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Dear Sir/Madam

## Draft Greater Cambridge Local Plan for consultation

### Representations on behalf of Martin Grant Land

Thank you for the opportunity to comment on the Draft Greater Cambridge Local Plan for consultation (the draft Plan). Savills (UK) Ltd is instructed to make representations on behalf of Martin Grant Land (MGL), previously known as Martin Grant Homes, with particular reference to Cambourne North.

This letter sets out MGL's comments on all relevant policies in the Draft Local Plan, including, in greater detail, Policy S/CBN: Cambourne North; however it is important that they are read holistically. In each instance, the comments are made under the respective policy or sub-policy heading.

We are keen to continue positive and proactive engagement with the Councils and key stakeholders throughout the preparation of the Local Plan, and welcome the opportunity to continue to engage with the Councils throughout the preparation of the Local Plan.

As an overarching comment, we very much welcome and support Cambourne North being included as an integral part of the Councils' spatial strategy for the draft Plan in order to meet its housing, employment and community needs and deliver sustainable development.

### Executive summary

These representations provide detailed commentary on the proposed policies, but the following overall themes have become apparent:

- There is too much prescription and not enough flexibility in the draft policies for a development of this size and timescale for delivery.
- The draft Framework plan is too detailed without sufficient levels of evidence to support it at this stage, it requires further reports, particularly on Landscape, Ecology, Highways and Heritage, to assess the implications for such a detailed plan as is proposed.
- The number of reports required in the Cambourne North policy text is excessive and would benefit from streamlining. Currently 19-20 reports/strategies are required by the policy as well as 7 groups or work strands that cover the reports (i.e. all the work could be covered by 7 reports, but with dedicated chapters in place of the original reports). We support the gathering of relevant evidence to inform strategy – but this should be proportionate.

Sensitive



- Viability considerations – this goes back to the requirement for greater flexibility or easing the level of prescription in the individual policies and sub-policies (as detailed/suggested in the body text below) in order that the scheme can be delivered.
- Whilst MGL note that the East West Rail (EWR) scheme and the Cambourne to Cambridge (C2C) will enhance the sustainability of development in this location, Cambourne North can come forwards and be delivered (and shown to be sustainable) without either scheme going ahead. These representations on the whole anticipate that EWR is progressing at pace and with the full support of Government – as is evidenced by the increased funding and speeding up of delivery by the Government in several recent announcements.

### Policy S/CBN: Cambourne North

1. *An expansion of approximately 13,000 homes, 108,000 square metres gross internal area (GIA) of employment floorspace, with a range of supporting services and facilities including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the Site Allocation boundary identified on the Policies Map.*

MGL support the ambition of a New Town scale of housing proposed, with a minimum of 13,000 homes to be delivered across the allocation. This level of proposed housing is considered to be sufficient to meet the other ambitions of Greater Cambridge (GC) for the wider development.

MGL has previously instructed an economics report to demonstrate the level of employment need in the authority area. This concluded that there is a significant shortfall in the level of identified need in the GC evidence, especially in the level of logistic need across the authority area. With respect to North Cambourne (then based on a quantum of 7214 new homes) the reports concludes that between 64,000m<sup>2</sup> and 86,087m<sup>2</sup> (688,929 – 926,635sqft) is required to support the development and the level of anticipated growth with East West Rail. Given that this is based on a quantum a little over half of the newly proposed allocation, an whilst recognising that the relationship is not entirely linear, the evidence would suggest that a development of 13,000 units at North Cambourne would require employment floorspace on the order of 115,000-155,000sqm. This would benefit the existing jobs market and reduce out commuting and therefore decrease emissions for the existing settlement over time.

The long term MGL vision for North Cambourne, to integrate with the existing settlement and offer a range of facilities not currently provided for residents, aligns closely with the emerging policy. Cultural and leisure facilities, such as cinemas, a theatre and sub-regional offerings like a velodrome or a concert venue could not only offer existing and future residents new facilities but would draw in visitors from further afield. This could leverage the public transport benefits of East West Rail (EWR) and the Cambourne to Cambridge (C2C) schemes. It could also provide facilities that are not available in Cambridge and would be hard to justify in release from the Greenbelt.

Currently the phrase *'built area being contained within the site boundary allocation'* is not fully supported by the evidence provided alongside the emerging framework plan. Further assessments of the local landscape, heritage (particularly below ground), existing and proposed Green and Blue infrastructure and transport work in particular are needed to inform where development is best focussed. Integration with the proposed EWR station and line, along with complimentary phasing of development with this major national project must also be a consideration. Given the likely timeframe for development over the coming decades, limiting development now to particular parcels, without the benefit of a full suite of evidence is considered by MGL to be inflexible and could harm future delivery of development in the most sustainable locations.

## Vision and identity

2. *Cambourne North will become an integrated part of Cambourne, a well-connected, sustainable, thriving and prosperous town that is rooted in nature. It will be a fantastic place to live, work or visit, where everyone within the town will have easy access to a wealth of employment opportunities, services and facilities.*

This aligns with the aims of MGL to promote North Cambourne as an extension of the existing settlement and not to build a new, standalone settlement. The benefits of a single larger settlement are manifest and MGL supports the vision of GC to integrate the two.

3. *Through the new railway station being delivered by the East West Rail project and the Cambourne to Cambridge (CtoC) Guided Busway, Cambourne will become a destination in its own right with facilities and open spaces of sub-regional significance, including a cultural hub and performance space, new leisure hub and northern forest.*

Whilst development at North Cambourne has been shown to be economically, environmentally and socially sustainable without either of the two proposed Infrastructure schemes, the benefits of both are significant and recognised by MGL. Work to integrate both schemes has been a strand of the promotion work since their inception, with representations to statutory consultations and less formal joint working with GC and the EWR company to ensure compatibility should the infrastructure schemes come forwards as anticipated.

Flexibility should be built into future agreements, such as in CPOs – so that future development is not blocked and roads, bridges and other infrastructure can be delivered for the North Cambourne scheme. Continued joint working with both GC and the EWR to aid delivery of both schemes and to integrate them into wider development framework is expected in order to streamline development. This proposed infrastructure will also benefit the existing settlement and the residents and ensure connectivity between both areas.

4. *The new station interchange will be a focal point for Cambourne North, providing a range of facilities and acting as a new gateway to the town. The station should have a dual role as a catalyst for the expanded community at North Cambourne and for connectivity and employment to the south of the railway. It will be supported by a network of neighbourhood centres that provide people with access to day to day services and facilities on their doorstep, complemented by public spaces for intergenerational communities to gather and set within a green network of open spaces and natural habitats.*

The evidence supplied alongside the R18 Draft, which tests the location of the station, agrees with MGL's own evidence and masterplanning, which placed the anticipated station in close proximity to the dumbbell roundabout with the A428 – such that it maximises benefits to the existing settlement and the proposed future settlement as a whole. With denser development around the station and a new centre for retail and other town centre uses anticipated around the station.

Recent EWR announcements have shown that their plans have changed to be in line with both the emerging R18 local plan and MGL's own masterplanning, with a station located further to the west, nearer to the dumbbell roundabout over the A428.

A balance needs to be sought between open green spaces and higher density living and working spaces around the station. There is currently a risk that EWR ecology restitution areas surround the station. This and other functional land uses associated with EWR (such as drainage ponds) should be located so as to not block development in the most sustainable locations that would also help to join the two halves of Cambourne together. The LPA should continue to consult closely with EWR such that the proposed infrastructure and supporting green and blue land uses align with the emerging framework plan, such that development is directed to the most appropriate and sustainable locations.

5. *The development will incorporate a series of sustainable neighbourhoods, each of which will have a distinct sense of place and community through innovative urban design. Homes, public and private spaces and local facilities will be designed to foster health and sustainability, accommodating people at all stages of life and with diverse needs. The town will benefit from well-considered, distinctive and contemporary design, which through the design of the buildings and public spaces will create a place that is memorable and outstanding across all aspects of placemaking.*

MGL supports a neighbourhoods approach, though learning from the lessons of the original settlement and thereby enhancing cohesion and walkability. Density should be varied across the wider development site proportionally from the centre outwards to the edge.

Matters of design should be dealt with in a way that recognises the likely phasing of development over a period of decades. Initial design work should remain high level and flexible, with detailed design guides only sought as the development parcels come forwards.

6. *Cambourne North will be a destination for new jobs through the creation of a new multi-sector employment cluster, with a particular focus on jobs that are complementary to those in the wider region, such as mid-tech industries.*

As noted in the first section of these representations above, MGL has sought to evidence the level of jobs and associated employment sites that development at North Cambourne can support. This evidence requires updates in light of the greater certainty of EWR progressing, the scope of the draft allocation, which exceeds the previous scope of anticipated development and in response to changing and emerging requirements/need. MGL supports the creation of jobs at North Cambourne and the ambition to create a new cluster that reflects the wider economy of Cambridge and its environs. Rather than stating particular sectors MGL suggest that the policy instead refers to meeting the identified employment needs through evidence, as this will allow for changing schemes to meet the needs of the local and sub-regional economy in the future.

MGL has long made the case that the number of movements from the existing settlement as well as future residents of North Cambourne, can be reduced if the number of high-quality jobs, in targeted industry sectors, are provided as part of multi-sector development. This will have the impact of reducing the number of in/out commutes for an increasing proportion of the future population, as people move to the area to take advantage of the local jobs market.

7. *Critical to the overall success of the town will be the integration of Cambourne North with the existing town and High Street, addressing potential barriers to movement, including the A428 and proposed East West Rail route, though a comprehensive movement network for walking and cycling, including a series of new connections and improvements to the public realm. These will deliver seamless, legible and safe movement of people across the wider town and, together with emerging sustainable transport connections, will support a wider reduction in reliance on private vehicles for local and sub-regional journeys. The emerging transport schemes and improvements to walking and cycling networks should also be designed to benefit to the existing town.*

MGL supports the approach which seeks to integrate the two halves of the settlement, for the reasons previously noted. Key to this will be both road and active links across the A428 and the future EWR rail line – which could act as a further barrier to flows north/south, if care is not taken to reduce these.

MGL currently anticipate one primary crossing point for vehicular traffic (at the existing dumbbell roundabout over the A428) and a secondary route in the area to the east of the site. Then a further 1-2 active routes – which might also accommodate C2C bus movements – and would help to serve both existing and future residents of Cambourne. MGL has modelled active movements and access to test,

amongst other matters, the walking and cycling times for both the existing and proposed development around the station.

8. *Cambourne North contains and is close to a number of nationally significant ecological and historic assets, including Ancient Woodlands, County Wildlife Sites, and an extensive network of archaeological remains and features. The future layout of the town will consider these assets, identifying and implementing measures that mitigate any impacts but also deliver enhancement wherever possible, including creating an extensive network of ecological corridors.*

The major constraints are known and sufficient land has been earmarked for development so as to allow for significant, and appropriate buffers and ongoing protection of sensitive designations. This will protect and conserve these assets which are irreplaceable.

Detailed archaeological assessment has yet to be undertaken, but is being produced to support the emerging allocation – with the information gathered to then feed into a heritage assessment and programme of mitigation. Given this key workstream will need to inform the location of built development, as noted elsewhere in these representations, MGL suggest that greater flexibility is incorporated in the next stage of the local plan.

Similarly existing ecology and landscape work is being updated to inform the direction of travel, buffers and mitigation so as to develop a scheme that makes use of the existing landscape features and results in a significant biodiversity net gain over the present base line.

## Uses

9. *The site is allocated for mixed-use development comprising:*
- a. A range of homes with a balanced mix of dwelling sizes, types, and tenures based on identified existing and future local needs, including affordable housing and homes to accommodate people at all stages of life to achieve a balanced and inclusive community, including:*
    - i. 10% of the dwellings as specialist accommodation (within use classes C2 or C3), particularly for older people or those with disabilities; and*
    - ii. a total of 24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches, each on approximately 1 hectare of land).*
  - b. At least 24 ha employment provision of type and mix to meet the needs of the town and provide access to local jobs and support the continued development of the economy of the Greater Cambridge area;*
  - c. Community services and facilities, including health, culture, at least three dedicated faith spaces, primary and secondary schools, and local spaces available for small scale independent retail and/or community uses;*
  - d. Open space, sports and leisure facilities, including a new regionally significant leisure, recreation and events centre and associated playing fields located between the A428 and East West Rail corridors;*

MGL supports the policy, with the exception of the prescribed levels of accommodation across the typologies, which might have to change as the scheme matures and also to reflect changes to lifestyle, demand, economy and reflecting delivery over the lifespan of such a large project/timeline. Therefore an approach which includes additional text in the policy such as ‘or at levels as determined through local needs’, would allow for anticipated changes, as noted, over time. The requirement for 24 permanent Gypsy and Traveller pitches is supported.

10. *To inform the overarching approach to land use, the applicant must:*
- a. Prepare an Intergenerational Housing Strategy in conjunction with key stakeholders, detailing how the site will provide diverse housing types and tenures to meet the needs of the community at all stages*

- of life, including how residential buildings will be designed and delivered to allow for flexibility in response to the changing needs of residents;*
- b. Prepare a Place Activation, Culture and Events Strategy detailing the range of community, faith, cultural and other related uses to be accommodated in the design of public buildings and spaces. This must be prepared in conjunction with key stakeholders and set out a Stewardship Delivery Plan for long term operation and maintenance of these spaces;*
- c. Prepare an Employment Strategy to identify appropriate types and mix of employment uses and explore the co-location / stacking of employment uses without her uses, reduction of vehicular trips generated by employment uses and ensuring flexibility in employment space provision. This will be prepared in conjunction with the Local Authority's economic development team and subsequently reviewed at each phase of the development;*
- d. Identify and deliver any improvements to existing infrastructure which will be relied upon by the expansion of Cambourne.*

MGL supports a report covering Intergenerational Housing Strategy to inform the range and level of housing typologies to meet the local need. Clarity is sought on the policy wording in limb A, as it is not apparent if the text requires that homes should be capable of adaption to allow 'cradle to grave' house types or that for example certain areas of the allocation could incorporate for example a care village and / or co-living. MGL support an evidence led approach to this – which the proposed strategy would of course inform.

Similarly MGL supports a report which covers a Place Activation, Culture and Events Strategy, such a report will guide the delivery of social benefits of a future scheme at North Cambourne – with early planning for these allowing for greater opportunities and optimisation of the benefits. MGL also support an emerging Employment Strategy, which would form part of a wider report into the economic benefits of the scheme and which will need to factor in the aims and conclusions of the EWR business case as well as viability and growth reports from GCSP.

The current draft of limb D, on provision of Infrastructure, is somewhat vague and should be subject to review in place of a clear infrastructure policy, most likely elsewhere in the policy, informed by appropriate levels of evidence. Care should be taken with regard to reference to existing infrastructure, which may fall outside of the proposed site boundaries and therefore might not be subject to a sufficient level of control to allow for delivery.

As noted in the summary text on the first page of these representations, the level of evidence gathering required to inform aspects of the site strategy has to be proportionate. MGL suggests that standalone reports will not always be required, when comprehensive studies and evidence can determine the strategy through a proportionate level of evidence.

### **The development of Cambourne North must do the following:**

#### **Context**

*(11.) Embed exemplar principles of landscape, townscape and heritage protection and enhancement into all phases of masterplanning and design by:*

*A .Establishing a strong and robust landscape framework that integrates the development with the Strategic Enhancement Area (S/SEA/CBN) and the wider landscape context, informed through preparation of a comprehensive Landscape Strategy.*

MGL agree that above and below ground heritage assessment and surveys will inform townscape – along with detailed landscape studies, currently being carried out.

The Strategic Enhancement Area (SEA) currently has a gap in the level of evidence to justify such a large area of planting/open space/buffer. It is an ambitious plan but risks being found unsound without full justification for its inclusion in the plan.

*(11.) B. Creating a well-considered landscape buffer within the Strategic Enhancement Area which responds sensitively to the neighbouring villages and their Conservation Areas and delivers wider landscape and ecological mitigation and enhancement measures. The landscape buffer will:*

*i. Include the 'Cambourne Forest', a new, accessible, regionally -significant woodland arc (aligned to the District Natural Greenspace category in the Natural England Green Infrastructure Framework).*

*Include areas of open agricultural fields, providing an appropriate context for the conservation areas to the north of the site and supporting farmland birds and other important species and habitats in this area, whilst avoiding the coalescence of Cambourne with Papworth Everard, Elsworth, Knapwell, Bourn Airfield New Village and Childerley.*

*iii. Require early, strategic consideration of local ecology through the design stages (aligned to the Local Nature Recovery Strategy) that will help to ensure biodiversity net gain can be fully met on site.*

See SEA comments above.

The land in the northern area of the site, where the majority of the forest is planned (noting that this would be a mixture of different landscape typologies and not just planted trees), falls away from the plateau on which the A428 and existing Cambourne is located. Therefore planting in this area needs to be carefully located in order to achieve best effect as a visual buffer. There is already limited intervisibility between the site and Papworth Everard due to the undulating nature of the intervening land which allows selectively located tree planting to provide a stronger buffer effect.

MGL agrees that a buffer that protects and emphasises the character of the surrounding land uses would be a benefit.

*(11.) c. Undertaking a Historic Landscape Characterisation and Archaeological Assessment, Landscape Visual Impact Assessment and Heritage Impact Assessment to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation measures that:*

*i. Provide a broad, well vegetated landscape buffer within the Strategic Enhancement Area, including naturalistic planting and tree lines that respond to topography and archaeological constraints;*

*ii. Incorporate areas of open, pastoral structured open spaces close to Elsworth and Papworth Everard to preserve their historic rural setting and sense of separation;*

*iii. Protect and, where possible, enhance the Grade II Listed New Inn Farmhouse and its barns on the southern edge of the Site as well as any non-designated heritage assets;*

*iv. Retain and enhance the immediate open landscape setting of the site, through a masterplan-led approach.*

MGL agrees that a proportionate heritage landscape study can be incorporated into the heritage assessment work to be carried out on site. Initial desk-based studies are being expanded to take account of the wider area of allocation and subsequent work and these will inform the level of below ground investigation that might be required in the future.

*(11.) d. Undertaking both desk-based assessment and appropriate field evaluation of archaeological investigation, identifying appropriate mitigation in collaboration where significant remains are found;*

As noted above MGL agree that a proportionate and phased level of desk based and field evaluation will be required to determine the impact of the development on both known and unknown heritage assets.

It is of note that whilst extensive archaeological features were identified during the survey work before the Caxton Gibbet to Black Cat extension works began, on a site that is largely adjacent to the proposed allocation, these did not impact upon the layout and route significantly.

*(11.) e. Ensuring that major infrastructure is well integrated into the wider landscape*

It is not clear why this is needed as it seems to be an unnecessary addition to the heritage landscape policy. We suggest this wording is removed and that an overarching infrastructure policy covers this topic.

*(12.) Avoid prejudicing the delivery of the preferred East West Rail route alignment and associated rail infrastructure.*

MGL agrees that care needs to be taken that development does not compromise delivery of EWR and other major infrastructure proposals, and vice versa. MGL has a good working relationship with EWR, with regular meetings to co-locate proposed development in a mutually beneficial way. It is also the case that EWR have to plan delivery of the allocated development, or at very least, given the legal restrictions on their scope, not block future development.

### **Built form**

*(13.) Deliver a new Station Quarter and Town Centre, anchored by a new 'living' railway station, that will become the heart of the town extension. The design must:*

*a. Include a landmark railway station, based on design excellence which is an exemplar in embedding high quality placemaking principles outlined in the supporting Spatial Framework and Rail Integration Study, forming a key component of the Station Quarter, Cambourne North and the overall town and serving the needs of the wider area;*

Draft MGL layouts reflect this policy and there is a generally agreement between all stakeholders for the focus for development around the station in a 'station quarter', that offers 'town centre' uses and increased density of residential development as well as a mix of uses – to be informed by the studies detailed in this policy.

Delivery of the station will be carried out by EWR, as well as station environment/public realm, related vehicular & cycle/e-bike parking/bus terminal footpaths & crossings etc. Policies should not be too restrictive given the complexities of the DCO process. Suggest that the phrase '*design excellence which is an exemplar in embedding*' is removed, leaving the station to be based on high quality placemaking principles.

*(13) b. Avoid overprovision/inflexibility of space that would precipitate empty plots/units. Large retail floorplate buildings will not be supported where they create large inactive frontages and/or would result in the over dominance of a town, local or neighbourhood centre or the town overall;*

MGL intends to use up-to-date economic data on employment and retail demand to inform the proposals for a proposed station quarter – such that it can become a lively and well-used gateway to the wider development from early on in the delivery of the scheme. Buildings with large commercial frontages could be designed so that they are capable of/easy to being sub-divided for adaptation to alternative uses.

*(13) c. Create active frontages through choice and positioning of uses, including small flexible units on the ground floor that are suitable for a range of uses to respond to market demand. These should be fine grain, wrapping and capping larger units with other uses and integrating a diverse range of occupiers.*

Whilst MGL supports the idea of flexible spaces, this level of detail on the design of the frontages is considered excessive for this initial stage, though there are no objections to the aims of this policy.

*(14.) Deliver a compact form of development, providing a mix of densities as appropriate to the area of the site, including:*

*a. Focusing the highest densities at the Station Quarter and Town Centre quarter at neighbourhood centres and at employment locations in areas within close walking and cycling distance of the new station;*

MGL agrees to a mixture of densities, with the highest focussed around the station, with flexibility to enable higher densities in other areas of the allocation where they contribute positively to the street scene and identity of settlement areas within the allocation, including public realm and other uses for example above a local retail centre.

*b. Promoting higher density development for all employment sectors, including stacking of employment servicing and logistics infrastructure to enable greater density;*

This should be subject to viability and market conditions/requirements assessment, as stacking and density can make some employment sites hard to lease for some potential users with specific requirements. Suggest adding 'subject to a needs assessment'.

*c. At residential neighbourhoods, incorporating corporate contemporary and innovative development of around 60-70dph.*

The thrust of this is supported, but MGL believes that a greater range of densities will aid overall delivery – with a suggested range of 40-90dph, to allow for a scheme that can deliver 13,000 units at North Cambourne. This should then be subject to viability and market need/conditions assessment in order to provide a wide range of densities and designs. This would also support the principle of inter-generational housing.

*(16.) At residential neighbourhoods, ensure the design:*

*Provides a coherent built form, with consistent building lines, street frontages, and a scale that reinforces the character;*

*Incorporates complementary employment uses as appropriate, including co-working and spaces for self-employed people and small businesses.*

MGL considers that this should be evidence led on a need basis, or it risks the overprovision of co-working spaces that then sit empty. Should also be subject to viability and incorporate evidence on changes in the way people work/live at the time of the delivery, these uses could be included within a Local Centre/'Meanwhile Use'.

*(17.) At employment-led areas, ensure the design:*

*Provides a flexible range of mixed-use and employment spaces which respond to their immediate context: high street mix, strategic road network access, noise sensitivity and intensification of uses around the station;*

*Provides active frontages to the public realm at buildings and main entrances, which make a positive contribution to the street scene and wider placemaking objectives.*

MGL suggests that this should be evidence led on a need basis, or it risks the overprovision of working spaces for which there is no ready market.

*(18.) Incorporate a well-considered northern approach into the design of the town, that is sensitive to local townscape, landscape, strategic views and heritage assets and integrates well with the wider landscape character.*

MGL supports this policy.

*(19.) Across the site, embed necessary mitigation with regard to noise, light and odour, including from the A428, proposed railway including Station and recreational activities, to ensure no significant adverse impact on quality of life / amenity and health.*

MGL supports this policy.

## Public space

*(20.) Deliver a new Town Centre and Station Quarter incorporating an associated mobility hub, a public square, new green streets, community spaces and a Cultural Hub, which complement the existing Cambourne Town Centre. Consistent with the principles set out in the Spatial Framework Strategy, this should:*

- a. Create a non-linear, appropriately sized, centre to act as a focus for retail, community and civic uses for the town. This should be segmented into multiple blocks to allow for further expansion;*
- b. Include a flexible cultural hub to anchor activity in the centre; the hub should include space to celebrate the archaeological assets of Cambourne and the wider area;*
- c. Be anchored at one end by the station quarter square and at the other by a smaller public open space with a more civic character. The Station Quarter square should be capable of supporting a regular market including the provision of the necessary market facilities for stall holders and visitors.*

MGL supports the creation of a new Station Quarter with ‘town centre’ uses, subject to details on the placemaking and draft framework, which is being undertaken by the Savills Urban Design team. The team is mindful of the impact upon the existing Cambourne, and recognises the policy text elsewhere which seeks to improve and balance development at North Cambourne with continued development at the existing settlement.

*(21.) Deliver a network of clearly defined neighbourhood centres, each including a public play area and/or green space, and additionally providing for a range of co-located uses such as education provision, community spaces and/or facilities including faith spaces, food stores to meet day to day needs, cafés or public houses.*

MGL supports this policy.

## Nature

*(22.) Protect, retain and enhance the statutory (Ancient Woodlands and SSSIs) and non-statutory (County Wildlife Sites) sites, including all designated woodland, and other local sites designated for their value to biodiversity. The development must:*

- a. Ensure that ancient Woodlands and SSSIs are kept free from public access to limit impacts of recreational disturbance;*
- b. Incorporate appropriate buffer zones between these environmentally and ecologically important sites and built form and areas of activity, which will need to be identified in the overall masterplan for the site;*
- c. Identify and deliver measures that minimise ecological pressures to these and other sites from domestic animals.*

Statutory buffer requirements could be subject to review, subject to future evidence based from the surveys carried out on the site.

We note that the proposed green buffer around the SSSI in the draft framework does not necessarily reflect the impact risk zones and consideration of these might be required in the assessment of the framework.

*(23.) Positively plan for and deliver dark corridors to ensure nocturnal and crepuscular species can forage with minimum disturbance. The development must:*

- a. Keep lighting to a minimum, which where necessary should be directional and movement sensitive if appropriate;*
- b. Use bat surveys to inform detailed design of lighting strategy including buffer distances around woodlands;*
- c. Incorporate planned buffers with diverse species including those traditionally managed through coppice, as well as areas of scrub and natural regeneration. Buffers should be subject to appropriate positive management to maintain biodiversity value.*

MGL supports this policy. This policy wording is fairly typical and the MGL response would be evidence based from the surveys carried out on the site. Buffer zones around woodland will be default for ancient woodland. Additionally MGL recognise that significant hedgerows / ditch lines etc which are shown to provide value will be retained wherever possible included within the masterplan. Though this is likely to form part of later detailed design, MGL recognise the importance of retention in order to deliver dark corridors and to contribute positively to biodiversity.

*(24.) In considering connections between different designated and non-designated sites, prioritise retention of existing habitats and where protected species are shown to be present. Where retention is not possible, replacement habitat networks will need to connect designated sites and areas known to support protected species, such as barbastelle bats and great crested newts. The network – retained and extended – should, and be of sufficient quality to enable passage movement through the landscape unhindered, an important aspect of nature’s recovery and future resilience to climate change. These networks should be subject to appropriate positive management to maintain biodiversity value.*

From existing survey work already carried out the presence of several protect species has been recorded including both GCNs and Barbastelle bats. Further surveys are required, given the increase in the site area in the draft allocation and this will inform the ecological strategy inline with the policy. Strategic significance will uplift certain planting proposals.

*(25.) Retain and keep dark existing bat habitats including as broadleaved woodland, wet pasture and meadows, hedgerows, watercourses and waterbodies. Any replacement habitat intended to provide connectivity should include necessary mitigations to create dark conditions for the movement of Barbastelle bats between old growth woodlands where they may be roosting. Any likely significant losses of, or damage to (including light pollution), habitats and the network should be avoided and considered through appropriate assessment.*

See comments to paras 23 and 24.

*(26) Where dark corridors cross necessary transport links, apply the following hierarchy:*  
*a. Areas should be entirely unlit with connected canopy;*  
*b. Where not possible, occasional use of minimal, directional and movement sensitive lighting;*  
*c. A final option where routes require more frequent lighting, rationalised lighting schemes will employ best practice according to bat mitigation guidance.*

Is this paragraph required given paragraph 23?

*(27.) Include buffers of at least 15m around existing (non-designated) woodlands and a minimum of 10m from all rivers and streams (though 20m is preferable where possible and appropriate to provide). These areas should also be informed by an appropriate site wide Lighting Strategy. Watercourses should be re-naturalised to enhance for biodiversity and increase potential for reducing flood risk as well as increasing resilience for a changing climate.*

MGL support this policy.

*(28.) Provide and retain street trees, woods, hedges, and water features which would contribute to the character and amenity of the town, managed to enhance their ecological value in line with Urban Forestry principles.*

MGL supports this part of the policy.

*(29.) Create strong active travel connections with new green infrastructure and open spaces to avoid recreational pressures on ancient woodlands and other protected and/or sensitive habitats and species.*

See comments under para 32.

*(30.) Integrate blue and green infrastructure into the design of streets, including street trees and watercourses, providing places for people to interact with nature.*

See comments under para 32.

*(31.) Consider the multifunctional value of spaces, e.g. amenity, landscape, biodiversity, recreation, flood mitigation and drainage where suitable and practical.*

See comments under para 32.

*(32.) Provide adequate green infrastructure on site to provide Suitable Alternative Natural Greenspace (SANGs) (including the 'Cambourne Forest') to compensate for any additional recreation pressure created by the expansion of Cambourne on nearby SSSIs, including Overhall Grove and Elsworth Wood.*

SANGS type design is expected on a site of this scale with cycle and footpath links. Circular walking routes, a country park, more formalised areas, will be incorporated into the design and layout. There is potential for negative impacts on retained habitats and MGL anticipate that an access management plan will be required in order to avoid ancient woodland and SSSI edges.

SANGS designs include circle walks, dogs off leads. SANGS can also contribute to BNG though additionality is also a factor for consideration.

We note the ambition of Greater Cambridge to establish a new, sub regional SANG or country park as a buffer mainly to the west and north of the proposed development area. Whilst full justification for this scale of green and blue infrastructure remains to be established, it is anticipated that links to and from this wider park will be integrated into the additional green and blue infrastructure within the developable area.

*(33. )To inform the overarching approach to ecology and the environment, the applicant must:*

*a. Carry out a full programme of ecological survey and monitoring, to guide a Biodiversity Implementation and Management Plan and lighting strategy to provide appropriate mitigation and enhancement. This includes preparing site-specific ecological surveys to inform all phases of development, including strategic masterplanning, development of design detail (including dark corridors and dark buffers) and, where unavoidable impacts occur, appropriate mitigation;*

MGL supports this policy.

*b. Prepare an Ecological Masterplan for Cambourne and associated Stewardship Strategy in conjunction with key local and statutory stakeholders. The masterplan and strategy should detail how the expansion of Cambourne will positively contribute to the regional natural environment, including ensuring the delivery and stewardship of the 'Cambourne Forest';*

MGL supports this policy, though as part of the wider strategy for ecology and landscaping rather than a separate standalone report.

*c. Adopt a holistic approach to Cambourne's environmental, economic and social sustainability should be adopted which provides effective responses to the climate and ecological emergencies. To aid this, the*

*Cambourne Ecological Masterplan should be prepared to align with the Cambourne Climate and Sustainability Innovation Delivery Plan.*

MGL supports this policy, though as part of the wider strategy for ecology and landscaping rather than a separate standalone report.

## **Movement**

*(34.) Deliver a comprehensive movement and connectivity network for the whole town connecting key locations including the new Station Quarter and Town Centre, neighbourhood centres, Cambourne High Street, other existing local centres and new East West Rail Station. The network design must:*

- (a) actively encourage and prioritise the use of sustainable and active modes of travel;*
- (b) identify the Station Quarter and Town Centre as the focus of the network ensuring it is highly accessible by modes other than public transport and acts as the interchange for walking, cycling, rail and bus connectivity;*
- (c) consider connections across all parts of Cambourne and to surrounding villages, enabling all residents in Cambourne to reach employment locations, services and facilities using sustainable modes of transport.*

MGL believes that this policy is too prescriptive – it should include some flexibility and have regard to what is necessary for good placemaking.

*(35.) Design new residential neighbourhoods to be walkable – where day-to-day services and amenities can be easily accessed by active travel or public transport. Employment-focused areas must ensure amenities, including local food and beverage, high quality public realm, leisure facilities and green space, are within walking distance to attract a highly skilled workforce and high quality employers.*

MGL supports this policy.

*(36.) In early phases of the development, deliver new and enhanced north-south connections which stitch existing and expanded Cambourne together to create one cohesive place, including a landmark ‘landbridge’ connecting Cambourne’s existing High Street with the new Station Quarter and Town Centre and key services and facilities.*

It is the opinion of MGL that the requirement for all crossing infrastructure to be built in the early phases is too prescriptive to be considered viable. Indeed, it could lead to the creation of unnecessary (and unused) infrastructure. The potential ‘landbridge’ is an especially unrealistic aim for the early stages. Such a scheme would require substantial development to have progressed to ensure there is sufficient demand for regular use.

This is further discussed in the accompanying technical paper prepared on behalf of MGL by iTransport.

*(37.) Other measures to promote walking and cycling must include:*

- a. Provision of a network of attractive, direct, safe and convenient walking and cycling routes linking all homes to public transport and the main areas of activity such as the new Town Centre, Cambourne High Street, schools and employment areas;*
- b. Pedestrian and cycle improvements at two existing junctions on the A428 (at Cambourne and Caxton Gibbet) and the Broadway overbridge;*

*c. Improvements in walking and cycling links to surrounding villages so they are accessible throughout the day and evening and all year round;*

*d. Creation of strong active travel connections with new green infrastructure and open spaces to avoid recreational pressures on ancient woodlands and other protected and/or sensitive habitats and species.*

MGL believes that item c. is not really practicable for walking and cycling links to surrounding villages (some beyond acceptable distances in any event). Links the edge of the site, onto the wider road network would be a practical solution that is under the control of MGL.

*(38.) Improvements to public transport must include:*

*a. Integration of the new East West Rail Station with appropriate access arrangements by all modes, facilitated by a mobility hub and high-quality active travel infrastructure connecting the station to centres, neighbourhoods and surrounding villages;*

*b. Integration of the Cambourne to Cambridge (CtoC) busway;*

*c. A primary bus corridor providing good connectivity across the Site and connecting to existing Camborne;*

*d. Improved local bus connections between Cambourne and Papworth Everard, Elsworth and Knapwell;*

*e. New dedicated bus, pedestrian and cycle bridges over the A428 and East West Rail to connect new development with the proposed Station and existing Cambourne;*

*f. Through engagement with developers at Cambourne West, deliver a new public transport and active travel bridge to the west of the A428 dumbbell roundabout.*

MGL believe that the policy need some greater flexibility around these items or the ability to provide alternatives that achieve similar outcomes.

*(39.) Utilise localised logistics and micro-consolidation hubs to reduce number of local vehicular trips and minimise duplicated parking provision.*

MGL supports this policy.

*(40.) Parking measures must include:*

*(a) In the residential areas, setting low parking ratios and optimise garden spaces/back-to-back and overlooking distances. Where parking courts are utilised, ensuring these are secure, well overlooked and integrate urban greening;*

*(b) At employment-led areas, avoiding employee surface parking by providing off-plot parking for staff and visitors in the Station Quarter and Town Centre, enabling progressive management of parking provision and flexibility;*

*(c) Optimised parking provision at the new station, with minimised provision across the wider Station Quarter and Town Centre, to support the achievement of the trip budget. Innovative measures to drive higher sustainable mode shares, trip internalisation and reduce vehicular trips will be supported;*

*(d) Across the development, considering use of multi-storey mobility hubs and limited*

*unallocated and flexible spaces to consolidate parking, enabling a more efficient use of space and encouraging active and sustainable travel for local journeys. Provision of high quality multi-storey hubs will be supported;*

- (e) Avoiding surface car parking outside of the areas associated with the new station to support compact and walkable neighbourhoods.*

Clarity is sought on the meaning of 'low parking ratio' and what is it low in comparison to.

*(41.) Highway improvements must include:*

- a. New and, where necessary, enhanced pedestrian, cycle and vehicle crossings across the East West Rail route, including connections to the A1198 and St Neots Road (with the re-provision of existing road connections affected by the new railway delivered by East West Rail Co);*
- b. Appropriate traffic calming measures in surrounding villages to prevent 'rat running' and encourage sustainable travel, with exact measures to be identified through a Traffic Calming Study developed in conjunction with local communities. Development will not be supported where the necessary mitigation measures have not been delivered and, where appropriate, are enforceable.*

It is for EWR to re-provide road connections they affect. Clarity is sought on the extent of the 'surrounding villages', this needs to be defined.

*(42.) All expansion proposals at Cambourne will be subject to a monitored and enforceable peak-hour vehicular trip budget. The indicative trip budget is approximately 2,500 trips in the AM peak and 2,500 trips in the PM peak. A refined trip budget based on more detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.*

MGL believes this is critical. Whilst it is recognised that trip budgets are the chosen mechanism for the emerging plan to provide future road improvements, the opportunity/ability to influence how these are calculated and monitored needs to be retained. Reference to 2,500 trips at this stage should be removed, as should the need to agree levels prior to submission.

This is further discussed in the accompanying technical paper prepared on behalf of MGL by iTransport.

*(43.) To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and Local Planning Authority. This will include (but not be limited to) high-quality mobility services that prioritise modal shift and monitor ongoing performance.*

MGL believes that the terminology "monitoring ongoing performance" is too open ended "monitoring performance throughout delivery" is more precise and achievable.

## **Resources**

*(44.) To control known risks of flooding on-site to reduce the risk of flooding to areas downstream or upstream of the development, ensure the provision, management and on-going maintenance of sustainable surface water drainage measures, informed by the preparation of a Sustainable Drainage masterplan to reduce the rate of rainwater run-off whilst delivering benefits for biodiversity, water quality and amenity.*

MGL supports this policy.

*(45.) Prepare a Cambourne Climate and Sustainability Innovation Delivery Plan to inform the masterplan for the site, including detail of how the expansion of Cambourne will innovate on resource use, net zero and climate resilience through design and delivery of development (in line with the Cambourne Sustainability Framework).*

MGL is supportive of principles and the need to develop a sustainability focussed plan

- Policy context may no longer be applicable in light of 2025/26 NPPF revisions
- Operational energy targets in policy CC/NZ may need to be viability tested
- Energy generation targets in policy CC/NZ may not be achievable due to land and grid constraints
- Water consumption targets in policy CC/WE should be tested as may require rain/greywater harvesting
- Net zero targets will require further testing to confirm potential
- Energy masterplan will confirm this
- On-site water reuse strategy will need more detailed evaluation

*(46.) Provide appropriate provision for and design of foul drainage and sewage disposal in line with the Climate and Sustainability Innovation Delivery Plan and a Foul Drainage Strategy, to be prepared by the applicant.*

MGL is supportive tentatively, but will need more detailed surveys and assessment from landscape and civil engineering.

*(47.) Provide appropriate provision for and design of waste and recycling management facilities, to be in line with the Climate and Sustainability Innovation Delivery Plan and a Street Space and Kerbside Strategy to be prepared by the applicant.*

MGL is supportive tentatively, but will need more detailed assessment from urban design and transport.

*(48.) Cambourne North must be designed to:*

- a. minimise embodied carbon emission by embedding innovative and exemplary deep decarbonisation actions through design and construction, informed by regular whole life carbon assessments;*
- b. be net zero in operation, delivering a high-standard of energy efficiency and with 100% of site energy, being supplied through on-site renewable energy;*
- c. integrate circular economy principles into design (including Zero Avoidable Waste in construction, maximising opportunities for reuse and recycling of materials across whole life-cycle) and will encourage zero waste living in operation for future residents through provision of services and facilities;*
- d. maximise opportunities for food growing throughout the development, including within dedicated spaces and as part of the public realm;*
- e. meet high standards of water use efficiency and on-site water reuse, designed around community scale water recycling measures.*

MGL is supportive of all principles, subject to further analysis as detailed above

### **Lifespan**

*(49.) Delivery of Cambourne North, including any individual phases, must be in accordance with an approved phasing plan that must be submitted alongside the first planning application for the site, to ensure the expansion supports the creation of a fully functioning and successful town.*

MGL supports this policy.

*(50.) Planning for essential services, facilities and infrastructure must be undertaken in a comprehensive manner, anticipating future needs, and establishing suitable mechanisms to deliver the infrastructure in a timely and efficient way to achieve the successful delivery of the new town, including the needs of individual phases, and the requirements on developers.*

MGL supports this policy.

*(51.) The approach to the long-term management, maintenance and stewardship of the expansion of Cambourne, including its infrastructure, services and facilities, must be identified at the outset. An approach that enables community-led stewardship of Cambourne's new place assets should be strongly considered, reflecting the approach to management in the existing town and building on Cambourne's distinctive community spirit and collaborative culture. The stewardship approach must include the approach to funding and financing the management and maintenance of community assets and open space.*

MGL supports this policy.

*(52.) A Meanwhile Strategy must be prepared by the applicant to identify opportunities for the meanwhile use of sites for housing, employment and other uses, making efficient use of land while it is awaiting longer-term development.*

MGL supports this policy. Subject to incorporating the proposed report into a more general topic paper on how to avoid empty or unused spaces and facilities.

*(53.) An Engagement Strategy must be prepared by the applicant to meaningfully enable local people and stakeholders on site wide and phase/neighbourhood specific proposals.*

MGL supports this policy.

In addition to Policy S/CBN: Cambourne North and the comments above, future proposals at Cambourne will be considered in light of the other relevant policies in the Local Plan. Comment is therefore provided on each of those policies considered relevant to proposals at Cambourne North below under the relevant policy heading.

## **Development Strategy**

### **[Policy S/DS: Development strategy](#)**

Support. MGL very much welcomes and supports Cambourne North being identified at 1.c. as an integral part of the Councils' strategy to meet the housing, employment and community needs and deliver sustainable development.

## **Climate change**

### **[Policy CC/SD: Sustainable development and the climate emergency](#)**

It is noted that this policy requires a Sustainability Statement, whereas the Cambourne North allocation policy requires a Cambourne Climate and Sustainability Innovation Delivery Plan to be prepared. Further comments have been made in relation to (45) of Cambourne North Policy S/CBN.

### **[Policy CC/DC: Designing for a changing climate](#)**

Support. It is recognised that designing for a changing climate is a key element of a successful community.

### [Policy CC/NZ: Net zero carbon new buildings](#)

Comment. MGL recognises the need to address the climate crisis and to ensure that energy usage is reduced wherever possible in the pursuit of reducing emissions. However greater flexibility should be encouraged in order to ensure that it does not compromise development, and the associated socio-economic benefits that development will bring to Cambourne.

The space heating targets may be challenging in certain circumstances and flexibility is therefore needed to reflect built form, design, urban design, placemaking and viability principles. Similarly the EUI targets need to be adaptable to ensure they can respond appropriately to differing site contexts and design constraints. The energy consumption will be very different with different tenants, and might not necessarily be reflective of the specification and design strategy for the building itself. Therefore the EUI targets for non-domestic buildings will be more variable, in practice, than those for domestic buildings, and the associated policy should allow for flexibility in this regard.

While the UK Net Zero Carbon Building Standard provides valuable guidance, its EUI targets have not yet been formally confirmed or adopted. Relying on these provisional figures at this stage could lead to misalignment with future updates and create unnecessary risk. It is therefore more appropriate to reference established benchmarks and recognised best practice until the standard is finalised. Additionally, the standard is voluntary and is therefore optional for developers. As such it is unreasonable to expect every scheme to adopt a voluntary standard that is likely to have significant implications for cost and viability.

MGL agrees with the drive to generate as much energy as possible on site to offset energy use. However, the current proposed policy ignores the fact that solar energy generation rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. Solar energy production is at its highest during the middle of the day, in summer; whilst no energy is generated outside daylight hours and only small quantities are generated during winter. This is different to how most occupiers use energy, with more energy consumed during the cold months and often outside daylight hours to provide heating and lighting. This mismatch between consumption and generation leads to excess energy being generated during certain times of the year and more energy being consumed during other times of the year. The policy wording should suggest that this should be balanced over the course of a year for a net zero carbon development.

It would not be considered reasonable to expect all schemes to provide at least all of their energy requirements on site and through renewable resources, especially for speculative developments where the end user is not known. Different tenants will use energy in different ways. For example, a tenant may decide to occupy a logistics building Monday-Friday 9am-5pm and use it only for unconditioned storage. Within the same usage class, another tenant may install significant amounts of machinery and use the building 24hrs a day, 7 days a week.

Additionally, many sites cannot rely on rooftop solar photovoltaic panels alone to achieve the very low energy use intensity targets set out in the policy. Across some developments, the available roof area is simply too small once plant, access zones, rooflights and other practical requirements are taken into account. Orientation also restricts performance, as roofs must often follow the urban layout rather than optimal solar angles, and many will face east or west or be shaded by neighbouring buildings.

We note that the requirement for ring-fenced contributions or direct delivery of local projects is highly specific and goes beyond what is typically included in planning policy. While we support the principle of offsetting, prescribing the exact mechanism within the policy may reduce flexibility and create challenges for viability and delivery. We recommend that these detailed provisions are addressed through supplementary guidance rather than the policy itself, allowing the policy to focus on overarching objectives.

The assured performance requirement is not realistically enforceable because operational energy use is ultimately driven by occupant behaviour, unregulated loads and real world operating patterns that cannot be

controlled through planning conditions. While a methodology can be required, the council cannot enforce actual in use performance outcomes as these will never fully align with design intent.

The policies for embodied carbon are supported as they are not unduly prescriptive.

In addition to the above comments, however, it is worth noting that in December 2025, the UK Government launched a consultation to amend the NPPF to include both plan making and development management policy guidance. Whilst this guidance will only apply to new Local Plans being drafted once the new NPPF is adopted, the underlying policy guidance has the potential to impact the associated use of energy use intensity targets. The supporting guidance the draft NPPF policy PM13 states that, 'The policy as drafted would limit local standards for energy efficiency, as we are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. If this specific restriction were to be taken forward following consultation, we intend to use secondary legislation to commence section 43 of the Deregulation Act 2015 to amend the Planning & Energy Act 2008 to make clear that local plans should not set higher energy efficiency standards for residential development. The draft Framework policy would also replace the policy contained in the 2023 Written Ministerial Statement titled Planning – Local Energy Efficiency Standards Update.'

This may be further clarified by the introduction of the Future Homes and Buildings Standard, which is expected to be published in early 2026. Whilst this relates primarily to energy efficiency standards implemented by Building Control, as opposed to Planning departments, it will demonstrate a significant step-change for the industry in aligning the delivery of new homes with the national Net Zero Carbon strategy, and will confirm the expected specification of new homes that will ensure the delivery of the national 2050 Net Zero Carbon objective. Expected additions and amendments to this include:

- A new software tool to assess domestic energy use, costs and associated carbon emissions; the Home Energy Model (HEM), which will replace the Standard Assessment Procedure (SAP) and provide more accurate predictions of domestic energy consumption and allow integration of new energy saving technologies.
- The inclusion of rooftop solar panels for the notional dwelling to reduce energy bills and reliance on grid electricity.
- The exclusion of gas-fired boilers for heating and hot water to ensure that no future energy-related retrofits are required.

#### [Policy CC/WE: Water efficiency in new developments](#)

Comment. MGL notes that water efficiency is a critical issue for Cambridgeshire, which is officially classified as a seriously water-stressed region by the Environment Agency. The area relies heavily on sensitive chalk aquifers that support internationally important habitats, and over-abstraction poses significant environmental risks.

While MGL fully supports the principle of reducing potable water use to protect these resources, the proposed requirement for 80 litres per person per day for schemes of 100 or more dwellings is stringent compared to the current Building Regulations standard of 110 litres per person per day. Achieving this level will likely require advanced water reuse systems and dual plumbing infrastructure, adding considerable cost and complexity. Site requirements can significantly limit the ability to achieve higher water efficiency standards because many factors fall outside the control of the design team. Constraints such as the layout of the development, the availability of space for rainwater or greywater systems, existing underground utilities, and the need to maintain essential site access often restrict opportunities to integrate more efficient infrastructure.

Similarly, the expectation for full credits under Wat 02, Wat 03, and Wat 04 goes beyond minimum compliance and typically demands specialist design and technology. Wat 04 is difficult to control because it focuses on unregulated water uses, which rely heavily on end users, operational practices and decisions made after construction. As a result, even with strong design intentions, it can be challenging to guarantee performance outcomes, and the measures required may not always be feasible within the physical or operational limitations

of the site. We therefore recommend that these requirements are supported by clear viability guidance or phased implementation and that flexibility is allowed where site specific constraints limit the ability to achieve the highest water efficiency standards.

#### [Policy CC/IW: Integrated water management, sustainable drainage and water quality](#)

Comment. MGL fully supports the principles of integrated water management and sustainable drainage. However, we would like to raise the following points for consideration to ensure the policy is deliverable and proportionate:

- While we recognise the environmental benefits, mandating green or brown roofs on all flat roofs can present significant challenges, particularly for refurbishments. Structural capacity, cost implications, and heritage constraints may make this impractical in some cases. We suggest allowing flexibility where technical or viability issues arise, supported by alternative biodiversity measures.
- Designing for no runoff during small rainfall events is ambitious and may be difficult to achieve on constrained or high-density sites. We recommend considering a performance-based approach that allows equivalent mitigation measures where strict compliance is not feasible.

#### [Policy CC/FM: Managing flood risk](#)

Support. The policy reiterates the approach set out in the National Planning Policy Framework, taking into account the impacts of climate change

#### [Policy CC/RE: Renewable energy projects and infrastructure](#)

Support. Energy generation projects are not being proposed and Cambourne is not in heat network zone boundary.

#### [Policy CC/CE: Supporting a circular economy and sustainable resource use](#)

Support. It is important that the reference in 1. to “where practical and viable” is retained in the Policy and that “where practical and viable” is similarly referenced in Policy S/CBN: Cambourne North 48 where it states “integrate circular economy principles into design (including Zero Avoidable Waste in construction, maximising opportunities for reuse and recycling of materials across whole life-cycle) and will encourage zero waste living in operation for future residents through provision of services and facilities”

#### [Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks](#)

Support. The policy is not unduly prescriptive in cases where peat is not identified on site.

#### [Biodiversity and green spaces](#)

##### [Policy BG/BG: Biodiversity and geodiversity](#)

Support. Whilst recognising that it should be provided on-site “where this is feasible and effective”, it is important that the policy does retain flexibility to allow for off-site provision where on-site is not demonstrated to be not feasible or not effective. Further comments have been made in relation to ecological matters on the Cambourne North Policy S/CBN.

##### [Policy BG/GI: Green and blue infrastructure](#)

Support. The proportion of Structural GI Framework currently indicated within the draft allocation areas of the Site should ensure that UGF of 0.4 is achievable. Allocation policy includes “(30.) Integrate blue and green infrastructure into the design of streets, including street trees and watercourses, providing places for people to

interact with nature.” Further comments have been made in relation to ecological matters on the Cambourne North Policy S/CBN.

#### [Policy BG/TC: Improving tree canopy cover and the tree population](#)

Comment. It is noted that the Cambourne North Policy S/CBN Allocation Policy states “11.) B. Creating a well-considered landscape buffer within the Strategic Enhancement Area” Further comments have been made in relation to ecological matters on the Cambourne North Policy S/CBN.

Over the area of the Site and adjacent Strategic Enhancement Area, a future (in 25 years) tree canopy cover of 30% is potentially achievable.

Achieving 30% tree canopy cover is likely to be challenging within the S/CBN area alone. Paragraph 5.20 of the Greater Cambridge Local Plan: Topic Paper 3: Biodiversity and Green Spaces summarises the findings of the ‘First Proposals Sustainability Appraisal’, stating that a *“high canopy cover requirement could mean that woodland would dominate a development site’s landscape and biodiversity provision, at the expense of a more biodiverse mix of habitats and landscapes.”*

A requirement for 30% tree canopy cover in new development is largely instigated by a Woodland Trust recommendation, set out in the ‘Emergency Tree Plan for the UK: How to increase tree cover and address the nature and climate emergency (2020)’ This recommendation is not evidenced regarding its suitability or sustainability.

In this context, it is more appropriate that the tree canopy cover target is reduced to 20% for the site itself, potentially reflected as a specific requirement in Policy S/CBN.

#### [Policy BG/RC: River corridors](#)

Comments have been made in relation to ecological matters on the Cambourne North Policy S/CBN.

#### [Policy BG/EO: Providing and enhancing open spaces](#)

Support. It is noted that policy standards are still being explored by Greater Cambridge, and MGL would welcome the opportunity to discuss how open space would be best achieved at Cambourne North. Further comments have been made in relation to ecological matters on the Cambourne North Policy S/CBN.

### **[Wellbeing and social inclusion](#)**

#### [Policy BG/EO: Providing and enhancing open spaces](#)

Support. It is recognised that open spaces are a key element of a successful community.

#### [Policy WS/NC: Meeting the needs of new and growing Communities](#)

Support. It is recognised that services and facilities necessary to meet the needs of the development are a key element of a successful community.

#### [Policy WS/CF: Community, sports, and leisure facilities](#)

Support. It is recognised that community, sports and leisure facilities are a key element of a successful community.

#### [Policy WS/CH: Cultural and creative hubs](#)

Support. It is recognised that cultural/creative hubs are a key element of a successful community.

#### [Policy WS/IO: Creating inclusive employment and business opportunities through new developments](#)

Support. It is recognised that inclusive employment and business opportunities are a key element of a successful community.

#### [Policy WS/HS: Pollution, health and safety](#)

Support. It is recognised that successful development should take account of sources of pollution.

#### [Policy WS/PH: Public houses](#)

Support. It is recognised that public houses are a key element of a successful community.

### **[Great places](#)**

#### [Policy GP/PP: People and place responsive design](#)

Support. It is recognised that high quality design is a key element of a successful community.

#### [Policy GP/QD: Achieving high quality development](#)

Support. It is recognised that high quality design is a key element of a successful community.

#### [Policy GP/HD: Housing density](#)

Support. MGL welcomes the approach to defining appropriate density, and avoiding undue prescriptive. In relation to Cambourne North allocation wording, we believe that a range of densities will aid overall delivery – with a suggested range of 40-90dph, to allow for a scheme that can deliver 13,000 units at North Cambourne. This should then be subject to viability and market need/conditions assessment in order to provide a wide range of densities and designs.

#### [Policy GP/ST: Skyline and tall buildings](#)

Support, recognising that Appendix H includes “While new settlements and employment areas such as science and technology parks may accommodate taller buildings due to their evolving context heights, proposals in these areas will still be assessed against these guidelines to ensure appropriate skyline integration and design quality.”

#### [Policy GP/QP: Establishing high quality landscape and public realm](#)

Support. It is recognised that high quality landscaping and public realm are a key element of a successful community.

#### [Policy GP/LC: Protection and enhancement of landscape character](#)

Comment. Current policy wording of South Cambs Local Plan (2018), Policy NH/2 would be more appropriate, which states that “*Development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located.*”

If the current drafting remains, it needs to be recognised that the LVIA and GI Strategy for the planning application for Cambourne North will state that the scheme takes account of the Specific Landscape

Sensitivities, and complies with the Specific Landscape Guidelines, of LCA 4A Croxton to Conington Wooded Claylands (within which the site lies), as defined in the GC LCA (2021).

#### [Policy GP/HE: Historic environment](#)

Support. It is recognised that it is important that development proposals that may affect heritage assets, or their settings, are carefully considered.

#### [Policy GP/HA: Designated heritage assets](#)

Comment. It is recognised that the requirement to ‘preserve and enhance’ is rooted in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, whilst the similar concept of ‘sustain and enhance’ is found at Paragraph 210 of the current NPPF.

2.a. should be reworded to: “Pay special attention to the desirability of preserving or enhancing the significance of the designated heritage asset(s) and its setting, and the character or appearance of Conservation Areas including views into, within and out of them” as development may not always meet the current wording of “Preserve or enhance the significance of the designated heritage asset(s) and its setting”. This rephrasing will bring the policy in line with the wording of the Act and NPPF as referenced above, and removes the apparent contradiction created by the current wording. Reordering this section so that the current points 1. and 2. are reversed would also seem logical to help this.

This policy also appears to be trying to do quite a lot and might benefit from being split into policy relevant to listed buildings and policy relevant to conservation areas (rather than trying to do both under one heading, leading to comments on importance of original fabric and layouts, alongside more generic requirements). This could still be in the same policy, but under separate headings.

#### [Policy GP/ND: Non-designated heritage assets](#)

Support. It is recognised it is helpful that the policy sets out how proposals to alter, extend or demolish non-designated heritage assets will be assessed.

#### [Policy GP/AR: Archaeology](#)

Support. It is recognised it is helpful that the policy sets out how proposals that may affect sites of known or potential archaeological importance or interest will be assessed.

### [Jobs](#)

#### [Policy J/NE: New employment development proposals](#)

Comment. It is noted that this policy does not include new employment developments as part of new / expanded settlements.

#### [Policy J/AL: Protecting the best agricultural land](#)

Support reference to policy wording accepting loss of Grades 1, 2 or 3a agricultural land where the land is allocated for development in the Local Plan.

#### [Policy J/AW: Affordable workspace and creative industries](#)

Support in principle. It is noted that the Local Plan states that “The Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. We would welcome feedback on the approach through this consultation.” It is important that this

detail is carefully considered and viability tested, and that stakeholders have further opportunity to consider these details before these matters are concluded.

#### [Policy J/EP: Supporting a range of facilities in employment parks](#)

Support. It is recognised that it is important that there is support for proposals for shared facilities in employment parks and campuses.

#### [Policy J/MS: Markets and street trading](#)

Support. It is recognised that it is important that policy explains the circumstances in which local markets and street traders will be supported in Designated Centres.

#### [Policy J/RC: Retail and other complementary town centre uses](#)

Support. It is recognised that it is important that the policy includes support for a new town centre at Cambourne North.

#### [Policy J/VA: Visitor accommodation, attractions and facilities](#)

Comment. MGL consider that the proposed policy wording does not provide express support for visitor accommodation within new / expanded settlements, and it is important that it does provide support for this as part of a demand-led, mixed and balanced economy.

### [Homes](#)

#### [Policy H/AH: Affordable housing](#)

Comment. It is important that this policy sets out how affordable housing will be delivered on new housing developments in accordance with Government policy. The wording needs to provide more flexibility in the proposed affordable housing tenure requirements in accordance with Government policy to include for example other forms of intermediate housing like discount market housing. The policy should also expressly recognise that viability may justify a different percentage and / or mix. It is notes that there is no reference to how the affordable housing policy applies to key worker accommodation.

#### [Policy H/HM: Housing mix](#)

Support. It is important that the inclusion of “Unless an alternative mix has been justified as part of a planning application...” is retained in the policy so that and variations from the prescribed housing mixes will be allowed where an alternative mix is justified.

#### [Policy H/SS: Residential space standards and accessible homes](#)

Support. It is recognised that it is important that residential space standards and accessible homes requirements are clearly set out in policy.

#### [Policy H/SH: Specialist housing](#)

Support. It is recognised that it is important that specialist housing requirements are clearly set out in policy.

#### [Policy H/CB: Self and custom build homes](#)

Comment. It is recognised that it is important that self and custom build homes requirements are clearly set out in policy. The quantum required should be subject to a cap of 5% and subject to demand/viability. The reference to demand/ viability is particularly relevant to strategic sites where it is much less likely that there will

be demand for 5%, which would equate to some 650 units at Cambourne North. The proposed requirement for further, undefined marketing beyond an initial 12 month marketing period before plots can revert to market housing also requires clarity and justification from the Councils.

#### [Policy H/BR: Build to rent homes](#)

Support. The proposed approach whereby the proposed policy does not prescribe a proportion of BTR, but rather sets out criteria against which an application will be assessed, is supported.

#### [Policy H/CL: Co-living](#)

Support. The proposed approach whereby the proposed policy does not prescribe a proportion of co-living, but rather sets out criteria against which an application will be assessed, is supported.

#### [Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites](#)

It is recognised that strategic sites can play a part in meeting this needs, and the requirement to provide 24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches) as part of Cambourne North is supported.

### [Infrastructure](#)

#### [Policy I/ST: Sustainable transport and connectivity](#)

Support. It is recognised that it is important that transport impacts of development should be managed, and new development should be located, designed and connected to the transport network to enable travel by sustainable modes.

#### [Policy I/TH: Travel hub facilities](#)

Support. It is recognised that it is important that the Local Plan supports the development of new travel hub sites in order to optimise their contribution towards delivering modal shifts away from private car use in line with the adopted Transport Strategy objectives.

#### [Policy I/EV: Parking and electric vehicles](#)

Support. It is recognised that it is important policy clearly sets out the requirements for cycle and vehicle parking.

#### [Policy I/SD: Servicing and last-mile deliveries](#)

Support. It is recognised that it is important that development proposals include adequate provision for servicing and deliveries.

#### [Policy I/SI: Safeguarding important infrastructure](#)

Support. It is critical that important infrastructure, including the East West Rail Scheme, are safeguarded from any adverse impacts that may arise from development.

#### [Policy I/EI: Energy infrastructure masterplanning](#)

Support. It is recognised that it is important that large scale developments masterplan for energy infrastructure to help facilitate decarbonisation and make best use of grid infrastructure.

[Policy I/ID: Infrastructure and delivery](#)

Support. It is recognised that it is important for all parties to plan so as to ensure there is sufficient infrastructure capacity to support and meet all the requirements arising from the new development, and at the time when they are needed.

[Policy I/DI: Digital and telecommunications infrastructure](#)

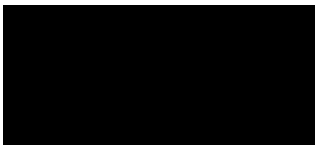
Support. It is recognised that it is important that developments contribute to Greater Cambridge's access to broadband, telecommunication infrastructure and smart infrastructure.

[Policy I/CM: Construction management](#)

Support. It is recognised that it is important that construction management details are agreed with the local planning authority prior to the commencement of development.

We trust that the above comments are clear and helpful, and we would reiterate our appreciation for the opportunity to comment upon them. We also look forward to continuing positive engagement with the Councils and key stakeholders to deliver the extensive benefits and opportunities presented by Cambourne North as an integral part of the Councils' strategy to meet its housing, employment and community needs and deliver sustainable development.

Yours faithfully



**David Jackson MA, MRTPI**  
Head of Planning