



# THAKEHAM

Greater Cambridge Shared Planning  
Planning Policy Team  
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30 January 2026

Dear Sir/ Madam,

## **Re: Draft Greater Cambridge Local Plan 2024 to 2042 - Regulation 18 Consultation**

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). 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.

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- 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 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.

<b>Chapter 2: Development Strategy</b>
<p><b>Policy S/JH: New Jobs and Homes</b></p> <p>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)</p> <p>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 <i>“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”</i>. Greater Cambridge adjoins the following local authorities:</p> <ul style="list-style-type: none"> <li>• Huntingdonshire District Council</li> <li>• Central Bedfordshire Council</li> </ul>

- 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.

## **Chapter 7: Great Places**

Policy GP/HD: Housing density

Thakeham support the inclusion of draft 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 draft 2025 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 40 dwellings per hectare where located within walking distance of a train station, or 50 dwellings per hectare where the station or stop is defined as 'well-connected'.

## Chapter 9: Homes

### Policy H/AH: Affordable housing

Thakeham supports 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 the Council has sought to propose an approximate tenure provision of affordable housing, the Policy should seek to retain flexibility on the tenure to allow developments to reflect localised need for affordable housing.

Whilst supportive of the draft policy, Thakeham would raise the inclusion of paragraph 5e and the table it refers to within draft Policy H/AH. The table 5e refers to, duplicates the Nationally Described Space Standards (NDSS) requirements, which affordable housing is already required to comply to under draft Policy H/SS. The table also fails to recognise some of the minimum number of bedrooms allowed under NDSS. To avoid duplication and confusion with NDSS, it is recommended that paragraph 5e is removed.

### Policy H/HM: Housing mix

Thakeham supports the inclusion of draft 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 (2025). 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.

Whilst the housing mix from the evidence base has been set out within the draft Policy, the policy wording should ensure 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 draft Policy H/SS and the blanket application of NDSS requirement across Greater Cambridge. National Policy 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 draft 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, draft 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.

Draft 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. With regard to the need for M4(2) plots, paragraph 11.107 raises that it expects Building Regulations to mandate M4(2) under revised Building Regulations. It should however be noted that this report was published under the Johnson Conservative government and therefore may not align with the current political agenda. The requirement for M4(2) should therefore be on evidenced need and where Building Regulations are to change, this will supersede planning policy.

The Council's evidence base therefore shows that there is not the demand to justify the current draft policy requirement for both M4(2) and M4(3). Such policy requirements should only be based on evidenced need.

As well as the policies departure from evidence need, the current drafting is unsuitable and unnecessary as a blanket policy across the authority area. On larger schemes for example, the quantum of M4(2) and M4(3) dwellings would be extensive and would far outstrip local need, across such developments this would lead to viability concerns and be prohibitive to maximising housing deliverability and supply. The footprint of such homes is significantly larger and more land hungry, this is particularly more noticeable in flatted development due to the space required for lifts. This would therefore impact on the density of developments

and the ability to make efficient use of land to meet the Councils housing requirement. There are also the added costs of the enhanced build to consider further.

Considering the above, the Council should revise draft Policy H/SS to reflect the current evidenced need for M4(2) and M4(3) and incorporate flexibility to ensure that such policies do not require quantum's of M4(2) and 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 draft 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 for 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.

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**

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