TERRA

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

30 January 2026

[redacted]

Dear Sir/Madam,

TERRA REPRESENTATIONS TO THE DRAFT GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION, DECEMBER – JANUARY 2026

This document comprises Terra's representations to the above Regulation 18 Consultation. These have been prepared in relation to our land interests at ***Land at Oakington Road, Cottenham***. Representations have been made to the previous stage of the Local Plan Consultation, these representations add to those submissions.

The Site – Land at Oakington Road, Cottenham, Cambridgeshire

Terra land interests on Land at Oakington Road is approximately 4.9 hectares in extent and comprises of one field that is in arable use and two horse grazed paddocks. Access to the Site is via a double gate from Oakington Road to the eastern edge of the Site. The Site is located to the western edge of Cottenham, adjacent to recently constructed new housing developments which have taken place to the western side of Cottenham. The site is bounded to the north and west by fields in agricultural use. To the east the Site is bounded by existing residential development which has come forward through a series of separate planning application over the last 8 years. The Sites southern boundary is formed by Oakington Road, which leads eastwards to the centre of Cottenham.

As set out above, to the eastern side of the Site there is established residential development which has come forward through a series of separate planning application by Persimmon Homes (126 homes), Bellway Homes (50 homes) and a larger development of 200 homes which extends the development extents of Cottenham further north along Rampton Road. More recently. planning permission has been granted for 9 custom build homes immediately to the south east of the Site, under Outline Application 24/02654/OUT, which was allowed on appeal in July 2025, and has yet to be implemented.

The Site is not within a designated Conservation Area, does not contain any Listed Buildings, with the nearest Listed Building being approximately 550m away off Rampton Road. The Site is not within the Designated Green Belt, the Green Belt lies to the southern side of Oakington Road and affects much of the southern side of Cottenham.

The Site contains a number of existing landscape features, including boundary hedgerow along the Site's frontage to Oakington Road, aswell as along the Sites north, eastern and western boundaries. There is a line of mature trees within the Site dividing the agricultural field from the grazed parcels and along the Site frontage with Oakington Road. There are no Public Rights of Way within or adjacent to the Site. There is an existing pedestrain footpath to the east of the Site along the northern side of Oakington Road provided as part of the recent Charles Church development which continues east towards the village centre.

The Site falls wholly within Flood Zone 1 and as such is not at risk from Flooding. There are not ecological statutory or non statutory designations related on the Site or within 1km of the Site and the Site is not subject to any landscape designations.

The Site is considered to be an appropriate small/ medium sized site which would be a suitable housing allocation.

Figure 1 shows the Site Location Plan.

Figure 1. Site Location Plan

Settlement Context – Cottenham

Within the adopted Local Plan Cottenham is identified as a Rural Centre and is a large village located in South Cambridgeshire, to the north of Cambridge which lies approximately 9 km to the to the south. Cottenham is 6km to the north of Waterbeach, which is one of South Cambridgeshire's main new settlements where approximately 11,000 new homes ared coming forard and being delivered alongside associated services, community facilities and infrastructure on the fomrer Waterbeach Barracks.

Cottenham is considered to be a sustainable settlement due to the number and range of services and facilities located within the village which includes a number of Educational Facilities, namely Pre-School Facilities and Primary School; Leisure and Recreation Uses, including Recreation Ground, Skate Park and Equipped Play Areas; Community Facilities, including a Village Hall with Sports and Social Club, Library, GP Practices, Dental Practice and Place of Worship, as well as a Post Office, Shops, Public Houses and Restaurants.

Cottenham has good sustainable transport links, with the nearest bus stop 250m from the Site on Oakington Road. The Number 8 Bus service provide links through the village, linking to other villages and onwards to Cambridge. At a frequency of every 40 minutes.

The nearest railway station is located at Waterbeach Railway Station approximately 6km to the south east with services to London Kings Cross via Cambridge to the south east and Ely to the north at half hourly frequencies, with hourly services to Kings Lynn.

Initial Technical Work

Initial high level work has been undertaken on the Site to guide a future development proposal for circa 90 dwellings.
This is at early stages, Terra welcome discussing the Site further with Officers at South Cambridgeshire in the coming months.

RESPONSE TO GREATER CAMBRIDGE DRAFT LOCAL PLAN (Reg 18) CONSULTATION

Terra welcome the opportunity to comment on the current Regultation 18 Consultation.

Terra welcome the plan period being up to 2045 which allows the Council's to plan for a period of 15 years and beyond.

The below comments are made in response to the proposed Development Strategy and draft policies contained in the Consultation document.

Section 2 - Development Strategy

There are a number of draft policieis that require comments.

Draft Policy S/JH: New Jobs and Homes

Terra supports the provision of a minimum of **48,195** new homes in the period up to 2045 to meet the objectively assessed needs in Greater Cambridgeshire.

It is noted that the current supply is cited as **37,865** with a requirement for **10,330** additional new homes to be identified as new allocations to meet the housing need.

Land at Oakington Road, Cottenham is sustainably located adjacent to the Development Extents of Cottenham and constitues an appropriate medium size site for housing to come forward.

Draft Policy S/DS: Development Strategy

The proposed development strategy sets out where new homes and jobs identified in Draft Policy S/JH are to be provided to meet the visions and strategic proiorties of the Plan.

The strategy is heavily reliant on carrying forward previous allocations from the adopted Plans. New strategic scale allocations are proposed (a) within the Cambridge urban area; (b) on the edge of Cambridge; (c) at New Settlements; (d) In the Rural Southern Cluster and (e) In the Rest of the Rural Area.

The remainder of the development needs are to be met at smaller sites within; a. Cambridge urban area; and b. the rural area, where further development is to be limited with allocations for jobs and housing focused on Rural Centres and Minor Rural Centres, and the settlement hierarchy policy providing for windfall development for different categories of village consistent with the level of local service provision and quality of public transport access to Cambridge or a market town.

National Policy sets out a requirement for small and medium sized sites to be identified to accommodate at least 10% of the overall housing requirment on sites no larger than one hectare, unless it can be shown that there are strong reasons why the 10% target cannot be achieved.

Allocations within a Local Plan take away some of the risk from a development by providing greater certainty of that site coming forward. Regard should be given to national policy outlined in Paragraph 73, which states:

'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:

a) *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.*
b) *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.*
c) *Use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
d) *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.*

e) *Work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes*

The proposed Development Strategy should include an allowance for small and medium size sites in line with Paragraph 73 of the NPPF to ensure a mix of sites are provided for in the Plan. ***Draft Policy HO6*** of the draft NPPF published on the 16th December 2025 shows the governments intentions to support a diverse mix of sites setting out that Local Plans should:

a. ***allocate at least 10% of the housing requirement on sites no larger than 1 hectare, and a further 10% on sites between one and two and a hlaf hectares, unless there are strong reasons why these targets cannot be met; and***
b. ***allocate sites which will support and enhance the vitailty of rural communities and enable villages to grow and thrive, especially where this will support local services***

The supporting text to the draft policy sets out Greater Cambridgeshire stance that allocating 10% of the housing requirement on small sites would need them to identify large numbers of small sites across the rural area which is cited as being extremely challenging, which would compromise their development strategy by directing a significant proportion of growth to less sustainanble locations. The supporting text goes further to suggest that the identification of the small sites requirement may also require more sites being released from the Green Belt, as well as suggesting it would be diffucult to deliver the infrastructure needed to make the developments sustainable.

There are no strong reasons why the 10% target for allocating small and medium size sites cannot be achieved in Greater Cambridgeshire. This is a serious flaw of the current Consultation Plan.

By not including a diverse range and mix of sites, Greater Cambrideshire's Developemnt Strategy conflicts with the NPPF and leaves the future supply of sites vulnerable. This will be based on existing commitments which have not delivered in the current Plan as anticipated, new allocations, which may face similar issues with delivery, and a windfall allowance which provides no certainty of sites coming forward.

The Draft Plan's failure to include the allocation of small sites will also impact significantly on the vitality of rural communities preventing them to grow, thrive and support existing local services, which is a key objective of the NPPF and the emerging NPPF.

The Draft Plan sets out that villages should play only a limited role in meeting future developmet needs, as such only a limited number of smaller new sites are proposed to be allocated in what the Councils consider to be the more sustainable villages.

Figure 12 shows the distribution of growth proposed in the Greater Cambridge Local Plan compared to previous Local Plans. The majority of growth, namely 44% is proposed to be allocated as New Settlements; whilst 29% is proposed on the edge of Cambridge; 11% at Cambridge Urban Area and only 16% to the Rural Areas. This is significantly less than previous Local Plans and would limit the growth of a number of villages across Greater Cambridgeshire.

Terra consider that a higher level of growth should be attributed to the rural villages to maintain their vitality, to support existing services and to ensure a suitable supply of homes, including specialist housing, is provided to meet the needs of the existing residents and future generations.

Cottenham is considered to be a sustainable village to take further growth given its population, the considerable level of services and facilities it contains which includes local services, facilities and a range of clubs and community activities which take place within the village. ***Land at Oakington Road, Cottenham*** is an available and suitable site that is sustainably located for housing development to come forward for market and affordable housing.

Our land interests at ***Land at Oakington Road, Cottenham*** are of an appropraite size to contribute to the small and medium sized housing site requirements, in line with the NPPF, which can assist the Councils to meet their housing needs in a sustainable location.

Draft Policy S/SH Settlement Hierarchy

This policy groups settlements into categories to reflect their scale, characteristics and sustainability and is used to guide development to the most sustainable locations. The policy also sets the scale of development for unallocated (windfall) sites that would be potentially be suitable in each category of settlement.

There are 6 Settlement Tiers proposed with Cottenham identified as a Minor Rural Centre.

The Consultation Document sets out that within Minor Rural Centres, residential development and redevelopment up to an indicative maximum size of 30 dwellings will be permitted, within the defined development extents. There is no justification given within the policy wording or the supporting text to justify the figure of a maximum of 30 dwellings.

Cottenham's settlement status is proposed to be downgraded from its current status of being a Rural Centre in the adopted Local Plan to a Minor Rural Centre. The reasoning for this is attributed to the reduction in the frequency of the existing bus service from a frequency of 30 minutes to every 40 minutes, and due to Cottenham not having a segregated public transport route. This is not a robust justification for limiting the level of growth that Cottenham can achieve.

The proposed change in settlement status is also at odds with the level of services and facilities that are readily available within Cottenham. Paragraph 3.7 of the Settlement Hierarchy Study acknowledges that Cottenham offers a good range of shops and services and acknowledges that it has 28 shops and services, as well as a Primary School and GP Surgery.

As has been set out earlier in these representations Cottenham is considered to be a sustainable settlement due to the number and range of services and facilities located within the village which includes a number of Educational Facilities, namely Pre-School Facilities and Primary School; Leisure and Recreation Uses, including Recreation Ground, Skate Park and Equipped Play Areas; Community Facilities, including a Village Hall with Sports and Social Clubs, Library, GP Practices, Dental Practice and Place of Worship, as well as a Post Office, Shops, Public Houses and Restaurants.

The sustainability of Cottenham is though much more than the number of services it contains. The types of services on offer also contribute to Cottenham having a thriving community with residents utilising the services it contains, via walking and cycling. In this regard there are a range of sporting, social clubs and community clubs that take place at the Village Hall which are available to a mix of ages. Cottenham also has a very active and well run Parish Council who organise local community events. Cottenham Library is an inclusive community facilities with accessible parking and wheelchair access. These all contribute to the strong, vibrant and healthy community within Cottenham.

Within the Consultation Plan, Minor Rural Centres are set out as having a lower level of services, facilities and employment than rural centres, but a greater level than most other settlements in Greater Cambridge. Cottenham does not fit this tier of settlement for the above reasons and is not comparable to other Minor Rural Centres such as Gamlingay, which has a population of 3,810 and scores 7 in the Settlement Hierachy Study (Appendix 11 Summary Table) and Girton which has a population of 4,565 and also scored 7 whilst Cottenham scores 15.

Within the Rural Centres there is no limit to the scale of development that can be supported provided the development or redevelopment is within the defined extents of Rural centres and provided adequate services, facilities and infrastructure are avialable or can be made available by the development. Within the Minor Rural Centres however, as set out above, the scale of development is limited to an indicative maximum of 30 dwellings within the Defined Extents of the Minor Rural Centres. This unduly limits the level of growth that these settlements could provide and would also conflict with national planning policy, in particular Paragraph 83, which sets out that '***planning policies should identify oppportunities for villages to thrive, especially where this will support local service, Where there are groups of smaller settlements, development in one village may support services in a village nearby***' as well as national policy which requires proposals to make the most effcient use of availble land.

Terra consider that rather than having an arbitrary figure written in policy, the level of development should be of an appropriate scale to the size of the settlement and should relate to the character of the area, with any judgements made through the planning application process.

Terra consider that the Council should not downgrade the status of Cottenham as is proposed to a Minor Rural Centre. It should remain with Rural Centre status given the range of services and facilities located within Cottenham and the ability for residents to make full use of these through sustainable transport, in particular through walking and cycling. Retaining Cottenham status as a Rural Centre will allow for windfall development to come forward on sites that can deliver over 30 new homes, where appropriate, which will also support the existing services and facilities in the village to ensure a strong, vibrant and healthy community.

Appendix 11 of the Settlement Hierarchy Study - Terra Object to Cottenham moving from Rural Centre to a Minor Rural Centre for the above reasons.

Section 4 - Climate Change

A number of policies are proposed to seek to reduce the impact of development on climate change to assist the ambitions for Greater Cambridge to transistion to net zero carbon by 2025.

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

The proposed restriction on water use to 80 litres per person per day (LPPPD) 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 policy 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.

Draft Policy CC/IW should be amended to reflect National Building Regulations Standards of 125 LPPPD.

Policy CC/FM Managing Flood Risk

Terra 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 line with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175.

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. Terra therefore request that this Policy be amended to reflect the updated PPG.

The site Terra are promoting for development at ***Land at Oakington Road, Cottenham*** is at a low risk of flooding, being wholly in Flood Zone 1

Section 6 – Wellbeing and Social Inclusion

Policy GP/HD Housing Density

Terra supports the Council's view that for housing density to be appropriate it should reflect the local character and context.

Making the efficient use of land through increasing densities is an existing national planning policy requirement. The draft NPPF issued on the 16th December 2025 emphasises the need for intensification in appropriate sustainable locations through building on infill plots, building higher and at a greater density on corner plots and in the more sustainable locations. The emerging Local Plan should align with national policy in order to assist Greater Cambridgeshire in meeting their housing requirement.

Terra note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy.

Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers.

Section 9 - Homes

Draft Policy H/AH Affordable Homes

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

Draft Policy H/HM Housing Mix

Terra 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 can respond effectively to changing housing requirements over the plan period.

Draft Policy H/SS Residential Space Standards and Accessible Homes

Policy H/SS is in line with 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.

The requirement for all new residential developments to meet and wherever possible exceed, the residential standards set out in the Governments Technical Housing Standards – Nationally Described Space Standard (NDSS) is not supported by Terra. The requirement for NDSS compliance on all new dwellings is overly prescriptive and does not comply with National Guidance. In addition, this requirement is not supported by local evidence and would place additional financial burdens on developments which could affect viability of developments.

The policy also sets out requirements for accessible and adaptable homes requiring all new build houses to be designed in accordance with Building Regulations M4(2) standard, this is noted and in line with the separate legislation contained in Building Regulations.

On developments over 20 units, draft Policy H/SS sets out a requirement for 10% of the affordable units and 5% of the of Market homes to meet M4(3) regulations. This will have implications for the cost of development and as such could be a challenge for SME's delivering small to medium size developments. Accordingly, this should be an optional requirement, if viability allows for M4 (3) to be provided on a proportion of the units in a development. It is noted that exceptions to meeting both the M4(2) and M4 (3) will be taken into account if justification for site specific circumstances is provided however, Terra request that the policy should be drafted to include reference specifically to considerations of viability.

Conclusions

Terra requests that these representations are taken into account in the preparation of the next stage of the Plan.

Land at Oakington Road, Cottenham is readily available and residential development is deliverable within the short to medium term. Terra recommend that the Councils include the Site within the emerging Plan as Housing Allocation.

I trust that you will find the above acceptable, if you require any further information please do not hesitate to contact myself or my colleague [redacted]

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