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Project number	5859
Version and date	V3 2026.09.23

Written Representation for the Reg 19 Consultation on the Draft Greater Cambridge Local Plan

1 Introduction

1.1 This document is a written representation prepared by Tibbalds Planning and Urban Design, on behalf of Homes England, which responds to the Regulation 19 consultation for the Draft Greater Cambridge Local Plan.

1.2 This representation primarily responds to draft Policy S/NST of the Draft Local Plan (and its supporting text and spatial framework plan), which relates to Northstowe New Town, which is classified in the Draft Plan as an "Existing New Settlement". The intention of the draft Policy S/NST is to replace the existing Northstowe Area Action Plan (July 2007).

1.3 Homes England have secured outline planning permission for Phases 2, 3A and 3B of Northstowe and are bringing forward development on these Phases as master developer, alongside a number of development partners. Phase 1 of Northstowe has already largely been delivered.

1.4 Homes England are fully supportive of the continued allocation of Northstowe as a sustainable new town and are committed to its ongoing delivery alongside Greater Cambridge Shared Planning and other key stakeholders. Homes England also supports the accelerated delivery of Northstowe, recognising its importance to meeting housing needs and the wider growth ambitions of Greater Cambridge. Northstowe is a New Homes Accelerator Site and, given its existing planning permissions and advanced stage of delivery, policy should support and facilitate this acceleration rather than introduce complexity, constraints or uncertainty which could delay delivery. This representation therefore comments on draft Policy S/NST with this in mind. The topics of the comments and their section in this document are listed below:

4 S/NST – Uses associated with Northstowe, including G&T and Specialist Accommodation provision

5 Sports Hubs and Open Space

6 Indicative Spatial Framework (Figure 70)

7 Development Strategy (Figure 6)

8 Minor issues

2 Existing Planning Permissions and Planning Policy Guidance

2.1 The Northstowe Area Action Plan (AAP) was adopted by South Cambridgeshire Council in 2007. This set out the detailed planning policies, spatial development principles, infrastructure requirements and sustainability objectives for the New Town. The Northstowe AAP will no longer be part of the development plan when the draft Greater Cambridge Local Plan is adopted.

2.2 Since the adoption of the AAP, Northstowe New Town is the subject of four main overarching Outline Planning Permissions. These are set out below:

- Phase 1: S/0388/12/OL, granted in April 2014 for *Outline planning application for phase 1 of Northstowe comprising up to 1500 dwellings a primary school a mixed-use local centre (including a community building and provision for non-residential institutions financial and professional services shops cafes and restaurants drinking establishments and hot food take-aways) leisure community residential institutions cultural health and employment provision (business general industry and storage & distribution) including a household recycling centre formal and informal recreational space and landscaped areas and infrastructure works including site re-profiling and associated drainage works foul and surface water*

pumping stations two flood attenuation ponds on land east of Hattons Road and associated works including the demolition of existing buildings and structures..

- Phase 2: S/2011/14/OL, granted in January 2017 for *Development of Phase 2 of Northstowe with details of appearance landscaping layout scale and access reserved (save for the matters submitted in respect of the Southern Access Road (West)) comprising:.1) development of the main Phase 2 development area for up to 3500 dwellings two primary schools secondary school town centre including employment uses formal and informal recreational space and landscaped areas eastern sports hub remainder of the western sports hub (to complete the provision delivered at Phase 1) busway a primary road to link to the southern access construction haul route engineering and infrastructure works and.2) construction of a highway link (Southern Access Road (West)) between the proposed new town of Northstowe and the B1050 improvements to the B1050 and associated landscaping and drainage Policy Preparation Guidance*.

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

- Phase 3b: 20/02142/OUT, granted March 2022 for *Outline planning application for the development of Northstowe Phase 3B, comprising up to 1,000 homes, a primary school, secondary mixed use zone (with retail and associated services, food and drink, community, leisure, employment and residential uses), open space and landscaped areas, engineering and infrastructure works, with details of appearance, landscaping, layout, scale and access reserved. Application accompanied by an Environmental Statement*.

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

- Digital Park: S/3854/19/OL, granted July 2023 for *Outline Planning Application for residential development of up to 80 dwellings and associated infrastructure (considering access only) following demolition of existing buildings.*

- Land West of Station Road: 20/03598/OUT, granted July 2022 for *Outline Planning with all matters reserved, except for the vehicular accesses onto Station Road, for the demolition of a single dwelling and associated buildings and development of up to 107 dwellings (including affordable housing) and employment/ community/ cafe/ development together with parking areas, landscaping and all associated infrastructure.*

3 Policy Preparation Guidance

3.1 The National Planning Policy Framework requires Local Plans to be prepared positively, to be clearly written and unambiguous, and to provide a practical framework for decision-making (NPPF, Chapter 2). The Planning Practice Guidance reinforces this approach by emphasising that Local Plan policies should be clear, justified, effective and based on an understanding of how development will eventually be delivered. This is delivered by the “Tests of Soundness” which seek to ensure that Local Plans and policies are:

- Positive;
- Appropriate;
- Effective;
- Consistent with National Policy and;
- Conforming with any adopted spatial development strategy.

3.2 Conforming with any adopted spatial strategy does apply in the case of Northstowe nor the draft Greater Cambridge Local Plan as there is current no adopted spatial strategy.

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

3.4 This is particularly important given the advanced stage of Northstowe's delivery and the late stage of plan preparation at which these matters are now being considered. Housebuilding in Phase 1 of Northstowe is effectively complete, and Phase 2 has approximately 1260 homes already the subject of reserved matters approval. Accordingly, any additional requirements which create uncertainty over the implementation of the existing permissions have the potential to delay the accelerated delivery of Northstowe at a time when bringing forward housing delivery is a critical priority for Greater Cambridge.

3.5 Local Plan policy has a different role in comparison to outline planning permission, reserved matters applications and planning conditions / obligations. Where a site already has planning permission (even in outline form), the role of policy should be to support delivery of the permission and provide strategic guidance for any remaining or future applications, such as subsequent reserved matters applications.

3.6 The descriptions of development set out in Paragraph 2.2 above set the overall quantum of development within the respective red line boundaries of those six outline permissions. There is no formal planning mechanism through the Local Plan to change the quantum of development approved by the extant outline permissions and so the draft Policy S/NST must be consistent with the approved descriptions of development and should not introduce requirements which cannot be accommodated within the approved development.

3.7 The relevant Development Management policies have also been considered alongside Policy S/NST. Homes England supports the role of Development Management policies in providing appropriate criteria and guidance for future planning applications. However, where matters are already addressed through the extant Northstowe permissions, conditions, legal agreements and approved strategies, the Development Management policies should not operate to duplicate or introduce additional site-specific requirements through Policy S/NST. In particular, the requirements of Policies H/SS and H/SH in relation to accessible and adaptable homes and specialist housing should be considered alongside, rather than in addition to, the requirements already secured through the Northstowe permissions.

Comments on the Reg 19 Draft Local Plan

4 Comment: S/NST – Uses associated with Northstowe, including G&T and Specialist Accommodation provision

4.1 The table below is a comparison of the uses as set out in the previous Reg 18 iteration of Policy S/NST against the new Reg 19 proposed wording, and proposed amendments to the policy wording. Key changes have been underlined.

Policy wording in Reg 18 Local Plan	Policy wording in current Reg 19 Local Plan	Proposed Wording
S/NST – Northstowe New Town 7. The new town of Northstowe is allocated for mixed-use development, comprising: a. Approximately 10,180 homes in a wide range of dwelling types and tenures including: ii. Approximately 1,050 units of specialist accommodation (Use Class C2 and C3), particularly for older people or those with disabilities; and	S/NST – Northstowe New Town 6. The new town of Northstowe is allocated for mixed-use development, comprising: a. Approximately 10,180 homes <u>(delivering 6,201 homes within the plan period)</u> in a wide range of dwelling types and tenures including: ii. <u>24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches, each on approximately 1</u>	S/NST – Northstowe New Town 6. The new town of Northstowe is allocated for mixed-use development, comprising: a. Approximately 10,180 homes (delivering 6,201 homes within the plan period) in a wide range of dwelling types and tenures including: <u>ii. Permanent Gypsy and Traveller pitches located outside but in close</u>

iii. 24 permanent Gypsy and Traveller pitches (within two sites of 12 pitches, each on approximately 1 hectare of land).	hectare of land) located within but on the edge of the development, or outside but in close proximity to the site, meeting requirements of Policy H/GT; iv. Approximately 850 units of specialist accommodation (Use Class C2 and C3), particularly for older people or those with disabilities;	proximity to the site, meeting requirements of Policy H/GT; iv. Specialist accommodation (Use Class C2 and C3), particularly for older people or those with disabilities;
S/DS – Development Strategy 2.101. …Gypsy and Traveller pitches are therefore required within the following strategic sites (as set out in the allocation policies): Northstowe: 24 pitches	S/DS – Development Strategy 2.95. …Gyspy and Traveller pitches are therefore required within the following strategic sites (as set out in the allocation policies): Northstowe: 24 pitches	S/DS – Development Strategy ~~2.95. …Gyspy and Traveller pitches are therefore required within the following strategic sites (as set out in the allocation policies):~~ ~~Northstowe: 24 pitches~~
S/DS – Development Strategy 2.108. …Specialist housing is therefore required within the following strategic sites (as set out in the allocation policies): Northstowe: 850 units for specialist housing (within the up to 8,500 dwellings)	S/DS – Development Strategy 2.102. …Specialist housing is therefore required within the following strategic sites (as set out in the allocation policies): Northstowe: 850 units for specialist housing (within the up to 8,500 dwellings on phases 2, 3A and 3B)	S/DS – Development Strategy ~~2.102. …Specialist housing is therefore required within the following strategic sites (as set out in the allocation policies):~~ ~~Northstowe: 850 units for specialist housing (within the up to 8,500 dwellings on phases 2, 3A and 3B)~~

4.2 Policy S/NST part 6a includes the requirement for 24 permanent Gypsy and Traveller pitches and approximately 850 units of specialist accommodation (Use Class C2 and C3). These requirements for Northstowe are not committed to or consistent with the outline development descriptions and are therefore adding additional layers of policy, which introduces unnecessary prescription, complexity and uncertainty and constrains the delivery of the approved development, rather than enabling it. This risks undermining the effectiveness of the Local Plan, as the policy is not sufficiently flexible to support the implementation of the extant permissions, and would be inconsistent with national policy and guidance on positive plan-making and deliverability.

4.3 The Sustainability Appraisal ("SA") provided with the Regulation 19 Consultation does not appear to demonstrate that these requirements can be accommodated within the existing consented development at Northstowe. The SA expressly recognises that Northstowe benefits from existing planning permissions, is currently under construction and has already been subject to detailed scrutiny through the planning application process. Consequently, no equivalent site option was assessed through the HELAA and the SA assessment of Policy S/NST focuses on the specific development requirements set out in the policy. The SA therefore does not constitute evidence that the additional requirements for 24 Gypsy and Traveller pitches and approximately 850 units of specialist accommodation can be delivered within the existing approved development.

4.4 The requirement for 24 permanent Gypsy and Traveller pitches should be removed from the policy, or alternatively amended to provide greater flexibility regarding their location, given that this requirement has not been demonstrated to be deliverable within the extant outline permissions. Policy S/NST states that Gypsy and Traveller sites can be delivered either within the development or outside but in close proximity to Northstowe**.** While the latter approach provides some flexibility, the policy does not identify any specific land or demonstrate that suitable sites are available to accommodate the required 24 pitches. This is particularly important given that all of Homes England's consented land is covered by approved parameter plans which do not accommodate this use, and there is no 'blank land' within the outline consents that could readily accommodate the pitches. The SA's assessment of Policy S/NST similarly does not identify or assess the availability of land for these pitches, instead treating the provision of 24 pitches as a policy requirement and concluding that this will help meet identified housing needs. The policy should therefore avoid establishing a prescriptive requirement for 24 pitches without evidence that suitable and deliverable sites are available, whether within Northstowe or in close proximity to the development. If retained in its current form, there is a

risk that the requirement could conflict with the uses and development already planned and consented at Northstowe, or result in delays to delivery, contrary to national policy and guidance on positive plan-making and deliverability.

4.5 The requirement for 850 units of specialist accommodation should also be removed, as it introduces unnecessary complexity and an additional layer of policy that undermines the clarity of the outline permissions. Phase 2 outline permission (S/2011/14/OL) condition 12 (as amended by S/2011/14/NMA11), Phase 3A outline permission (ref. 20/02171/OUT) condition 58 and Phase 3B outline permission (20/02142/OUT) condition 53 all already require a minimum of 5% of residential dwellings within Reserved Matters Areas to meet the M4(2) standard of The Building Regulations 2010. This is a significant level of specialist accommodation provision, and it is unclear if the draft policy takes account of this. Notwithstanding our view that the policy requirement should be removed, this 5% requirement secured by the conditions could be included in policy for completeness. Furthermore, the SA identifies the provision of specialist accommodation as contributing to its significant positive housing effect for Northstowe, but does not explain whether the existing requirements for accessible and adaptable homes secured through the outline permissions have been taken into account in determining the additional quantum of specialist accommodation required, meaning the policy may be mandating a far larger number of units of specialist accommodation across Northstowe. This should also be considered alongside the proposed Development Management policies, including Policy H/SS, which already provides for accessible and adaptable homes through the M4(2) requirements. The relationship between these existing requirements and the policy S/NST requirement of 850 units of specialist accommodation is therefore unclear, and this requirement should be removed so as to avoid introducing unnecessary complexity and uncertainty that could compromise the delivery of housing in Northstowe.

4.6 The Council's Sustainability Appraisal Addendum identifies the alternative to Policy S/NST as a “No Policy” option, which was rejected on the basis that area-specific detail is required for existing new settlements. However, the reasonable alternatives assessment does not appear to consider an alternative which retains a strategic policy framework for Northstowe whilst reflecting the existing planning permissions and avoiding the imposition of additional quantitative requirements where their deliverability within the consented development has not been demonstrated. Homes England considers that this approach would provide an appropriate strategic policy framework for Northstowe whilst recognising its particular circumstances as an existing, consented and substantially committed new settlement. It is therefore considered that this represents a reasonable alternative approach which should be considered through the plan-making process.

5 Comment: Sports Hubs in open space

5.1 Policy in the Local Plan and Policy S/NST should clarify how strategic sports hubs are intended to function within areas that are designated as protected open space. Whilst policy that protects open space is supported, Sports hubs are essential in delivering the necessary sports facilities in Northstowe and require ancillary development such as car parks and sports pavilions. The current proposed policy complicates the development of this crucial infrastructure and could slow the delivery of Sports provision across Northstowe.

5.2 Policy BG/PO does not account for buildings associated with sports and leisure uses. The policy currently states: “*Development proposals will not be permitted where they would harm the character, function and/or quality of, or lead to the loss of, protected open space of environmental and/or recreational importance as identified on the policies map, or undesignated areas that fulfil the criteria used to assess protected open space, unless the existing open space can be satisfactorily replaced to an equivalent or better standard in terms of quality, quantity and accessibility.*”

5.3 The policy should be amended to state: “Development proposals, other than for buildings and infrastructure associated with or ancillary to sports and leisure uses, will not be permitted where…”. This explicitly allows sports hubs to deliver the necessary supporting infrastructure and ancillary development. Please see Appendix 1, which shows the location of Sports Hubs, which indicates where supporting infrastructure and ancillary development will be located.

6 Comment: Indicative Spatial Framework (Figure 70)

6.1 Figure 70 (Indicative Spatial Framework for Northstowe New Town) incorrectly designates the location of Parcel C2 as 'Open Space and Green Infrastructure'. Please see the attached Spatial Framework diagram which provides a corrected spatial framework for Northstowe (Appendix 1). This must be updated in the next iteration of the plan.

7 Comment: Development Strategy (Figure 6)

7.1 Figure 6 (Illustrative map showing locations of proposed new housing development from 2024 to 2045) displays Northstowe as having 6,382 homes currently planned. This differs from the 6,201 homes identified within the plan period in Policy S/NST. As the key notes that the number includes adopted allocations and existing permissions, the figure of 6,382 homes should be updated to accurately reflect current planned housing delivery in Northstowe. Homes England requests clarity on the source of the 6,382 homes figure and how it relates to the housing trajectory underpinning the Draft Local Plan.

7.2 The housing trajectory should also be reviewed to ensure that it properly reflects the accelerated delivery of Northstowe. The Infrastructure Delivery Plan confirms that the housing trajectory includes the long-term delivery of Northstowe as an existing consented development and that the concentration of housing supply from existing permissions in the earlier years reflects the advanced delivery stage of major sites. The Council's previous strategic spatial options also explicitly included increased delivery rates at existing major sites delivering beyond 2045, including Northstowe, with those assumptions retained within the current housing supply. Homes England considers it important that the trajectory continues to recognise the opportunity for accelerated delivery at Northstowe and does not inadvertently constrain or understate the contribution that Northstowe can make to meeting Greater Cambridge's housing requirements.

7.3 Homes England therefore requests confirmation that the housing trajectory and Figure 6 have been aligned with the latest anticipated delivery programme for Northstowe and appropriately reflect the potential for accelerated delivery through the existing permissions. The policy should clearly state the overall expected housing delivery of Northstowe, alongside what has been delivered to date, expected delivery during the plan period, and expected delivery beyond the plan period.

8 Comment: Minor issues

8.1 A number of miscellaneous issues have been identified that should be corrected. Whilst these issues do not constitute reasons to object to the adoption of the plan, their correction would result in a more consistent and accurate local plan.

S/DS Part 2C (iii) Employment Floorspace figure

8.2 The removal of employment floorspace figures from Policy S/NST part 6b is welcome, however Policy S/DS part 2C (iii) still states Northstowe is to provide 47,000 square metres of employment floorspace for office and research & development. As this is now inconsistent with Policy S/NST, this figure should be removed, or be prefaced with "approximately".

Town Centre Strategy and Retail Needs Assessment requirement

8.3 Policy S/NST part 6c currently states: "Retail and other Town Centre and Local Centre uses, to be provided in accordance with an up-to-date Retail Needs Assessment and/or agreed Town Centre Strategy". There is already an approved Town Centre Strategy for Northstowe, and a Retail Needs Assessment is not required by any of the outline consents and should not be introduced at this stage. This policy should be updated to state: "Retail and other Town Centre and Local Centre uses, to be provided in accordance with an up-to-date Retail Needs Assessment or agreed Town Centre Strategy".

Waterbeach Policy consistency

8.4 Policy S/NST part 22 is inconsistent with the equivalent policy for Waterbeach, policy S/WNT part 17, which is based on retaining and enhancing existing landscape features. Policy S/NST should be updated to match the wording used in S/WNT, with regards to retaining and enhancing landscape features.

S/NST Part 32 – Recycling of building materials

8.5 Policy S/NST part 32 currently states: "*Make provision for recycling existing building materials by the granting of planning permission for a plant to process such materials into hardcore and aggregates, which would be located towards the eastern edge of the Oakington Airfield*".

8.6 This policy could represent an additional requirement for Northstowe, as it seems to require a dedicated recycling facility, which does not reflect the material recycling processes that already occurs. The reuse of site-won materials currently takes place as part of construction and earthworks activities across Northstowe, and is managed through Construction Environmental Management Plans, Waste Management Plans and Material Management Plans (MMPs) registered in accordance with CL:AIRE principles, and secured through Reserved Matters Applications.

8.7 Policy S/NST part 32 should therefore be updated to state: "*Make provision for recycling existing building materials ~~by the granting of planning permission for a plant to process such materials~~ into hardcore and aggregates, ~~which would be located towards the eastern edge of the Oakington Airfield~~".*

8.8 Policy S/NST part 35(i) should be updated to remove the inclusion of unadopted roads and parking enforcement being covered by Management and Maintenance Strategies, as these subjects will be covered by Section 106 stewardship requirements.

A14 Highway Improvements

8.9 Policy S/NST part 27 makes reference to capacity improvements to the A14 corridor. All highways improvements delivered as part of the development of Northstowe, including those affecting the A14 corridor, are intended to mitigate the impacts of the Northstowe development alone. Other planning applications and site allocations should not rely on any increases in capacity and must demonstrate themselves through their own transport assessment how any capacity constraints on the A14 would be mitigated as part of their proposals.

9 Conclusion

9.1 As set out in this representation, Northstowe is already comprehensively consented through four main overarching outline planning permissions, supported by approved parameter plans, environmental assessments, technical strategies, conditions and section 106 obligations. In this context, draft Policy S/NST should be framed in a manner that is positive, clear and effective, to support the delivery and, where possible, acceleration of the approved scheme. It must avoid introducing additional requirements which go beyond the outline requirements and would likely slow progress in delivering the town.

9.2 The policies commented on in this representation risk compromising the delivery and acceleration of Northstowe by adding additional requirements beyond those found in the outline planning permissions, without sufficient evidence that those requirements can be accommodated within the consented development. To accord with the National Planning Policy Framework and the Planning Practice Guidance, these policies should be amended as suggested to support the delivery of Northstowe, rather than hinder it. Of particular note is the requirement for 24 permanent Gypsy and Traveller pitches in Policy S/NST part 6a, which is not allowed for in the outline consents. The Sustainability Appraisal itself confirms that Northstowe is an already-consented site under construction and that its assessment of Policy S/NST focuses on the specific requirements introduced by the policy rather than reassessing the site's capacity through the HELAA. The Council should therefore ensure that any additional requirements imposed through Policy S/NST are supported by clear evidence of need, locational justification and deliverability within the existing consented development. This is particularly important given the role of Northstowe in the housing trajectory and the opportunity for accelerated delivery from an already consented and substantially progressed strategic site.

9.3 The errors identified within the Indicative Spatial Framework and Development Strategy similarly introduce unnecessary uncertainty to the clear requirements of the approved planning permissions for Northstowe, and should be rectified.

9.4 The correction of the other minor issues identified would result in a more consistent and clear local plan.

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Appendix 1 – Proposed corrected Spatial Framework Diagram

