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Proposed Submission Greater Cambridge Local Plan

Representations to Regulation 19 Draft Local Plan for Wilson Bowden Developments Limited

In respect of land at Prospects Royston (previously Three Prospects Farm, land east of Royston)

September 2026
Our Ref: 25-03099

Wilson Bowden Developments



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned are appropriately qualified and experienced Chartered Planners experienced in the commercial property sector.

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1 INTRODUCTION AND SUMMARY

1.1 These representations to the Regulation 19 draft Greater Cambridge Local Plan ('the Plan') have been prepared by Rapleys LLP on behalf of our client Wilson Bowden Developments Limited (WBD). WBD has a long-term option on land known as Prospects Royston, which lies within South Cambridgeshire, although the town of Royston itself lies within North Hertfordshire district. The extent of the Prospects Royston land is outlined in red on the aerial image below in **Figure 1**. In previous Call for Sites submissions the land was referred to as Three Prospects Farm, land east of Royston.

Figure 1: Outline of the Site, Prospects Royston (outlined in red on a Google Maps aerial image)



1.2 Our representations are made in respect of the following parts of the Plan:

- Policy S/DS: Development Strategy (detailed in section 3 below);
- Site Allocations Policies: 'Prospects Royston Reserve Site' (detailed in section 4 below); and
- Policy S/DE: Defined Development Extents (detailed in section 5 below).

1.3 In summary, our representations show that the Plan's development strategy is flawed and risky. This is because, to meet its identified local housing and employment needs, it relies on strategic allocations which can only be delivered if significant levels of costly, enabling strategic transport, water and wastewater infrastructure are provided. Yet the delivery of such infrastructure is outside of the Greater Cambridge Councils' control. This is a serious threat to the deliverability of the Plan, yet deliverability underpins the 'soundness' tests at paragraph 36 of the NPPF.

1.4 The strategy is also flawed because it does not have a 'fall-back' strategy should one or more of its major allocations be significantly delayed or indeed not be delivered during the plan period. Nor does it allow for necessary housing and employment growth at the North Hertfordshire market town of Royston, despite the Plan and its supporting Sustainability Appraisal accepting that land on the edge of Royston, lying within South Cambridgeshire, is a reasonable and sustainable strategic development option. Finally, in respect of social infrastructure, the Plan recognises that there are multiple shortfalls in sports provision in the Royston area, yet it does nothing to specifically address those shortfalls or identify land close to Royston which would be suitable for such sports provision.

1.5 In order to overcome the flaws and risks identified above and address concerns about its deliverability, the Plan should reserve sufficient land for homes, jobs and social infrastructure to meet local needs in full in the event that one or more of its largest allocations does not deliver in the plan period, or indeed at all. Our representations below demonstrate that the Plan should identify such a reserve site on the edge of Royston, specifically our client's land known as Prospects Royston.

1.6 Prospects Royston (HELAA Site ID 40511) is a large parcel of land (some 174.06 hectares in area) proposed as an extension to Royston to deliver a phased, housing led development also including employment land, extensive social and community infrastructure, including a 12.47-hectare sports hub and a 46.46-hectare nature park, and supporting transport and utilities infrastructure. An initial phase of development could comprise 96.47 ha delivering more than 500 new residential homes alongside the sports hub and other associated infrastructure. Development here would be sustainable, it would comply with the Plan's key themes and objectives, and it would play an important role in ensuring that Greater Cambridge's housing and employment needs are met in full. Furthermore, it would also provide significant benefits for Royston and surrounding villages, both in South Cambridgeshire and North Hertfordshire. Finally, and crucially, unlike the current Plan's major allocations, it would not rely on the provision of major transport or other enabling infrastructure, meaning that its construction could commence relatively early in the plan period and its delivery in full could be completed before the end of the plan period.

1.7 For the reasons summarised above, we therefore object to the Regulation 19 draft Plan. In order to overcome our objections, the Greater Cambridge and North Hertfordshire authorities should work together in co-operation to ensure that the Plan's development strategy (Policy S/DS) is expanded to identify land at Prospects Royston as a reserve site for sustainable and strategic mixed-use housing and employment growth, with supporting social infrastructure, including a sports hub and nature park. Prospects Royston is a suitable, sustainably located and deliverable site of a sufficiently strategic scale to be identified for formal allocation in a future update to the Plan. This would afford the Plan future flexibility and resilience if one or more of the currently proposed strategic scale allocations fails to progress ~~deliver~~ ~~as expected~~, for whatever reason.

1.8 In addition, the draft Duty to Corporate Statement of Common Ground [SoCG], especially the Supplementary SoCG 'Meeting sports needs around Royston' [page 54 of the overall report], confirms that the parties (Cambridge CC, South Cambridgeshire DC and North Herts DC) in respect of Royston's outdoor sports needs "...agree that there are multiple shortfalls in sports provision in the Royston area" and "are committed to collaborating through future plan processes to explore how both short- and longer-term needs for outdoor sports facilities in the Royston area should be met." [page 3 of the Supplementary SoCG]

1.9 Given these identified sports needs Prospects Royston has the potential to help meet some or all this need. Appended to these representations is our illustrative masterplan for the site which identifies a sports hub of 12.47 ha. This would be part of the first phase of development to come forward with enabling residential development. Page 9 of the Vision Statement at Appendix 1 sets out an indicative sports hub layout. At this stage this is a flexible area and has not been designed in any detail but comprises provision of multiple pitches, MUGAs and other facilities supporting a wider range of different sports, in response to the deficiencies described in the draft SoCG. This would deliver tangible benefits to the area in the short to medium term and not be pushed to a future local plan review process.

1.10 We consider that such a revision to Policy S/DS, together with associated revisions to the Site Allocations policies and Policy S/DE (as described in sections 4 and 5 below), would render the Plan sound and could be dealt with under the Main Modifications process, thereby meaning that the Plan can still progress to formal submission by the end of 2026.

1.11 A reserve site could be identified on the Policies Map in order that it may be utilised, if required, to meet strategic development needs should one or more of the proposed strategic allocations not deliver development as planned within the Local Plan period. We have given some thought to how a reverse site policy could be worded and set out below some initial thoughts as follows:

The following principles apply to the reserve site:

a) It is not allocated for development at the present time;
b) Unless and until it is allocated for development, Local Plan policies relating to development in the countryside will apply;
c) Development that would prejudice the future comprehensive development of the reserve site will not be permitted;
d) The status of the reserve site will only change through a review of the Local Plan, following an assessment of development need and the identification of the most appropriate locations for development.
A reserve site is identified on the Policies Map in the following location:

- Land at Prospects Royston, lying immediately north of the A505 and immediately east of the A10 on the edge of Royston.

1.12 Our representations below are supported by the following evidence base, copies of which are appended to this document:

- A Prospects Royston Vision Statement, prepared by Bradley Murphy Design (landscape architects, urban designers and ecologists). This is Appendix 1;
- An Illustrative masterplan, also prepared by Bradley Murphy Design. This is Appendix 2;
- A Landscape, Visual and Ecology Technical Note, also prepared by Bradley Murphy Design. This is Appendix 3;
- A Transport Connectivity Statement, prepared by EAS Transport Consultants. This is Appendix 4;
- A Utilities Summary Table and associated Site Plan by Stantec UK Ltd. This is Appendix 5.

2 NORTH HERTFORDSHIRE DISTRICT COUNCIL OFFICER LETTER. THIS IS APPENDIX 6.WILSON BOWDEN DEVELOPMENTS LTD.

2.1 WBD is the commercial development division of Barratt Redrow Group PLC. WBD already has an impressive track record and pipeline of successful residential and industrial sites and applications, focusing on the northern Home Counties and the Midlands. As part of one of the largest UK house builders, we are confident that the site can contribute to the long-term sustainable future of Royston bringing with it necessary supporting green, social and physical infrastructure. WBD is primarily a developer of large scale commercial and mixed-use sites.

2.2 WBD's aim is to create great places by building long term relationships to deliver high-quality developments where people aspire to work and live, and which are a pleasure to live in and will enhance communities for years to come.

3 POLICY S/DS DEVELOPMENT STRATEGY

3.1 The Plan's development strategy, which of course underpins the Plan as a whole and its requirement to meet identified local housing, employment and other needs in full, is flawed and risky, for three key reasons:

- Its major allocations rely too heavily upon the timely provision of extensive and costly strategic infrastructure, the delivery of which is both uncertain and outside the control of the plan-making authorities;
- It fails to incorporate a 'fall-back' strategy whereby sufficient additional land for housing, employment and social infrastructure is reserved, so that local needs are still met in full in the event of one or more of its largest allocations not delivering as proposed; and
- It fails to plan for growth at the market town of Royston. Such growth would provide the 'fall-back' strategy needed for the Plan and at the same time it would help to meet housing and employment needs and address existing pressures on parts of Royston's infrastructure, particularly the acknowledged multiple shortfalls in sports provision in the Royston area.

3.2 In this section of our representations, we consider these three strategy flaws and risks in turn, before concluding that they would be addressed and overcome through the identification of our client's land, Prospects Royston, as a reserve site for phased, mixed use development which could be formally allocated in a future review of the Plan, in the event that one or more of the currently proposed strategic scale allocations fails to deliver as expected.

a) Uncertainties and risks over infrastructure delivery

3.3 The Plan's larger allocations can only come forward in full once strategic transport, water supply and wastewater infrastructure improvements have been delivered. Yet these infrastructure improvements are wholly reliant on consenting, timing and funding decisions which are in the control of third parties rather than the plan-making authorities. The Plan's whole strategy for delivering homes and jobs to meet local needs is at risk because such consenting and/or funding cannot in any way be guaranteed. It is widely accepted in the UK that major infrastructure projects, particularly those which rely on public funding, are commonly delayed, rejected/refused or withdrawn (as was the case for much of the HS2 project, for example). The Plan itself acknowledges some of these risks, which include as follows:

- East-West Rail: the necessary consents and funding are awaited, yet the Cambourne North allocation is wholly reliant on such;
- The Greater Cambridge Transport Strategy (the GCTS): this is only at draft interim stage, yet all proposed allocations are affected by this. In this regard, the GCLP Development Strategy Topic

Paper recognised that "the transport strategy remains a substantive challenge that needs to be resolved";

- It is noted that the application for the Cambourne to Cambridge Guided Busway Order was confirmed by the Secretary of State on 8th September, but the necessary consents and / or delivery details are still awaited for the Cambridge South-East (known as CSET) and Waterbeach to Cambridge public transport corridors; these are particularly crucial for the Grange Farm and Waterbeach allocations;
- The Plan's Strategy Topic Paper confirms that there is uncertainty over adequate water supply being available for the Cambridge area, which is largely reliant on timely implementation by 2032 of a new pipeline from Grafham Water to Cambridge and later by a new Fens reservoir being built, although this is still at an early planning stage – a DCO application is due to be submitted in 2027, with a Secretary of State decision expected in 2028 but even if approvals and funding are secured, the reservoir would not be built and contributing to water supply until 2036 at the earliest. From the 2040s onwards, adaptive approaches and new infrastructure such as desalination will need to be applied to ensure there continues to be water available to meet needs whilst protecting the environment; and
- The Cambridge Wastewater Treatment Plant re-location from North-East Cambridge was not approved by Government, meaning that Anglian Water will have to implement significant upgrades to the existing plant instead, to ensure it can treat future wastewater flows in a sustainable way and whilst also maintaining the environmental quality of the area's chalk streams.

3.4 Other risks to delivery of the Plan's strategy include:

- Uncertainty regarding the relationship between the Combined Authority's Local Growth Plan and the Cambridge Growth Company's long-term strategy for delivering homes and economic growth, which may impact on infrastructure and delivery requirements during the plan period; and
- Uncertainties created by imminent Local Government Re-organisation.

Transport-related challenges facing specific allocations

3.5 In terms of transport related matters, paragraphs 2.35 to 2.37 [page 10] of the Transport Connectivity Statement prepared by EAS (see Appendix 4) find that:

> *2.35 'The Greater Cambridge transport evidence demonstrates that the scale and characteristics of transport intervention required to support development varies significantly between strategic growth locations.*
>
> *2.36 Several of the strategic sites identified within the Proposed Submission Local Plan require significant transport interventions, trip budgets and phased infrastructure improvements. The GCTS seeks to establish a framework through which these sites can be supported over time.*
>
> *2.37 Prospects Royston has materially different transport characteristics. The site is immediately adjacent to an established market town and already benefits from access to a mainline railway station, existing bus services, the A10 and A505 corridors and a substantial range of local services and employment opportunities.'*

3.6 In this regard, the EAS statement also confirms that the applicable national and local transport related policies establish a clear direction towards vision-led and infrastructure-led development, with paragraphs 2.81 – 2.85 [page 15] stating that:

> *2.81 'New development is expected to provide sustainable travel choices from the outset, integrate effectively with existing settlements and transport networks, safeguard future transport opportunities and coordinate the timing of development with the delivery of infrastructure.*
>
> *2.82 Prospects Royston performs strongly against these principles. It is adjacent to an established market town; benefits from existing rail, bus and highway connectivity; can connect directly to strategic active travel infrastructure; provides sufficient scale to support enhanced public transport; and can deliver transport infrastructure progressively as the site builds out.*
>
> *2.83 The emerging GCTS further strengthens this position through its recognition of Royston's functional relationship with Greater Cambridge and its identification of the A505 Royston–Granta Park corridor for further multimodal study and potential future intervention.*

2.84 Importantly, Prospects Royston does not rely upon completion of a major external strategic transport project before development can commence. Instead, the transport strategy can be developed progressively from an established baseline, with additional infrastructure provided alongside the scale and phasing of development.

2.85 There is therefore a strong transport policy basis for considering Prospects Royston as a sustainable, adaptable and deliverable strategic development opportunity capable of making a positive contribution to the Greater Cambridge growth strategy.'

What happens if infrastructure is not delivered?

3.7 In theory, if all the Plan's allocations were to be delivered in full as envisaged by the Councils, this would more than meet local housing and employment needs. However, we describe below four potential scenarios (and there will be many others) which illustrate the impact that some of the above uncertainties and risks about infrastructure could have on delivery of both homes and jobs, leaving identified needs unmet, at least in part. In producing these scenarios, we have had regard to the information and assumptions contained within the Councils' Housing Trajectory (Appendix 10 of the Councils' Development Strategy Topic Paper August 2026):

3.8 Scenario 1 assumes as follows:

- The critical Grafham Water – Cambridge water supply pipeline is delayed by 5 years, becoming operational in 2037, rather than in 2032 as the Plan envisages. This would mean that strategic housing, employment and mixed-use allocations within the Cambridge area which are reliant on the pipeline are also delayed by 5 years, with the following impact on housing completions, when compared with those envisaged in the Councils' Housing Trajectory:
    - Cambourne North: a reduction in completions of 1,500 dwellings during the plan period, down from 2,550 to 1,050;
    - Cambridge East (airport): a reduction in completions of 1,750 dwellings during the plan period, down from 3,950 to 2,200;
    - NW Cambridge (Eddington): a reduction in completions of 450 dwellings during the plan period, down from 2,500 to 2,050;
    - Cambridge Biomedical Campus (CBC): a reduction in completions of 250 dwellings during the plan period, down from 1,000 to 750; and
    - Grange Farm: a reduction in completions of 1,500 dwellings during the plan period, down from 2,550 to 1,050.

3.9 Based on this assumption, scenario 1 would mean that:

- Housing completions in the plan period would total only 46,582 dwellings, resulting in a shortfall against the minimum housing need identified in the Plan (48,069 dwellings) of at least 1,487 dwellings, thereby meaning that housing needs are not fully met; and
- The delay of 5 years in commencing development would also mean that the following employment floorspace would not be provided within the plan period, with consequent implications for meeting employment needs:
    - A proportion of the 108,000 m2 of office, R&D and industrial floorspace which is part of the Cambourne North allocation;
    - A proportion of the minimum 20,000 m2 of Class B2/B8 floorspace and significant office and R&D floorspace which is part of the Cambridge East (airport) allocation;
    - A proportion of the approximately 100,000 m2 of office, R&D and mid-tech floorspace which is part of the Eddington allocation;
    - A proportion of the c520,000 m2 of office and R&D and industrial floorspace which is part of the CBC allocation; and
    - A proportion of the 15,000 m2 of office floorspace and 20,000 m2 of industrial floorspace which is part of the Grange Farm allocation.

3.10 Scenario 2 assumes as follows:

- The East-West Rail proposal falls away, or its delivery is delayed, such that Cambourne North does not deliver any housing or employment in the plan period (if at all). Also, as per scenario 1,

the Grafham pipeline is delayed by 5 years, to 2037. This would have the following impact on housing completions, when compared with those envisaged in the Councils' Housing Trajectory:

- Cambourne North: no completions during the plan period, down from 2,550 dwellings to nil;
- Cambridge East (airport): a reduction in completions of 1,750 dwellings during the plan period, down from 3,950 to 2,200;
- NW Cambridge (Eddington): a reduction in completions of 450 dwellings during the plan period, down from 2,500 to 2,050;
- Cambridge Biomedical Campus (CBC): a reduction in completions of 250 dwellings during the plan period, down from 1,000 to 750; and
- Grange Farm: a reduction in completions of 1,500 dwellings during the plan period, down from 2,550 to 1,050.

3.11 Based on these assumptions, scenario 2 would mean that:

- Housing completions in the plan period would total only 45,532 dwellings, resulting in a shortfall against the minimum housing need identified in the Plan of at least 2,537 dwellings, thereby meaning that housing needs are not fully met; and
- The delay of 5 years in commencing development would also mean that the following employment floorspace would not be provided within the plan period, with consequent implications for meeting employment needs:
  - All of the 108,000 m2 of office, R&D and industrial floorspace which is part of the Cambourne North allocation;
  - A proportion of the minimum 20,000 m2 of Class B2/B8 floorspace and significant office and R&D floorspace which is part of the Cambridge East (airport) allocation;
  - A proportion of the approximately 100,000 m2 of office, R&D and mid-tech floorspace which is part of the Eddington allocation;
  - A proportion of the c520,000 m2 of office and R&D and industrial floorspace which is part of the CBC allocation; and
  - A proportion of the 15,000 m2 of office floorspace and 20,000 m2 of industrial floorspace which is part of the Grange Farm allocation.

3.12 Scenario 3 assumes as follows:

- Funding or delivery of the Cambridge South East public transport corridor (C-SET) is delayed or abandoned, meaning that Grange Farm is delayed and does not deliver any housing or employment in the plan period (if at all). Also, as per scenarios 1 and 2, the Grafham pipeline is delayed by 5 years, to 2037. This would have the following impact on housing completions, when compared with those envisaged in the Councils' Housing Trajectory:
  - Cambourne North: a reduction in completions of 1,500 dwellings during the plan period, down from 2,550 to 1,050;
  - Cambridge East (airport): a reduction in completions of 1,750 dwellings during the plan period, down from 3,950 to 2,200;
  - NW Cambridge (Eddington): a reduction in completions of 450 dwellings during the plan period, down from 2,500 to 2,050;
  - Cambridge Biomedical Campus (CBC): a reduction in completions of 250 dwellings during the plan period, down from 1,000 to 750; and
  - Grange Farm: no completions during the plan period, down from 2,550 dwellings to nil.

3.13 Based on these assumptions, scenario 3 would mean that:

- Housing completions in the plan period would total only 45,532 dwellings, resulting in a shortfall against the minimum housing need identified in the Plan of at least 2,537 dwellings, thereby meaning that housing needs are not fully met (coincidentally, these are the same numbers as applicable to scenario 2); and

- The delay of 5 years in commencing development would also mean that the following employment floorspace would not be provided within the plan period, with consequent implications for meeting employment needs:
    - A proportion of the 108,000 m2 of office, R&D and industrial floorspace which is part of the Cambourne North allocation;
    - A proportion of the minimum 20,000 m2 of Class B2/B8 floorspace and significant office and R&D floorspace which is part of the Cambridge East (airport) allocation;
    - A proportion of the approximately 100,000 m2 of office, R&D and mid-tech floorspace which is part of the Eddington allocation;
    - A proportion of the c520,000 m2 of office and R&D and industrial floorspace which is part of the CBC allocation; and
    - All of the 15,000 m2 of office floorspace and 20,000 m2 of industrial floorspace which is part of the Grange Farm allocation.

3.14 Scenario 4 assumes as follows:

- The Grafham pipeline is not delayed but the East-West Rail proposal falls away, or its delivery is delayed, such that Cambourne North does not deliver any housing or employment in the plan period (if at all). Also, funding or delivery of the Cambridge South East public transport corridor (C-SET) is delayed or abandoned, meaning that Grange Farm is delayed and does not deliver any housing or employment in the plan period (if at all). This would have the following impact on housing completions, when compared with those envisaged in the Councils' Housing Trajectory:
    - Cambourne North: no completions during the plan period, down from 2,550 to nil; and
    - Grange Farm: no completions during the plan period, down from 2,550 dwellings to nil.

3.15 Based on these assumptions, scenario 4 would mean that:

- Housing completions in the plan period would total only 46,932 dwellings, resulting in a shortfall against the minimum housing need identified in the Plan of at least 1,137 dwellings, thereby meaning that housing needs are not fully met; and
- The following employment floorspace would not be provided within the plan period, with consequent implications for meeting employment needs:
    - All of the 108,000 m2 of office, R&D and industrial floorspace which is part of the Cambourne North allocation; and
    - All of the 15,000 m2 of office floorspace and 20,000 m2 of industrial floorspace which is part of the Grange Farm allocation.

3.16 To keep these example scenarios simple, we have focussed on the major 'new' allocations proposed in the Plan. However, there are likely to be other housing units and/or employment floorspace on other sites, including some already approved/committed, which would also be delayed or nor delivered because of a delay to the Grafham pipeline or East-West Rail. We have not attempted to calculate this here, due to the number of variables and complexity involved, but it is likely that such infrastructure delays will in fact result in a greater failure to meet housing and employment needs than we have described in these scenarios. As an example of changing forward planning is the fact that under the Regulation 18 Consultation there was a mixed employment/housing draft allocation at nearby Melbourn. However, in the Regulation 19 Consultation version this allocation is proposed for housing only, meaning 8,000 sqm of employment floorspace has been 'lost' from the locality, helping to further support our proposal for c50,000 sqm employment at Prospects Royston.

b) Absence of a 'fall-back' strategy

3.17 In the light of all the above arguments, it is clear that because the Plan's major housing and employment allocations are so reliant on timely delivery of strategic infrastructure, there is a significant risk that one or more of them will be delayed or fail to deliver during the plan period at all. Assessed in that context, the Plan's strategy risks not being delivered in full, because it lacks a 'fall-back' whereby sufficient additional land for homes, jobs and social infrastructure is reserved, so that local needs are still met in full in the event of one or more of its largest allocations not delivering as proposed.

c) Failure to plan for growth at Royston

3.18 The Plan's strategy is also flawed because it does not allow for growth at the market town of Royston. The supporting text to Policy S/DS and the Plan's Sustainability Appraisal and Development Strategy Topic Paper all confirm that expansion of Royston (comprising land beyond the A505 and therefore within Greater Cambridge, although the existing town itself is within North Hertfordshire) is a reasonable and sustainable strategic development option, yet the reasons for this option being rejected are flawed, as we show in section 4 of our representations below.

3.19 In fact, there are demonstrably robust reasons to support the expansion of Royston as a key part of the Greater Cambridge development strategy:

- It is a thriving market town of over 17,000 people with commensurate, existing higher order physical, economic and social infrastructure. Whilst the town itself is within North Hertfordshire district, it is well connected to Cambridge by rail (14 minutes) and road (13 miles) and it forms part of the Greater Cambridge sub-region and travel to work area, which the Government regards as a world class exemplar for substantial future economic and associated growth and which will be a focus for significant growth for the foreseeable future, well beyond the current plan period which is to 2045.
- North Hertfordshire District Council is at the early stages of a Local Plan review and as its third largest settlement, Royston is a necessary and sustainable choice as a location for growth to meet a proportion of its future housing and employment needs - yet within the North Hertfordshire district boundary there is little or no room left for Royston to grow, its adopted Local Plan housing and employment allocations having been largely built out and there being landscape/topography and SSSI constraints to the south of the town. As a result, growth beyond the A505 north/east of the town and therefore within Greater Cambridge, is the logical and most sustainable alternative.
- North Hertfordshire District Council cannot demonstrate a 5-year housing land supply. A recent appeal decision for 'Land off Barkway Road and North of Flint Hall, Barkway Road, Royston, Hertfordshire on 7th July 2026 [Appeal reference 6004178; LPA reference 21/00765/OP] for an outline planning application for residential development of up to 280 dwellings (including affordable housing) green infrastructure including public open space, landscape boundaries and SUDS with all matters reserved except for access which is to be taken from Barkway Road was granted planning permission. At paragraphs 93 and 94 of the Inspector's decision it was stated

  '*The Council cannot demonstrate a 5-year housing supply, with the figure standing at 2.6 years. This equates to a shortfall of some 3,347 dwellings. The proposal would contribute up to 280 dwellings to the local housing supply. I note the proposal at Turnpike Lane (Council reference: 25/02401/OP) which the Council resolved to grant planning permission in April 2026. The scheme was for up to 100 dwellings and would contribute to the local housing supply.*

  Nonetheless, given the considerable shortfall, I attach significant weight to the benefit of provision of housing. Moreover, the 40% of the proposed dwellings would be affordable housing to which I also attach significant weight as a benefit.'
- Importantly, delivery of development on the edge of Royston at Prospects Royston is relatively risk-free in that it does not rely on provision of significant strategic scale transport, water supply or wastewater infrastructure in the same way that the larger sites already allocated in the Plan do. As a result, development could commence relatively early in the plan period and delivery in full could be completed before the end of the plan period. Attached at Appendix 5 is a Site Plan and Summary Utilities table produced by Stantec UK that demonstrates no impediment to the site coming forward. Potential future infrastructure points of connection (POC) are indicated on the Site Plan, and the Summary table gives high level delivery timelines at this early stage.
- Development at Prospects Royston is more sustainable and deliverable than a very large new settlement which would be remote from the town and therefore less well equipped to meet local needs without multiple car journeys, so inherently less sustainable.

3.20 Furthermore, Royston itself needs such growth for other reasons; in order for its economy to grow, as an important part of the Cambridge economic sub-region, and to address current pressures on its existing social infrastructure. We address both these matters below.

Royston's Economic Needs

3.21 The North Herts Economic Strategy 2025-2030 (North Herts DC, June 2025) notes at page 17 that:

"Given its proximity to both Cambridge and London, the district's asset base ought to be valuable – albeit there is a long-term programme to work through. The York Way industrial area in Royston is already home to some major advanced manufacturing and life sciences businesses and in developing it further, **every attempt should be made to forge wider and deeper links to the Cambridge Sub-Region"** (emphasis is from the source document, underlining its importance to the strategy as a whole).

3.22 The Economic Strategy also acknowledges that the York Way industrial area in Royston, known as Royston Gateway, already accommodates a cluster of 'major advanced manufacturing and life sciences' but we note that there remains very limited land/opportunity to grow this site further, with most of the allocated land now being taken up.

3.23 Given this context and proximity to the core of the OxCam Arc at Cambridge, it is clear that if North Herts Council is to fulfil its economic ambitions and continue to grow its recognised 'major advanced manufacturing and life science' cluster, additional land to that remaining at York Way will be needed. At the same time, care is needed to avoid competing with the established and emerging Greater Cambridge supply and so some consideration needs to be given to the Greater Cambridge Plan's evidence base.

3.24 The main thrust of Greater Cambridge's employment land supply is orientated to the core research and development (R&D) market – including specialised research space that needs to cluster around the Cambridge Core. The latest Greater Cambridge Employment and Housing Needs Update 2024-2045 (Iceni, Final Report, September 2025, published December 2025) finds an oversupply of office and R&D space but a large shortfall in industrial land – this aligns with recent deliveries and take-up at Royson in respect of its 'advanced manufacturing cluster', with firms being encouraged to Royston seeking industrial space but remaining accessible to the Cambridge Core. Whilst the Plan now includes two new class B2/B8 allocations (Slate Hall Farm and Land adjoining the A14 Services) to address this need, this leaves the Cambridge supply effectively limited only to these two sites, such that possible investors seeking industrial floorspace are faced almost with a duopoly position. Furthermore, given the location of these two sites immediately adjoining the A14, we consider that they will only be attractive to Class B8 users, thereby further restricting the supply of sites suitable for Class B2 users.

3.25 In these circumstances, provision of additional land for class B2/B8 floorspace as part of Royston's cluster of 'major advanced manufacturing and life sciences', should be supported, both to meet North Hertfordshire objectives and address any Greater Cambridgeshire shortfalls that may flow from its Plan. Given the strong supply of office and core R&D space in Cambridge, but a shortfall in industrial land, there would appear to be a qualitative gap to identify more land around Royston that does not compete with Cambridge for core R&D activity but can complement it and address the need for industrial space for occupiers who do not need, or want (due to cost and land supply pressure) to be located in the Cambridge R&D core.

3.26 Under the Regulation 18 Consultation there was a mixed employment/housing draft allocation at nearby Melbourn with the employment element providing approximately 8,000 sqm employment floorspace. However, in the Regulation 19 Consultation version this allocation is now proposed as housing only, meaning 8,000 sqm of employment floorspace has been 'lost' from the locality, helping to further support our proposal for c50,000 sqm employment at Prospects Royston. The loss of the employment allocation at Melbourn exacerbates the continuing shortage of industrial floorspace serving the Cambridge market and strengthens the case for the employment development proposed at Prospects Royston.

Pressures on Royston's Social Infrastructure

3.27 As we have described above, strategic development on the edge of Royston can be delivered without the need for major new physical infrastructure in respect of transport, water or wastewater provision. However, Royston does have current pressures on elements of its social infrastructure - pressures which could be relieved through the delivery of major new development.

3.28 Provision for formal sport is one example of such social infrastructure pressures, highlighted by the following:

- The latest North Herts DC evidence base (Playing Pitch and Outdoor Sports Strategy - Assessment Report, April 2025 and Strategy and Action Plan, September 2025) finds that there is a shortage of pitches for football (grass and 3G) rugby, hockey, cricket, tennis and padel.
- The draft Duty to Corporate Statement of Common Ground [SoCG], especially the Supplementary SoCG 'Meeting sports needs around Royston' [page 54 of the overall report], which confirms that the parties (Cambridge CC, South Cambridgeshire DC and North Herts DC) in respect of Royston's outdoor sports needs

"...agree that there are multiple shortfalls in sports provision in the Royston area" and "are committed to collaborating through future plan processes to explore how both short- and longer-term needs for outdoor sports facilities in the Royston area should be met." [page 3 of the Supplementary SoCG]

The Supplementary SoCG "Meeting sports needs around Royston" concludes that "...the parties will continue to collaborate through future plan processes to explore how short and longer term needs for outdoor sports facilities in the Royston area should be met as both Local Plans progress." This is akin to 'kicking the can down the road', as the Playing Pitch and Outdoor Sports Strategy - Assessment Report makes it clear that this need is immediate and exists now.

Thus, addressing this significant shortfall need should be a priority now, not delaying this to a future plan process which has an unknown timeline for resolution of the identified need.

Given these identified needs Prospects Royston has the potential to help meet some or all this need. Appended to these representations is our illustrative masterplan for the site which identifies a sports hub of 12.47 ha. This would be part of the first phase of development to come forward with enabling residential development. Page 9 of the Vision Statement at Appendix 1 sets out an indicative sports hub layout. At this stage this is a flexible area and has not been designed in any detail but comprises provision of multiple pitches, MUGAs and other facilities supporting a wider range of different sports, in response to the deficiencies described in the draft SoCG.

- Royston Town Football Club is currently located at Garden Walk, within the built-up area of Royston and surrounded by residential properties. The club aspires to expand, to provide better facilities for men's, women's and youth football. It also suffers from having very limited car parking facilities, leading to concerns about parking on adjoining residential roads. Possible re-location of the club to a purpose-built site within Prospects Royston would offer the opportunity to address all these issues.
- Royston's rugby and tennis clubs are currently located on common land, which is part of Therfield Heath, located on the south-west side of the town and managed by the Therfield Heath Conservators. The location of these clubs on the heath creates conflicts between their activities and aspirations and the need to conserve the ecological and landscape qualities of the Common and its recreational purposes. Again, possible re-location of one or both clubs to a purpose-built site within Prospects Royston would offer the opportunity to manage such issues.

3.29 We have engaged in early discussions with Officers at North Hertfordshire District Council in respect of the sports hub and they have responded by letter dated 24th August 2026 [attached at Appendix 6]. It states that '*North Herts Council commissioned the North Hertfordshire Council Playing Pitch & Outdoor Sport Strategy [PPOSS] Assessment Report and the Strategy and Action Plan – April 2025 which sets out a strategic framework for North Hertfordshire to ensure that the provision of outdoor playing pitches meets the needs of residents (both existing and future) and visitors to the North Hertfordshire area.*' The Officer response then concludes that '*...Having identified multiple shortfalls of playing pitch space in Royston, the PPOSS Report identified that there is a need to:*

- *develop a new full-sized sport lit AGP to accommodate Royston Hockey Club,*
- *find a site for Royston RFC to relocate from the Heath Sports Club which has space for three adult pitched and four changing rooms; and*
- *provide a new 11v11 3G pitch in the Local Football Facility Plan.*

In terms of the Sports Hub Options put forward, either option would start to address the deficiencies that have been identified in the PPOSS Report in terms of the spaces provided. However, there are some issues which would need to be addressed.
Both Options 1 and 2 suggest that provision is made for grass hockey pitches but the PPOSS Report states that competitive hockey is played on AGPs. Therefore, to address the deficiencies in hockey provision in the areas, the pitches would need to be designed as AGPs rather than grass.

For rugby provision in Royston, the PPOSS Report recommended that a new site should be investigated and that there should be provision for three senior pitches and ancillary space. The Options presented indicate two adult rugby pitches could be provided on the Three Prospects Farm site and whilst this would go some way to addressing the issues faced by the Rugby Club it falls short of the recommended number of pitches identified in the PPOSS Report.

Both Options 1 and 2 suggest that a number of adult football pitches could be provided on the site, but that these would be grass pitches. The PPOSS Report recommends that

a 3G pitch is needed rather than a grass pitch to address the current shortfall of pitch space. At a meeting of the Royston and Villages Community Forum, a presentation from the Royston Football Club suggested that there is a waiting list of children interested in playing youth football who often have to travel to nearby villages to access pitches. The provision of youth and adult pitches on this site would help to address this.

Options 1 and 2 suggest that an athletics track could be provided on site, but the PPOSS Report does not identify this as a priority and therefore it is unclear whether this would be used as an integral part of a new facility.

The inclusion of car parking and sports pavilion is welcome as these would be expected in a new Sports Hub facility.

As part of the monitoring and review of the recommendations and actions in the PPOSS Report, North Herts Council will be holding a meeting with the affiliated bodies in the autumn which will provide an update of the current position in relation to demand for different sport provision.'

3.30 It is apparent that identification of Prospects Royston as a reserve site in the Plan could include a requirement for new sports pitch provision and associated infrastructure, within a sports hub, both to meet the outdoor sports needs of its residents and to address the deficiencies and pressures described above. In so doing, there would be community benefits for the town and for surrounding villages, in both South Cambridgeshire and North Hertfordshire. At this early stage, no detailed design work has been undertaken in respect of the detail of the sports hub, but it is evident that much of the requirements referenced in the Officer letter could be accommodated on Prospects Royston site. We believe that no other sites appear to be being currently considered/allocated in or around Royston to meet this sports provision deficiency.

3.31 Furthermore, as part of the identification of Prospects Royston as a reserve site, provision could also be made for new open space/green infrastructure on a scale which would provide an alternative town-wide recreational facility for Royston and surrounding villages. This would be in the form of a 46.46 ha nature park which can be delivered with an extensive footpath network, which could relieve pressure on the broader recreational use of Therfield Heath. There are few other examples of this in Cambridgeshire and none of the Regulation 19 allocations make provision for Green Infrastructure on the scale proposed for Prospects Royston and this thus represents a unique opportunity.

Conclusion re Policy S/DS

3.32 Given all the above circumstances, the Greater Cambridge and North Hertfordshire authorities should work together in co-operation to ensure that the Plan's development strategy (Policy S/DS) is expanded to identify land at Prospects Royston as a reserve site for sustainable and strategic mixed-use housing and employment growth, with supporting social infrastructure, including a sports hub and nature park. Prospects Royston is a suitable, sustainably located and deliverable site of a sufficiently strategic scale to be identified for formal allocation in a future update to the Plan, if one or more of the currently proposed strategic scale allocations fails to deliver as expected, for whatever reason.

3.33 This would help to meet the needs of both the Plan area and the town of Royston and provide a robust 'fall-back' position should one or more of the Plan's major allocations not progress as anticipated during the plan period. This would afford the Plan greater flexibility and resilience. Such a strategy should also be recognised and supported in the emerging draft North Herts Local Plan, which is due to reach its first consultation stage later in autumn 2026.

3.34 We consider that such a revision to Policy S/DS, together with associated revisions to the Site Allocations policies and Policy S/DE (as described in sections 4 and 5 below), would render the Plan sound and could be dealt with under the Main Modifications process, thereby meaning that the Plan can still progress to formal submission by the end of 2026.

3.35 Because of our proposed amendment to Policy S/DS, and as stated above in section 1 of our representations, the Plan should also have an additional policy, under the heading 'Prospects Royston Reserve Site', in respect of mixed-use development of our client's land. We describe the multiple benefits of, and detailed arguments in favour of, such a reserve site policy below, in section 4 of our representations.

4 SITE ALLOCATIONS POLICIES: PROSPECTS ROYSTON RESERVE SITE

4.1 In this section of our representations, we demonstrate why our client's land known as Prospects Royston should be identified as a reserve site for mixed-use development under the Site Allocations policy section of the Plan.

4.2 In support of these representations, we have prepared a Vision Statement and illustrative masterplan (attached at Appendices 1 and 2 respectively) which show indicatively how the land at Prospects Royston could be developed for homes, employment, a primary school, local centre, sports hub and a nature park. It would thereby help to meet housing and employment needs in Greater Cambridge and North Hertfordshire and would provide significant benefits in terms of connectivity and the social, economic and environmental infrastructure of Royston, to the benefit of all residents of the town and surrounding villages. Our vision for the site is:

> *'to create a sustainable, well-connected extension to Royston that responds directly to climate change, delivers a measurable net gain for nature and grows the town in a way that feels distinctive and connected to its landscape, providing a high-quality place for people to live, work, play and enjoy.'*

4.3 In describing our proposals below, we have used the same seven themes as used in the Plan – homes, jobs, infrastructure, climate change, biodiversity and green spaces, wellbeing and social inclusion and great places.

Homes

4.4 Our illustrative masterplan proposes some 1,351 dwellings within areas of varying density but achieving an average density of 35dph across the site. The masterplan would accommodate a range of housing sizes, types and storey heights and secure 40% affordable housing.

Jobs

4.5 We propose some 12.58 hectares of employment land for new, flexible class B2/B8 industrial orientated units, to build on Royston's previous success in securing advanced manufacturing whilst complementing, and not competing with, the core Greater Cambridge R&D market. The employment land is likely to deliver some 50,000 square metres of floorspace and generate approximately 1,800 jobs.

Transport Infrastructure

4.6 The updated EAS Transport Connectivity Statement at Appendix 4 identifies the transport infrastructure, connectivity and accessibility benefits associated with the proposed Prospects Royston masterplan. The statement has been updated to reflect the Regulation 19 stage of the Greater Cambridge Local Plan and the evolving transport evidence base, including the Proposed Submission Greater Cambridge Local Plan and Draft Interim Greater Cambridge Transport Strategy. The principal transport benefits and opportunities are summarised below.

Overview of Proposals

- Balanced mix of residential, employment, education and community/leisure/recreational uses, designed to support self-containment.
- Co-location of uses reduces the need for residents to travel off-site for day-to-day activities.
- Development structure supports walkable neighbourhoods and short-distance trips.
- The mixed-use development form aligns strongly with the Proposed Submission Local Plan's emphasis on sustainable accessibility, walkable neighbourhoods, multimodal connectivity and infrastructure-led development.

Trip Internalisation

- Mixed-use nature of the site enables a high degree of trip internalisation.
- Significant proportion of education, employment, shopping and leisure trips expected to be made within the site.
- Close proximity to Royston means many remaining trips are localised rather than strategic.
- Indicative analysis shows that over 50% of AM peak-hour car trips could be removed or internalised compared to a standalone residential development.
- Remaining off-site trips are expected to be short-distance movements, with fewer longer regional car trips.

- Internalisation benefits apply across all land uses, including school trips, employment trips and recreational activity.

Proposed Walking and Cycling Connectivity

- Use of an existing 6m-wide tunnel beneath the A505 to provide a high-quality pedestrian and cycle connection.
- Direct walking and cycling links to schools, Royston town centre and Royston railway station.
- Land within the site safeguarded to support delivery of the Melbourn Greenway, including the proposed A505 crossing.
- Internal routes designed to avoid the A10 corridor, creating attractive, traffic-free connections.
- Potential signalisation of the A10/A505 roundabout to deliver safe, direct at-grade pedestrian and cycle crossings.
- Multiple complementary routes providing resilient, legible and policy aligned active travel connectivity.

Mobility Hub

- On-site Mobility Hub forming a focal point for sustainable travel.
- Designed as a multi-modal interchange, prioritising walking, cycling and public transport.
- Facilities to include secure cycle parking, bike hire, EV charging, real-time information and sheltered waiting areas.
- Direct integration with the Greenway and internal active travel network.
- Mobility Hub acts as the anchor for high-frequency bus services and shared mobility provision.

Public Transport Enhancements

- Introduction of a high-frequency "turn-up-and-go" bus service serving the site.
- Bus stops located within 400m of all dwellings.
- Service frequency of approximately every 10–15 minutes.
- Looped route connecting the site with Royston town centre, Royston railway station and Cambridge via the A10 corridor.
- Anticlockwise routing through Royston maximises reliability and early rail interchange at Royston Station.
- Step change in public transport provision benefiting both new and existing communities.
- Opportunity to extend and enhance existing bus services to serve the site and Mobility Hub.

'Incidental' Park and Ride

- Incidental Park & Ride function arising naturally from the high-frequency bus service.
- Attractive to villages along the A10 corridor where rail services are less frequent.
- Provides an alternative to constrained and chargeable parking at Royston Station.
- Shared-use parking (e.g. sports facilities) could provide 100–200 spaces outside peak leisure periods.
- Park & Ride remains secondary and low-key, not a standalone facility.
- Intercepts trips that would otherwise use the A10 corridor, reducing congestion.

Bus Gate

- Bus gate to prevent general traffic movements between the A505 and A10 through the site.
- Access retained for buses, pedestrians, cyclists and emergency vehicles only.
- Prevents rat-running and reinforces the sustainable transport hierarchy.

Foxton Travel Hub

- The Draft Interim GCTS identifies Foxton as an important location within the wider southern Greater Cambridge transport corridor.

- The medium-term southern corridor package includes Foxton Station, the Melbourn and Sawston Greenways, targeted A505 corridor improvements, Whittlesford Parkway improvements and enhanced rail capacity.
- The GCTS delivery programme also identifies a further study at Foxton Level Crossing, including opportunities to improve safety, reliability and interchange.
- Prospects Royston would complement this wider corridor strategy by providing enhanced sustainable transport provision at the southern end of the A10 corridor.
- Delivery of Prospects Royston would not depend upon completion of infrastructure at Foxton or any single wider strategic transport intervention.

Street Bikes (Beryl or Voi)

- Introduction of a street bike hire scheme within the site and wider Royston area.
- Docking locations at the Mobility Hub, town centre, station and Greenway-linked villages.
- Supports short local trips and first/last-mile journeys.
- Potential delivery through established operators such as Beryl or Voi.
- Fully integrated with active travel and public transport networks.

Herts Lynx Buses

- Extension of Herts Lynx demand-responsive bus service into the site and Mobility Hub.
- Provides flexible, bookable connections complementing fixed-route services.
- Improves accessibility for residents without access to a private car.
- Supports inclusive mobility, rural connectivity and modal shift objectives.

Vehicular Access Strategy

- Two principal vehicular access points are ultimately envisaged to serve Prospects Royston.
- Primary access from the A10 via a new junction (roundabout or signalised, subject to assessment).
- Secondary access from the A505 via the existing Desborow Lane roundabout with a new fourth arm.
- The A505 access provides an opportunity to facilitate an initial phase of development before delivery of the site's ultimate access strategy.
- Access locations selected to achieve good visibility and operational safety.

Traffic Management and Site Permeability

- A10 access to serve commercial and servicing traffic.
- A505 access to serve residential traffic.
- Internal connection between accesses restricted to buses, emergency vehicles, pedestrians and cyclists only.
- Prevents rat-running between the A10 and A505 while maintaining sustainable permeability.

Off-Site Highway Mitigation

- Some off-site mitigation likely to be required despite strong sustainable transport measures.
- Increased demand anticipated at the A10/A505 roundabout.
- Further assessment to determine the precise scope of highway works.

A10/A505 Roundabout Enhancement

- Signalisation identified as a proportionate means of increasing junction capacity.
- Roundabout geometry (circa 90m ICD) suitable for signal conversion.
- Signalisation enables both capacity enhancement and safe pedestrian and cycle crossings.

Pedestrian and Cycle Crossings

- At-grade, signal-controlled pedestrian and cycle crossings proposed on the A10 and A505 arms.
- Crossings align with key desire lines and improve accessibility.
- At-grade solution preferred over overbridge due to inclusivity and reduced weather exposure.

Balanced Highway and Sustainable Transport Approach

- Highway interventions designed to complement, not undermine, sustainable transport objectives.
- Focus on junction optimisation, not wholesale road widening.
- Development philosophy prioritises mode shift and demand management over increasing link capacity.
- Generous frontage allows flexibility if required, but additional link capacity is not the preferred outcome.

4.7 The EAS Statement also summarises (in its section 6, pages 31-32, paragraphs 6.3 – 6.18) the transport and connectivity merits of the Prospects Royston proposal as follows, based on the premise that the site benefits from a transport context which is different from, and more robust than that relating to most of the Plan's other major allocations:

> *'6.3 The emerging strategic policy position continues to place significant emphasis on vision-led development, genuine travel choice, early provision of sustainable transport infrastructure, integration between transport and land use and the phased delivery of infrastructure alongside growth.*
>
> *6.4 Prospects Royston is well placed to respond to these objectives. The site is immediately adjacent to an established market town with a mainline railway station, existing bus services, established walking and cycling infrastructure and direct access to the A10 and A505 corridors.*
>
> *6.5 The site would comprise a mixed-use development incorporating homes, employment, education, local facilities, recreation and open space. This would provide substantial opportunities for trip internalisation and shorter local journeys rather than operating as an isolated residential settlement.*
>
> *6.6 The sustainable transport strategy would build upon the existing baseline through provision of high-quality walking and cycling connections into Royston, integration with the Melbourn Greenway, bus penetration through the site, a dedicated Mobility Hub, shared mobility and demand-responsive transport opportunities.*
>
> *6.7 The Draft Interim GCTS provides additional support for this approach. It recognises Royston's functional relationship with Greater Cambridge and identifies the A505 corridor between Royston and Granta Park for further multimodal study and investment.*
>
> *6.8 The GCTS also identifies a wider southern corridor package incorporating the Melbourn Greenway, Foxton, Whittlesford Parkway, public transport improvements and targeted A505 interventions. Prospects Royston would complement this strategic programme while remaining capable of being delivered without relying upon completion of any one of these longer-term schemes.*
>
> *6.9 A credible phased highway access strategy is available. The final development would benefit from principal accesses to both the A505 and A10, providing network resilience and flexibility.*
>
> *6.10 In the initial phase, the existing A505 roundabout provides an opportunity to serve the proposed sports hub together with residential development and associated infrastructure. The precise quantum of development capable of being accommodated before additional access infrastructure is required would be established through subsequent transport assessment and discussion with Cambridgeshire County Council.*
>
> *6.11 This provides flexibility to establish a commercially and operationally viable first phase while ensuring that the access strategy responds appropriately to the scale and characteristics of development being delivered. Additional access and transport infrastructure would then be introduced at appropriate stages as the site progresses.*

6.12 Further detailed Transport Assessment, junction modelling and design work would appropriately be undertaken as part of a future planning application. At this stage of plan-making, the purpose is to establish whether a credible transport solution exists and whether there are strategic transport constraints which would prevent development.

6.13 The work undertaken demonstrates that the site can be accessed safely, can be connected effectively to existing and planned sustainable transport networks and can be delivered progressively alongside proportionate transport infrastructure.

6.14 Prospects Royston represents a credible and deliverable strategic growth opportunity from a transport perspective.

6.15 The site benefits from a strong existing transport baseline, is physically and functionally related to an established rail-served market town and is capable of delivering meaningful improvements to public transport, active travel and cross-boundary connectivity.

6.16 Importantly, the development is not dependent upon completion of a major uncommitted strategic transport project before its first phases can be delivered. Instead, transport infrastructure can be provided progressively in response to defined development thresholds while safeguarding opportunities to integrate with the wider Greater Cambridge transport network as it evolves.

6.17 The proposed transport strategy is therefore consistent with the vision-led approach established by the National Planning Policy Framework (August 2026), together with the sustainable transport and infrastructure-led principles of the Proposed Submission Greater Cambridge Local Plan and Draft Interim Greater Cambridge Transport Strategy.

6.18 On this basis, there are no identified transport, or highway matters which would preclude Prospects Royston from being considered as a sustainable strategic development opportunity within the Greater Cambridge Local Plan, and the site provides a robust transport basis to support its promotion through the Regulation 19 process.'

Climate Change

4.8 Our masterplan is climate change resilient throughout, as shown by the following examples:

- As demonstrated in paragraphs 4.6 and 4.7 above, the site's location on the edge of Royston, the balanced mix of uses (including homes, employment, education and leisure), and the high degree of walking and cycling connectivity and public transport enhancements proposed, all combine to support self-containment, with a high proportion of trips to be internal to the site or local within Royston. In all these ways, our masterplan proposals would contribute to minimising the impacts of climate change;
- WBD (as part of the Barratt-Redrow Group) is committed to sustainable methods of construction and incorporation of energy efficient design features in all its residential and employment developments, thereby further contributing to climate change resilience; and
- All the various design, biodiversity and landscape/open space characteristics described below would also contribute fully to a climate change resilient form of development.

Biodiversity and Green Spaces

4.9 Our masterplan proposes to open the site's attractive landscape for full public access where none exists at present, through provision of:

- a 40+ hectare nature park with extensive countryside views, new footpath and cycle links and a range of ecological enhancements, including creation of chalkland and other species rich priority habitats, tree planting, woodland creation and re-establishment of existing hedgerows. Such benefits are particularly important because Cambridgeshire has one of the lowest proportions of priority habitats in England (less than 10%), with one of the lowest percentages of land designated for nature and the second lowest woodland cover at 4.8%;
- the strategic scale of green infrastructure proposed in this regard is a major benefit, providing recreational facilities for the whole town of Royston and for surrounding villages in both Cambridgeshire and Hertfordshire, as well as for residents of the development itself; and

- extensive provision of other open space and a network of nature-focused green corridors and linear parks throughout the site, all of which will strengthen existing habitats to enhance ecological connectivity and biodiversity.

Wellbeing and Social Inclusion

4.10 Our masterplan includes the following:

- a sports hub which would provide new outdoor sports pitches to meet the needs of the site's residents, address existing deficiencies in sports pitch provision in and around Royston and allow for the potential re-location of existing sports clubs, such as Royston Town Football Club, with whom preliminary discussions have taken place. The sports hub may also provide an opportunity to relieve pressures on the Therfield Heath SSSI to the south of Royston, where there are currently pressures and potential conflicts at times between sports use (rugby, hockey and tennis) and other recreational and conservation interests; and
- land for a new two-form entry primary school to cater for children living on the site and potentially those already living locally if appropriate.

Great Places

4.11 Our masterplan and Vision Statement show how great places would be created throughout the site, including:

- Unlocking the chalk hills landscape character with a new 40ha + nature park focusing on retention and enhancement of hedgerows and creation of new chalk grassland;
- Enhancement of the Royston Greenway along the A505 with new woodland planting;
- Connection to the historic Icknield Way (Chalk Walk) to the south of the nature park;
- Integration of the Melbourn Greenway cycle link and bridge; and
- Promotion of archaeological and heritage assets by incorporating them into the strategic green infrastructure network.

Delivery Timescales

4.12 As we described above in section 3 of our representations, given the absence of need here for strategic transport or other large scale infrastructure improvements, development of the Prospects Royston site can be delivered within the plan period to 2045, based on the following assumptions:

- The site is in single ownership and under the control of the Barratt/Redrow Group, a major national housebuilder and commercial developer;
- Allowing 6 years for the grant of outline and detailed permissions, development could commence by 2032;
- Development could be delivered in phases with the first phase being delivered by 2038; and
- The whole site could then be delivered in full within the plan period by 2045.

The Plan's Rejection of the Prospects Royston Option

4.13 The reasons for growth at Prospects Royston not being preferred as a strategic development option in the Plan (as stated within the 2026 HELAA), together with our response based on our proposed masterplan and Vision Statement, are summarised below:

- *Housing development at this site would be relatively distant from Cambridge – serving at least in part the Stevenage Housing Market Area, such that it would not provide easy access to jobs arising within Greater Cambridge*: OUR RESPONSE - our Vision Statement, Masterplan and the EAS Statement all show that we propose a sustainable transport and connectivity strategy, including a comprehensive package of public transport, active travel and local highway infrastructure improvements. Furthermore, delivery of allocations closer to Cambridge relies on major new infrastructure which is uncertain and is beyond the control of the plan-making authorities. Finally, our masterplan also proposes some 12.5 hectares of new employment land, thereby securing a significant number of jobs within the site itself.

  In dismissing the site as a strategic development option in the Plan (as stated within the 2026 HELAA), there is a suggestion that, were homes provided at Prospects Royston, they would not meet local needs but would meet the needs of the Stevenage Housing Market Area.

  We have looked to test this assertion using the most recent 2021 commuting data, and because of concerns re 2021 and Covid, looked back to the 2011 data for historical trends. What we find at

the macro level is that, for existing residents living in North Hertfordshire, there are strong economic links with Stevenage and that these links are stronger than any Cambridge related flows. But this largely reflects the nature of the district and the geography of a 1974 era local authority which excluded the urban area of Stevenage from its nearby land/villages.

Looking behind the headline data, and looking at Royston Town specifically, there are strong links with Cambridge and, in this part of the district, weak links with Stevenage. With a very strong Cambridge economy, Royson residents (old and new) have strong motivations to form part of a wider Cambridge economy so we may expect those links to grow over time. As our analysis sets out, if new homes were provided in Prospects Royston, there is every likelihood they would assist with homes and labour supply in the wider Greater Cambridge area and the town; while there are always complex cross boundary links, this location cannot simply be dismissed on housing market area grounds, evidenced only at the local authority district level.

National changes to the NPPF and ongoing Local Government reorganising only illustrates the fragility of applying 1974 era administrative boundaries to a fluid housing, and economic geography. At the district level it is correct to consider North Hertfordshire as a separate housing market area to Greater Cambridge – North Hertfordshire is a 1974 era administrative district where the economic and social geography no longer fits. This is not uncommon; 1974 era geographies are in the process of being abandoned.

However, this analysis does not hold up below district level data. The influence of Stevenage at the district level data is clear to see because the way Stevenage excludes its connected hinterland – located in North Hertfordshire. But looking at Royston, Greater Cambridge is more important as a destination than elsewhere in North Hertfordshire or other neighbouring districts.

The 2011 Census Data (source - DataShine) indicates that at the sub district there two data points covering Royson town (North and Central in 2011 census and Geographic Code North Hertfordshire 001) and Royston South, West and East (North Hertfordshire 002). The main flows, in 2011, indicated around 5,500 workers were based in Royson with around two thirds living and working in the town. But when workers do commute cross boundary, out of town, their most likely destination was almost always into Greater Cambridge. Over 2,000 workers commuted from Royston into Greater Cambridge – whereby only 200 Royston residents commuted to Stevenage and fewer than 500 elsewhere in North Hertfordshire.

In 2021, the data source (Origin Destination), changes the name of Royston 001 and 002 to Royston North and Central and Royston South, West and East. However, for our research purposes, Royston N & C and Royston S, W & E have been combined to result in a single representation of Royston. There are 9,144 working residents in the Royston of which 3,780 commute out of the town.

As noted, care is needed regarding the 2021 census, but checking the main destinations, as with 2011, a Royson resident is likely to work very locally, in the town, or when commuting their most likely destination is Greater Cambridge. The table below shows where commuters are most likely to head. Of those who do leave the town for work their main destination is Greater Cambridge with 1,045 Royston residents working in Greater Cambridge as opposed to only 550 to another North Hertfordshire location and only 276 to Stevenage.

	Royston S, W & E	Royston N & C	Total	Grand Total
Travel To Greater Cambridgeshire	674	371	1045 (56%)	1871 (100%) Commuters Living in Royston who commute elsewhere.
Travel to Stevenage	168	108	276 (15%)	
Travel to NH	348	202	550 (29%)	

Figures for 2021 Commuters Living in Royston (Source: Origin Destination)

The key finding is that one third of people living in Royston travel outside of Royston (3,125/ 9,144) and when they do, they are most likely to commute to Greater Cambridge and very unlikely to commute to Stevenage or elsewhere in North Hertfordshire.

The data confirms that, were houses proposed at Royston, following the established resident's patterns they would meet a local need for homes in the town or Greater Cambridge. When workers commute out of Royston to work their most likely destination is already Greater Cambridge. Thus, our proposed Prospects Royston site, on the east of Royson, well connected to Cambridge and Royson Town, is likely to meet the needs of the town and Greater Cambridge than other market areas.

With a rapidly growing Cambridge, supported at the national level and forming a key plank in future industrial strategies; the 'pull' of Cambridge's influence is only likely to increase over time – the commuting flows discussed above well pre-date the modern growth of the Cambridge economy and the current push for economic growth by the Government .

In conclusion, dismissing the Prospects Royston site as not being preferred as a strategic development option in the Plan (as stated within the 2026 HELAA) on the basis that housing development at this site would be relatively distant from Cambridge – serving at least in part the Stevenage Housing Market Area, such that it would not provide easy access to jobs arising within Greater Cambridge – does not accord with the reality when the census data is examined.

- *The site is relatively distant from Royston town centre services including the railway station, which would limit opportunities for sustainable travel options:* OUR RESPONSE - the EAS statement summarises our transport and connectivity strategy which will secure excellent public transport and active travel links to the town centre and railway station and maximise internal trips within the site and Royston. The EAS statement also shows that other new allocations such as Cambourne North are likely to generate more/longer car trips due to the absence of established local facilities/services in those locations.

  The proposed Melbourn Greenway requires land within the site boundary. This land could be made available to facilitate delivery of the Greenway bridge and provide direct connections to the wider strategic active travel network. Internal site routes would allow users to travel away from the A10 corridor, creating more attractive, legible and traffic-free walking and cycling routes.

  The site also benefits from an existing circa 6m diameter tunnel beneath the A505, located approximately 230m north of the A505/Desborough Lane roundabout. On the western side, this tunnel connects directly to highway-maintained land within the wide western verge of the A505. It is proposed that this structure is utilised as a high-quality pedestrian and cycle connection. New routes could be delivered within the existing highway boundary running along the current A505 western verge, providing links to nearby schools and onward connections to established cycling routes leading into Royston town centre and Royston railway station. As this connection operates at ground level, it would be significantly less exposed to weather than an overbridge crossing.

  Together, these interventions demonstrate that multiple complementary walking and cycling routes could be delivered, significantly strengthening sustainable connectivity between the site and Royston and removing severance.

- *Development form would have a significant adverse effect on landscape character:* OUR RESPONSE - our Vision Statement and masterplan (informed by the supporting Landscape, Visual and Ecology Technical Note) demonstrate that development at Prospects Royston would not be harmful to the wider landscape and indeed the site would be opened up to the public who would then be able to experience and enjoy the site's attractive landscape qualities and extensive countryside views. The landscape character of our site is not special and indeed is no different really from the various greenfield sites which have been allocated elsewhere in the Plan area with our proposed masterplan retaining suitable separation from Melbourn. Therefore, we do not agree that the development form would have a significant adverse effect on landscape character.

- *There are other sites considered more appropriate for allocation*: OUR RESPONSE - as we have demonstrated throughout these representations, the delivery of the Plan's proposed strategic allocations is uncertain due to the need for extensive and costly supporting strategic-scale infrastructure, whereas Prospects Royston can be delivered without the need for such significant levels of infrastructure.

5 POLICY S/DE: DEFINED DEVELOPMENT EXTENTS

5.1 For all the reasons described above in our representations regarding other parts of the Plan, Policy S/DE should also be revised and an 'edge of Royston' map should be provided showing our client's Prospects Royston site extent excluded from the countryside and identified instead as a reserve site for mixed-use development, capable of accommodating the various land-uses described within the Vision Statement at Appendix 1 and shown on the illustrative masterplan at Appendix 2, including

approximately 1,351 dwellings, 50,000 square metres of employment floorspace, nature park, sports hub, primary school, incidental park and ride and other transport, social and green infrastructure, all as described above in section 4 of our representations.

5.2 A reserve site could be identified on the Policies Map in order that it may be utilised, if required, to meet strategic development needs should one or more of the proposed strategic allocations not deliver development as planned within the Local Plan period. We have given some thought to how a reverse site policy could be worded and set out below some initial thoughts as follows:

The following principles apply to the reserve site:

a) It is not allocated for development at the present time;
b) Unless and until it is allocated for development, Local Plan policies relating to development in the countryside will apply;
c) Development that would prejudice the future comprehensive development of the reserve site will not be permitted;
d) The status of the reserve site will only change through a review of the Local Plan, following an assessment of development need and the identification of the most appropriate locations for development.
A reserve site is identified on the Policies Map in the following location:

- Land at Prospects Royston, lying immediately north of the A505 and immediately east of the A10 on the edge of Royston.

5.3 In addition, the draft Duty to Corporate Statement of Common Ground [SoCG], especially the Supplementary SoCG 'Meeting sports needs around Royston' [page 54 of the overall report], confirms that the parties (Cambridge CC, South Cambridgeshire DC and North Herts DC) in respect of Royston's outdoor sport's needs "...agree that there are multiple shortfalls in sports provision in the Royston area" and "are committed to collaborating through future plan processes to explore how both short- and longer-term needs for outdoor sports facilities in the Royston area should be met." [page 3 of the Supplementary SoCG]

5.4 Given these identified sports needs Prospects Royston has the potential to help meet some or all this need. Appended to these representations is our illustrative masterplan for the site which identifies a sports hub of 12.47 ha. This would be part of the first phase of development to come forward with enabling residential development. Page 9 of the Vision Statement at Appendix 1 sets out an indicative sports hub layout. At this stage this is a flexible area and has not been designed in any detail but comprises provision of multiple pitches, MUGAs and other facilities supporting a wider range of different sports, in response to the deficiencies described in the draft SoCG

5.5 The Prospects Royston site is in single ownership, has no significant infrastructure impediment to prevent development, development is not dependent on major strategic infrastructure interventions and thus the site is immediately deliverable.

Appendix 1

Prospects Royston Vision Statement

Appendix 2

Prospects Royston Illustrative Masterplan

Appendix 3

Landscape, Visual and Ecology Technical Note

Appendix 4

Transport and Connectivity Statement



Appendix 5

Stantec Table and Plan

Appendix 6

NHDC Officer Letter Aug 2026





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