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Northstowe Policy S/NST

Written Representation for the Reg 18 Consultation on the Draft Greater Cambridge Local Plan – Draft for discussion with Homes England

1 Introduction

- 1.1 This document is a written representation prepared by Tibbalds Planning and Urban Design, on behalf of Homes England, which responds to the ongoing Regulation 18 consultation for the Draft Greater Cambridge Local Plan.
- 1.2 Specifically, this representation responds to draft Policy S/NST of the Draft Local Plan (and supporting text), which relates to Northstowe New Town, which is classified in the Draft Plan as an “Existing New Town”. The intention of the draft Policy S/NST is to replace the existing Northstowe Area Action Plan (July 2007).
- 1.3 Homes England have secured outline planning permission for Phases 2, 3A and 3B of Northstowe and are bringing forward development on these Phases as master developer, alongside a number of development partners. The enclosed plan constitutes Homes England’s land holdings.
- 1.4 Homes England are fully supportive of the continued allocation of Northstowe as a sustainable new town and are committed to its ongoing delivery alongside Greater Cambridge Shared Planning and other key stakeholders. Key to this is ensuring that the existing planning permissions and local plan policy continues to support the delivery of housing and community facilities in the right way and in good time. Northstowe is a New Homes Accelerator Site and policy should not introduce complexity or constraints which would slow delivery. This representation therefore comments on draft Policy S/NST with this in mind and covers:
 - Ensuring the local plan does not replicate existing delivery mechanism or introduce new requirements on these permission or subsequent reserved matters applications;
 - Ensuring the local plan accurately and consistently reflects and references the outline permissions, for example in relation to the quantum of development; and
 - Suggested specific wording that could potentially be more positive or less ambiguous.

2 Existing Planning Permissions and Planning Policy Guidance

- 2.1 The Northstowe Area Action Plan (AAP) was adopted by South Cambridgeshire Council in 2007. This set out the detailed planning policies, spatial development principles, infrastructure requirements and sustainability objectives for the New Town.
- 2.2 Since the adoption of the AAP, Northstowe New Town is the subject of four main overarching Outline Planning Permissions. These are set out below:
 - Phase 1: S/0388/12/OL, granted in April 2014 for *Outline planning application for phase 1 of Northstowe comprising up to 1500 dwellings a primary school a mixed-use local centre (including a community building and provision for non-residential institutions financial and professional services shops cafes and restaurants drinking establishments and hot food take-aways) leisure community residential institutions cultural health and employment provision (business general industry and storage & distribution) including a household recycling centre formal and informal recreational space and landscaped areas and infrastructure works including site re-profiling and associated drainage works foul and surface water pumping stations two flood attenuation ponds on land east of Hattons Road and associated works including the demolition of existing buildings and structures..*
 - Phase 2: S/2011/14/OL, granted in January 2017 for *Development of Phase 2 of Northstowe with details of appearance landscaping layout scale and access reserved (save for the matters submitted in respect of the Southern Access Road (West)) comprising:.. 1) development of the main Phase 2 development area for up to*

3500 dwellings two primary schools secondary school town centre including employment uses formal and informal recreational space and landscaped areas eastern sports hub remainder of the western sports hub (to complete the provision delivered at Phase 1) busway a primary road to link to the southern access construction haul route engineering and infrastructure works and.2) construction of a highway link (Southern Access Road (West)) between the proposed new town of Northstowe and the B1050 improvements to the B1050 and associated landscaping and drainage.

- Phase 3a: 20/02171/OUT, granted March 2022 for Outline planning application for the development of Northstowe Phase 3A for up to 4,000 homes, two primary schools, a local centre (including employment, community, retail and associated services, food and drink, community, leisure, residential uses and other accommodation), secondary mixed use zones (including employment, community, retail and associated services, food and drink, community, leisure, residential uses), open space and landscaped areas, sports pitches, associated engineering and infrastructure works, including the retention of the existing military lake and creation of a new lake, with details of appearance, landscaping, layout, scale and access reserved. Application is accompanied by an Environmental Statement and involves works to/affecting existing Public Rights of Way.
- Phase 3b: 20/02142/OUT, granted March 2022 for Outline planning application for the development of Northstowe Phase 3B, comprising up to 1,000 homes, a primary school, secondary mixed use zone (with retail and associated services, food and drink, community, leisure, employment and residential uses), open space and landscaped areas, engineering and infrastructure works, with details of appearance, landscaping, layout, scale and access reserved. Application accompanied by an Environmental Statement.

2.3 There are two further outline permissions for sites located within Northstowe New Town. These are:

- Digital Park: S/3854/19/OL, granted July 2023 for Outline Planning Application for residential development of up to 80 dwellings and associated infrastructure (considering access only) following demolition of existing buildings.
- Land West of Station Road: 20/03598/OUT, granted July 2022 for Outline Planning with all matters reserved, except for the vehicular accesses onto Station Road, for the demolition of a single dwelling and associated buildings and development of up to 107 dwellings (including affordable housing) and employment/ community/ cafe/ development together with parking areas, landscaping and all associated infrastructure.

3 Policy Preparation Guidance

3.1 The National Planning Policy Framework requires Local Plans to be *prepared positively*, to be *clearly written and unambiguous*, and to provide a *practical framework for decision-making* (NPPF, Chapter 3). The Planning Practice Guidance reinforces this approach by emphasising that Local Plan policies should be clear, justified, effective and based on an understanding of how development will eventually be delivered. This is delivered by the four “Tests of Soundness” which seeks to ensure that Local Plans and policies are:

- positively prepared;
- justified;
- effective; and
- consistent with National Policy.

3.2 As Northstowe New Town already benefits from outline planning permission and approved parameter plans, it is particularly important that Policy S/NST is framed positively and flexibly. This is so that it supports and enables the implementation of those consents rather than introducing unnecessary prescription, complexity or uncertainty. Any policy wording that could be interpreted as adding new requirements, constraining approved development parameters, or re-opening matters already resolved through the outline permissions would risk undermining the effectiveness of the policy and slowing delivery. As a result this would be inconsistent with national policy and guidance on positive plan-making and deliverability.

3.3 Local Plan policy has a different role in comparison to outline planning permission, reserved matters applications and planning conditions / obligations. Where a site already has planning permission (even in outline form), the

role of policy should be to support delivery of the permission and provide strategic guidance for any remaining or future applications, such as subsequent reserved matters applications.

- 3.4 The descriptions of development set out in Paragraph 1.3 above set the overall quantum of development within the respective red line boundaries of those six outline permissions. There is no formal planning mechanism to change the quantum of development approved and so the draft Policy S/NST must be consistent with the approved descriptions of development.
- 3.5 Updated Development Planning Policies are noted and welcomed. Future applications at Northstowe will seek to adhere to planning policy where possible. In the instance of any future policy conflicts, future applications will be required to be assessed against what is already approved at Northstowe via the Outline Permissions, relevant legal agreements and Site Wide Strategies over updated Planning Policy.

4 Comments on draft Local Plan Policy S/NST

- 4.1 Draft Policy S/NST includes detailed requirements relating to movement, connectivity and transport mitigation. However, for Northstowe these matters have already been comprehensively assessed and secured through the existing outline planning permissions, Environmental Statements, Transport Assessments and associated conditions and legal agreements. While it is appropriate for the Local Plan to contain a policy framework against any future outline or related applications could be assessed, it is important that the policy does not introduce new or additional requirements that go beyond the scope of the consented scheme, nor reintroduced policy requirements that have already been agreed.
- 4.2 Policy S/NST includes extensive requirements relating to stewardship, long-term management and community development measures. While the importance of effective stewardship is acknowledged, long term maintenance and stewardship will be secured via the outline permissions and respective s106 agreements, which can include the Council's own adoption of longer term stewardship.
- 4.3 The policy requires the preparation and approval of various strategies relating to drainage, flood risk and utilities. These matters are already addressed through site-wide drainage strategies and technical submissions approved as part of the outline planning permissions and regulated through statutory consultees. Requiring further strategies through Local Plan policy adds little additional planning value and risks unnecessary duplication of controls. Given the highly technical and regulated nature of these matters, it would be more appropriate for the policy to acknowledge that compliance with existing approved strategies and conditions is sufficient, rather than re-stating requirements that are already secured.

Quantum of Development

- 4.4 The policy wording (Part 7a) stating that Northstowe is allocated for a 'wide range of dwelling types and tenures' is consistent with the descriptions of the outline permission. However, the draft Local Plan seeks to include additional specialist accommodation of 1,050 units (Part 7a ii) and 24 permanent Gypsy and Traveller pitches (Part 7a iii). These are additional policy layers that are introduced to the Northstowe site that are not consistent, nor committed to in the outline development descriptions. Homes England has no additional land available at Northstowe and so these references should be removed from the draft policy.
- 4.5 Part 7b of the proposed policy refers to a variety of uses proposed in the Town Centre (Phase 2) and includes incorrect floorspaces. The approved Town Centre Strategy for Phase 2 (ref. S/2011/14/COND14) sets out the overall range of floorspaces for proposed uses in the Town Centre. The draft Policy should refer to the figures set out in the approved Town Centre Strategy, which demonstrate the range of floorspaces to be proposed. For all phases of Northstowe, the policy should reflect the outline approvals which set out maximum floorspaces for different use classes.
- 4.6 Part 7c states that retail and other town centre and local centre uses to be provided in accordance with an up-to-date Retail Needs Assessment and Town Centre Strategy. As referred to above, there is an approved Town Centre Strategy for Northstowe under the Phase 2 outline. A retail needs assessment is not required by any of the outline consents and should not be introduced at this stage. Community Infrastructure and services
- 4.7 The proposed policy requirements for education healthcare, community, cultural and leisure facilities are broadly consistent with the four outline permissions. The policy refers to youth facilities which can form part of wider community facilities and the open space strategy. The policy also appropriately mentions the need for temporary facilities, which are being delivered in parts of the Town Centre, reflecting the phased delivery strategy

embedded within the existing consents. This approach is supported, provided it does not create additional triggers or obligations beyond those already secured through existing legal agreements and planning conditions.

Open space, landscape and green infrastructure

- 4.8 All four outline permissions include extensive formal and informal open space, sports provision, landscape buffers and green infrastructure. Draft Policy S/NST accurately reflects these elements and appropriately emphasises:
- Strategic separation from Longstanton and Oakington
 - Retention and enhancement of key landscape features
 - The role of lakes, water bodies and the water park
- 4.9 The policy places a stronger emphasis on biodiversity networks and long-term landscape management than the outline summaries alone; however, this is consistent with the Environmental Statements accompanying Phases 3A and 3B and does not represent a departure from the approved development strategy.
- 4.10 Figure 84 should be amended to make clear that there is a clear separation between Longstanton and Oakington, as is emphasised by the policy.
- 4.11 The draft Local Plan and Policy S/NST should clarify how strategic sports hubs are intended to function within areas that are designated as protected open space. While the protection of open space is supported, sports hubs require ancillary development such as car parks and sports pavilion. Policy should explicitly allow sports hubs to deliver necessary supporting infrastructure and ancillary development. Alternatively, sports hubs could be given a distinct policy designation that recognises both open space and community infrastructure, ensuring that built forms are not constrained by restrictive open space policies.

Resources and landforms

- 4.12 Part 27 of the draft policy wording requires matters such as:
- landform and engineering controls,
 - sustainable drainage systems in perpetuity,
 - foul drainage strategies,
 - construction strategies, and
 - recycling of materials
- 4.13 Many of these details are approved via site wide strategies or will be provided via reserved matters applications, so the policy is over prescribing / creating additional requirements that have already been approved.

Lifespan

- 4.14 The Lifespan section of the draft policy is particularly overprescribed as it requires comprehensive masterplanning, adherence to phasing plans and design codes and stewardship strategies. These details are already adhered via reserved matters applications, discharge of conditions application or planning obligations. The wording should be updated to reflect what matters have already approved and agreed for Northstowe.

Other comments and wording suggestions

- 4.15 The order of numbering in the policy is incorrect and will need to be rectified.
- 4.16 The below table summarises our additional comments on specific wording within the draft policy in addition to the above comments:

Para	Existing Wording	Proposed Amendment	Reason(s)
Figure 9	Refers to Northstowe as having 6,229 homes,	Figure to be updated to state "approximately 10,180 new homes"	Figure was inconsistent with the outline planning permissions.

<p>32h.b.</p>	<p>The delivery of Northstowe must be in accordance with: b. Design codes, prepared and submitted with reserved matters applications for all phases</p>	<p>The delivery of Northstowe must be in accordance with: b. Approved Design Codes and those required pursuant to the existing outline permissions</p>	<p>Existing approved design codes should be acknowledged. Design codes do not need to come forward <i>with</i> reserved matters applications. For Phases 2 and 3 there are pursuant to specific planning conditions</p>
<p>5</p>	<p>Through its ongoing development, the site will continue to embody long-established character and design principles for the new town, including: ensuring it is well integrated into the surrounding landscape; delivering a distinctive town character with well-designed and landscaped neighbourhoods; incorporating exemplar, low carbon design, able to accommodate the impacts of climate change; and securing a balanced, viable and social inclusive community.</p>	<p>Through its ongoing development, the site will continue to embody long-established character and design principles for the new town, including: ensuring it is well integrated into the surrounding landscape; delivering a distinctive town character with well-designed and landscaped neighbourhoods; incorporating exemplar, low carbon design, able to accommodate the impacts of climate change; and securing a balanced, viable and social inclusive community.</p>	<p>Removal of the word “exemplar” as this is a subjective term.</p>
<p>7a</p>	<p>Approximately 10,180 homes in a wide range of dwelling types and tenures i.Affordable and self/custom build homes; ii.Approximately 1,050 units of specialist accommodation (Use Class C2 and C3), particularly for older people or those with disabilities; and iii.24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches, each on approximately 1 hectare of land).</p>	<p>ii and iii to be removed from policy Gypsy and Traveller and specialist accommodation in the context of Northstowe are also mentioned in Para 2.101 and Para 2.108 respectively and these will need to be removed.</p>	<p>Part i can also be retained as affordable and self/custom build plots will be part of the new town. Part ii and iii should be removed as there is no space available for that amount of specialist accommodation.</p>
<p>7b</p>	<p>b.Employment uses amounting to a total capacity of approximately up to 47,000 square metres gross internal area, including: i.Approximately 19,000 square metres (GIA) of Class E(g)/B2/B8 in Phase 1; ii.In the Phase 2 Town Centre, approximately 16,200 square metres (GIA)</p>	<p>We suggest that high level figures are provided with more flexible names (such as employment and town centre uses) rather than specific use classes are included. A more flexible approach to policy in relation to commercial and employment floorspace will be more productive and help to support development in a rapidly evolving context.</p>	<p>Some of the details provided in 7b are inaccurate against approved documentation. Further details are introduced that do not have explicit approval via reserved matters, such as the light industrial mews. The below figures set out the maximum floorspace approved either under outline consents or the town</p>

	<p>of Class E(g) workspace including a market hall of approximately 2,270 square metres (GIA) Class E(g)(i) and E(g)(iii);</p> <p>iii. In the Phase 3A Local Centre, a light industrial mews of Class E(g)(iii) of approximately 1,000 square metres (GIA) and 5,000 square metres (GIA) of Class E(g) floorspace and a further 3,300 square metres (GIA) of flexible workspace in secondary mixed use zone; and</p> <p>iv. In the Phase 3B Local Centre, a secondary mixed use zone of approximately 300 square metres (GIA) of Class E(g). Employment uses could include offices, light industrial and research and development, appropriate to the context.</p>	<p>Page 57, paragraph 2 iii refers to employment floorspace for Northstowe being 20ha. We suggest removing this as this is devolved to existing Northstowe permissions.</p>	<p>centre strategy. The planning consents set out a range of floorspace and it is unlikely that the highest figure will be delivered.</p> <p>Phase 2: 16,200 B Use Employment and 49,660 Non B Use Employment (Class E, Class F, Class C1 and Sui Generis)</p> <p>Phase 3A: Within the local centre 9,027 square metres Gross Internal Area (GIA) (Classes E and F2 uses) of retail, service and other employment uses, made up of the following - 615 square metres for a convenience food store 2,530 square metres GIA for local shops and services 5,882 square metres GIA for employment uses c. Within the secondary mixed-use zones up to 13,300 square metres Gross Internal Area (GIA) (Classes C1, C2, C4, E, F1 and F2 uses, sui-generis live/work accommodation, sui generis hot food take-away) of employment, community, retail and associated services, food and drink, community, leisure and residential)</p> <p>Phase 3B: b) 1,320 square metres Gross internal Area (GIA) of retail, service and other employment uses (Classes E, F1 and F2);</p>
7f	<p>f. Cultural facilities, including faith spaces, libraries, burial land of 3.9 hectares, and public art;</p>	<p>f. Cultural facilities, including faith spaces, libraries, burial land of 3.9 hectares, and public art;</p>	<p>Burial land is subject to the Burial Strategy, which is already part of the Phase 2 outline permission. Therefore, the specific prescribed area should be removed.</p>
56	<p>Mitigate current flood risks affecting Oakington village and Longstanton village.</p>	<p>Mitigate any additional flood risk caused by the development.</p>	<p>The proposed development of Northstowe New Town, should only be required to mitigate flood risks caused by its own development, existing requirements within legal agreements will be delivered as required.</p>

58	Incorporate local centres within a 400 metres walk of most residents and not more than 600 metres walk of any residents, grouped with other uses and facilities, such as a primary school and/or bus service, and include a focal point for legibility;	Incorporate local centres within walking distance of residential development, grouped with other uses and facilities, such as a primary school and/or bus service, and include a focal point for legibility;	Specific walking distances removed as this is too prescriptive and locations are already established by outline consents.
63	Deliver a town park adjoining the Town Centre, which must include outdoor sports provision such as tennis courts and bowling greens, and appropriate ancillary facilities.	Deliver a town park adjoining the Town Centre, which must include a good range of appropriate facilities.	Tennis and bowling provision is covered by the various outline permissions and subject to specific strategies/s106 agreements and may not necessarily be delivered in the Town Park.
64f	Create a network of green spaces within the settlement, which integrate well with the development and contribute to the legibility and attractiveness of the place. This must: f. Establish awareness within the local population of the biodiversity within and beyond the town and thus encourage its protection and enhancement;	Replace “establish” with “promote”	Promote is a better word use for policy as “establish” is introducing a requirement for a potential Strategic Engineering RMA.
66	To assist the creation of a mature landscape at an early stage in the development, existing landscape features must be retained where they are capable of making a significant contribution to the urban environment and strategic landscaping, carried out at any early stage in accordance with the approved Landscape Strategy.	To assist the creation of a mature landscape at an early stage in the development, existing landscape features must be retained where feasible. Strategic landscaping should be carried out at any early stage where feasible and in accordance with the approved Landscape Strategy.	Amended to avoid an unintended commitment to the provision of additional landscaping in circumstances where this may not be appropriate or feasible at later stages of design. Enables a flexible approach to site specific constraints.
69	Public transport measure must include: a Providing a dedicated local busway, linked to the guided bus route on the disused St Ives railway line, to be aligned and have a number of stops to maximise accessibility within Northstowe whilst not compromising the level of service;	Part a and d are duplicated Merge a and d into the following: Providing an effective and dedicated local busway through the town, linked to the guided bus route on the disused St Ives railway line, aligned to maximise accessibility within Northstowe without compromising service efficiency, and designed to ensure that all dwellings are	Part a and d are duplicated and slightly contradictory. See amended wording. Bus subsidy is included with s106 agreements relating to the four outline permissions, and so there is no need for policy to over subscribe. Reference added to s106 agreements. Part g updated to include reference to approved travel plan arrangements.

	<p>d Creating an effective and dedicated local busway through the town to maximise the opportunities offered by the guided bus route and to ensure that all dwellings are within easy walking distance of a bus stop;</p> <p>f. Including an initial subsidy for new residents to encourage bus usage. The subsidy will fund free or discounted travel by public transport;</p> <p>g. Setting up a car sharing scheme including the associated parking provisions, which shall be in accordance with an approved scheme.</p>	<p>within easy walking distance of a bus stop.</p> <p>Part f to be updated to state:</p> <p>Including an initial subsidy for new residents to encourage bus usage as per the agreed legal agreements. The subsidy will fund free or discounted travel by public transport;</p> <p>Part g to be updated to reflect:</p> <p>Setting up a car sharing scheme including the associated parking provisions, which shall be in accordance with an approved scheme and already approved travel plans.</p>	
31b	<p>Development must:</p> <p>b.be in accordance with a construction strategy, to be agreed, to avoid construction vehicles travelling through nearby villages or having an adverse effect on biodiversity.</p>	<p>Development must:</p> <p>b.be in accordance with a construction strategy, to be agreed</p>	<p>The substance of the draft policy is agreeable, but there is no guarantee that construction vehicles cannot travel through nearby villages, albeit CEMPs have sought to avoid this.</p>
32b	<p>Throughout its development, Northstowe must be comprehensively masterplanned and delivered to ensure that development proposals do not prejudice the creation of a fully functioning and successful new town</p> <p>b.Design codes, prepared and submitted with reserved matters applications for all phases;</p>	<p>Amend part b to state:</p> <p>The delivery of Northstowe must be in accordance with:</p> <p>b. relevant approved design codes</p>	<p>Design codes are not required as part of Reserved Matters Applications, as these are approved under separate Discharge of Conditions applications.</p>
34	<p>In addition to the specific studies required elsewhere in this policy, the applicant also will be required to prepare and submit, through future planning applications, management and maintenance plans for:</p>	<p>In addition to the specific studies required elsewhere in this policy, the applicant also will be required to comply with the requirements set out in the outline permission.</p>	<p>Management and Maintenance plans for Northstowe have been / will be provided via existing s106 agreements or planning conditions (where relevant) and in some cases, Reserved Matters Applications. Therefor this paragraph is unnecessary.</p>

35	At all phases of development, applicants must consider and propose appropriate measures to assist the development of a new community, for example the funding and recruitment of community development workers.	At all phases of development, applicants must consider and propose appropriate measures to assist the development of a new community, for example the funding and recruitment of community development workers. Existing Outline consents will be required to comply with existing s106 obligations.	Existing s106 agreements are in place for the outline permissions and so no additional requirements can be reasonably added. Clarification wording included.
3.3.72	The Council maintains high aspirations for the new town, ensuring that it delivers exceptional standards of sustainability, high quality design and a strong sense of community.	The Council maintains high aspirations for the new town, ensuring that it delivers high standards of sustainability, high quality design and a strong sense of community.	Replacing the word exceptional with high so the sentence is consistent with the rest of the paragraph.
3.3.75	A range of facilities will be necessary to serve residents and provide a comprehensively planned new town. The proposed town centre in Phase 2 has yet to receive detailed approval. This is expected to be a vibrant and diverse town centre in the heart of Northstowe where it will be accessible by walking, cycling and public transport. It should include shops, services, cultural, leisure and community facilities and residential units at first floor level and above. A community centre in Phase 1 has now been built, and the continued phasing of facilities is required to serve residents as the town grows.	Remove this paragraph	This paragraph repeats parts of the policy and so is duplication. The details are sufficiently covered by other parts of the policy.
3.3.76	Local centres will have only modest shopping facilities and services and may include play areas and small-scale office/employment uses appropriate to a residential area. They should be phased to provide day to day facilities for residents as the town is developed and located in accordance with the agreed Development Framework Document.	Local centres will have shopping facilities to serve day-to-day needs and services and may include play areas and small-scale office/employment uses appropriate to a residential area. They should be phased to provide day to day facilities for residents as the town is developed and located in accordance with the agreed Development Framework Document.	Modest could be replaced with more positive wording.
3.3.77	A secondary school and primary school have now been built but further education facilities will be	A secondary school, primary school, SEN school and sixth form and nursery have now been built with further	Updated wording to reflecting the SEN school being delivered and the s106 obligation already securing

	required to meet the needs of the new town, including additional primary schools, for special needs and lifelong learning.	delivery of primary schools, to be delivered as per the already agreed s106 agreement.	the future delivery of other education facilities.
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5 Other matters

- 5.1 Homes England is also the landowner of the former Oakington Tomato Farm, Dry Drayton Road, Oakington. This constitutes previously developed land, immediately adjacent to the existing settlement boundary of Oakington and already accommodates two dwellinghouses (one with an agricultural tie, one without). It's location and previously developed nature mean that this land is a logical site to deliver development at Oakington. We respectfully submit that the Oakington settlement boundary should be amended to include the tomato farm which would allow this land to come forward for development should it not be required for use to support the development of Northstowe.
- 5.2 Homes England are also landowners for land that is located outside of red line boundaries for the outline planning permissions. This does not require a change in the Northstowe settlement boundary, but is an acknowledgement that supporting infrastructure is to be delivered outside of the settlement boundary, such as the Southern Access Road East (if required) and flood mitigation measures. A Homes England Land Ownership Boundary (ref. 66636_001_RevA) is enclosed.
- 5.3 The draft policy makes reference to required capacity improvements associated with the A14. Highways improvements delivered as part of the Northstowe development, including works affecting the A14 corridor, are intended to mitigate the impacts of the Northstowe development alone. Other site allocations / planning applications in the vicinity should not rely on this increased capacity and must demonstrate, through their own transport assessment, how any capacity constraints on the A14 would be mitigated as part of their proposals.

6 Conclusion

- 6.1 Homes England supports the continued allocation of Northstowe as an "Existing New Town" within the Draft Greater Cambridge Local Plan and agrees that the Plan should provide an up-to-date strategic policy framework to guide delivery through the plan period and beyond.
- 6.2 However, as set out in this representation, Northstowe is already comprehensively consented through four overarching outline planning permissions, supported by approved parameter plans, environmental assessments, technical strategies, conditions and section 106 obligations. In this context, draft Policy S/NST should be framed in a manner that is positive, clear and effective, and should support delivery of the approved scheme and avoid introducing additional requirements which go beyond the outline requirements and would likely slow progress in delivering the town.
- 6.3 In particular, the policy seeks to introduce additional requirements around gypsy and traveller pitches and specialist accommodation which are not required under the consented outlines and for which Homes England has no additional land which could accommodate such uses. The policy lists non-residential floorspace figures and use classes which are inconsistent with the outline consents and would introduce uncertainty into planning and decision making for these uses.
- 6.4 The identification of the sport hubs (approved under the outline consents) as Protected Open Space is supported in principle, however the policy needs to be amended to allow for sports pavilions, car parks and other ancillary infrastructure to be delivered within these spaces, or they should not be subject to this designation. As currently drafted, the policy will frustrate delivery of these facilities.
- 6.5 Homes England has additional land ownership outside of the designated boundaries of Northstowe. this includes the Oakington Tomato Farm which should be included within the development boundary for Oakington Village. HE has additional land in the locality which may be required to deliver supporting infrastructure for the town, including for example access roads and flood mitigation. This does not need to be included on the policy map but it is helpful to recognise that supporting infrastructure will extend beyond the town's boundaries.