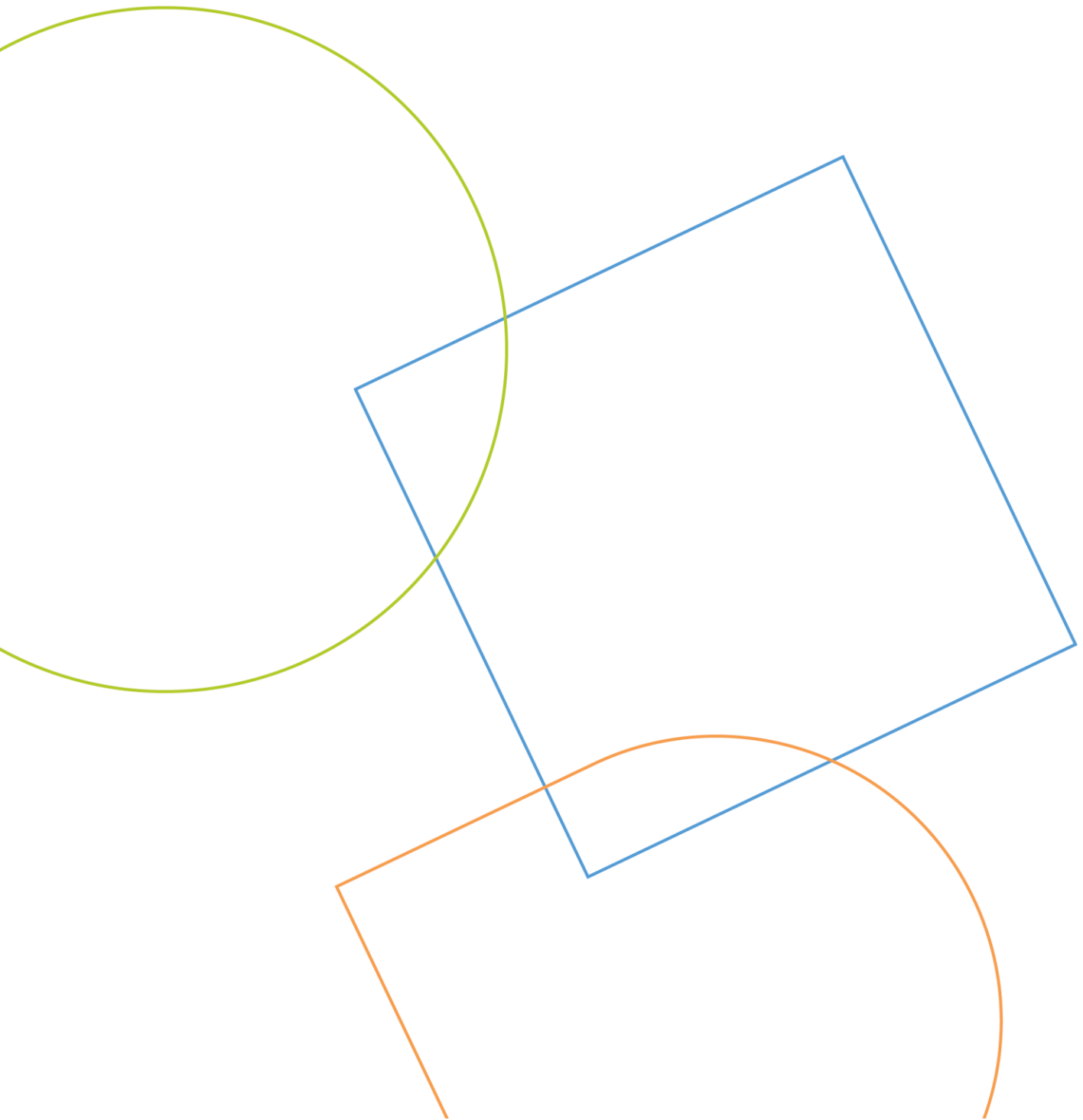




4512 – Land at Station Fields, Foxton, Cambridgeshire  
Representations to Greater Cambridge Local Plan Regulation 18 Consultation



# Representations to Greater Cambridge Local Plan Regulation 18 Consultation

Land at Station Fields, Foxton, Cambridgeshire

January 2026

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## Issue Sheet

Document Prepared for: Axis Land Partnerships

Representations to the Greater Cambridge Local Plan Consultation:  
Land at Station Fields, Foxton, Cambridgeshire (Site ID 115171)

4512

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## 1 Introduction

- 1.1.1 These Regulation 18 representations have been prepared by Lanpro Services Ltd on behalf of Axis Land Partnerships ('our client'). The representations respond to the Greater Cambridge Local Plan Regulation 18's draft policies that relate to our client's interests at land at Station Fields, ('the Site').
- 1.1.2 The Site at land at Station Fields, Foxton, Cambridgeshire could deliver up to 2000 homes on land adjacent to Foxton railway station. A location plan of the Site is shown at **Appendix 1**. These representations follow previous representations submitted on behalf of Axis Land Partnerships.
- 1.1.3 These representations should be read in conjunction with the supporting report in **Appendix 2: Station Fields Economic Case**, which demonstrates how increasing the local labour supply could catalyse the growth of the Cambridge Biomedical Campus (CBC).
- 1.1.4 **Appendix 3: Vision Document** provides an overview setting out why Foxton should be allocated for residential development and containing images of how the proposed development could look once developed.
- 1.1.5 **Appendix 4: Travel Isochrones** showing the travel times to the Cambridge Biomedical Campus.
- 1.1.6 The Site has been promoted through previous versions of the plan-making process. It was originally submitted to the Greater Cambridge Shared Planning Service in 2020 in response to an initial 'Call for Sites' exercise. The site was assessed in the draft Greater Cambridge Housing and Employment Land Availability Assessment (HEELA) 2025 under Site ID ref: 115171 (HEELA Site ID 40084).
- 1.1.7 Since then, the strategic context of the Site has evolved, and further work has been undertaken by Axis Land Partnerships. An additional submission in relation to the Site as part of the Site Submission Update process was presented in March 2025 to demonstrate that the Site remains available, suitable, and deliverable.
- 1.1.8 The Station Fields Economic Case concludes that the proposal would:
- Act as a catalyst for the growth of the Cambridge Biomedical campus;
  - Deliver homes in a well-connected location close to a mainline railway station;
  - Deliver extensive sustainability, health, and well-being benefits;
  - Support the delivery of much needed new local infrastructure such as a new integrated travel hub, a bypass of the level crossing comprising a bridge over the railway line and station improvements;
  - New business space supporting SMEs;
  - New community infrastructure to foster social cohesion; and

- Delivering accessible open space.

## **1.2 Axis Land Partnerships Ltd**

1.2.1 Axis Land Partnerships is a land promotion company. It is part of the Sir Robert McAlpine group of companies and can call upon extensive resources ensuring the delivery of schemes through the planning process and construction phases.

## **1.3 Structure of Document**

1.3.1 These representations to the Greater Cambridge Regulation 18 consultation are structured as follows:

- Chapter 1: Introduction – This Chapter sets out the introduction to these representations and provides details of our client, Axis Land Partnerships Ltd, the promoter.
- Chapter 2: Site Context – This Chapter sets out the site context for the Site and demonstrates why the Site should be allocated for development in the Council’s emerging Local Plan.
- Chapter 3: Response to Representations – This Chapter provides a response to the draft policies that are relevant to the Site.
- Chapter 4: Conclusion – This Chapter summarises and concludes these representations.

## 2 Site Context

### 2.1 Site Context

- 2.1.1 The Site is located to the north-west of the village of Foxton, which is designated as a Group Village in the adopted Greater Cambridge Local Plan. Foxton is located approximately 11 kilometres south-west of Cambridge and approximately 9 kilometres south-west of the Cambridge Biomedical Campus (CBC).
- 2.1.2 The Site Location Plan is shown at **Appendix 1** and shows its location and local context. Station Fields offers a unique and rare opportunity for sustainable future growth and development outside the Cambridge Green Belt. Situated in South Cambridgeshire, its location benefits from existing rail infrastructure and offers the opportunity to enhance public safety through the bypass of existing level crossings (which cause considerable delays to vehicular traffic along this key transport corridor. The proposed development of Station Fields aims to deliver a housing-led development to support the huge growth pressures in Greater Cambridge, including that within the science and technology sectors.
- 2.1.3 The vision is for up to 2000 homes alongside employment uses and wider community facilities. The proposed development is in alignment with the emerging Local Plan objectives and themes, also addressing key issues such as water quality in the local area, while preserving existing villages and fulfilling community aspirations for green spaces, safety, and amenities.
- 2.1.4 The proposals include integration with surrounding villages through cycling and walking networks (including the proposed Melbourn Greenway, which will run along the edge of the Site providing an active travel link between Melbourn and Royston to the south-west and Cambridge Harston and Cambridge to the north-east). It also optimises existing sustainable rail connections, with direct trains to Cambridge, Cambridge South (for the Cambridge Biomedical Campus), Royston, Letchworth Garden City, Hitchin, and London King's Cross.

### 2.2 Land at Station Fields, Foxton, Cambridgeshire

- 2.2.1 The vision for the Site is set out in the accompanying document in **Appendix 3: Station Fields, Foxton Vision Document** . This builds on the vision document submitted to the 'Call for Sites' exercise in 2020. The site was assessed in the draft Greater Cambridge Housing and Employment Land Availability Assessment (Site ID 115171 (HEELA Site ID: 40084).
- 2.2.2 The Site has an area of approximately 98 hectares and is located between the villages of Foxton, Shepreth, and Barrington. The illustrative masterplan features significant

landscape buffers for each of these villages, creating a stand-alone settlement. The vision presents a settlement of up to 2000 dwellings.

- 2.2.3 In a statement on 26 January 2025, the Chancellor announced bold reforms of the planning system, in which she advocated *‘new plans for more houses near commuter train stations to kick start economic growth’*. The Government announced that *‘Untapped land near commuter transport hubs will be unlocked to build new housing for working people, as part of bold new steps to reform the planning system and unlock growth to deliver win-win outcomes for the country and the economy.’*<sup>1</sup>
- 2.2.4 In a statement on 18<sup>th</sup> November 2025, the Government announced that *‘Housebuilding near well-connected train stations will receive a default “yes” in future if they meet certain rules, enduring new homes are built’*.
- 2.2.5 In light of these announcements from Government, it is highly relevant to note that the Site is adjacent to and has easy access to Foxton railway station, which is an intermediate stop on the Cambridge line, which runs between Hitchin on the East Coast Main Line and joins the West Anglia Main Line just south of the new Cambridge South railway station, which is scheduled to open in June 2026. The Site also has access to the A10, which provides links between Royston and Cambridge via Barrington Road.
- 2.2.6 One of the significant benefits of the proposed scheme to users of the A10 and the railway are the enhancements involving the removal of the level crossings (the main vehicular level crossing and two foot crossings) adjacent to Foxton railway station, and the proposed bridge running to the west of the existing level crossing. These in combination with the proposed travel hub provide a high-quality multi-modal interchange providing car and cycle parking, bus stops, and links between these and rail.
- 2.2.7 These enhancements will provide significant public safety improvements as well as removing a major bottleneck that causes frequent delays for traffic (including the emergency services) on the A10, with no cost to the public purse. The proposals would also include a new footbridge and lifts at Foxton station. The removal of the level crossings will create a significantly enhanced and more attractive environment for rail passengers.
- 2.2.8 Alongside the evolution of national policy on Cambridge growth, Cambridge Biomedical Campus Limited (CBC Ltd), which brings together the tenants and landowners of the existing campus, commissioned Lichfields to conduct a review of the future housing needs of the growing campus workforce. The April 2024 report, entitled *Cambridge Biomedical Campus Housing Study*<sup>2</sup> suggests that the major challenges for housing provision are affordability and travel accessibility.

<sup>1</sup> <https://www.gov.uk/government/news/government-goes-further-and-faster-on-planning-reform-in-bid-for-growth>

<sup>2</sup> <https://cambridge-biomedical.com/wp-content/uploads/2024/07/CBC-Housing-Study-Report-Final-May24.pdf>

- 2.2.9 With the number of people working at CBC anticipated to grow from 22,000 now to 40,000 in coming years, additional housing demand will be significant. The 2024 Housing Study concludes that there is a need for 4-5,000 affordable homes across tenures. Clearly it would be beneficial both to life sciences/medical business/organisations, and employees alike for homes to be built close to these jobs and with access via existing sustainable transport.
- 2.2.10 The 2024 Housing Study did not assess individual sites for their contribution to the housing needs of CBC. Rather, it sets out on page 6 ‘specific asks’ for strategic sites within each of three travel time zones: central catchment, middle catchment, and wider catchment. Having regard to the map on page 6, the Site is identified to lie within the middle catchment, and the ask for this area is:
- 2. Sites well connected but further away from CBC, within our middle catchment, may be suitable to meet our central catchment asks, but otherwise should:*
- *reflect our ‘basic ask’ providing affordable homes suitable for CBC workers;*
  - *consider provision of housing to meet our specific housing needs of those in the biomedical sectors and professions; and*
  - *reflect our principles on placemaking and enhance accessibility to CBC.*
- 2.2.11 The 2024 Housing Study included travel times maps for CBC on pages 6 and 25-27. While we agree that these maps give a good overview of the relative travel times, we believe that there is an insufficient level of granularity to guide policy makers.
- 2.2.12 We have therefore undertaken travel time modelling for the two most relevant modes of transport: cycling and train. The travel isochrone plans are appended to this submission in **Appendix 4: Travel Isochrones**. For cycling, the Site at Foxton benefits from existing segregated cycle links which will be further improved as part of the Melbourn Greenway project being delivered by the Greater Cambridge Partnership (GCP). The Site is located just outside the 30-minute isochrone, with a travel time of no more than 36 minutes. For train journeys, the Site is adjacent to Foxton station, which will have direct rail half-hourly services to Cambridge South station when it is opened in early 2026. Journey times from Foxton (within close proximity to the Site) to Cambridge South will be approximately 7 minutes. To Cambridge Central the journey time is around 10 minutes.
- 2.2.13 Growth of the CBC is of international importance, and recognised as such by successive governments. One of the principal barriers to growth is the availability of affordable and accessible housing near the CBC. The Site would make a substantial contribution to the identified need for both market housing and affordable housing, in a location just 7 minutes by rail from the Campus via a high-quality public transport corridor and which therefore could potentially be linked to employment at CBC.

### 3 Response to Representations

3.1.1 This Chapter sets our response to the draft policies that are relevant to the Site.

#### 3.2 Draft Policy S/JK: New Jobs and Homes

*Position on this policy: Object*

*Do you consider the plan to be legally compliant? Yes*

*Do you consider the plan to be sound? No*

*Does it comply with the duty to cooperate? Yes*

3.2.1 This draft policy sets out the level of needs for jobs and homes in Greater Cambridge over the plan period from 2024-2045, as well as dealing with specific groups such as Gypsies and Travellers, Travelling Showpeople, boat dwellers, and other caravan dwellers.

3.2.2 The policy meets objectively assessed needs for the Greater Cambridge area of 73,000 additional jobs, and a minimum of 48,195 new homes meeting the needs for the total population.

3.2.3 The Government's updated standard methodology for Greater Cambridge is 2,309 dwellings per annum (1,135 in Cambridge City and 1,174 in South Cambridgeshire).

3.2.4 It is noted that the number of dwellings per annum being provided by Greater Cambridge is 2,295, which is slightly fewer than the standard method. However, the draft Local Plan acknowledges that the total supply set out in Table 4 is 55,278 dwellings, which is from the current supply and new sites, including North East Cambridge. Therefore, the total number of dwellings that the Councils calculate will be provided across the emerging Plan Period is greater than the standard method, which is supported.

3.2.5 However, there may be potential for additional growth across Greater Cambridge. Both the previous and the current Governments recognised the potential of Cambridge to support national growth. The Government has set up the Cambridge Growth Company whose job is to work with local stakeholders to deliver “*high quality sustainable growth in Cambridge and its environs*”<sup>3</sup>. Significant funding has been provided to the Cambridge Growth Company to enable and shape this growth.

3.2.6 The potential for additional growth to support the ambitions of the Cambridge Growth Company and by extension, the Government, should be incorporated into the draft Local Plan as a material consideration.

**What changes do you think need to be made to the plan?**

<sup>3</sup> <https://thecgc.org.uk/>

- 3.2.7 Revise the calculation of housing need to take into account Government ambitions for Greater Cambridge, including the creation of and funding for the Cambridge Growth Company.

**If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

- 3.2.8 Yes. In order to test the assumptions and evidence upon which the draft Local Plan housing need is based.

**Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?**

- 3.2.9 No. This is a new draft policy.

### **3.3 Draft Policy S/DS Development Strategy**

*Position on this policy: Object*

*Do you consider the plan to be legally compliant? Yes*

*Do you consider the plan to be sound? No*

*Does it comply with the duty to cooperate? Yes*

- 3.3.1 The Draft Policy S/DS sets out the proposed strategy for the patterns, scale, and design quality of places in Greater Cambridge, for the plan period to 2045 and beyond.
- 3.3.2 The Cambridgeshire & Peterborough Independent Economic Review (CPIER), which was published in September 2018 around the time of the adoption of the current Cambridge Local Plan and South Cambridgeshire Local Plan.
- 3.3.3 The CPIER recommended a blended spatial strategy being the most appropriate form of development. It considered densification, dispersal, fringe growth, and growth along transport corridors.
- 3.3.4 While the CPIER report concluded that a dispersed approach should not be the main paradigm for development, it concluded a blended approach was the most appropriate options as none of the approaches on their own are likely to work. However, the balance of development set out in the Greater Cambridge Local Plan is unbalanced and the spatial strategy advance risks delivery of homes, particularly in the early part of the plan period.
- 3.3.5 The Councils are distributing 44% of growth across the Plan Period in new settlements, and 29% in major sites on the edge of Cambridge which are similar to new settlements (Figure 12 of the Local Plan). Combined, 73% of growth is allocated to major strategic sites.

3.3.6 The table below sets out the distribution of growth during the Plan Period across these new settlements and whether these have planning permission. **Appendix 4** sets out the proposed housing trajectory of the new settlements which do not currently have extant consent during the emerging Local Plan timeframe.

**Table 3.1: Delivery of new settlements during the emerging Plan Period**

<b>Settlement</b>	<b>Number of Homes to be delivered in Plan Period</b>	<b>Total number of dwellings</b>	<b>Extant permission</b>	<b>Percentage of homes delivered during Plan Period</b>
Northstowe* <sup>4</sup>	6,229	10,107	Yes	62%
Waterbeach New Town*	5,727	11,531	Yes	50%
Bourn Airfield	3,500	3,500	Yes	100%
North East Cambridge	3,950	8000	No	50%
Cambridge East	3,950	8,000	No	49%
Cambourne North	2,550	13,000	No	20%
Grange Farm New Settlement	2,550	6000	No	43%

\*Northstowe has delivered 1,401 dwellings prior to this emerging Plan Period. Waterbeach New Town has delivered 556 dwellings prior this emerging Plan Period.

3.3.7 The delivery rates for these settlements are unrealistic, particularly regarding the new settlements which are yet to have been granted planning permission, which include:

- North East Cambridge;
- Cambridge East;
- Cambourne West; and
- Grange Farm.

<sup>4</sup> [greater-cambridge-housing-trajectory-and-housing-land-supply-report-2025.pdf](#)

- 3.3.8 In the latest ‘Start to Finish’ Report, undertaken by Lichfields in 2024<sup>5</sup>, it is demonstrated that sites comprising over 1,000 dwellings will take, on average, five years to obtain detailed planning permission and then a further 1.3-1.6 years to deliver the first dwelling.
- 3.3.9 Indeed, for sites over 2,000 dwellings, it states that the median timescale from validation of the first planning application to the completion of the first dwelling is 6.7 years.
- 3.3.10 The Councils’ Local Development Scheme anticipates that the emerging Local Plan will be submitted to the Secretary of State for examination in December 2026. In July 2024 (after their General Election win), the new Minister for Housing, Matthew Pennycook, wrote to the Planning Inspectorate and noted that the average length of time for the completion of examination had increased from 65 weeks on average in 2016 to 134 weeks on average in 2022 (approximately 2 ½ years)<sup>6</sup>.
- 3.3.11 Therefore, if the Plan were submitted to the Secretary of State in December 2026, then the earliest that the Plan might be adopted is May 2029, using the data above. That would be equivalent to ‘Year 6’ (2029/2030) in the proposed housing trajectory.
- 3.3.12 If these new settlements were to be approved in Year 6 (2029/30), then the earliest that the first house might be delivered according to the Lichfields ‘Start to Finish’ is in Year 12 (2035/2036). It is unrealistic to conclude that the first dwellings will be delivered in North East Cambridge and Cambridge East in 2032/33, and in 2034/35 in Cambourne North and Grange Farm. All these sites have significant infrastructure requirements, while the main housing trajectory does not rely on Cambridge North East (following the Government’s recent announcement not to fund the relocation of the waste water treatment works from the existing site to Honey Hill), the delivery targets for the other three areas remain unrealistic. Cambourne North is reliant on East West Rail being delivered and a new railway station being brought forward at Cambourne, while Grange Farm is heavily reliant on the proposed CSET scheme.
- 3.3.13 The current housing trajectory figures are overly ambitious for large new settlements requiring significant new infrastructure requirements such as yet unbuilt or unfunded extensive dedicated busways, or major new railway such as East West Rail, particularly considering recent delivery rates both within Greater Cambridge and in other parts of the UK.
- 3.3.14 Therefore, to meet this shortfall, the Councils should focus on sites that can utilise existing infrastructure such as land at Station Fields, Foxton, Cambridgeshire adjoining existing settlements, especially ones that benefit from proximity to an existing railway station, and consequently therefore access to a large number of jobs, educational establishments, and other services using existing sustainable modes of transport.
- 3.3.15 The Councils’ housing trajectory is also reliant on the new settlements each delivering 350 dwellings per annum. This is equivalent to seven plots delivering 50 dwellings per annum, by several housebuilders.

<sup>5</sup> [start-to-finish-3 how-quickly-do-large-scale-housing-sites-deliver.pdf](#)

<sup>6</sup> [Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate \(July 2024\)](#)

3.3.16 The Lichfields ‘Start to Finish’ document sets out the housing completions of large sites. The table below sets out the average delivery of sites which are for over 5,000 dwellings across the years. The Annual Monitoring Report (2025) confirms this with Northstowe’s historic maximum in which only 278 in 2018/19, and only 92 homes were delivered in 2023/24. At Waterbeach, only 263 dwellings were completed in 2022/23, and the number of completions has declined since then.

**Table 3.2: Table of average housing delivery on sites larger than 5,000 dwellings**

<b>Site Name</b>	<b>No of Dwellings</b>	<b>No of Years of Delivery</b>	<b>Average Delivery (rounded)</b>
Former Alconbury Weald, Huntingdon	5,000	2	208
Priors Hall, Northamptonshire	5,200	11	135
North West Preston	5,300	8	290
East Kettering SUE	5,500	6	133
Sherford, South Hams	5,500	7	119
South Ashford Garden Community	5,750	2	75
Houlton (Rugby Radio Station)	6,200	3	139
The Hamptons (Peterborough)	6,320	25	224
Ebbsfleet	15,000	14	255

3.3.17 The table above demonstrates that none of the new settlements assessed achieved, on average, 350 dwellings per annum. For Greater Cambridge to have so many of these type of sites in one area, is particularly problematic for delivery. Therefore, there should be a greater focus on delivering the required housing across sustainable settlements, which includes Foxton and the A10/London King’s Cross to Cambridge corridor which has been afforded very limited growth in the emerging Greater Cambridge Local Plan. The Site can help meet the needs of the emerging Local Plan, particularly on adoption of the Local Plan, and in the early part of the plan period.

3.3.18 We raise concerns about the principle of the development at Grange Farm, and we note that North East Cambridge may not be available due to the Government withdrawing funding for the wastewater treatment relocation.

- 3.3.19 Regarding Cambridge East (the existing Cambridge Airport), in October 2025, Marshall Group confirmed that they were not relocating to Cranfield Airport, in Bedfordshire, as it was considered “no longer affordable”.
- 3.3.20 There is nothing in the news, which sets out when Marshall Group intends to vacate the Site. Therefore, we question whether the emerging Local Plan can be reliant on these dwellings during the Local Plan period.
- 3.3.21 With respect to Cambourne North, the delivery of the settlement extension is principally reliant on the proposed new station that will be delivered as part of East West Rail.
- 3.3.22 Although we acknowledges that in June 2025, as part of the spending review, the Government committed a further £2.5 billion for the continued delivery of East West Rail, there is far from certainty that this will be delivered. This Government is fully committed to the delivery of East West Rail but there are no guarantees that a future government would be as committed. In contrast, Station Fields benefits from an existing railway station and services to nearby towns and the city of Cambridge including the Cambridge Biomedical Campus.
- 3.3.23 Regarding Grange Farm, we are concerned that there is not sufficient infrastructure to deliver this Site, particularly as this will be a sustainable new town, located at the heart of the Rural Southern Cluster. Once again, the Local Plan is placing far too much emphasis on the delivery of new standalone new settlements, which experience demonstrates take a considerable time to deliver.
- 3.3.24 The Deliverability Paper that was submitted as part of the previous ‘call for sites’ application for Grange Farm, confirms that 3,560 dwellings (market and affordable) can be delivered during the emerging Local Plan period with the first dwellings being delivered in 2030.
- 3.3.25 The Councils’ housing trajectory states that only 2,550 dwellings can be delivered during the Plan Period. .
- 3.3.26 There is also a discrepancy between the number in the Housing Trajectory provided by the Council (up to 300 dwellings in 2040) and only 275 dwellings in the Housing Deliverability Note<sup>8</sup>. Therefore, we have concerns that the Council will be able to deliver that number of dwellings across the Plan Period.
- 3.3.27 In order to help meet this shortfall, our client can provide a Site that is deliverable in the short term at a sustainable location, and does not rely on uncertain delivery of strategic infrastructure by third parties.
- 3.3.28 In total, as set out in Figure 12 of the emerging Local Plan above, new settlements will provide 44% of the total housing supply. Given the timings set out in the Lichfields ‘Start to Finish’ report, there is a severe risk of delay in delivering a significant number of Greater

<sup>7</sup> <https://www.bbc.co.uk/news/articles/c62l6gnvdyqo>

<sup>8</sup> <https://oc2.greatercambridgeplanning.org/form/59401>

Cambridge's housing sites, which will mean that the Councils will not be able to meet their housing needs across the Plan Period..

- 3.3.29 In order to avoid this scenario and to ensure as far as possible a plan-led system can be successfully implemented and delivered, the Site can help the Council deliver a consistent and deliverable supply of housing across the Plan Period to reduce the risk of the Council not being able to meet its housing needs, thereby attracting speculative development.
- 3.3.30 The Site at Stations Fields, Foxton is immediately deliverable and could contribute towards the Council's increased housing needs to ensure that the required housing delivery numbers are maintained. Less reliance on large strategic scale sites and new settlements would help to ensure that in future Greater Cambridge is able to demonstrate a five-year supply of housing land. smaller and medium sized sites typically come forward quicker than new large settlements which require significant infrastructure to support them.
- 3.3.31 The Development Strategy of the draft Local Plan is underpinned by the Housing Trajectory set out in draft Appendix E. This anticipates that the local housing need (standard method) annual number of 2,309 is not achievable between 2024/25 and 2027/28, in 2031/32 or in the final four years of the plan period. For the years 2028/29 and 2029/30, anticipated completions are significantly higher, at 3,483 and 3,530 respectively. This results in a predicted number of completions for 2028-2033 of 14,427 units, which equates to a five-year supply of 5.32 years.
- 3.3.32 Analysis of the projected completions for individual sites suggests that the above anticipated completions numbers are based on estimates of completions on strategic sites for 2028/29 and 2029/30 are that are significantly above historic maximums and that do not consider the planning context of each site.
- 3.3.33 At North West Cambridge, completion of the final Phase 1 dwellings permitted under the 2013 outline consent (references: 11/1114/OUT and S/1886/11) is expected in 2028. The outline application for future phases is currently under consideration and is unlikely to be approved before late 2026, with reserved matters to follow. It is therefore implausible that 305 and 376 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 100 per year, as the trajectory anticipates for most of the 2030s.
- 3.3.34 At Northstowe, the historic maximum annual delivery was in 2018/19, when 278 dwellings were completed. Only 92 dwellings were completed in 2023/2024 (on both Phase 1 and Phase 2). Phase 1 is now almost complete, and Phase 2 has 706 dwellings permitted. It is therefore implausible that 473 and 467 dwellings can be delivered in 2028/29 and 2029/30 respectively. A more reasonable assumption might be 300 per year, as the trajectory anticipates for 2030 onwards.
- 3.3.35 At Waterbeach New Town, 263 dwellings were completed in 2022/23, with completions declining since then. It is unlikely that 376 and 368 dwellings can be delivered in 2028/29

and 2029/30 respectively. A more reasonable assumption might be 300 per year, as the trajectory anticipate for 2030 onwards.

- 3.3.36 If the above reasonable adjustments are made to the housing trajectory in Appendix E, the number of predicted completions is reduced by 965 and the five-year supply for 2028-2033 falls to 4.96. Therefore, the Plan cannot be found ‘sound’ in line with paragraph 36 of the NPPF, 2024.
- 3.3.37 It is also noted that the housing trajectory relies on historically high delivery rates in 2028/29 and 2029/30 for four further major previously allocated strategic sites: North East Cambridge, Darwin Green, Cambridge East (Marleigh and Land north of Cherry Hinton), and Cambourne West.
- 3.3.38 Given historic experience of both general and site-specific causes of delays and reductions in delivery rates, notably the delivery of major infrastructure, it is not credible to assume that seven major strategic sites will all be able to deliver at historically exceptional rates.
- 3.3.39 In order to reduce reliance on uncertain major sites and increase the likelihood that overall completion rates will be close to or exceed standard method need over the first 5-10 years of the plan period, the draft Local Plan should make significant additional allocations for smaller developments close to existing settlements and that do not require enabling infrastructure investment.

### **3.4 Draft Policy S/SH: Settlement Hierarchy**

*Position on this policy: Object*

*Do you consider the plan to be legally compliant? Yes*

*Do you consider the plan to be sound? No*

*Does it comply with the duty to cooperate? Yes*

- 3.4.1 Policy S/SH: Settlement Hierarchy ‘sets out the groupings of settlements into categories that reflect their scale, characteristics, and sustainability, to ensure development is located in the most sustainable places. While this broad approach is supported, the precise balance of development being attributed to different settlement types should be altered to ensure deliverability and sustainability.
- 3.4.2 Foxton’s access to a mainline railway station and its existing railway link to the CBC has been ignored or underplayed in the site assessment process. Furthermore, the Local Plan has directed virtually no growth to settlements with existing railway stations, and this is a huge lost opportunity as it fails to utilise existing transport infrastructure.
- 3.4.3 These proposals provide significant benefits for users of the A10 and the railway. The enhancements include the removal of the level crossings (the main vehicular level crossing and two foot crossings) adjacent to Foxton railway station, and the proposed bridge running to the west of the existing level crossing. These in combination with the

proposed travel hub provide a high-quality multi-modal interchange providing car and cycle parking, bus stops, and links between these and rail.

- 3.4.4 The replacement of the level crossings with a new vehicular bridge for the A10 and station footbridge and lifts provide significant public safety improvements as well as removing a major bottleneck that causes frequent delays for traffic (including the emergency services) on the A10, with no cost to the public purse.
- 3.4.5 Even before the Government’s policy announcement in November 2025, and subsequent proposed policy changes set out in the National Planning Policy Framework, the Greater Cambridge Local Plan has systematically failed to satisfactorily address the significant role of rail in delivering homes in sustainable locations close to jobs, services, and facilities.
- 3.4.6 Key policy change 2: Building homes around stations on page 15 of the proposed reforms to the National Planning Policy Framework and other changes to the planning system, which was published in December 2025 states that the Government wants ‘to establish ‘in principle’ support – a “default yes” – for suitable proposals that develop land around rail stations within existing settlements, and around ‘well-connected’ train stations outside settlements, including on Green belt land’. The Government also states that it is ‘also proposing a minimum density of 40 dwellings per hectare around all stations and 50 dwellings per hectare around ‘well-connected’ stations – maximising opportunities for sustainable development.
- 3.4.7 Consideration should be given to upgrading settlements with railway stations within the Settlement Hierarchy, particularly considering the Government’s recent announcement about focusing development in locations well served by rail. The Local Plan fails to address this. The capacity for growth in settlements with railway stations should be acknowledged to be significantly higher than other such villages in this category, reflecting their location on major sustainable transport corridors.

**What changes do you think need to be made to the plan?**

- 3.4.8 Changes to the settlement hierarchy to reflect the role of railway stations to reflect Government policy.

**If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

- 3.4.9 Yes. In order to present in support of this allocation.

**Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?**

- 3.4.10 No. Proposed new policy.

### 3.5 Draft Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

*Position on this policy: Object*

*Do you consider the plan to be legally compliant? Yes*

*Do you consider the plan to be sound? No*

*Does it comply with the duty to cooperate? Yes*

- 3.5.1 This draft policy proposes an allocation for an entirely new settlement of around 6,000 homes, of which it states that 2,550 are to be delivered during the plan period. It is located east of the Fourwentways junction of the A11 and A1307 roads. The justification for this site is that it is close to the Rural Southern Cluster of science innovation parks, in an area with low housing supply. It is to be connected to Cambridge via an extension to the Cambridge South East Transport (CSET) segregated public transport scheme.
- 3.5.2 The Grange Farm site depends on the construction of a new high quality public transport link to Cambridge, which has two elements: CSET and a further extension.
- 3.5.3 CSET is managed by the Greater Cambridge Partnership (GCP). It is a proposed segregated busway running from the Cambridge Biomedical Campus (including Cambridge South railway station) to a new park and ride site west of the Fourwentways junction, giving access to the A11 and A1307. It will serve the villages of Great Shelford, Stapleford and Sawston, as well as the Babraham Research Campus. An application for a Transport and Works Act Order was submitted to the Department for Transport (DfT) in January 2025. It is expected that a public inquiry will take place in 2026.
- 3.5.4 In 2023, GCP concluded that it could not fund construction of CSET itself. Since then, central government has provided funding for the design to be advanced and the planning submission to be made. However, no construction funding has been secured. While there is political support for the project at both national and local level, there remains considerable uncertainty as to its delivery.
- 3.5.5 In its latest Board papers (November 2025), the GCP did not provide either a target completion date or forecast completion date for the CSET project. If permission were granted in 2027, it is unlikely that construction would start before 2028-29 and that the scheme would be completed before 2032.
- 3.5.6 The link between the CSET park and ride and the Grange Farm site must cross both the A11 Trunk Road and the A1307, a major arterial road into Cambridge already suffering considerable congestion during the morning and evening peaks.
- 3.5.7 CSET feasibility work conducted in 2020 included an option for a park and ride east of Fourwentways, and this has been reviewed in the preparation of the draft Local Plan as an option for linking to Grange Farm. No other design or feasibility work appears to have been undertaken. A bridge over the A11 would cost tens of millions of pounds, with significant further work required for junctions and route. While it might theoretically be possible to complete the link at the same time as CSET, this element is at an early stage.

- 3.5.8 Even with a busway link, Grange Farm would be severed from potential destinations to the west by the A11 and A1307 without significant further interventions, and would be heavily reliant on the private car. Station Fields, Foxton, in stark contrast is located on a major railway line between Cambridge and London King's Cross.
- 3.5.9 The Grange Farm site is isolated and is a considerable distance from other major settlements. The busway link, if funding can be secured, will represent the only high-quality public transport link for the settlement. No existing major settlement is within cycling distance. Given the limited range of services that could be sustained by a settlement of 6,000 dwellings itself, it is likely that a high number of external journeys will be made by the private car. No evidence has been provided that this is not the case, nor that high car usage can be limited. Development at this site is therefore not sustainable, and focusing development on a corridor without rail connectivity is a significant flaw in the proposed spatial strategy.
- 3.5.10 In summary, the Grange Farm allocation relies entirely on major new transport infrastructure that is currently not planned for, nor consented, does not have secure finance and the delivery of which is technically challenging. Furthermore, it is an inferior form of public transport to the railway station at Foxton, which provides far greater capacity and considerably faster speeds linking the Site to jobs and education.
- 3.5.11 Design of the settlement itself has not begun. The housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of the new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. In transport terms, the site is not sustainable. While we have concerns about whether this is the most appropriate location for a large new settlement for the reasons set out above, if the site is to be retained as an allocations, expectations about delivery rates and timescale for commencement should be revised to reflect realistic rates of delivery.

**What changes do you think need to be made to the plan?**

- 3.5.12 Remove allocation, or provide much more realistic expectations about delivery rates and timescale for commencement.

**If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

- 3.5.13 Yes. In order to evaluate the assumptions and evidence on which the draft Local Plan allocation is based.

**Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?**

- 3.5.14 No. New draft policy.

### 3.6 Policy S/RRA: Site allocations in the rest of the rural area

*Position on this policy: Object*

*Do you consider the plan to be legally compliant? Yes*

*Do you consider the plan to be sound? No*

*Does it comply with the duty to cooperate? Yes*

- 3.6.1 Additional allocations in rural areas are required to make the plan sound. The site at Station Fields, Foxton, Cambridgeshire is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable in early stages of the plan period, and is not reliant upon uncertain delivery of strategic infrastructure by third parties. It would therefore contribute to the objectives of the Local Plan.
- 3.6.2 The site could deliver up to 2,000 dwellings . Landscape and heritage impacts can be mitigated. Safe highway access can be provided.
- 3.6.3 In November 2025 the Government announced a key new policy that sought to focus development in locations close to existing railway station. It stated that: *‘Housebuilding near well-connected train stations will receive a default “yes” in future if they meet certain rules, ensuring more high-quality, affordable homes are built in and around our key towns and cities, saving commuters time and boosting access to housing.*
- 3.6.4 It continued stating that *‘Thousands more working families and commuters will be able to live and work near train stations thanks to this drive to speed up housebuilding, which will help connect people to towns and cities, and open the door to new job and education opportunities’.*
- 3.6.5 Finally, it concluded that *‘Housebuilders will be encouraged to build more homes near these transport links, and councils in England will also now be required to tell the government when they intend to reject new housing developments over a certain size, with the Housing Secretary able to have the final say on whether they should go ahead’.*
- 3.6.6 Soon after, a new consultation draft of the National Planning Policy Framework was published.
- 3.6.7 Foxton’s access to a mainline railway station and its existing railway link to the CBC appear to have been ignored or underplayed in the site assessment process. Furthermore, the Local Plan has directed virtually no growth to settlements with existing railway stations, and this is a huge lost opportunity as it fails to utilise existing transport infrastructure.
- 3.6.8 Consideration should be given to upgrading settlements with railway stations within the Settlement Hierarchy, and/or allocating growth to these settlements, particularly in light of the Government’s recent announcement about focusing development in locations well served by rail. The Local plan patently fails to address this. Settlements with railway stations should be duly upgraded in the Local Plan by a position in the hierarchy to reflect this. Consequently, the capacity for growth in settlements with railway stations should be

acknowledged to be significantly higher than other such villages in this category, reflecting their location on major sustainable transport corridors.

- 3.6.9 The site meets the requirements of the new draft NPPF for development close to railway stations.
- 3.6.10 In order to make the plan sound and meet housing need throughout the plan period, further small sites in sustainable locations in the rural area should be allocated for development.
- 3.6.11 The site at Land at Station Fields, Foxton, Cambridgeshire is located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable. It would therefore contribute to the objectives of the Local Plan.
- 3.6.12 The site at Land at Station Fields, Foxton, Cambridgeshire is a sustainable location for a new residential development. It is close to a railway station with a frequent service to employment locations in Cambridge and elsewhere. A wide range of services, including schools, shops and community facilities, are located within walking distance.
- 3.6.13 The site is available and deliverable in early stages of the plan period, and is not reliant upon uncertain delivery of strategic infrastructure by third parties..

**What changes do you think need to be made to the plan?**

- 3.6.14 Allocation of Land at Station Fields, Foxton, Cambridgeshire residential-led mixed use development.

**If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

- 3.6.15 Yes. In order to present in support of this allocation.

**Have you already raised the matter that is the subject of your representation with the local planning authority at an earlier consultation stage?**

- 3.6.16 No. Proposed new policy.

## 4 Conclusion

- 4.1.1 In conclusion Axis is continuing to promote the Site, at land at Station Fields, Foxton, Cambridgeshire that was previously submitted as part of the 2025 'call for sites' for up to 2000 dwellings.
- 4.1.2 These representations have set out our principal concerns relating to the draft housing and jobs targets. In our view there is an over-reliance of development in a small number of large new settlements many of which require significant infrastructure to enable their delivery. Furthermore, the draft Local Plan sets out overly ambitious housing delivery targets over the course of the plan period.
- 4.1.3 The growth strategy is unbalanced and places too much emphasis on large new settlements failing to take account of existing transport infrastructure and the role of existing railways in linking homes to jobs.
- 4.1.4 Foxton's access to a mainline railway station and its existing railway link to the CBC appear to have been ignored or underplayed in the site assessment process. Furthermore, the Local Plan has directed virtually no growth to settlements with existing railway stations, and this is a huge lost opportunity as it fails to utilise existing transport infrastructure. Consideration should be given to upgrading settlements with railway stations within the Settlement Hierarchy, particularly in light of the Government's recent announcement about focusing development in locations well served by rail. The Local plan patently fails to address this. Settlements with railway stations should be duly upgraded in the Local Plan by a position in the hierarchy to reflect this. Consequently, Foxton should be upgraded to a Minor Rural Centre, or at the very least should be acknowledged to be able to sustainably accommodate levels of growth far in excess of other group village not served by a mainline railway station.
- 4.1.5 Foxton's relatively sustainability as a location for growth means that that the settlement can accommodate an increased number of dwellings to support sustainable growth in the plan area. The Site is ideally suited to meet this need. It is located adjacent to the settlement boundary, meaning that it is within easy walking/cycling distance of the settlement's services and facilities, as well as benefitting from a direct rail link to jobs, secondary and further education.
- 4.1.6 These proposals provide significant benefits for users of the A10 and the railway. The enhancements include the removal of the level crossings (the main vehicular level crossing and two foot crossings) adjacent to Foxton railway station, and the proposed bridge running to the west of the existing level crossing. These in combination with the proposed travel hub provide a high-quality multi-modal interchange providing car and cycle parking, bus stops, and links between these and rail.
- 4.1.7 The replacement of the level crossings with a new vehicular bridge for the A10 and station footbridge and lifts provide significant public safety improvements as well as removing a

major bottleneck that causes frequent delays for traffic (including the emergency services) on the A10, with no cost to the public purse.

- 4.1.8 Although the Council is providing a greater number of dwellings per annum than what is set out in the Government's Standard Method, there are significant risks that upon adoption, the Council will not be able to maintain a five-year housing land supply. Therefore, it will be found 'unsound' at Examination as it will not comply with paragraph 72 of the NPPF, 2024.
- 4.1.9 We consider that there are fundamental issues with the distribution of housing across the Plan Period. There is an overreliance on the delivery of new settlement sites that are larger than 2,000 dwellings. Independent research from Lichfields' 'Start to Finish' confirms that there is a protracted delay in large sites submitting a planning application to the first house being delivered, and this unbalanced approach is likely to see the Council in a situation where it is unable to maintain a 5-year supply of housing land in a short time following adoption.
- 4.1.10 Therefore, there should be an increase in the number of dwellings being allocated within other sustainable settlements such as Foxton. The Site is ideally placed to provide housing at the start of the Plan Period, reducing the reliance on larger sites and ensuring a wider variety of SME housebuilders into the market.
- 4.1.11 Finally, the Council's attention is drawn to Government Planning Practice Guidance discourages the seeking of more than 10% biodiversity net gain. Therefore, the reference to 20% being actively encouraged should be removed.

**Appendix 1      Location Plan**

**Appendix 2      Station Fields Economic Case Report**

**Appendix 3      Station Fields Vision Document**

## Appendix 4      Travel Isochrones

