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30 January 2026

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By email: localplan@greatercambridgeplanning.org

Dear Stephen,

Greater Cambridge Local Plan Consultation – Preferred Options 2045 (Regulation 18). *Submission of Representations on Behalf of Barratt Northampton – Bourn Airfield Residential Development*

I write on behalf of Barratt Northampton (part of Barratt Redrow) in response to the Preferred Options consultation on the Greater Cambridge Local Plan, published under Regulation 18.

Barratt Northampton is currently progressing a Reserved Matters application forming Phase 1 of the Bourn Airfield new settlement. This application will deliver the first 500 homes on the site and will be brought forward in full accordance with the approved outline consent (Ref: S/3440/18/L) and Design Code (once approved).

Barratt Redrow is the UK's leading housebuilder and the only major publicly traded UK developer to achieve the HBF 5-Star Quality Award for 15 consecutive years. In the 2024 financial year, the Group delivered 16,565 homes nationally, making a significant contribution to the Government's ambition to deliver 1.5 million homes during this Parliament. A robust, up-to-date Local Plan is fundamental to enabling this level of delivery; as highlighted in the recent Written Ministerial Statement by Matthew Pennycook (27 November 2025), areas with modern, adopted plans consistently achieve higher housing delivery than those without. We therefore welcome the publication of the Draft Local Plan.

Barratt Northampton also welcomes the opportunity to comment on the Regulation 18 Draft Plan and the accompanying evidence base. We understand that the purpose of this consultation is to facilitate full and open engagement as the Council refines the plan prior to the Publication Draft (Regulation 19). We hope that the

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representations submitted—while naturally focus on their operational interests—will assist in addressing matters of soundness and ensuring that the next iteration of the Plan is effective, deliverable and aligned with national policy.

For clarity, these representations focus solely on the **Development Management policies**, as they are of direct relevance to the delivery of the Bourn Airfield new settlement.

Policy CC/SD: Sustainable development and the climate emergency

Barratt Northampton **objects** to Policy CC/SD in its current form. Although we fully support the principle of addressing climate change through sustainable development, the policy introduces a broad and highly ambitious suite of requirements that are not sufficiently justified, lack clarity, and do not demonstrate an understanding of the practical and viability implications for major development. In its current form, CC/SD risks creating significant uncertainty for applicants and may unintentionally compromise the deliverability of strategic sites such as Bourn Airfield.

The policy attempts to consolidate a wide range of climate-related expectations within a single overarching framework, but in doing so it becomes overly prescriptive while remaining conceptually vague. Several of its requirements overlap with, contradict, or duplicate more detailed technical policies contained elsewhere in the Plan, including CC/NZ, CC/DC, CC/IW and CC/CE. This duplication introduces avoidable complexity for applicants and raises concerns about how compliance will be interpreted at validation, determination, and post-approval stages. For Bourn Airfield, where extensive evidence has already been prepared at outline stage and where a comprehensive design code will set out a clear sustainability trajectory, such duplication risks unnecessary re-assessment, delay and inefficiency.

A further concern is that CC/SD exceeds the expectations of national policy without adequate justification. The NPPF requires Local Plans to set out a clear, proportionate, and deliverable approach to climate change adaptation and mitigation. CC/SD, however, introduces several broad obligations—particularly in relation to carbon minimisation, water efficiency, biodiversity delivery, and resource consumption—that go beyond national requirements yet are not supported by either robust evidence or viability testing. For a large, phased development such as Bourn Airfield, these cumulative policy burdens have significant implications for infrastructure funding, affordable housing delivery, and overall scheme viability. Without comprehensive whole-plan viability assessment, the policy cannot be considered positively prepared.

The policy also does not adequately account for the long build-out periods associated with major strategic allocations. Bourn Airfield will be delivered over many years, during which national standards, technologies, supply chains and

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regulatory frameworks will continue to evolve. The rigid and wide-ranging expectations within CC/SD could force reinterpretation of approved masterplan principles or require repeated redesign as later phases come forward. This would undermine certainty for both the developers and the planning authority and risks creating inconsistent approaches across different phases of the development.

Barratt Northampton therefore considers that Policy CC/SD should be redrafted to provide a clearer, more proportionate and more deliverable framework for sustainable development in Greater Cambridge. The policy should focus on high-level sustainability objectives—such as reducing carbon emissions, promoting energy efficiency, supporting climate resilience, and encouraging responsible resource use—while leaving detailed requirements to the specific topic-based policies. It should also clearly articulate its relationship with other climate and sustainability policies to avoid duplication and ensure that applicants need to submit only one coordinated set of evidence. Finally, the policy must be supported by robust whole-plan viability testing before the next draft of the Local Plan, to ensure that its expectations do not inadvertently jeopardise housing delivery, infrastructure contributions, or affordable housing provision.

Policy CC/DC: Designing for a changing climate

Barratt Northampton **objects** to Policy CC/DC in its current form. While we fully support the principle of ensuring development is resilient to climate impacts, the draft policy introduces requirements that are overly prescriptive, insufficiently evidenced, and lack the flexibility necessary to account for the diverse conditions and design parameters of major development sites such as Bourn Airfield. The policy as drafted risks imposing design obligations that exceed national guidance without clear justification, and in doing so creates significant uncertainty for the delivery of complex, phased development.

A central concern is that CC/DC adopts a highly prescriptive approach to climate-resilient design, mandating specific measures relating to thermal comfort, overheating mitigation, urban cooling, air quality, wind environment, and building orientation. This approach conflicts with the NPPF, which emphasises a proportionate, outcome-driven, and evidence-based framework for climate adaptation. National guidance supports a flexible approach that enables developers to balance competing considerations and respond to site-specific opportunities and constraints. By contrast, CC/DC appears to assume that all developments can comply with a fixed set of design interventions, without recognising that many factors—such as microclimate, masterplanning constraints, approved parameter plans, and building typology—will limit the applicability of certain measures.

For a strategic site such as Bourn Airfield, where outline permission and a carefully balanced masterplan are already in place, this prescriptive approach risks undermining established design principles and complicating the Reserved Matters

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process. The policy does not adequately recognise the reality of phased delivery, the implications of fixed infrastructure layouts, or the need for design responses to evolve throughout the build-out. Requiring each phase to retroactively adjust to new, prescriptive standards would compromise the coherence of the masterplan and introduce significant delivery risk.

There is also a lack of robust evidence supporting the deliverability, proportionality, and viability of the measures outlined within CC/DC. Several expectations—particularly relating to building orientation, extensive shading features, microclimate mitigation, and mandatory urban cooling measures—could materially impact site capacity, housing mix, architectural design, and the cost of construction. Without a clear understanding of these implications, the policy cannot be considered positively prepared. The cumulative impact of CC/DC alongside other climate-related policies such as CC/NZ, CC/SD, CC/IW and CC/CE has also not been assessed, despite the NPPF requirement for whole-plan viability testing. This omission creates a significant risk that the combined policy burdens will reduce the deliverability of strategic housing sites.

Furthermore, CC/DC lacks clarity over how developers are expected to demonstrate compliance and how the policy interacts with existing national standards relating to thermal comfort, overheating risk, ventilation, water efficiency, and building performance. The absence of clear evidence requirements or recognised assessment methodologies risks inconsistent interpretation at decision-making stage and may lead to unnecessary delays, redesign, or duplication of technical analysis.

In light of these concerns, Barratt Northampton considers that Policy CC/DC should be revised to provide a more flexible, evidence-based and proportionate approach to climate-resilient design. The policy should focus on high-level outcomes rather than prescriptive solutions, allowing developers to identify the most appropriate measures through site-specific assessment. Any new requirements must be supported by robust viability testing, clear technical guidance, and defined compliance pathways. Additionally, the policy should explicitly recognise the frameworks already established for strategic sites such as Bourn Airfield, ensuring that climate adaptation measures can be integrated in a manner consistent with approved masterplans, design codes, and long-term phasing arrangements.

Policy CC/NZ: Net zero carbon new buildings

Barratt Northampton **objects** to Policy CC/NZ in its current form. While the overarching ambition is supported to reduce carbon emissions from new development, the policy as drafted is neither justified nor deliverable and presents serious risks to the viability and delivery of strategic sites, including Bourn Airfield.

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The performance thresholds set out in the draft policy align closely with, and in some cases exceed, full Passivhaus requirements. These are significantly beyond current national standards and far exceed what the UK volume housebuilding sector is presently equipped to deliver. Achieving these performance levels would necessitate fundamental changes to fabric specification, airtightness standards, ventilation and heat recovery technologies, and onsite renewable energy provision. Such changes would also lead to substantial increases in construction costs, which would ultimately be borne either by purchasers or through reductions in other policy-critical obligations such as affordable housing or infrastructure contributions.

For these reasons, Policy CC/NZ fails multiple tests of soundness. It is not justified because the evidence base does not demonstrate that the proposed thresholds are achievable across all building types or site contexts. The expectations are not supported by sufficiently robust cost or feasibility analysis, nor is there adequate consideration of construction skills, supply chains, or technological readiness. The policy is not effective because it imposes performance requirements that are not technically or commercially deliverable for standard UK housebuilding practices, complex non-domestic uses, or constrained or phased strategic sites. This threatens to undermine approved masterplans and development trajectories including those already in place for Bourn Airfield.

Policy CC/NZ is also not consistent with national policy. The NPPF requires that local planning policies be proportionate, justified, and viable. By setting requirements that exceed the Future Homes Standard ahead of national implementation, and without clear viability evidence, the policy imposes burdens that conflict with national guidance and risk destabilising housing delivery. Furthermore, the policy is not positively prepared. The cumulative impacts of these enhanced carbon standards have not been assessed in combination with wider policy requirements, including affordable housing, biodiversity, transport, and infrastructure commitments. Without whole-plan viability testing, there is a significant risk that the policy will suppress development rates and reduce affordable housing delivery across Greater Cambridge.

Strategic sites such as Bourn Airfield also require a flexible approach due to their extended delivery periods. These sites must adapt to changing national regulations, evolving technologies, and shifting energy infrastructure over many years. A rigid requirement for Passivhaus-equivalent performance from the outset would be incompatible with existing outline consents, approved design parameters, and phased delivery structures. This lack of flexibility risks forcing redesigns, creating inconsistencies across phases, and ultimately jeopardising delivery.

Given these concerns, Barratt Northampton considers that Policy CC/NZ must be redrafted to be evidence-based, feasible, proportionate, and compatible with national policy while still supporting the transition to low-carbon development. The policy should introduce greater flexibility by allowing performance targets to be met

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“where technically feasible and demonstrated to be viable,” supported by site-specific evidence. It should align its ambitions with national standards, including the Future Homes Standard, and avoid imposing Passivhaus-level requirements without clear, robust justification. The policy should also provide multiple compliance pathways to reflect the diversity of building types and construction methods, rather than relying solely on modelling tools such as PHPP or TM54. Requirements for onsite renewable energy generation should be reframed to focus on maximising feasible provision rather than mandating that all energy demand be met onsite. Additionally, the proposed carbon offsetting fund must be supported by clear governance, transparent cost structures, and defined delivery mechanisms. Crucially, whole-plan viability testing must be undertaken prior to the next iteration of the Local Plan to ensure that the requirements of CC/NZ can be delivered without compromising housing supply, viability, or affordable housing. Finally, the policy should clarify its relationship with other climate-related policies to avoid duplication and ensure that applicants can provide one coordinated set of evidence.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

Barratt Northampton **objects** to Policy CC/IW in its current form. While the principle of delivering high-quality integrated water management and sustainable drainage is supported, the policy introduces a number of requirements that are not sufficiently justified, lack flexibility for site-specific delivery, and risk compromising the viability and timely implementation of strategic developments such as Bourn Airfield. The policy goes significantly beyond national standards in several areas, including the expectation for multi-functional SuDS to achieve multiple water quality, biodiversity and amenity outcomes simultaneously, and the prescriptive requirement for infiltration-led approaches even in locations where ground conditions or water table levels may not be suitable.

A fundamental concern is that Policy CC/IW appears to assume that infiltration SuDS will be feasible across most development sites in Greater Cambridge, yet this has not been robustly evidenced. At Bourn Airfield, ground conditions, clay content, and local hydrology create meaningful constraints on infiltration-based drainage solutions. The policy therefore risks being undeliverable or requiring extensive engineered interventions that would undermine both cost-effectiveness and the broader sustainability principles the policy seeks to promote. A rigid, prescriptive hierarchy for SuDS also conflicts with national guidance, which emphasises a site-specific approach based on local constraints, opportunities, and a balanced assessment of feasibility, performance and maintenance requirements.

In addition, the policy’s requirements for high-level water quality treatment, extensive multi-functional features, and long-term monitoring obligations introduce

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significant additional costs. These have not been supported by adequate viability evidence.

Policy CC/IW is also not consistent with national policy. The NPPF expects local policies to be proportionate, evidence-based, and deliverable, and to avoid imposing requirements that exceed national standards without clear justification. The draft policy includes a number of obligations that go beyond national policy, such as precise multi-functional performance requirements and fixed design expectations that are not aligned with the flexible, risk-based approach set out in national guidance on SuDS and water management. Without evidence to demonstrate that these requirements are viable and achievable across a wide range of development types and site conditions, the policy cannot be considered positively prepared.

Given these issues, Barratt Northampton considers that Policy CC/IW should be revised to provide greater flexibility, clarity and proportionality. The policy should recognise that not all SuDS types are feasible on all sites and should allow developers to select the most appropriate drainage strategy based on site-specific assessments. Requirements for multifunctional SuDS and water-quality treatment should be expressed as outcomes rather than fixed design expectations, enabling innovative and cost-effective solutions. Furthermore, the policy should be supported by robust viability assessment and provide clear guidance on long-term adoption, maintenance responsibilities and cost implications. Only through such adjustments can the policy support the delivery of sustainable, compliant developments without compromising overall deliverability.

Policy BG/GI: Green and blue infrastructure

Barratt Northampton **supports** the overarching principle of strengthening and enhancing green and blue infrastructure across Greater Cambridge. This aligns with our commitment to delivering high-quality, well-connected and ecologically rich environments as part of the Bourn Airfield development. The integration of green corridors, multifunctional open spaces, sustainable drainage features and biodiversity enhancements forms a core component of the approved masterplan for the site. We therefore welcome the policy's ambition to create a resilient, healthy and nature-positive network of open spaces.

However, despite supporting the principle, we **object** to the policy as currently drafted on the grounds that it is overly prescriptive, insufficiently evidence-based and has the potential to conflict with established design frameworks for strategic allocations. The policy attempts to impose a broad range of detailed requirements relating to multifunctionality, ecological targets, connectivity, water management, recreational access and long-term stewardship. While these objectives are commendable, the policy does not sufficiently recognise the practical constraints, site-specific considerations or existing parameters that shape the green infrastructure strategy at major development sites such as Bourn Airfield.

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The policy introduces expectations that go beyond national standards without providing sufficient evidence or viability assessment. Requirements for enhanced habitat connectivity, quantifiable ecological functions, and multi-layered performance criteria have not been supported by clear technical guidance or cost analysis. For a large, phased scheme such as Bourn Airfield, the cumulative cost and delivery implications of these requirements could be significant, particularly when considered alongside other ambitious environmental policies within the emerging Plan. Without whole-plan viability testing, the policy cannot be considered positively prepared.

There is also a lack of clarity around long-term governance, maintenance responsibilities and funding mechanisms for green and blue infrastructure. For strategic sites with complex management arrangements, it is essential that the Local Plan provides a clear and realistic framework for stewardship without placing disproportionate or unfunded burdens on developers or future management bodies. The current policy wording does not provide this certainty.

For these reasons, Barratt Northampton respectfully requests that Policy BG/GI be revised to provide a more flexible, proportionate and deliverable approach. The policy should recognise that green and blue infrastructure strategies must be informed by site-specific constraints, existing permissions and approved design codes. It should support high-level outcomes such as biodiversity enhancement, ecological connectivity, landscape quality and accessible open space, while allowing the detailed design to be developed through masterplanning and technical assessments at the planning application stage. Additionally, the policy should be underpinned by robust viability evidence and clarity on long-term management expectations.

Policy BG/TC: Improving tree canopy cover and the tree population

Barratt Northampton **supports** the principle of enhancing green infrastructure and recognises the important role that trees play in improving environmental quality, supporting biodiversity and creating attractive places to live. However, we **object** to Policy BG/TC as currently drafted because it introduces a number of rigid, prescriptive and untested requirements relating to tree canopy cover, planting densities and species composition which are neither justified nor deliverable across all development contexts.

The policy places significant emphasis on delivering specific increases in tree canopy cover across development sites, yet it does not provide clear evidence to demonstrate that these targets are achievable in practice. The feasibility of increasing canopy cover is constrained by a range of factors including soil conditions, drainage infrastructure, street layout, utility corridors, highway safety requirements and the spatial parameters established at outline stage. At Bourn

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Airfield, extensive design work has already been undertaken to balance tree planting, open space provision, SuDS features, movement networks and the wider landscape structure. Prescriptive canopy targets risk undermining these carefully considered strategies and could result in a need to redesign layouts or introduce unrealistic planting densities that compromise delivery and long-term tree health.

Furthermore, the policy does not sufficiently acknowledge that strategic sites have long build-out periods and phased delivery. Tree canopy cover takes time to mature, and expecting immediate compliance with long-term canopy targets is impractical. The policy should recognise that canopy growth is incremental and that the benefits accrue over many years. A policy framework that requires premature canopy percentages at early phases of development may inadvertently reduce developable land, constrain housing layouts or necessitate the planting of unsuitable species solely to meet a numerical target. This risks poor-quality outcomes and increased maintenance liabilities.

There are also concerns about the policy's lack of clarity regarding responsibilities for maintenance, monitoring and replacement planting. For a site such as Bourn Airfield, long-term stewardship arrangements are already embedded in the outline permission and Section 106 commitments. The draft policy creates uncertainty by introducing additional expectations that could duplicate or conflict with existing obligations. Without clear guidance on governance, adoption routes and funding mechanisms, the policy cannot be considered effective.

Policy BG/TC is further undermined by the absence of viability testing. Expansive tree planting, canopy targets and associated infrastructure (such as enlarged tree pits, root protection systems and irrigation) introduce significant costs, especially within constrained street environments. When considered alongside the cumulative demands of other environmental policies—particularly those relating to climate resilience, biodiversity, drainage and carbon mitigation—the financial impact becomes substantial. The lack of whole-plan viability assessment means the policy is not positively prepared under the requirements of the NPPF.

Given these concerns, Barratt Northampton considers that Policy BG/TC requires substantial refinement. The policy should adopt a more flexible, outcome-based approach tailored to site-specific opportunities and constraints rather than prescribing canopy percentages or tree quantities in isolation. It should support the delivery of high-quality, well-located trees that contribute meaningfully to landscape character and biodiversity, while allowing the detailed design to be shaped through the masterplanning and Reserved Matters process. Greater clarity is also needed regarding long-term stewardship, replacement planting expectations and alignment with the requirements of existing consents. Only through such amendments will the policy provide a realistic and deliverable framework for enhancing the tree population in a manner consistent with the delivery of large strategic developments.

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Policy WS/HD: Creating healthy new developments

Barratt Northampton recognise the importance of supporting health and wellbeing through the planning and design of new communities, and these principles are already embedded within the approved masterplan and design code for Bourn Airfield. However, Barratt Northampton **object** to Policy WS/HD as currently drafted because it is overly broad, prescriptive and insufficiently justified, placing significant and sometimes unrealistic burdens on developments of all scales. In its present form, the policy risks duplication with other parts of the Local Plan, lacks proportionality, and has not been supported by appropriate evidence or viability testing.

WS/HD attempts to consolidate a wide range of thematic requirements relating to active travel, inclusive design, access to open space, climate resilience, air quality, community infrastructure, food growing, and wider determinants of health. Several of these matters are already addressed in specific topic-based policies or are dealt with through national standards. As a result, WS/HD risks duplicating existing policy expectations, generating unnecessary documentation and creating uncertainty for applicants at validation and determination stages.

A particular concern is the lack of proportionality within the policy. WS/HD places the same breadth of expectations on developments of around 100–150 dwellings as it does on strategic new settlements. This is not realistic. The Topic Paper: Wellbeing and Social Inclusion makes clear that the policy seeks to address wide-ranging health outcomes, drawing together numerous strands of the wider Plan including health infrastructure, accessible green/blue space, inclusive design and climate resilience. However, the ability to deliver such a comprehensive suite of outcomes is largely dependent on scale. A mid-sized scheme simply does not have the land area, critical mass or spatial flexibility to accommodate extensive community infrastructure, multiple thematic interventions, and large areas of multifunctional open space while maintaining viability.

The requirement for a full Health Impact Assessment (HIA) at 100+ dwellings is a clear example of this lack of proportionality. The Topic Paper does not provide evidence demonstrating that developments of this scale generate health impacts of a magnitude that would require a full HIA, nor does it identify why existing assessments—such as Environmental Statements, Design and Access Statements, Transport Assessments or green infrastructure strategies—would be insufficient. For non-strategic sites, a full HIA introduces unnecessary cost and administrative burden without clear justification. A tiered approach is far more appropriate and aligns with good practice. Barratt Northampton therefore considers that a full HIA requirement should apply only to developments of 500 dwellings or more, with a rapid HIA required for schemes of 200–500 dwellings, and no HIA requirement for developments of under 200 homes.

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WS/HD also includes wording requiring developments to “support delivery of community and health facilities”, yet this expectation is not supported by defined mechanisms, triggers or evidence of need. In the absence of clarity, this wording risks operating as a non-CIL-compliant obligation, contrary to the statutory requirements governing planning contributions. Furthermore, the policy does not set out how these obligations relate to other Local Plan policies that already regulate infrastructure delivery. Greater clarity and alignment are therefore required to avoid duplication or conflicting requirements.

In addition, the policy has not been supported by whole-plan viability testing. Many of the expectations within WS/HD—such as enhanced open space and active travel requirements, additional assessments, community infrastructure expectations and environmental quality interventions—carry significant cost implications. When combined with the ambitious requirements of other climate-, design- and infrastructure-related policies, these risks become amplified. Without evidence demonstrating that the cumulative burden of these obligations is viable across the plan area, the policy cannot be considered positively prepared under the NPPF tests of soundness.

For these reasons, Barratt Northampton believes that Policy WS/HD requires substantive revision. The policy should focus on high-level principles that support healthy placemaking, while relying on topic-specific policies and site-specific assessments to secure detailed requirements. Proportionality must be embedded through clear thresholds and flexibility for non-strategic sites. The HIA requirements need to be revised so that full HIAs apply only to major strategic developments, with rapid assessments or no assessment required for smaller schemes. The policy’s relationship with other Local Plan policies should also be clarified to avoid duplication, and its expectations must be tested through whole-plan viability analysis before the next iteration of the Local Plan.

Policy GP/QD: Achieving high quality development

Barratt Northampton **supports** Policy GP/QD and its overarching objective to secure high-quality, sustainable, and well-designed development across Greater Cambridge. The commitment to delivering places that are attractive, distinctive, functional, and resilient is consistent with national planning policy and aligns well with the design principles underpinning the approved Bourn Airfield masterplan.

The focus within GP/QD on placemaking, context-responsive design, and the creation of walkable neighbourhoods is particularly relevant to Bourn Airfield. These ambitions reflect the design trajectory already established through the outline consent and associated design parameters, which prioritise high-quality public realm, well-integrated green infrastructure, sustainable movement, and characterful neighbourhoods.

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The principles set out in Policy GP/QD provide a helpful and flexible framework that complements the ongoing Reserved Matters work at Bourn Airfield. In particular, the policy allows for a context-led approach that recognises the site's unique characteristics, masterplan vision, and locally distinctive design aspirations.

Barratt Northampton welcomes this policy direction and considers it a sound basis for guiding high-quality development across the plan area.

Policy GP/HD: Housing density

Barratt Northampton, as the developer currently progressing Reserved Matters proposals at Bourn Airfield, **supports** Policy GP/HD and welcomes the flexibility it provides to deliver higher-density development where appropriate. The approach aligns with national policy, notably paragraph 129 of the National Planning Policy Framework, which emphasises that planning policies should promote the efficient use of land, taking account of the identified need for different forms of housing, local opportunities to achieve higher densities, and the availability of suitably located land.

At Bourn Airfield, higher-density development represents an effective and sustainable use of land within a strategic new settlement. Increased density supports the overarching spatial vision for a compact, walkable, and well-serviced new village, enabling residents to live close to employment opportunities and local services. A critical mass of population is essential to underpin the successful delivery of community infrastructure, local centres, public transport, and the broad range of ancillary facilities that are necessary to support a thriving new community.

Accordingly, Barratt Northampton supports the policy's flexible framework, which enables density to respond to context, character, and placemaking objectives.

Policy GP/QP: Establishing high quality landscape and public realm

Barratt Northampton **supports** Policy GP/QP and its strong emphasis on delivering high-quality landscape and public realm across Greater Cambridge. The policy aligns well with the landscape-led masterplanning and placemaking principles embedded within the approved Bourn Airfield outline consent and design code, where green infrastructure, well-designed streets and attractive public spaces form key components of the new settlement.

The policy's focus on designing landscapes and public realm that are inclusive, locally distinctive and resilient is consistent with national design guidance and complements the approach already taken at Bourn Airfield. Supporting elements such as character-led public spaces, accessible walking and cycling networks, and

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multifunctional green infrastructure help ensure that neighbourhoods are well-connected, attractive and capable of maturing successfully over time.

Barratt Northampton also welcomes the clarity that GP/QP provides for the delivery of coherent landscape and public realm across phased developments. The flexibility within the policy allows site-specific interpretation while maintaining high design standards.

Overall, Barratt Northampton considers Policy GP/QP to be a well-founded and effective policy that will support the creation of high-quality, enduring public realm across the plan area, and are pleased to support it.

Policy H/HM: Housing mix

Barratt Northampton **objects** to Policy H/HM in its current form. While the principle of delivering a balanced mix of homes to meet a range of local housing needs is supported, the policy is overly prescriptive, lacks sufficient flexibility and does not reflect the practical realities of delivering housing on large, phased sites such as Bourn Airfield. As drafted, the policy introduces rigid percentage requirements and prescriptive dwelling mix expectations that risk constraining deliverability, undermining site-specific design principles and limiting the ability to respond to changing market conditions over the lifetime of the development.

The policy appears to assume that a fixed mix can be applied uniformly across all sites, without regard to local circumstances, approved masterplans or evidence submitted at outline stage. At Bourn Airfield, the housing mix has already been broadly established taking account of the outline consent and associated parameters, informed by detailed demographic evidence, viability testing, market assessments and design considerations. The mix will vary across phases to deliver a balanced community and to ensure that each parcel reflects its character area, density, design code requirements and relationship to the wider settlement structure. Imposing a rigid policy requirement risks conflicting with these approved frameworks and may necessitate redesign or unviable alterations at Reserved Matters stage.

A further concern is that the policy does not adequately account for the need to maintain delivery rates on large strategic sites. The ability to vary the mix across phases is essential to respond to changing demand, absorption rates and economic conditions. A fixed, percentage-based policy requirement would hinder this responsiveness and could slow the build-out, directly contradicting national policy objectives to support and maintain housing delivery.

Additionally, the evidence base does not sufficiently justify the detailed mix requirements proposed. While the SHMA provides useful strategic guidance, it does not support the imposition of precise mix percentages on every site, nor does it

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consider site-specific design codes or the implications for viability. The NPPF requires policies to be flexible, justified and deliverable; however, H/HM does not demonstrate that the prescribed mix can be achieved on all sites without compromising design quality, affordability, viability or delivery trajectory.

The policy also fails to explain how its requirements will interact with other policy burdens—such as net zero standards, accessibility standards, green space requirements and density expectations—each of which influences housing typology and layout. Without this clarity, there is a risk that mix requirements could conflict with, or be overridden by, other design and technical constraints on multi-policy-burdened strategic sites.

For these reasons, Barratt Northampton considers that Policy H/HM should be revised to provide a more flexible, outcome-based approach. The policy should set high-level expectations for delivering a balanced and inclusive housing mix, while allowing the detailed mix to be determined through site-specific evidence and agreed through the Reserved Matters process. Strategic sites with outline permission, such as Bourn Airfield, should be allowed to deliver the mix established through their consented frameworks, with flexibility to adjust over time in response to market signals, viability considerations and phasing strategies. This approach would ensure that the policy remains effective, justified and consistent with national planning policy.

Policy H/SS: Residential space standards and accessible homes

Barratt Northampton **objects** to Policy H/SS as drafted. While the delivery of high-quality, accessible homes is supported, the policy adopts an unduly rigid and prescriptive approach to both internal and external space standards, introduces requirements that are not evidenced or proportionate, and fails to demonstrate deliverability within the context of the wider cumulative policy burden set out in the emerging Local Plan.

A primary concern relates to the strict external space requirements set out in Clauses 3–6. The policy mandates fixed minimum private amenity space standards for all dwellings, including a blanket requirement of 30 sqm for every house and set balcony dimensions for apartments. These uniform thresholds do not reflect the diversity of development contexts across Greater Cambridge. In higher-density locations, on constrained infill plots, within heritage settings, or on conversion projects—including listed buildings—achieving these private space requirements is frequently impractical. Rigid thresholds risk undermining design quality, compromising local character, depressing densities in sustainable locations, and obstructing the ability to optimise housing delivery in areas well served by public transport. Although the draft policy provides a narrow exception for cohousing or community-led housing, this offers little assistance for the far more common scenarios where a flexible, design-led solution is required.

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The evidence base provides no robust justification for the 30 sqm minimum requirement, nor does it explain why the same standard should apply universally to all houses regardless of size, typology or bedroom count. Imposing fixed minimum garden sizes may also conflict with the objectives of other Local Plan policies, including those encouraging higher densities, brownfield redevelopment, character-led design, and a diverse mix of housing typologies. A more balanced, context-sensitive and design-led approach is therefore necessary to ensure that external space standards support, rather than hinder, the overall planning strategy. The policy also reproduces the Nationally Described Space Standards (NDSS) in full, despite the fact that these already apply automatically once adopted in the Local Plan. Repeating this technical material provides no additional clarity and instead creates unnecessary duplication, making the policy lengthier and harder to navigate. A simple cross-reference to the NDSS would be clearer, more succinct and fully effective.

On accessibility, Barratt Northampton supports the continued delivery of M4(2) accessible and adaptable homes, which form an important part of inclusive design. However, the proposed requirement for 10% of affordable dwellings and 5% of market dwellings to meet M4(3) wheelchair user standards is inconsistent with national policy. The Planning Practice Guidance is clear that wheelchair-accessible homes should only be required for dwellings where the local authority is responsible for allocating or nominating the occupant. As councils do not nominate occupants for market housing, applying an M4(3) requirement to market units is not compliant with national guidance and should be removed. Furthermore, no viability evidence has been provided to demonstrate that M4(3) units can be delivered viably across a range of sites, densities and market conditions. These units require greater internal floor areas, step-free access, and bespoke parking arrangements, all of which may be unachievable on constrained, sloping or complex sites.

More broadly, H/SS sits within an emerging Local Plan that already imposes a substantial cumulative policy burden. Housing space and accessibility standards interact with other demanding policies relating to net zero carbon and energy performance, water efficiency, biodiversity net gain, the proposed greening factor, climate resilience measures, Building with Nature principles, parking and transport requirements, and landscape/green infrastructure expectations. The draft plan provides no evidence that these requirements—individually or cumulatively—are viable across the plan area. Without whole-plan viability testing, the policy cannot be considered positively prepared or justified under the tests of the NPPF.

Given these concerns, Barratt Northampton considers that Policy H/SS is not justified, not effective, and not aligned with national policy. The policy should be revised to introduce significantly greater flexibility, allow genuinely design-led solutions, and reflect the varied practical constraints affecting different types of residential development. Specifically, the fixed private amenity space standards

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should be removed or made more flexible; the duplication of the NDSS should be replaced with a simple reference; the M4(3) requirement should apply only to affordable dwellings where the Council nominates occupants; and additional flexibility should be provided for constrained, heritage, conversion and brownfield sites. Whole-plan viability testing must also be undertaken to understand the cumulative impact of these requirements and ensure that they do not jeopardise the delivery of new housing.

Policy H/CB: Self and Custom Build Houses

Barratt Northampton **objects** to Policy H/CB as currently drafted. While supporting opportunities for self- and custom-build housing is an important objective, the policy's requirement that all developments of more than 20 homes must provide a fixed 5% proportion of self- or custom-build plots is unduly prescriptive and does not reflect the varying suitability of different sites or the practicalities of delivering major housing schemes.

Although the council identifies a shortfall of approximately 400 self-build plots in South Cambridgeshire, the existing policy framework (Policy H/9) already requires schemes of more than 20 dwellings to make provision for self-build. The continuation of this requirement has not proved effective in addressing the shortfall, indicating that imposing mandatory on-site provision within larger schemes is not an appropriate delivery mechanism. In practice, self- and custom-builders often prefer standalone or small-scale opportunities where construction can proceed independently of a major phased build-out programme. Conversely, integrating self-build plots into large strategic or multi-phase developments frequently creates complications relating to site logistics, delivery sequencing, sales absorption, marketability, long-term construction management, and health and safety considerations. This can introduce delay and additional cost without yielding meaningful improvements in self-build delivery.

For these reasons, the Local Plan should adopt a more nuanced approach that recognises the practicality and desirability of supporting dedicated standalone self- and custom-build sites, rather than relying on compulsory provision within all medium- and large-scale housing schemes. Such an approach would better reflect market preferences, respond to the spatial distribution of demand, and contribute more effectively to meeting the identified shortfall.

In addition, Policy H/CB omits an important flexibility mechanism contained within the existing Policy H/9. Under clause 2(f) of the adopted policy, self-build plots that have been marketed for 12 months without a confirmed purchaser may be built out by the developer. This safeguard is essential to ensure that housing delivery is not delayed, that sites can remain viable, and that unused self-build plots do not inhibit progress on multi-phase schemes. The removal of this flexibility in the draft Plan is unjustified and risks undermining delivery rates across projects of all scales. Barratt

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Northampton strongly recommends that this clause be reinstated in the revised policy wording.

Given these concerns, Policy H/CB is not considered justified, effective or positively prepared. It does not demonstrate that the identified shortfall can be addressed through mandatory on-site provision, it fails to acknowledge practical and operational constraints associated with large development sites, and it risks slowing the delivery of housing through unnecessary rigidity.

Barratt Northampton therefore requests that Policy H/CB be amended to introduce greater flexibility, including:

- Removing the blanket 5% requirement for all schemes of more than 20 homes;
- Allowing delivery through off-site or standalone self-build sites where more appropriate; and
- Reinstating the existing 12-month marketing caveat that enables developers to build out plots where no self-builder has come forward.

Such revisions would ensure that the policy is proportionate, effective and better aligned with the practical delivery of self- and custom-build housing across Greater Cambridge.

Policy I/EV: Parking and electric vehicles

Barratt Northampton **supports** the overarching ambition of Policy I/EV to encourage sustainable travel, reduce carbon emissions and facilitate the transition to electric vehicles (EVs). Providing well-designed parking, promoting modal shift and ensuring that new development can accommodate future transport technologies are important elements of delivering sustainable communities.

However, Barratt Northampton **objects** to several elements of the draft policy on the grounds that they are unduly prescriptive, insufficiently justified and risk undermining viability, design flexibility and the delivery of strategic sites.

A key concern is that the policy adopts a rigid, one-size-fits-all approach to EV charging provision, requiring every residential parking space to be served by active charging points. While supporting EV uptake is essential, this requirement lacks proportionality and does not reflect current national guidance, which takes a more flexible approach by allowing a combination of active and passive provision. For large strategic sites, where delivery spans 10–20+ years, mandating EV chargers for every space from the outset risks technological obsolescence, grid constraints and unnecessary upfront cost. A phased or demand-responsive approach would be more realistic and cost-effective, ensuring appropriate provision while maintaining flexibility to respond to evolving technology, grid capacity, and national standards.

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In addition, the policy sets out tight parking standards and maximum thresholds that may not be appropriate in all circumstances, particularly in early phases of strategic developments where public transport services, walking/cycling infrastructure and local facilities are still coming forward. For Bourn Airfield, parking ratios need to be balanced with the emerging transport offer, public transport delivery, density, design code principles and the need to ensure safe and functional neighbourhoods during early build-out. Overly restrictive standards at the outset could lead to overspill parking, congestion within residential streets, and conflicts with design objectives. The policy should provide sufficient flexibility for strategic sites to adjust ratios across phases in response to monitoring, travel plan evidence and the staged delivery of sustainable transport alternatives.

There is also a lack of robust evidence demonstrating that the proposed EV charging requirements and reduced parking standards are viable in combination with the broader cumulative policy expectations of the emerging Local Plan. Significant additional costs arising from net zero carbon construction, accessibility requirements, green infrastructure delivery, water and drainage standards, and biodiversity expectations all contribute to escalating build costs. Without whole-plan viability testing that considers these combined impacts, the requirements of I/EV cannot be assumed to be deliverable across the plan area.

Furthermore, the policy does not adequately recognise practical delivery constraints relating to grid capacity. Strategic sites such as Bourn Airfield require coordinated, long-term grid upgrades to support extensive EV charging infrastructure. Requiring universal active provision without ensuring alignment with distribution network operator constraints risks creating obligations that cannot be implemented within realistic timescales, potentially delaying housing delivery.

For these reasons, Barratt Northampton considers that Policy I/EV should be amended to ensure it remains proportionate, flexible and deliverable. The policy should allow a balanced mix of active and passive EV charging provision, consistent with national guidance; provide flexibility for strategic sites to vary parking standards across phases; ensure alignment with grid capacity constraints; and be supported by whole-plan viability testing to confirm affordability and deliverability. This would ensure the policy remains effective while still supporting the transition to low-carbon transport.

Policy I/CM: Construction management

Barratt Northampton **objects** to Policy I/CM as drafted. While responsible construction management is essential—particularly on large strategic sites—the policy adopts an overly broad and inflexible approach that risks capturing developments where such detailed documentation is disproportionate or unnecessary. As currently worded, the policy requires either a Noise and Vibration Demolition Environmental Management Plan, a Construction Environmental

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Management Plan, or a combined DCEMP for all major development and for *any* development that “may have adverse effects during construction.” This definition is extremely wide-reaching and could inadvertently apply to relatively small developments where the scale and nature of works do not justify the level of assessment proposed.

The policy also mandates the preparation and approval of multiple documents prior to commencement, irrespective of whether a lighter-touch approach would adequately manage construction impacts. This introduces avoidable complexity and additional costs for applicants, particularly for modest developments or those with minimal risk of disturbance. Furthermore, several aspects of construction-related noise, vibration, dust and nuisance are already subject to established statutory controls under the Control of Pollution Act 1974 and the Environmental Protection Act 1990, which provide robust and enforceable mechanisms for regulating construction practices. The duplication of regulatory frameworks risks inefficiency and may lead to inconsistent or overlapping enforcement responsibilities between planning and environmental protection teams.

Given these concerns, Policy I/CM should be revised to ensure that construction management obligations are proportionate, targeted and clearly aligned with the scale and risk profile of a development. A more flexible approach would allow the local planning authority to determine the appropriate level of documentation required on a case-by-case basis, avoiding unnecessary burdens while still securing robust mitigation where justified.

Barratt Northampton therefore recommends introducing wording to ensure proportionality, such as:

“...documentation should be proportionate to the scale, nature and likely impacts of the development, and may not be required where impacts are minimal or can be addressed through standard planning conditions.”

Such amendments would allow the policy to operate effectively without imposing unreasonable or duplicative requirements, while maintaining appropriate construction safeguards across the plan area.

Conclusions:

Barratt Northampton welcomes the Council’s progress in preparing an up-to-date Local Plan and appreciates the opportunity to comment at this Regulation 18 stage. A sound, deliverable and evidence-based Local Plan is essential to supporting housing delivery across Greater Cambridge, contributing to the Government’s ambition of accelerating new home provision, and ensuring that communities have access to high-quality, energy-efficient and sustainable homes.

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Barratt Northampton trust that these representations assist in refining the next stage of the Plan. Barratt Northampton remains committed to working collaboratively with the Council to ensure that emerging policies are effective, proportionate and capable of supporting timely delivery on strategic sites such as Bourn Airfield. Should the Council wish to discuss any of the matters raised, Barratt Northampton would be pleased to engage further.

Finally, I would be grateful if my contact details could be added to your consultation database so that I am notified of future updates as the Local Plan progresses.

Yours sincerely,



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