then additional allocations should be made on the edge of those villages.

## **Policy S/DE: Defined Development Extents**

### Comment

Policy S/DE of the draft GCLP set out the approach to development within and outside the defined development extents of villages. Manor Oak Homes do not object to the principle of settlement boundaries being defined around villages. However, the existing defined settlement boundaries for most villages in South Cambridgeshire, including Cottenham, have remained largely unchanged since the Local Plan 2004. The settlement boundaries were adjusted in some cases to take into account allocations at some villages through the Site Specific Allocations DPD 2010 and the South Cambridgeshire Local Plan 2018.

No Neighbourhood Plan Area application has yet been made in relation to Cottenham. The currently defined development framework boundary for Cottenham means that limited development would take place in this village.

No changes are requested to Policy S/DE. However, as set out elsewhere in these representations, amendments should be made to the development strategy for draft GCLP, which directs development to the more sustainable villages including Cottenham to support existing services and facilities, deliver additional facilities, and meets identified affordable needs of villages.

## **Policy S/GB: The Cambridge Green Belt**

### Object

Policy S/GB of the draft GCLP sets out the Green Belt policy for Cambridge. Paragraph 143 of the NPPF sets out the five national purposes for Green Belts. The second purpose listed in Paragraph 143 states “*b) to prevent neighbouring towns merging into one another;*”. The third purpose for the Cambridge Green Belt in Policy S/GB states “*1c. prevent communities in the environs of Cambridge from merging into one another and with the city*”. Purpose 1c in Policy S/GB is inconsistent with the second purpose in NPPG Paragraph 143 i.e. it refers to communities and not towns. Consistency with national policy is one of the soundness tests for local plan policies. The reference to communities rather than towns could have implications for how inappropriate development in the Green Belt is assessed and the implementation of grey belt policy at planning application stage.

### Requested Change

It is requested that Purpose 1c in Policy S/GB is amended to refer to towns and not communities. The amended text should be as follows: prevent towns in the environs of Cambridge from merging into one another and with the city.

## **Policy S/RRA: Additional Allocation - Land at Beach Road, Cottenham (Site Ref. 40251)**

### Object

As set out elsewhere in these representations, it is considered that upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. All these factors indicate that additional allocations should be made in the draft GCLP to meet development needs.

Manor Oak Homes has promoted the Land at Beach Road, Cottenham (Site Ref. 40251). There are no significant constraints to development at this site.

Cottenham contains a good range of services and facilities, and employment opportunities. Key village facilities include a doctors surgery, pharmacy, primary school, village college, church, shops, village hall, library, and a community sports centre, and access to the Guided Busway for wider transport.

Cottenham possesses the following bus route services:

- 8: Cambridge - Cottenham
- 8A: Cambridge – Orchard Park
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- 110: Ely – Cottenham - Impington

The village is well-related to significant employment opportunities:

## Immediate Local Employment & Industrial Areas

- Cottenham Village: Local demand exists for care work (e.g., Bupa Cottenham Court), education (Chestnut Nursery School), and retail/services.
- Waterbeach (approx. 3 miles): Home to the Cambridge Research Park, which hosts various tech, scientific, and office-based firms.
- Milton (approx. 4 miles): Offers significant employment opportunities, including the Cambridge Science Park and various retail/industrial roles.
- Longstanton (approx. 4 miles): Nearby business parks and specific employer sites, such as the Village Vet Group.

## Major Regional Hubs (Accessible by Road/Bus)

- Cambridge Science Park & Northern Fringe: Located just south of Milton, this is a major hub for science, technology, and engineering, easily accessed from the A10.
- Cambridge City Centre: 6-7 miles south, offering a broad range of jobs in education, healthcare (Cambridge University Hospitals), retail, and professional services.
- Ely (approx. 10 miles north): Provides industrial and logistics employment, with a busy recruitment market (e.g., Busy Bee Recruitment).
- Huntingdon (approx. 10-12 miles west): A significant hub for warehouse, logistics, and manufacturing roles, including businesses like Dreams Ltd and

In April 2018, Manor Oak Homes submitted an outline planning application (S/0012/18/OL) with all matters reserved except for access for the erection of up to 50 dwellings (use class C3) and associated works including access, car and cycle parking, open space and landscaping. The application was refused and ultimately went to appeal. At which, in dismissing the appeal, the Inspector acknowledged that the proposed scheme would deliver local benefits. However, he considered that the proposed scheme would be contrary to the newly adopted development plan.

The subsequent SHLAA Site Assessment in respect of Land at Beach Road, Cottenham (40251) scored the site very positively with only green or amber scores being recorded.

The application site is outside Cottenham's Conservation Area on the eastern edge of the village, just outside the Cambridge Green Belt, which lies to its immediate south.

The proposed development will essentially create a new 'village edge'. It will improve the village edge by good design with an outward facing development and quality landscaping. It seeks to create a strong, but sensitive edge addressing the open countryside with enhanced ecological and landscape characteristics.

Sustainable Urban Drainage Systems (SUDS) will be utilised on the site. Surface water will discharge to the existing watercourse located adjacent to Beach Road and will be attenuated to greenfield runoff rates using a detention basin. Foul water will discharge to Anglian Water's foul sewer network via a new pumping station.

The site can be accessed off Beach Road with a footway link via Long Drove. Visibility Splays, relevant to the speed limit, will be acknowledged and adhered to. The proposed development is located in a sustainable location and is located within acceptable walking and cycling distance of local facilities, including the primary school. The site offers many opportunities for residential development including:

- Long distance views into the site are limited, however, some long-distance views across the site and out towards the north east can be explored via carefully selected and located boundary planting.
- The built form will be concentrated to the western half of the site, providing opportunities for new landscaping and green open space along the more sensitive boundaries.

- Providing new, accessible green public open space retaining specific landscape features with improved site wide ecology.
- Creating strong vistas and 'places' within the site, such as a central square or feature area. These areas will break up the scheme and are relevant for the site's rural location.
- Improving boundary conditions, including security, with additional planting. Also, the retention of the existing field hedge.
- Identifying a zone for the fowl water pumping station so it is hidden but accessible.

## Requested Change

It is requested that Land at Beach Road, Cottenham is allocated with the following policy requirements:

- Site Area of 2.4 Ha
- Capacity for 50 dwellings, including affordable housing
- Provision of landscaping and a biodiversity net gain

## **Policy I/ST: Sustainable Transport and Connectivity**

### Comment

Policy I/ST of the draft GCLP seeks to ensure that development promotes sustainable transport in order to reduce reliance on the car. Paragraph 110 of the NPPF expects the planning system to actively manage patterns of growth to support transport objectives. It is expected that significant development would be focused on locations which are or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 identifies factors that should be considered when assessing sites to be allocated for development, including that sustainable transport modes are prioritised, safe and suitable access can be provided, and the impacts on the transport network and highway safety can be mitigated. Policy I/ST is broadly consistent with this national policy.

Manor Oak Homes has promoted the Land at Beach Road, Cottenham. The principle of directing development to locations that are accessible by sustainable modes of transport is supported, but land should be allocated in the more sustainable villages including Cottenham to implement this approach.

Cottenham is defined as a Minor Rural Centre in the settlement hierarchy.

Cottenham contains a good range of services and facilities, and employment opportunities. Key village facilities include a doctors surgery, pharmacy, primary school, village college, church, shops, village hall, library, and a community sports centre, and access to the Guided Busway for wider transport.

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- Huntingdon (approx. 10-12 miles west): A significant hub for warehouse, logistics, and manufacturing roles, including businesses like Dreams Ltd and

As set out elsewhere in these representations, amendments should be made to the development strategy for the draft GCLP to direct development to the more sustainable villages including Cottenham.

## **Appendix D - Housing Requirements for Neighbourhood Areas within Greater Cambridge**

### Object

Appendix D of the draft GCLP identifies a housing requirement for the period 2024 to 2045 for those designated neighbourhood plan areas. There is a made Cottenham Neighbourhood Plan (made May 2021), which makes no allocations for housing. However, Figure 14 lists Cottenham's possible development sites, which includes Manor Oak Homes' Land at Beach Road site.

The housing requirement for Cottenham in Appendix D is 130 dwellings between 2024 and 2045. It is positive that a housing requirement is identified for Cottenham, but it is considered that additional policy support is required in draft GCLP to ensure that the additional housing is actually delivered in Cottenham during the plan period. It is suggested that the housing requirement for neighbourhood plan areas should take into account the affordable housing needs of a village.

The Cottenham Neighbourhood Plan made in May 2021 does not allocate any land for development. It was not able to release land from the Green Belt because the adopted South Cambridgeshire Local Plan 2018 does not include a policy that would have allowed that to happen. It is noted that Paragraph 104 (Id.41: Neighbourhood Planning) of the Planning Practice Guidance indicates that any housing requirement provided for a neighbourhood plan is not binding, and it is for the neighbourhood plan group to decide the scope of the document and whether to allocate land for development. It is also noted that the Government is no longer providing funding support for neighbourhood plans. In these circumstances, it is very unlikely that the Cottenham Neighbourhood Plan will be updated to address the housing requirement identified in Appendix D for the village. There is no policy in draft GCLP that would ensure the identified housing requirement for Cottenham is delivered during the plan period if the Cottenham Neighbourhood Plan is not updated. A new policy is requested to deal with this potential scenario, in order to ensure that the identified housing requirements are met.

Cottenham is located within the designated Green Belt and there is limited capacity within the settlement to meet the identified housing requirement for Cottenham. It is considered that the only

realistic option for meeting that identified housing requirement is for land on the edge of the village to be released for development. Paragraph 145 of the NPPF states in part that *“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”*. There is no policy in draft GCLP that would allow an updated Cottenham Neighbourhood Plan to release land from the Green Belt to meet the identified housing requirement for Cottenham. As set out above, it is very unlikely that the Cottenham Neighbourhood Plan would be updated. As set out elsewhere in these representations, allocations should be made in Cottenham through draft GCLP to meet the identified housing requirement for the village.

Appendix D explains how the housing requirement for neighbourhood plan areas has been calculated. In summary the housing requirement is based on the overall housing target for draft GCLP divided proportionately to each neighbourhood plan area according to the size of their population. It is considered that an adjustment should be made to the housing requirement to reflect the affordable housing needs of villages. For example, South Cambridgeshire District Council’s ‘Housing Statistical Information Sheet for 2022 (published September 2022) identified an affordable housing need of 91 dwellings for those with a local connection to Cottenham.

It is requested that the housing requirement for Cottenham seeks to also meet affordable housing needs. The promoted development at Land at Beach Road would include housing and affordable housing to meet local needs of the village.

### Requested Change

The following changes are requested.

It is requested that the draft GCLP includes a new policy to deal with the potential scenario where a neighbourhood plan is not updated or does not allocate land to meet the identified housing requirement identified in Appendix D. This requested change would ensure that the identified housing requirement for villages are met during the plan period.

It is requested that the draft GCLP includes a policy requirement that allows relevant neighbourhood plans to release land from the Green Belt to meet the identified housing requirement for villages.

It is requested that the identified housing requirements in Appendix D include an adjustment so that affordable housing needs of villages are met during the plan period. The housing requirement for Cottenham should also ensure that the affordable housing needs of the village are met.

**Carter Jonas – January 2026**