**GREATER CAMBRIDGE LOCAL PLAN (GCLP) – FIRST PROPOSALS**

**REGULATION 18: PREFERRED OPTIONS**

**REPRESENTATIONS: BLETSOES – VARIOUS CLIENTS**

**INTRODUCTION**

1. We act for various landowning clients and we are promoting sites in their ownership for residential development (please see separate representations to chapter S/RRA Allocations in the Rest of the Rural Area).
2. On behalf of our clients, we make the following comments on the Regulation 18 Preferred Options Consultation.

**S/DS: DEVELOPMENT STRATEGY**

1. We support the aspiration of the GCLP where it states that the proposed development strategy supports *“rural communities to thrive and sustain services”* however we do not believe that the GCLP achieves this aspiration and instead adopts a development strategy which neglects sustainable settlements in the rural area. Unless this approach is changed there will be very serious consequences in terms of maintaining service provision in rural areas as well as limiting the variety of choice in the housing market.
2. After accounting for existing committed housing supply, the GCLP aims to deliver 11,640 additional dwellings to meet the housing need target. The proposed development strategy includes the allocation of a very small number of dwellings in the rural area. A total of only four sites are identified for allocation which can deliver only 224 dwellings, equating to **1.9%** of the new housing supply need.
3. The GCLP is heavily reliant on the delivery of new settlements and strategic sites which account for 62% of the total supply over the plan period. Strategic sites and new settlements are complex developments to bring forward and implement with significant investment in infrastructure often required before dwellings can be delivered. It is acknowledged that these types of sites have a role to play in meeting housing needs, however the proposed development strategy is too heavily reliant on such sites coming forward which risks the deliverability of the GCLP.
4. We would also like to highlight that the focus on new settlements and strategic sites will limit the supply of development sites for smaller and mid-sized enterprises (SME) because larger schemes are generally limited to PLC house builders. There is a strong drive across government departments to facilitate the wider involvement of SMEs in the housing market as it is seen as key to broaden the range of developers to increase the level of supply and variety of houses.The NPPF specifically requires local planning policies to bring forward a mix and variety of housing land and in its current form the plan does not meet this requirement.
5. Whilst the plan proposes the allocation of sites in a very small number of rural settlements it isn’t clear why these sites have been allocated in preference to other sites in settlements at the same level in the hierarchy. A better strategy would be to increase the number of allocations across the settlement hierarchy so that a broader distribution of development can be achieved.
6. Over the current plan period and historically in Greater Cambridge there has been significant pressure placed upon the five-year housing land supply. This in part is due to the current over reliance on strategic sites and failure to allocate proportionate growth at established rural settlements which are proven to increase supply as there are fewer delivery constraints. Accordingly, promoting a development strategy which provides variety in making new allocations will safeguard against future shortfalls in five-year land supply and subsequent speculative development proposals coming forward. The GCLP and Neighbourhood Plans should take the lead by positively planning for new housing at established rural settlements across the hierarchy rather than being subject to future speculative development proposals at sites not allocated in a Local Plan when there is a deficit in supply across the plan area.
7. Alongside the total housing need requirement, the proposed development strategy should be reconsidered and amended to ensure that established settlements in the rural area benefit from sustainable levels of housing growth.