

Living Space

Greater Cambridge Shared Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambridge
CB23 6EA

30th January 2026

Submitted via email: localplan@greatercambridgeplanning.org

Dear Sir/Madam,

RE: LIVING SPACE HOUSING REPRESENTATIONS TO THE DRAFT GREATER CAMBRIDGESHIRE LOCAL PLAN PUBLIC CONSULTATION

This document comprises Living Space Housings (LSH) representation to the Regulation 18 ("Reg.18") version of the Greater Cambridgeshire Local Plan Public Consultation. These have been prepared to our land interest at Land At 56 Histon Road Cottenham, Cambridgeshire. We therefore submit the following representations to the Greater Cambridgeshire authorities, January 2026.

I. The Site and Planning History - Land At 56 Histon Road Cottenham, Cambridgeshire

- I.1 LSH control land at 56 Histon Road, a greenfield site with some development used as a sawmill. The village of Cottenham is located to the north-west of Histon Road, providing a variety of services and facilities for local residents. The site is within a sustainable location, with the closest bus stop a short walk from the site (approximately 120m to the South along Histon Road) providing connections from Cottenham to Cambridge. Cambridge North Station and Cambridge Station are both within 10km from the site, providing further services to key national locations, such as London, Birmingham and Stansted Airport.
- I.2 The site is not subject to onerous planning constraints. It is not located within a Conservation Area, nor is it subject to any TPOs, or Public Rights of Way (PROWs). In 2021, the site was subject to a Green Belt review within the Greater Cambridge Green Belt Assessment Final Report August 2021 for potential release (ref: CH10). During this review, it was concluded that the site makes limited contributions to the overall Green Belt and could be potentially released with minimal impact. The Council concluded:

Parcel CH10 makes a relatively limited contribution to maintaining and enhancing the quality of Cambridge's setting, and a limited contribution to preventing communities in the environs of Cambridge from merging with one another. The additional impact on the adjacent Green Belt of the release of the parcel would be minor. Therefore, the harm resulting from its release, as an expansion of Cottenham, would be low.
- I.3 A current full planning application has been submitted by LSH (ref: 24/03961/FUL) for demolition of existing dwellinghouse at 56 Histon Road and Timber Mill buildings and erection of 34 affordable dwellings with access from Histon Road, associated infrastructure, works and open space.
- I.4 During the statutory consultation period, it has been acknowledged by the Local Highways Authority that this site benefits from pedestrianised links via an existing shared footway/cycleway on the opposite (eastern) side of the carriageway.
- I.5 Figure I below shows the site location plan in reference to the settlement of Cottenham.

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Figure 1. Site Location Plan



2. Settlement Context – Cottenham

- 2.1 Cottenham is a large village in Cambridgeshire, providing a variety of facilities and services expected of a Rural Centre settlement. There are a number of educational facilities, shops, pubs, and places to eat as well as a library, dental practice and a number of places of worship.
- 2.2 Cottenham is considered to be a sustainable settlement due to the various public transport services provided, such as bus services through the village that provide links between Cottenham and March. Cottenham is located less than 9km north of the city of Cambridge, which offers a number of further services typical of a city.
- 2.3 As well as the previously acknowledged public transport services, there are a number of existing services within Cottenham, including primary and secondary schools, convenience shops, pubs and restaurants, a GP Surgery, Library and other various community buildings. The provision of these establishments further confirms that Cottenham is a sustainable settlement that can accommodate further growth.

RESPONSE TO DRAFT LOCAL PLAN

3. Section 2 - Development Strategy

3.1 Policy SIJH: New Jobs and Homes

- 3.1.1 LSH supports the requirement of providing a minimum of 48,195 homes over the Greater Cambridgeshire area. The Housing Needs of Specific Groups in Cambridge and South Cambridgeshire Report (August 2025) concluded that there was an annual need in Greater Cambridge for 2,309 dwellings, with paragraph 7.159 stating that there is an acute need for affordable housing in both local authorities (Cambridge City and South Cambridgeshire) and that it is clear that the provision of new affordable housing is an important and pressing issue in the area (para. 7.169).
- 3.1.2 The site that LSH have a live planning application against (ref: 24/03961/FUL) would assist the Council in its need for affordable housing, given that it is a wholly affordable scheme that would provide 34 affordable dwellings to the local area.

3.2 Policy SIDS: Development Strategy

- 3.2.1 The allocation of small sites should be recognised as a priority and supports small house builders to ensure that they benefit from having their sites identified for development. Allocations within a Local Plan take away some of the risk from

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a development by providing greater certainty of that site coming forward. The effect of this is that it allows the SME sector to grow, delivering homes to increase the range of new homes available. In turn, this would align with and follow the National guidance of the NPPF outlined in Paragraph 73, which states:

- 3.2.2 Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.
 - Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing.
 - Use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;
 - Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.
 - Work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.
- 3.2.3 Therefore, in order for the plan to be consistent with National Policy, the Council should seek to promote the delivery of small and medium sites through allocations within the Local Plan.

3.3 Policy SISH: Settlement Hierarchy

- 3.3.1 LSH do not agree with the allocation of Cottenham as a 'Minor Rural Centre'. The downgrade of this settlement seems to be at odds with the proposed allocations for residential development identified within this draft local plan. The Settlement Hierarchy Study states that the reason for this downgrading is due to the frequency of bus service changing to every 40 minutes, and as Cottenham does not have a segregated public transport route. However, Cottenham is still identified within paragraph 3.7 of this study as *offering a good range of shops and services*, with later acknowledgement that the settlement provides 28 shops and services, as well as a primary school and GP surgery.
- 3.3.2 In relation to villages services and facilities provided, *appendix 11* finds that Cottenham scored 15 points, significantly higher than Gamlingay which scored 7 and Willingham which scored 9. Both of these settlements are also identified as minor rural centres. The implication here is that settlements with significantly varied scores are identified as the same category village that can take the same level of growth and have a maximum size of 30 dwellings per development, which should not be the case. Given the high levels of services and facilities that Cottenham provides, as acknowledged within the settlement hierarchy study, the identification of Cottenham as a minor rural centre should be re-evaluated.
- 3.3.3 LSH therefore suggest that the Council re-evaluate their settlement hierarchy to identify higher scoring 'minor rural centre' settlements, such as Cottenham, as a higher tiered village, such as reverting it to its previous standing from 2018 as a Rural Centre.

3.4 Policy SIGB: The Cambridge Green Belt

- 3.4.1 LSH agrees with this Policies alignment with National Policy within the NPPF relating to Green Belt release on sites that accord with the Golden Rules.
- 3.4.2 As previously stated above, the Greater Cambridge Green Belt Assessment Final Report August 2021 reviewed this site for Green Belt release and it was concluded that the site makes limited contributions to the overall Green Belt and could be potentially released with minimal impact.

4. Section 4 – Climate Change

4.1 Policy CC/WE: Water Efficiency in new developments

- 4.1.1 The proposed restriction on water use to 80 litres per person per day in developments of 100+ dwellings, and 90-100 litres per person per day in developments of less than 100 dwellings is unduly onerous and is not consistent with national requirements. By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day. The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035.
- 4.1.2 These restrictions to the LPPPD is considered unreasonable. The Policy should instead be written to reflect national regulations. LSH consider the Policy is reworded to reflect National Building Regulations Standards of 125 LPPPD.

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4.2 Policy CC/IW: Integrated Water Management, Sustainable Drainage and Water Quality

4.2.1 LSH agrees with the integration of Sustainable Drainage Systems (SuDS) into developments as a way of managing surface water runoff.

4.3 Policy CC/FM: Managing Flood Risk

4.3.1 LSH are concerned that this Policy does not reflect the updated Planning Practice Guidance (“PPG”) (updated 17 09 2025) relating to sequential testing. Policy CC/FM states that development proposals will be supported where the sequential test has been passed. However, this is not in compliance with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175.

4.3.2 The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. LSH therefore request that this Policy be amended to reflect the updated PPG.

4.3.3 The site LSH are promoting for development at land at 56 Histon Road, Cottenham is at a low risk of flooding due to its location being wholly in Flood Zone 1.

5. Section 5 – Biodiversity and Green Spaces

5.1 Policy BG/BG: Biodiversity and Geodiversity

5.1.1 LSH do not agree with Policy BG/BG as it is not a consistent approach in relation to the National Requirements for BNG. We accept that on-site net gain delivery should followed however, the Policy requirement of 20% BNG on major sites should not be followed. The uplift of the minimum BNG requirement unfairly penalises SME developers who deliver smaller residential developments that cannot often feasibly deliver the mandatory 10% net gain in biodiversity, in full, on-site. LSH suggest that Policy BG/BG needs to be amended to be consistent with the national requirements for delivering a net gain in biodiversity, to be justified.

5.2 Policy BG/EO: Providing and Enhancing Open Spaces

5.2.1 LSH supports the inclusion of public open spaces within future developments, as part of creating high quality functional spaces for residents to enjoy.

6. Section 6 – Wellbeing and Social Inclusion

6.1 Policy GP/QD: Achieving High Quality Development

6.1.1 LSH agrees that future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.

6.2 Policy GP/HD: Housing Density

6.2.1 LSH supports the Councils decision for housing density to be appropriate in order to reflect the local character and context.

6.2.2 However, LSH note that no density figures have been provided. Whilst it is acknowledged and supported that character and local context should inform appropriate density levels, the absence of any benchmark figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance, alongside the policy’s design-led and context-led approach, would improve consistency in decision-making and provide greater certainty for delivery.

6.2.3 Therefore, it is recommended that Policy GP/HD be altered to include indicative density ranges that provide clarity for developers and decision-makers. While a design-led approach is welcomed, clear benchmarks would support early feasibility work, improve consistency across decisions, and reduce uncertainty at pre-application and application stages.

7. Section 9 – Homes

7.1 Policy H/IAH: Affordable Housing

7.1.1 LSH supports the inclusion of at least 40% affordable housing within major residential developments, and increasing to 50% on Green Belt land, in accordance with the NPPF (2024). The option for an off-site provision or financial contribution

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to be considered as an alternative to on-site affordable housing if it is not suitable or viable, is something that is supported by LSH.

- 7.1.2 The site that LSH are promoting consists of a wholly affordable residential development of up to 34 dwellings, of which there will be a tenure mix that is suitable and reflects what is required for the Cottenham area following policy and guidance.

7.2 Policy H/HM: Housing Mix

- 7.2.1 LSH supports the Council's approach to securing a varied housing mix within new residential developments and welcomes the flexibility within the policy to allow for alternative mixes where this can be robustly justified. This balanced approach recognises the importance of responding to local housing needs and demographic trends, while also allowing schemes to reflect site-specific constraints, market demand and viability considerations. Such flexibility will help ensure that developments remain deliverable and can respond effectively to changing housing requirements over the plan period.

- 7.2.2 Whilst it is understood that there is a need for a mix of house types, tenures and sizes, it is important that such a policy is flexible and ensures that delivery of housing is not stalled due to overly prescriptive requirements that do not consider the scale and viability of sites. LSH supports the flexibility of this Policy, which allows home builders and developers to provide alternative housing mixes as required by the market.

7.3 Policy H/SS: Residential Space Standards and Accessible Homes

- 7.3.1 Policy H/SS conforms to paragraph 135 (f) of the NPPF 2024, which states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

- 7.3.2 However, the requirement for all new residential developments to comply with NDSS standards is not supported by LSH. The requirement for NDSS compliance on all new dwellings lacks flexibility and does not comply with National Guidance. There is also a lack of evidence surrounding this compliance requirement. Therefore, it not been justified and should be removed from the Local Plan.

- 7.3.3 5% minimum Market homes to meet M4(3) regulations and 10% minimum Affordable homes to meet M4(3) regulations within developments of over 20 dwellings is partially supported by LSH, in principle. However, the Council should be aware of National Building Regulation requirements and be conscious not to double count.

- 7.3.4 It should also be noted that if the Council are to implement such a policy in the way outlined within their draft plan, they should allow reflection of this within cost viability assessments. The implementation of such a policy may be a challenge from a viability and deliverability perspective, meaning that further flexibility would be favoured with regards to this policy in order to address these concerns. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.

8. Conclusion

- 8.1 LSH politely request that these representations are taken into account. Land at 56 Histon Road, Cottenham is readily available and deliverable within the desired timeframe, particularly given the current planning application which is running alongside this representation. Therefore, LSH recommend that the Council include the site within the emerging Plan as an allocation for residential development.

- 8.2 I trust that you will find the above acceptable.

Yours Sincerely,

Lucy Taylor
Assistant Planning Manager