24th September 2026

David Jackson MA MRTPI

E: [redacted]

savills.com

Dear Sir/Madam

Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation

Representations on behalf of Martin Grant Land and Landoak Estates

Savills (UK) Ltd is instructed to make joint representations on behalf of Martin Grant Land (MGL), the Cambourne North Landowners Consortium (landowners), Landoak Estates (LE) and Davison & Co (POTCO) Ltd (landowner), with reference to Cambourne North.

MGL and LE previously made separate representations at the Regulation 18 stage in January 2026, MGL as reference 131257, and LE (as Endurance Estates as they were at the time) as reference 131481. Since the submission of these separate representations, MGL and LE have been working together and are committed to continuing that work together to deliver Cambourne North. The submission of these joint representations is a demonstration of that collaboration.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which 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. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
d) Consistent with national policy.

These representations therefore relate to these tests.

MGL, Cambourne North Landowners Consortium, LE and Davison & Co (POTCO) Ltd very much welcome and support Cambourne North being included as an integral part of the Councils' spatial strategy for the Local Plan in order to meet its housing, employment and community needs and deliver sustainable development. However, they object to and are seeking changes in relation to the level of prescription in the Proposed Submission Local Plan details which are not justified. The greater part of these representations therefore relate

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Sensitive

to Policy S/CBN, which is the principal policy in the plan that addresses the Cambourne North scheme. The representations seek modifications to the policy to allow for a level of flexibility that is required to enable the policy to be applicable and resilient for the 20+ years over which the project will be implemented. Subject to these proposed modifications to the detail of the Proposed Submission Local Plan, it is clear that Cambourne North can be delivered as an expansion of 'One Cambourne'.

Infrastructure and Viability

Cambourne to Cambridge Guided Busway (Policy S/CBN parts 6, 15, 37 and 39)

In the decision made by the Minister of State Lord Hendy of Richmond Hill CBE dated the 8th September 2026, the Cambourne to Cambridge Guided Busway (CtoC) was granted deemed planning permission with construction expected to commence in 2027 (reference: TWA/24/APP/03). It can therefore be assumed that occupations at Cambourne North would follow delivery of CtoC. The consented route links Cambridge with Upper Cambourne, with Upper Cambourne being the eastern part of Cambourne. Flexibility needs to be maintained to ensure effective delivery when details are finalised of an extension of the CtoC public transport corridor through the remainder of Cambourne and Cambourne North, and beyond to Papworth Everard.

East West Rail (Policy S/CBN parts 6, 10, 15, 16, 37 and 39)

The Development Consent Order (DCO) application for East West Rail (EWR) is expected to be submitted in 2027, with an examination in mid-2028. The Cambourne North allocation is compatible with its delivery, and the alignment of the EWR can be accommodated as part of the development. The DCO is expected to show crossings and mitigation that are required for EWR alone and discussions continue between EWR, MGL and LE on the mechanisms to ensure that any additional requirements of Cambourne North, including connections between Cambourne and Cambourne North can be delivered. At this time though, it is simply too early to say exactly what will be necessary, to confirm costs and viability, and be clear who will fund and deliver them.

The requirement in part 16. of Policy S/CBN that "Developers will be required to pay a financial contribution to the delivery of an enhanced EWR Station to support the new station interchange…" is unclear in terms of its reasoning, scope and the level of any such contribution, and is not justified.

By way of an example of the flexibility and changes that are required, the requirement for "A new public transport and active travel bridge to the west of the A428 dumbbell roundabout to link with the emerging Cambourne West development" in part 37. of Policy S/CBN is too prescriptive. It is recognised that a connection is required between Cambourne North and Cambourne West, but there are options to achieve this including potentially utilising Caxton Gibbet. The requirement needs to be less prescriptive and require "A new public transport and active travel connection to the west of the A428 dumbbell roundabout to link with the emerging Cambourne West development".

Part 16 needs to be clarified, and we reserve the right to comment further on that clarification, and part 37 needs to be changed as set out above.

Trip Budget (Policy S/CBN part 38)

MGL / LE support the application of an appropriate trip budget as part of an overall transport strategy for the site. The definitive trip budget should be based on detailed evidence and be agreed prior to submission of the outline application according to part 38. of Policy S/CBN. This approach is generally welcome, however, the initial trip budget of c.4,000 vehicular trips in the AM peak and c.4,000 trips in the PM peak numbers contained in paragraph 3.3.15 of the Supporting information to Policy S/CBN is not properly evidenced in the Councils' supporting work.

MGL / EE therefore object to the specific trip budget referred to in paragraph 3.3.15 on the basis that it is not evidenced and therefore not fit for purpose, and should be removed.

Water (Policy S/CBN part 44)

Part 44. of Policy S/CBN states that "Conditions are likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the LPA is satisfied that there is scope for earlier development". The issue is understood but regulatory stages still need to be completed. Part 44. of Policy S/CBN needs to be removed. It is too prescriptive and indeed not justified because it is not possible to say at the moment that first occupations "are likely" to have to be restricted.

Climate Change

With the costs uncertainty outlined above, along with the uncertain cost implications of the Local Plan's Climate Change policies including Policy CC/NZ (Net zero carbon new buildings) and Policy CC/WE (Water efficiency in new developments), it is not possible to support the Climate Change policies in the Proposed Submission Local Plan at this time. We therefore have no alternative but to object to the lack of flexibility in these policies. Further comment on the Climate Change policies is included under the Other Matters (Other Policies) heading below.

Supporting information (Policy S/CBN paragraph 3.3.9)

Policy S/CBN is followed in the Local Plan by Supporting information. Paragraph 3.3.9 sets out infrastructure requirements for "the site, in combination with Cambourne", which need to be properly tested. It is unclear from the text whether the section relates to the plan period only, or a longer period. The paragraph therefore requires further clarification and / or supporting evidence to be useful in guiding the future delivery of the project and supporting infrastructure.

Viability Overall

The viability analysis provided as part of the evidence base for the Proposed Submission Local Plan is not fit for purpose. MGL / LE acknowledge the complexity of the issue and the challenges of seeking to establish evidence over such an extended period of time, particularly given current market circumstances and overall uncertainty. The circumstances support MGL / LE's position that undue prescription needs to be removed from the Local Plan to allow greater flexibility.

Site Area and Strategic Enhancement Area (SEA) (Policy S/CBN, parts 1 and 33)

Part 1. of Policy S/CBN states that the built area of North Cambourne should be contained within the Site Allocation boundary identified on the Policies Map. The Site Allocation boundary identified on the Policies Map no longer includes land to the northwest that was included within the Site Allocation boundary in the Draft Local Plan Regulation 18 Consultation (2025). The reasoning for now excluding this land is not clearly justified. At this time, there is insufficient evidence to draw a hard line to limit the extent of built development in this area. MGL / LE therefore seek flexibility in how the limits to future development are determined in order to allow the potential of the area to be optimised for the purposes of delivering highly sustainable development. The current proposed line of the Site Allocation is not justified on the basis of the evidence base provided by the GCSP.

The expectations on delivery of the SEA are also not clear and therefore not effective. As is it not required, or certainly not all required, to mitigate the impacts of the development, it cannot be for the Cambourne North developers to wholly deliver the SEA. Part 33. of Policy S/CBN requires the applicants to prepare a Biodiversity Enhancement, Implementation and Management Plan with "The Biodiversity Enhancement, Implementation and Management Plan, alongside the site wide Masterplan, will need to consider all aspects of the SEA area, including appropriate and proportionate visitor facilities and signage". MGL / LE object to this requirement as

it is not justified in terms of the requirement for the applicants to "consider all aspects *(our underlining)* of the SEA area".

Spatial Framework (Policy S/CBN parts 2, Figure 66 and paragraph 3.3.14)

It is welcome that the Spatial Framework is now expressly "Indicative" and the masterplan required by the policy "should be broadly aligned with the indicative Spatial Framework" in the Proposed Submission Local Plan. Nonetheless, the inclusion of narrow, specific alignments of crossings and connections indicates a degree of specificity and detail that is not supported by the evidence at this stage (as set out above) and therefore needs to be changed. Indeed, paragraph 3.3.14 of the Supporting information rightly states that the precise form, location and scale of transport interventions will be confirmed through subsequent stages of design and modelling at the planning application stage.

MGL / LE are exploring links to the A1198 with a specific focus on achieving direct access from the Caxton Gibbet roundabout, and vehicular links to Cambourne and the A428 via the existing dumbbell roundabout. As above, MGL / LE therefore request that the Spatial Framework should not show narrow, specific alignments of connection links that are not known to be deliverable, or be seen to exclude connections that are.

A light pink line as included in the northwest corner of the Framework is not on the key.

The comments above under the Site Area and Strategic Enhancement Area (SEA) heading relating to the site allocation and SEA boundaries are also relevant to the Spatial Framework too.

Employment floorspace (Policy S/CBN, paragraph 3.3.7)

The policy allows for approximately 108,000 square metres gross internal area (GIA) of employment floorspace. MGL / LE generally welcome the wording in 3.3.7 of the Supporting information and consider that it is essential that it is retained where it states:

"*The Councils would broadly support more employment floorspace than what is set out in the policy provided it would positively contribute to placemaking objectives and can be delivered within the trip budget for the site*".

Place book (Policy S/CBN, part 3)

The requirement and purpose of a Place book as required by part 3. of Policy S/CBN is unclear and therefore at risk of not being effective. The policy additionally requires the preparation of a masterplan and design codes. The NPPF 2024 definition of a Design Code includes "…The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area". The reference is to a "masterplan or *(our underlining)* other design and development framework for a site" refers to Masterplans and design codes. The requirement for a Place book in addition to a masterplan and design codes has not been justified.

Specialist Housing (Policy S/CBN, part 9)

Whilst it is clearly important that a mixed community is created at Cambourne North, the prescriptive requirement for 10% of the dwellings as specialist accommodation in part 9. of Policy S/CBN would have an impact on viability and, moreover, may not meet an identified need over time. To be effective over the long term over which the policy will be implemented, the policy needs to be more flexible and require delivery at levels as determined through local needs analyses to be undertaken throughout the delivery period of the development.

Supporting information (Policy S/CBN, paragraph 3.3.8)

Paragraph 3.3.8 of the Proposed Submission Local Plan needs to be changed where it refers to "d*ensities of 60-70 dph or higher could be achieved in and around the Town Centre and Station Quarter*" to accord with part 17 of the policy which states that "Focusing high-density development (circa. 90 dwellings per hectare) at the Station Quarter and Town Centre quarter as well as at neighbourhood centres".

Other Policies

Climate Change

Policy CC/NZ Net zero carbon new buildings

To be effective, changes are required to Policy CC/NZ as:

- Greater flexibility is required to ensure that the policy does not compromise development;
- The space heating targets may be challenging in certain circumstances and flexibility is therefore needed;
- EUI targets have not yet been formally confirmed or adopted; and
- If retained, the EUI targets need to be adaptable to ensure they can respond appropriately to differing site contexts and design constraints.

The requirement in Policy CC/NZ that "Proposals must seek to maximise opportunities to generate on-site renewable energy and facilitate flexibility to enable the development, where possible, to achieve all energy demands through onsite energy generation" also does not allow for the necessary planning balance to be assessed between 'maximise opportunities where possible' and other planning considerations and needs to be changed.

Policy CC/WE Water efficiency in new developments

An inflexible requirement for 80 litres of water per person per day for schemes of 100 or more dwellings as required by Policy CC/WE is stringent compared to the current Building Regulations standard of 110 litres per person per day. Limiting water use to this level will likely require advanced water reuse systems and dual plumbing infrastructure, adding considerable cost and complexity to developments. Furthermore, the requirement for non-residential development to achieve full credits under Wat 02, Wat 03, and Wat 04, and one credit for category Wat 05 of BREEAM goes beyond minimum compliance and typically demands specialist design and technology. Wat 04 is difficult to control because it focuses on unregulated water uses, which rely heavily on end users, operational practices and decisions made after construction, and adds considerable cost and complexity to developments.

Policy CC/WE therefore needs to be changed to be more flexible to allow for site specific constraints, including costs / viability, and be flexible enough to respond to the water availability position at the date of the application/detailed stage. This includes removing the prescription in Policy S/CBN: Cambourne North where it states that it is likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or when alternative headroom is secured.

Policy CC/IW: Managing Flood Risk

The policy approach to integrated water management, sustainable drainage and water quality also needs to be more flexible. Designing for no runoff during small rainfall events may be difficult to achieve on constrained or high-density sites, and a performance-based approach that allows equivalent mitigation measures, where strict compliance is not feasible, is required. Mandating green or brown roofs on all flat roofs can present significant challenges, including structural capacity, cost implications, and heritage constraints. Flexibility is required where technical or viability issues arise, supported by alternative biodiversity measures.

Biodiversity and green spaces

Policy BG/BG: Biodiversity and geodiversity for major development

The requirement in Policy BG/BG to provide a minimum 20% biodiversity net gain (BNG) on-site where this is feasible and effective, or off-site where onsite options for BNG have been evidenced to be exhausted as agreed with the Local Planning Authority, is not justified and needs to be changed. The requirement for onsite options to be exhausted does not allow for the necessary planning balance to be assessed having regard to other planning considerations. In the case of Policy S/CBN: Cambourne North, it may be most appropriate to provide (part of the) BNG within the Strategic Enhancement Area rather than within the Site Allocation boundary.

Policy BG/EO: Providing and enhancing open spaces

The Proposed Submission Local Plan is the first stage of the Local Plan that includes open space standards for major residential and / or commercial developments. The proposed standard for residential development of 7 hectares per 1,000 of the population in Policy BG/EO is based on current provision across Cambridge City and South Cambridgeshire which is not in itself a sound basis for determining what needs to be delivered as part of new development. In addition, the requirement in Policy BG/EO for all commercial developments of 2,000 square metres or more (Gross Internal Area) to demonstrate open space provision equivalent to 2.0 hectares of open space per 1,000 employees and / or provision off-site via financial contributions is not justified.

Policy WS/NC: Meeting the needs of new and growing communities

In addition to the contributions for community facilities based on a standard of 129 square metres floorspace per 1,000 additional population set out in the Draft Local Plan Regulation 18 Consultation (2025), the Proposed Submission Local Plan now additionally requires, in Policy WS/NC contributions for cultural facilities of 100 square metres per 1,000 additional population and 1.5% of Net Internal Area commercial space. This would be an additional cost that would need to be considered as part of overall viability at Cambourne North.

Heritage

Policy GP/HA: Designated heritage assets

Whilst Policy GP/HA does now include “Harm to the significance of a designated heritage asset or its setting will be weighed against public benefits” it retains the requirement that “Development proposals that affect designated heritage assets … must a) Preserve or enhance the significance of the designated heritage asset(s) and its setting, and the character or appearance of Conservation Areas”. Criterion a) needs to be reworded to state “Pay special attention to the desirability of preserving or enhancing the significance of the designated heritage asset(s) and its setting, and the character or appearance of Conservation Areas including views into, within and out of them” as harm can be outweighed by public benefits. This revised wording brings the policy in line with the wording of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF 2024.

Affordable Workspace

Policy J/AW: Affordable workspace and creative industries

The Proposed Submission Local Plan is the first stage of the Local Plan that requires affordable workspace as part of new office, R&D, Industrial and Storage developments. The requirements are set out in Policy J/AW and require 10% of net additional floorspace (GIA) as affordable workspace which should be a minimum of 20% below prevailing market rents in perpetuity. This would have an impact the viability of commercial development and would need to be considered as part of overall viability at Cambourne North.

Affordable Housing

Policy H/AH: Affordable housing

The policy needs to be changed to provide more flexibility in the proposed affordable housing tenure requirements in accordance with Government policy to include, for example, other forms of intermediate housing like discount market housing. The policy also needs to expressly recognise that viability may justify a different percentage and / or mix. It is noted that there is no reference to how the affordable housing policy applies to key worker accommodation. Flexibility is required to respond to changing need profile over a very long delivery of a development of this scale.

Self and Custom Build homes

Policy H/CB: Self and Custom Build homes

The policy requires all development proposals of 20 or more dwellings to provide at least 5% of the new homes as serviced plots for custom and self-build houses and/or serviced custom-build flats. This policy needs to be changed so that the quantum required is subject to a cap of 5% and subject to demand/viability. The reference to demand/viability is particularly relevant to strategic sites where it is much less likely that there will be demand for 5%, with 5% at Cambourne North equating to some 650 units. The proposed requirement for further, undefined marketing beyond an initial 12-month marketing period before plots can revert to market housing is not justified.

Request to appear before and be heard by the person(s) carrying out the examination

MGL and LE request the opportunity to appear before and be heard by the person(s) carrying out the examination on these matters.

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

Yours faithfully

[redacted]

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Head of Planning