



THAKEHAM

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

BY EMAIL ONLY

13th December 2021

Dear Sir/Madam,

**Greater Cambridge Local Plan – The First Proposals Consultation
Land east of Long Road, Comberton**

Thakeham Homes Ltd (Thakeham) is writing in respect of the Greater Cambridge Local Plan – The First Proposals Consultation (1st November to 13th December 2021), specifically in relation to Land east of Long Road, Comberton located to the east of Comberton ('The Site')

Introduction

Thakeham is pleased to be participating in this consultation and has outlined its position below in response to the Greater Cambridge Local Plan (GCLP) – The First Proposals Consultation.

Thakeham is promoting a site: Land east of Long Road, Comberton which is located on the eastern edge of Comberton. This site is available, within single ownership and is achievable and deliverable to contribute towards the development needs of Greater Cambridge in the first five years of the plan period. An Evolution Document accompanies these representations, which further sets out Thakeham's vision for the site, incorporating 400 new homes (inclusive of policy compliant affordable housing provision) alongside key community benefits including a new flexible co-working space, a new Multi Use Games Area and community allotments alongside play space and open space provision.

About Thakeham

Thakeham prides itself in being an infrastructure-led sustainable placemaker and is committed to creating new, extraordinary places, where the highest attention to detail makes a positive difference.

Thakeham build for the future, for communities and individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards. From 2025, all Thakeham Homes will be carbon neutral in production and zero carbon in lifetime use.

Each development is different and tailored to its locality with careful consideration of the area's character, as well as the environment. As a sustainable placemaker first and foremost, Thakeham's commitment to improving existing communities means its schemes are design and infrastructure-led; engaging with education, highways, healthcare, utilities and other local community, cultural and environmental stakeholders from the start of each project. The delivery of homes facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham create sustainable places to live and work.

As one of 12 members of the NHS Healthy New Towns network, Thakeham is a committed advocate of developing healthy places in line with the Healthy New Town principles. But over time, we have realised that these principles are just the starting blocks, and at Thakeham, as a founder member of the HBF Future Homes Task Force, we are committed to delivering sustainable, zero carbon communities. Our approach sets us apart from our competitors. We deliver our schemes with a focus on infrastructure-led sustainable development.

Sustainability

There is an evident theme in Greater Cambridge in respect of environmental impact and the importance of ensuring any development, whether that be residential or infrastructure, seeks to minimise its impact. Thakeham would like to take this opportunity to outline the measures implemented on its developments to minimise environmental impacts as a direct and indirect result of development:

- From 2025, all Thakeham homes will be net-zero carbon in lifetime use.
- From 2025, all Thakeham homes will be carbon neutral in production. Our off-site panellised system will make construction more efficient, faster, enhancing quality and reducing construction traffic.
- Thakeham is committed to offsetting the embodied impact from the production of new houses, as well as development houses that are zero carbon in lifetime operation.
- Thakeham support the Wildlife Trust's guidance on Homes for People and Wildlife. Our commitment is to at least 20% biodiversity net gain (double the government's target within the recent Environment Act 2021) on all our developments post-2025 with attractive and functional green and blue infrastructure.
- Through placemaking and the implementation of sustainable travel plans, Thakeham prioritises walking and cycling over car travel, helping people make more sustainable choices around walking, cycling and taking public transport, as well as highlighting

innovative car-sharing online platforms such as LiftShare to reduce single-occupancy car use and facilitating use of autonomous vehicle/pods.

- Thakeham provides electric car charging points at all of their homes both market and affordable alike, reducing barriers to customers purchasing emission-free vehicles.
- Thakeham is keen to champion low carbon transport in the local area, encouraging local transport services such as buses to electrify their fleet.
- Mechanical Ventilation with Heat Recovery (MVHR) is installed in our homes, which has a filter built-in to capture incoming pollution to provide fresh filtered air.
- Thakeham works with its supply chain with an aim that all mechanical plant on site is less than 18 months old, which means it is less polluting and more fuel efficient.

Response to Options

Thakeham has reviewed the consultation documents and has chosen to comment on key questions and themes where relevant to our business to comment on.

Vision and development strategy

Section / Policy	Your comments
Vision and aims	<p>Thakeham supports the Council's vision for new development to come forward with sustainability and healthy place shaping at the forefront.</p> <p>As we've touched on above, Thakeham supports the focus on healthy place shaping, with a need to ensure that future development maximises opportunities for journeys to be made on foot or bicycle. This will necessitate ensuring new developments prioritise non-motorised transport and easy access to full range of day-to-day services and facilities.</p> <p>Thakeham has made a number of commitments in respect of its own carbon impact, ensuring that all its development will be net-zero carbon in lifetime use and carbon neutral in production by 2025. Additionally, Thakeham has made a commitment to achieve 20% biodiversity net gain on all projects post-2025 which is double that set out in the Environment Act 2021.</p>
How much development, and where – general comments	<p>Whilst Thakeham supports a weighted distribution of development towards the most sustainable locations and key employment hubs, we would emphasise the importance of a variety of growth locations and sizes to support housing growth. New settlements, strategic extensions and development in rural</p>

	<p>locations all form a key part in meeting varying housing needs and ensuring a consistent supply of housing delivery.</p>
<p>S/JH: New jobs and homes</p>	<p>Thakeham is supportive of the Councils' conclusions that adopting the suggested 'standard method minimum homes and related jobs' approach would not be appropriate for Greater Cambridge and would not support its economic growth aspirations.</p> <p>It is acknowledged that the Councils' have sought to accommodate an uplift to accommodate their economic growth aspirations, suggesting that the 'medium level of homes' approach is justified, resulting in a need for 44,400 homes over the plan period 2020-2041 amounting the 2,111 homes per annum, alongside provision of 58,500 new jobs over the plan period.</p> <p>Whilst the 'maximum level of homes' does not represent the Councils' preferred approach; it is worth noting that this approach does acknowledge housing need arising out of fast job growth and therefore the Employment Land Review makes recommendations to provide more than the 'medium' scenario level of jobs to provide flexibility.</p> <p>Thakeham is supportive of the Councils' intention to accommodate their full objectively assessed needs for housing and jobs within the plan area. It is also acknowledged that a 10% buffer has also been added into their housing requirement to provide flexibility, amounting to a housing requirement of 48,840 over the plan period.</p> <p>The Greater Cambridge Local Plan will need to ensure that it is planning for a sufficient number of new homes to support its economic growth aspirations. Whilst it is acknowledged that the medium option for new homes does incorporate an uplift for economic growth in the area, in addition to the application of a 10% buffer to reach the suggested housing requirement. Thakeham would suggest that the Councils undertake further work to ensure that the correct uplift has been applied to ensure that the Councils can meet their relevant aspirations in terms of job creation and growth, and as a result provide the right level of housing to support this. This is important to ensure that existing</p>

	<p>employers in the area can continue to thrive and expand retaining and attracting staff including graduates, in what is a global recruitment marketplace for many of the industries already located in Greater Cambridge. Further, in order to ensure Greater Cambridge continues to be a focus for inward investment into the UK, following on from the successes of the past, continued focus on supporting employment growth will be key and part of that will be providing housing to attract not just highly skilled staff but also for the variety of lower paid workers such as cleaners, delivery drivers and shop workers. These lower paid workers are necessary to support the wider community and economy such as in Greater Cambridge where land and house prices are high. These people are either driven out, much has been the case in London and has been seen in parts of Greater Cambridge to more affordable locations, but with the consequence of a longer commute, or greater affordable housing provision is required to accommodate them</p>
<p>S/DS: Development strategy</p>	<p>The first proposals consultation is suggesting a focus on existing commitments and expansion of existing sites to meet the suggested housing need. Where new sites are proposed these are focussed predominantly within and around the edge of Cambridge.</p> <p>The background text to S/DS suggests that very limited development is proposed in rural areas due the Councils' desire to focus growth to more readily sustainable locations. Whilst, as we have touched on above, Thakeham supports a weighted distribution of development towards the most sustainable locations and key employment hubs, we would emphasise the importance of a variety of growth locations and sizes to support housing growth. New settlements, strategic extensions and development in rural locations all form a key part in meeting varying housing needs and ensuring a consistent supply of housing delivery. In particular, growth in rural areas can contribute to improving and maintaining the vibrancy of these areas and is of great importance to ensuring these communities thrive. The important role that development in these rural areas can play should not be overlooked in the GCLP development strategy.</p>

S/SH: Settlement hierarchy	<p>The settlement hierarchy seeks to group together similar settlements into categories that reflect their scale, characteristics and sustainability. It then seeks to limit development in any settlements which fall within the 'Minor Rural Centre' category and below.</p> <p>Thakeham considers this view is overly prescriptive. The Settlement hierarchy identifies just 8 settlements which would have no limit on individual scheme size:</p> <p>City: Cambridge Town: Cambourne, Northstowe and Waterbeach New Town Rural Centres: Bourn Airfield New Village, Histon & Impington, Great Shelford and Stapleford and Sawston</p> <p>The Greater Cambridge Area covers a significant geographical area and this suggested policy approach limits development opportunities across the plan area. It is suggested that development at Minor Rural Centre's should incorporate schemes of a maximum scheme size of 30 dwellings with lower tiers suggesting significantly less.</p> <p>Policies should retain a flexible approach to ensure that promotion sites and applications can be assessed on a site-by-site basis on the merits and positive contribution they could make to an existing and future community. Development opportunities in these communities could have significant longer-term sustainability benefits by helping existing services remain, and where appropriate levels of growth are accommodated, new services could be provided as a result of development.</p>
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Rest of the rural area

Policy	Your comments
Rest of the rural area - general comments	<p>As we have discussed above, Thakeham do not consider that the Greater Cambridge Local Plan goes far enough to support rural villages to allow them to thrive and grow in a sustainable way.</p> <p>The supporting text and preferred options throughout this consultation suggest that growth has been directed away from</p>

rural areas to meet the plans climate objectives and encourage a modal transport shift from private car use.

The importance of rural communities and ensuring they have the ability to grow appropriately to accommodate their needs and improve their services is paramount to ensuring these communities thrive alongside larger towns and cities. Importantly, appropriate growth at smaller settlements can help contribute to local services and facilities, including public transport provision and internalisation.

As discussed in these representations, Thakeham is promoting Land east of Long Road, Comberton as a sustainable extension to the village. Thakeham prides itself on being an infrastructure-led placemaker who seeks to ensure that social, physical, green and technological infrastructure is delivered as a result of its developments, in appropriate manner in relation to scale and siting of such sites. As part of its promotion at Land east of Long Road, Comberton Thakeham has sought to adopt a landscape a social infrastructure-led approach to its proposals. Alongside open space and play provision the proposals also include a co-working hub, community allotments and a Multi Use Games Area. Thakeham has proven track record for early infrastructure delivery, ensuring that existing and new communities' benefit from the outset.

In addition, Thakeham has its own approach to sustainable movement starting with the principle of reducing the need for travel, which in part can be achieved by offering bespoke home offices for all of our houses. The focus is then on shifting the mode of travel by ensuring pedestrian and cycle movement is prioritised and links into the existing network where possible, encouraging private vehicles to be a tertiary mode of transport. Thakeham has also made a commitment to provide easily accessible cycle storage with charging for electric bikes and scooters and the provision of fast electric vehicle charging points for all houses.

Climate change

Policy	Your comments
Climate change - general comments	<p>Thakeham is supportive of the Councils' objectives to enhance climate change resilience and transition Greater Cambridge to net zero carbon by 2050.</p> <p>As a developer, Thakeham prides itself in the objectives it has set in respect of climate change and the impact development can have. Thakeham has a key focus on sustainable practices both in construction and placemaking. Our approach sets us apart from our competitors. Thakeham's schemes are delivered with a focus on sustainable development, looking ahead of current housing standards. From 2025, all Thakeham homes will be carbon neutral in production and zero carbon in lifetime use. Thakeham are a founding member of the HBF Future Homes Task Force, which examines how the house building industry can work toward delivering net zero carbon homes in order to support the Government's target of the country delivering net zero carbon emissions by 2050. Thakeham has a particular focus on first improving the fabric of buildings, constructed from sustainable timber sources, consideration of sustainable energy features and a sustainable procurement strategy which encourages the use of recycled materials. Thakeham intends to open a new MMC factory in the future, which will provide locally sourced MMC constructed homes further helping to reduce the environmental impact of construction.</p>
CC/NZ: Net zero carbon new buildings	<p>Thakeham considers that the proposed policy direction is too prescriptive and does not provide sufficient flexibility for advances in technologies and Building Regulations. Policy wording should be less prescriptive on the measures used to achieve net zero carbon buildings, rather there should be sufficient flexibility to allow the methods for achieving such targets to be assessed on a site-by-site basis. This is critical as technology is advancing quickly and will continue to do so during the lifetime of the emerging local plan and consequently to set prescriptive policies will have the effect of the local plan being out of date before or at adoption.</p>

	As above, Thakeham prides itself in its own objectives for all its new homes to the zero-carbon in lifetime use and carbon neutral in production by 2025.
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Biodiversity and green spaces

Policy	Your comments
BG/BG: Biodiversity and geodiversity	<p>Thakeham is supportive of the policy direction of BG/BG and the Councils' aspiration to require a minimum of 20% biodiversity net gain, whilst also acknowledging the difficulties this may bring for smaller sites with a suggested contribution mechanism to allow these sites to meet the requirements of the proposed policy. However, the current policy direction seeks to limit off-site habitat measures to align with the Greater Cambridge green infrastructure network strategic initiatives. Whilst it is acknowledged that this may represent a preferred approach, this may cause issues in deliverability due to availability of such land. Policy BG/BG should incorporate sufficient flexibility to allow sites to achieve the required biodiversity net gain requirements by measures which are most appropriate to that site, if this requires off-site habitat creation there should be sufficient flexibility to allow consideration of all suitable options to ensure such requirements do not stifle development.</p> <p>Thakeham itself has already made a commitment to achieve at least 20% biodiversity net gain as a result of our projects post-2025.</p>

Wellbeing and Inclusion

Policy	Your Comments
Policy WS/HD: Creating healthy new developments	<p>Thakeham supports the objective and policy direction of Policy WS/HD, requiring health principles to be applied to new development, drawing on the ten principles developed from the Healthy New Towns Initiative.</p> <p>In our view, relevant policies in respect of wellbeing and inclusion could go further to set out requirements on not only creating healthy new developments, but other measures which maximise wellbeing benefits that developments can offer those who build</p>

	<p>them, those who live in them and the communities around them now and into the future.</p> <p>As one of 12 members of the NHS Healthy New Towns, Thakeham supports such policy initiatives and itself is a committed advocate of developing healthy places in line with the Healthy New Town principles. But over time, we have realised that these principles are just starting blocks, and at Thakeham, as a founder member of the HBF Future Homes Task Force, we are committed to delivering sustainable zero carbon communities. Our approach sets us apart from our competitors, Thakeham is passionate about having a positive impact on people’s wellbeing, constantly striving to deliver against our four key focus areas:</p> <p><u>-Building local communities</u> via excellent placemaking that creates interconnected communities that challenge issues of loneliness and promoting healthy living, and via our long-term charity partnerships.</p> <p><u>-Building future generations</u> via our school engagement programmes, including our industry leading holistic ecology programme ‘Eddie and Ellie’s Wild Adventures’ for primary age pupils, and providing inspiring careers support to secondary age pupils through our Cornerstone Employer status with The Careers Enterprise Company.</p> <p><u>-Building a stronger Industry</u> with our support of small and medium size enterprises and upskilling for local workers, supporting apprenticeships, and actively contributing to the diversification and upskilling of the construction sector.</p> <p><u>-Building Sustainable places</u> by tackling issues of climate change, biodiversity loss and societal disconnects via our ambitious Sustainability Strategy.</p>
<p>WS/IO: Creating inclusive employment and business opportunities through new developments</p>	<p>Thakeham is supportive of the policy direction of Policy WS/IO and as touched on above, adopts its own approach to creating inclusive employment and business opportunities through our support of small and medium size enterprises and upskilling for local workers, supporting apprenticeships, and actively contributing to the diversification and upskilling of the construction sector.</p>

Homes policies

Policy	Your comments
H/AH: Affordable housing	<p>Thakeham support the Councils' policy direction in respect of Affordable Housing and the importance that such homes are built with inclusion, health and wellbeing at the forefront.</p> <p>Thakeham continues to provide policy compliant affordable housing across all of our developments whilst adopting a truly tenure blind approach to affordable housing which creates cohesive communities.</p>
H/SS: Residential space standards and accessible homes	<p>Whilst Thakeham supports the Councils' aspiration to see good quality homes delivered across their districts, such policy requirement which seeks all dwellings to meet NDSS needs to be supported by robust evidence that there is a specific need to introduce such standards.</p> <p>Any policy requirements in respect of housing accessibility requirements should be based on identified need, with sufficient flexibility incorporated to ensure that provision is directed to the right places. In particular, blanket policy requirements for M4(2) in all new developments should not be adopted as these requirements should be based on identified need, whilst requirements in relation to M4(3) can be particularly onerous and should only be directed to developments where there is an identified end user.</p>
H/CB: Self- and custom-build homes	<p>Whilst Thakeham is supportive of self and custom build home provision in Greater Cambridge, it is not considered that a blanket policy as suggested by H/CB on developments of 20 or more is appropriate or feasible. Self and custom-build products should be directed towards key strategic allocations to ensure such homes are deliverable. Self and custom build home provision should also be based on an identified need.</p>

Land east of Long Road, Comberton

The accompanying Evolution Document outlines the constraints and opportunities associated with Land east of Long Road, Comberton and provides a high-level illustrative masterplan and delivery strategy. The site can accommodate circa 400 dwellings alongside significant community benefits on an edge of settlement location, with close proximity to existing facilities and services, with main vehicular access from Long Road.

The landscape and social infrastructure-led scheme is planned around the provision of open space incorporating a number of community benefits including: play space, a Multi Use Games Area, community allotments and a new flexible co-working space.

On the edge of Comberton, the site is situated in a sustainable location with opportunities to access existing local services and amenities within the village. There is also access to public transport provision within close proximity of the site.

The site is within single ownership, within the control of Thakeham and on that basis Thakeham confirms that the site is available and deliverable within the first five years of the plan period.

We trust that 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,



Sarah Sutcliffe
Planning Manager