24th September 2026

Greater Cambridge Planning Service

Andy Moffat

E: [redacted]

Botanic House
100 Hills Road
Cambridge CB2 1PH

Dear Sirs,

Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation

Representations on behalf of Brockton Everlast

Policy S/C/MRG: Milton Road Garages

Savills (UK) Ltd is instructed to make representations on behalf of Brockton Everlast (BE) in relation to Policy S/C/MRG: Milton Road Garages as owner of the land.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which, at paragraph 36, required that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. These representations therefore relate to the tests of soundness set out in paragraph 36.

Summary of representations:

The Regulation 19 Local Plan is the first time in the preparation of the Greater Cambridge Local Plan that the Milton Road Garages site has been a separate allocation. The Site was previously covered by Policy S/NEC: North East Cambridge in the Draft Greater Cambridge Local Plan Regulation 18 Consultation (December 2025 – January 2026). This is therefore the first opportunity Brockton Everlast has had to make these representations..

In relation to Policy S/C/MRG Milton Road Garages Site, Brockton Everlast as owner of the Site:

- Welcomes and supports the identification of the Milton Road Garages Site for redevelopment;
- Seeks the correction of the Site Area from 2.43ha to 2.84ha in the Policy;
- Seeks a change to the policy to make it explicit that any dwelling number or floorspace figures in the policy are not a ceiling on the quantum of development;
- Seeks a change to the policy to make clear that a wholly / predominantly residential redevelopment would also be supported;

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- Seeks a change to the policy to reference Research and Development facilities, light industrial space and / or retail floorspace (rather than Research and Development facilities, light industrial space or retail floorspace);

- Agrees that criteria a., c., and d. of the Policy relating to no unacceptable impacts, potential contamination remediation and surface water drainage are sound;

- Contends that criterion b. needs to be changed to make it sound by changing the reference from preventing adverse impacts to preventing unacceptable impacts; and

- Welcomes the Supporting information but contends that the precise wording of 3.1.39 and 3.1.40 need to be changed to make them sound by referencing the correct site area, and by requiring development to have regard to rather than complement the site's immediate surroundings.

As landowner, BE welcomes and supports the identification of the Milton Road Garages Site for redevelopment, but seeks changes to the policy wording to make it sound.

The Regulation 19 Local Plan is the first time in the preparation of the Greater Cambridge Local Plan that this Site has been a separate allocation. The Site was previously covered by Policy S/NEC: North East Cambridge in the Draft Greater Cambridge Local Plan Regulation 18 Consultation (December 2025 – January 2026). This is therefore the first opportunity BE has had to make these representations.

Policy S/C/MRG Site Area

The policy states the Site area as being 2.43 hectares, a site area figure that was included in the Cambridge Local Plan 2018 (CLP). The Site area has now been increased to include the Vindis Site, which is welcomed and supported, but the site area is still (and now erroneously) stated as being 2.43 hectare whereas the increased site area is now 2.84 hectares.

Change required: Site area to be correctly stated as being 2.84 hectares.

Policy S/C/MRG Site Capacity

The Policy states the capacity as being for approximately 95 homes, ancillary uses and approximately 5,000 square metres business / retail floorspace.

95 dwellings is the same number referenced in the allocation of the 2.43 hectares site in the CLP, although the CLP made clear that the '95 dwellings' '50 dph' '0.53 ha employment' were an:

> "Approximate number based on initial assessment in Strategic Housing Land Availability Assessment (SHLAA); final number may be greater or smaller depending on detailed assessment and detailed design." *(Site M1 Appendix B of the CLP)*

There are a number of policies and paragraphs in the Regulation 19 Local Plan that reference optimising / maximising the density of development in sustainable / well-connected locations within the Cambridge urban area including *(with the **underlined bold** text being our emphasis)* as follows:

"Policy S/DS: Development Strategy

*1. The need for jobs and homes will be met as far as possible in the **following order of preference**, having regard to the purposes of the Cambridge Green Belt:*
*a. **Within the Cambridge urban area**;*
b. On the edge of Cambridge;
c. At an expanded Cambourne;
d. At other new settlements; and
e. In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres …."

*"**Cambridge urban area***

*"2.56. Our evidence and Sustainability Appraisal confirm that the urban area of Cambridge remains a highly sustainable broad location for additional homes and jobs, relating to its accessibility to existing jobs and services. It also provides the most significant opportunities for reusing previously developed land and **optimising densities in these well connected locations**. A number of existing allocations are proposed for retention in this broad area."*

*…."2.59. In addition to North East Cambridge, considering its particular sustainability merits, the strategy seeks to **maximise supply from all other sources in the Cambridge urban area**. This includes optimising densities on other sites and identifying a number of smaller allocations that are opportunities for regeneration and estate renewal, drawing on engagement with the Cambridge Investment Partnership. Further to this, several new opportunity areas for regeneration have been identified alongside carrying forward those identified in the Cambridge Local Plan (2018) that have yet to come forward."*

"Policy S/SH: Settlement hierarchy

Cambridge

1. *Residential development and redevelopment **without any limit on individual scheme size** will be permitted within Cambridge's defined development extent as defined on the Policies Map, provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development…."*

"Policy GP/HD: Housing density

…..High density development in sustainable locations

*2. Subject to satisfactorily demonstrating the above, **higher density development that exceeds local prevailing densities will be supported** provided the site is:*
g. Within or within walking and cycling distance (800m) of Cambridge City Centre or a Town, District or Local Centre;*
h. In close proximity (800m) to active travel provision including high quality walking and cycling infrastructure; and

i. Well served (1,200m) by existing or proposed high quality public transport such as the Cambridgeshire Guided Busway, a transport interchange or railway station.

In these locations, higher density development proposals must:
j. Provide car parking at or below the adopted car parking standards, and
k. provide cycle parking at or in excess of adopted cycle parking standards."

**Savills Note: North East Cambridge is an Emerging District Centre in the Regulation 19 Local Plan within which the Site is located.*

This provides clear support for optimising density, maximising supply, no limit on individual scheme size and higher density development that exceeds local prevailing densities on sites.

Brockton Everlast is committed to optimising density and maximising supply in this well-connected location within the Cambridge urban area. A higher number of dwellings is anticipated to be achievable on this Site than set out in the Policy. Moreover, it is important to ensure that any number of dwellings referenced in the Local Plan is not perceived by any party to be a maximum. The Local Plan should therefore make explicit that they are not maximums.

With the amount of commercial development coming forward in North East Cambridge, a mixed use development that includes homes; ancillary uses (F1 and F2); and Research and Development facilities, light industrial space or retail floorspace is broadly supported, but the policy also needs to make clear that a wholly / predominantly residential redevelopment would be supported. The reference to Research and Development facilities, light industrial space or retail floorspace needs to reference Research and Development facilities, light industrial space and / or retail floorspace to allow for a potential mix of those uses rather than only allowing for one of those uses.

Changes required:

- The Local Plan to make explicit that approximate capacities are not ceilings or maximums, with the appropriate capacity for the Policy S/C/MRG: Milton Road Garages site being determined by a design-led approach taking advantage of opportunities to optimise density and maximise supply having regard to the surroundings and wider impacts;
- The policy to make clear that a wholly / predominantly residential redevelopment would be supported; and
- The policy to reference Research and Development facilities, light industrial space and / or retail floorspace.

Policy S/C/MRG Criteria

The policy wording requires that development proposals must demonstrate how they will meet five requirements. Taking each in turn:

"a. Buildings should, in regard to local context, building heights, densities, massing and contextually appropriate materials, be designed to ensure no unacceptable adverse impacts on the local or wider skyline and views"

It is agreed that new buildings on the site should be designed to ensure no unacceptable adverse impacts on the local or wider skyline and views. The reference to 'unacceptable' adverse impacts is welcome as it recognises that there may be circumstances where some adverse impacts may be acceptable as part of the planning balance.

No change required.

> **"b. Respond sensitively to its context, including neighbouring homes at Lovell Road and Seeleys Court, to prevent overlooking and adverse impacts on daylight and sunlight"**

It is agreed that development on the Site will need to respond sensitively to its context, including neighbouring homes at Lovell Road and Seeleys Court.

However, the references to:

> "…to prevent overlooking and adverse impacts on daylight and sunlight"

are not justified. Development should not have to prevent (any) overlooking, and some adverse impacts on daylight and sunlight may be acceptable.

Whilst the Local Plan is to be examined with respect to the NPPF 2024, it is relevant to note that the NPPF 2026 includes at L2 reference to:

> "….acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space."

and P3:

> "…development proposals should:…"not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree."

Proposed Submission Local Plan Policy GP/QD: Achieving high quality development does not require that there are no adverse impacts on residential amenity. Instead, it seeks to protect the amenity of neighbouring uses and states that design should minimise adverse impacts including loss of privacy, overlooking, overshadowing, poor daylight/sunlight access, microclimate effects, artificial lighting, noise, vibration, fumes, odours, and other forms of pollution.

There should be no requirement to ensure there is no overlooking and / or no adverse impacts. Instead, the requirement needs to be that there are no unacceptable impacts on residential amenity.

Change required: Change "to prevent overlooking and adverse impacts on daylight and sunlight" to "to prevent unacceptable overlooking and unacceptable impacts on daylight and sunlight".

> **"c. Potential contamination on site will require appropriate investigation and remediation"**

It is agreed that potential contamination on site will require appropriate investigation and remediation, and this criterion is accepted as being sound.

No change required.

"d. Proposals must respond appropriately to potential surface water drainage constraints"

It is agreed that proposals must respond appropriately to potential surface water drainage constraints, and this criterion is accepted as being sound.

No change required.

"e. The layout must consider the existing electricity sub-station on site, securing its ongoing operation through successful integration within the future development or relocation within the site, subject to appropriate mitigation"

It is agreed that the layout must consider the existing electricity sub-station on site, securing its ongoing operation through successful integration within the future development or relocation within the site, subject to appropriate mitigation. Planning permission was granted on the 20th July 2026 for:

"Construction of a substation compound, to incorporate 3 primary transformers and a switch house building (with associated basement) to accommodate the required 33kV and 11kV switchgear and associated fencing
Land North West Of 379 To 381 Milton Road Cambridge"

That application was for a replacement substation for the existing sub-station on site, and with the replacement station being on the western part of the allocation site. Notwithstanding that recent approval, the flexibility provided by the current policy wording for consideration of the existing electricity sub-station on site or relocation within the site is welcome and necessary, and this criterion is accepted as being sound.

No change required.

Supporting information to Policy S/C/MRG

The Policy is supported by Supporting information. Taking each in turn:

"3.1.39 This 2.43 hectare garage and car showroom site provides an opportunity for a sustainable mixed-use development on previously developed land within Cambridge. Comprehensive redevelopment of the site has been supported through successive development plans since its allocation in the 2006 Cambridge Local Plan. Identified constraints can be addressed through appropriate investigation of the site and careful and sensitive design."

As above, the Site Area needs to be corrected. It is agreed that identified constraints can be addressed through appropriate investigation of the site and careful and sensitive design.

Change required: Site area to be correctly stated as 2.84 hectares.

"3.1.40 In particular, the impact of higher density development on adjacent residential areas would need to be explored and tested carefully through a design led process, to ensure heights, densities and massing complement the site's immediate surroundings and any transition across the site is appropriate and sympathetic, reflecting existing

lower density residential streets to the west and higher densities and commercial buildings to the north of the Cambridgeshire Guided Busway."

It is agreed that the impact that higher density development would have on adjacent residential areas would need to be explored and tested carefully through a design led process, to ensure heights, densities and massing have regard to the site's immediate surroundings and any transition across the site is appropriate, having regard to existing lower density residential streets to the west and higher densities and commercial buildings to the north of the Cambridgeshire Guided Busway. However, the requirement to complement the site's immediate surroundings and reflect existing lower density residential streets to the west and higher densities and commercial buildings to the north of the Cambridgeshire Guided Busway is not justified. This is because Regulation 19 Local Plan Policy GP/HD: Housing density expressly supports higher density development that exceeds local prevailing densities on sites that meet specific criteria, which includes this Site. With the change below, it remains the case that development needs to be appropriate.

Change required: Change "…complement the site's immediate surroundings and any transition across the site is appropriate and sympathetic, reflecting…" to "have regard to the site's immediate surroundings and any transition across the site is appropriate, having regard to the existing lower….".

"3.1.41 This policy should be read in conjunction with Policy S/AMC/NEC: North East Cambridge, which designates a wider area, including this site, as an Area of Major Change."

It is recognised that this Site forms an important part of the wider North East Cambridge Area of which it forms a part.

No change required.

Summary

In summary, in relation to Policy S/C/MRG Milton Road Garages Site, Brockton Everlast:

- Welcomes and supports the identification of the Milton Road Garages Site for redevelopment;
- Seeks the correction of the Site Area from 2.43ha to 2.84ha in the Policy;
- As an effective policy for the Milton Road Garages Site needs to deliver the objectives of optimising density, maximising supply, no limit on individual scheme size in Cambridge and higher density development that exceeds local prevailing densities on sites in specific locations (as set out in the Regulation 19 Local Plan), the policy needs to make explicit that any dwelling number or floorspace figures in the policy are not a ceiling to the quantum of development;
- Seeks a change to the policy to make clear that a wholly / predominantly residential redevelopment would also be supported;
- Seeks a change to the policy to reference Research and Development facilities, light industrial space and / or retail floorspace (rather than Research and Development facilities, light industrial space or retail floorspace);

- Agrees that criteria a., c., and d. of the Policy relating to no unacceptable impacts, potential contamination remediation and surface water drainage are sound;

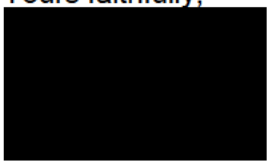
- Contends that criterion b. needs to be changed to make it sound by changing the reference from preventing adverse impacts to preventing unacceptable impacts; and

- Welcomes the Supporting information but contends that the precise wording of 3.1.39 and 3.1.40 need to be changed to make them sound by referencing the correct site area, and by requiring development to have regard to rather than complement the site's immediate surroundings.

Brockton Everlast requests the opportunity to appear before and be heard by the person(s) carrying out the examination on this matter in order to ensure that these points are fully understood and the necessary modifications to the Local Plan are made.

We trust that the above comments are clear and helpful. We look forward to continuing positive engagement with the Council and key stakeholders to deliver the extensive benefits and opportunities which a redevelopment of this site can unlock.

Yours faithfully,



Andy Moffat
Planning Director and Head of Department