Representations to the Greater Cambridge Local Plan Regulation 19 Consultation

Land at Fen Ditton

On behalf of Vistry Strategic Land and
The Quy Estate

September 2026

Vistry

Turley

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1. Introduction

1.1 These representations have been prepared by Turley on behalf of Vistry Strategic Land (Vistry) and The Quy Estate (the Landowner) **jointly and severally** in respect of the Draft Greater Cambridge Local Plan (GCLP) Regulation 19 Consultation.

1.2 Vistry and the Landowner have site interests within the Local Plan area including at Fen Ditton (see Section 4 and the accompanying Vision Document for further site details). Accordingly, these representations are made in respect of Vistry's existing land interests within the Greater Cambridge Area, with a specific focus on issues relating to the site at Fen Ditton; and should be read in conjunction with the supporting documentation that has been prepared for the site at **Appendix 1 and 2** (accompanying Vision Document and Green Belt Review).

1.3 These responses reference various policies proposed within the consultation and these representations are structured accordingly. These responses build upon the comments previously submitted by Turley of behalf of Vistry and the Landowner to the GCLP First Proposals Consultation (December 2021) and the Regulation 18 consultation of the GCLP (January 2026) on behalf of Countryside Properties (now Vistry) and The Quy Estate.

Vistry's Revised Approach to the Regulation 19 GCLP

1.4 Whilst hitherto broadly supporting the aims, objectives and strategy of the emerging GCLP (at the Regulation 18 stage) albeit with some caveats, Vistry and the Landowner nonetheless considered that the GCLP lacked overall ambition in terms of addressing the need for new homes in Cambridge and unlocking the greater economic potential of the area. We therefore reserved the right to amend future representations at a later date.

1.5 As part of our preceding Regulation 18 submissions Vistry and the Landowner therefore did not formally object to any specific aspect of the emerging Plan and were broadly supportive of the overall framework. However, since the publication of the Regulation 18 Plan, significant changes to the GCLP and its spatial development strategy have taken place, which has subsequently modified their position, notably, in relation to the GCLP's recalibrated spatial strategy.

1.6 Further changes relate to the explicit need to accommodate a minimum of 48,069 new homes and 73,000 additional jobs across the 2024-2045 plan period. In addition, there are now structural changes to the spatial strategy due to the loss of critical government infrastructure funding, resulting in the strategic allocation North East Cambridge (NEC) being unable to contribute the previously allocated housing numbers during the plan period to 2045. Furthermore, a new National Planning Policy Framework (NPPF) was published in August 2026, which is material to a number of core policy aspects of the emerging Local Plan, such as the presumption in favour of sustainable development, notwithstanding that the plan will be primarily examined under the 2024 NPPF.

1.7 It is noted that the GCLP has attempted to redistribute the housing numbers lost from the strategic NEC allocation to other strategic locations, such as at Cambourne and at Grange Farm. Vistry and the Landowner are however not convinced that the spatial redistribution of these homes is achievable in real world terms, due to the vulnerability of the GCLP to systemic delays beyond its practical powers to resolve. In addition, the enforced reallocation of these new homes leaves the wider spatial strategy unbalanced with insufficient housing allocation in the NEC area in the medium term.

1.8 This means that the Regulation 19 version of the plan is fundamentally under-allocated in terms of new housing provision during the relevant plan period and lacks sufficient resilience, making it unsound under national policy. As such, the only sustainable remedy is to allocate additional housing sites as part of this emerging Local Plan and not to defer such action to either an early local plan review or another future plan-making body.

1.9 This requirement is given further force by the formal creation of the Greater Cambridge Development Corporation in July 2026, which is explicitly tasked with planning and implementing much higher levels of strategic growth in the area, than that proposed by the Regulation 19 Local Plan. Accordingly, it is incumbent upon this emerging Local Plan not to leave strategic delivery deficits, which then need to be remedied by future plans.

1.10 In this regard, the proposals at Fen Ditton, which are set out in the Vision Document at **Appendix 1** of these submissions, demonstrate the immediate availability of a highly deliverable and sustainable alternative development site, which is well-suited as part of a more effective and broader-based spatial development strategy, to help deliver some of these reallocated new homes earlier in the relevant plan period. All of the land in question at Fen Ditton is within a single ownership and the joint promoter (Vistry) is a national housebuilder. As such, early delivery is assured.

1.11 For the avoidance of doubt, Vistry and the Landowner remain broadly supportive of the Local Plan when taken as a whole. However Vistry and the Landowner object to three key elements of the Local Plan. Primarily, the revised development strategy presented in the Regulation 19 version is <u>not positively prepared</u> and is also <u>not effective</u> as it relies upon the displacement of new homes away from North east Cambridge to alternative strategic locations which are also vulnerable to the risk of future housing delivery failure. The development strategy is therefore <u>not justified</u> as it clearly requires additional layers of supportive growth from other locations.

1.12 As such, Vistry and the Landowner request the right to participate in the forthcoming examination of the Local Plan to further articulate the development strategy objections made in these representations. Vistry and the Landowner seek specifically to participate in the development strategy hearing session (**Policy S/DS**) the North East Cambridge (NEC) hearing session (**Policy S/AMC/NEC**) and the Settlement Hierarchy matter hearing session (**Policy S/SH**). However, Vistry and the Landowner's conditional support for the GCLP in other general respects, remains unchanged, subject to the specific comments made within these representations.

2. Response to the Draft Cambridge Local Plan Regulation 19 Consultation

2.1 Within this section, responses are provided on behalf of Vistry and the Landowner to the Regulation 19 consultation documents, including the suggested policy directions set out by Cambridge City Council and South Cambridgeshire District Council ('the Councils'). These comments are provided in the context of their existing and potential future land interests within The Greater Cambridge Area and specifically those at Fen Ditton.

Development Strategy – General Comments (see objection to Policy S/DS below)

2.2 As stated in the preceding section Vistry and the Landowner have, hitherto, been broadly supportive of the emerging Local Plan, its key themes and strategic priorities as well as its strategy to direct the vast majority of new growth to the Cambridge Urban Area, the edge of Cambridge, and new settlements, recognising that that a range of sites will be required in order to deliver this strategy. However, our position has always been that the Councils should also ensure that an appropriate proportion of medium scale sites are allocated, such as the site proposed at Fen Ditton. This will enable the delivery of a broad mix of tenures and dwelling types, including affordable housing, and provide flexibility to ensure housing requirements can be met in full within the plan period.

2.3 Cambridge is one of the most economically dynamic and nationally significant regions in the UK and one the fastest growing cities in terms of population and economic output. This growth is primarily driven by its world-leading technology and life sciences clusters, which attracts highly skilled workers and investment.

2.4 The Cambridge Growth Company, formed in 2023, was the first vehicle to be tasked by Government to harness this potential and to develop a long-term growth plan to secure long-term ambitious and high quality sustainable growth in Cambridge and its environs. This has now been translated into the creation of the Greater Cambridge Development Corporation (GCDC) which formally came into existence in July 2026, with Peter Freeman CBE as interim Chair.

2.5 In this context, the recently formed GCDC represents an important first step towards shaping the future growth of the City and the wider region in advance of significant growth to come. For this reason, the emerging Greater Cambridge Local Plan must be more ambitious by focusing not just on reallocating capacity lost from other strategic sites, but also on enabling more dispersed spatial models that prioritise early delivery and underpin the small number of large strategic allocations which currently define the spatial strategy.

2.6 This is particularly relevant given the need to sustainably reallocate the housing numbers previously associated with the strategic NEC site, north of Cambridge, due to the recent loss of critical government infrastructure funding.

2.7 Vistry and the Landowner have not previously objected, in principle, to any particular aspect of the emerging GCLP and remains broadly supportive of its wider objectives. However given the recent structural change to the spatial strategy, identified above, this position has now been modified, due to the loss and rapid reallocation of the housing numbers associated with the NEC allocation during the core plan period.

2.8 The Councils originally anticipated that around 3,250 to 4,440 homes from the broader 8,350-home NEC allocation could realistically be built and delivered within the core GCLP period to 2045. However, as the delivery of the NEC allocation is entirely contingent on the Cambridge Waste Water Treatment Plant (CWWTP) being relocated, the Councils have had to delete this short-to-medium-term housing capacity from the active plan period of the GCLP.

2.9 In this regard, it is noted that the NEC allocation has not been removed from the current version of the Local Plan. Instead, it has been retained as a long-term strategic policy framework. However, the short-to-medium-term housing capacity of the allocation has been heavily restricted in terms of contributing housing delivery numbers within the active GCLP period to 2045. Given the fundamental issues which affect the relocation of the CWWTP and the withdrawal of central government funding, the GCLP has had to fundamentally alter its approach to the delivery of these new homes.

2.10 As large-scale housing at NEC cannot be brought forward until the CWWTP has been fully relocated, the allocation is now framed around what can realistically be developed alongside the operational treatment plant in the short to medium term, with the effect of driving the strategic housing-led phase out of the 20-year housing delivery trajectory. This has required the GCLP to source other replacement housing numbers from revised strategic allocations, including at Cambourne North and Grange Farm.

2.11 Whilst Vistry and the Landowner recognise the attempts to redistribute these housing numbers lost from the strategic NEC allocation, they are not convinced that the spatial redistribution of these homes, is achievable within the relevant plan period due to the vulnerability of the local plan to systemic delays beyond its powers to resolve, creating a cascading risk to future delivery as Local Plan has already suffered a major strategic setback in relation to the NEC site. In addition, the enforced reallocation of these new homes leaves the wider spatial strategy unbalanced with insufficient housing allocation in the NEC area in the medium term.

2.12 Policy S/DS acknowledges the Cambridge Urban Area (CUA) to be the most sustainable broad strategic location for development and therefore top of the spatial hierarchy. However within NEC (which is partly within the jurisdiction of Cambridge City and partly within that of South Cambridgeshire but forms part of the CUA) only 520 new homes are proposed. This is because the CWWTP cannot be relocated and the required quantum of homes cannot be delivered during the plan period, resulting in alternative allocations being sought in other locations lower down the spatial hierarchy.

2.13 However the CUA still remains the most sustainable location for development and so by not seeking alternative locations within the CUA, or at least on the edge of Cambridge (the next spatial tier) the Councils are departing from their own spatial strategy.

2.14 To make up for this housing deficit, the spatial strategy looks to over-compensate by relying on enhanced growth from two complex new settlements, which both require other infrastructure factors, such as the timely delivery of East West rail, to ensure that further structural delays to delivery do not occur.

2.15 Whilst Vistry and the Landowner consider that the emerging Plan is broadly ambitious in its overall outlook, the revised spatial growth strategy of the GCLP urgently requires additional layers of strategic growth within the wider Cambridge area, particularly in the area adjacent to the north eastern settlement boundary. As such, the only sustainable remedy is to allocate additional new housing sites as part of this Local Plan to underwrite delivery from these new settlements and ensure that the required housing trajectory can be maintained, particularly over the first five years of the plan period.

2.16 In this regard, the Fen Ditton site promoted by Vistry and the Landowner is perfectly placed to meet this objective, as it can deliver up to 1,500 new homes without the need for any major new enabling infrastructure. The site is also highly deliverable in that it is in single ownership and there are no abnormal constraints to delivery. Therefore the site can contribute a significant amount of new homes in both the short and medium term, with the potential for an early start and overall completion inside 10 years.

Policy S/JH: New jobs and homes - Commentary

2.17 As part of our Regulation 18 submissions, Vistry and the Landowners broadly welcomed the depth of analysis in the Councils' Economic and Housing Needs Update (EHNU) and its assessment of baseline forecasts, albeit obtained only from one source.

2.18 Vistry and the Landowners however remain concerned by the dismissal of the higher growth scenario, in which some 90,900 jobs are envisaged between 2024 and 2045 – generating a need for circa 2,829 homes per annum to provide the necessary labour – despite the EHNU clearly accepting that this '*could be achieved or exceeded*'[1]. The study appears hesitant of the '*step change in infrastructure and development*' that would be needed to facilitate such a level of growth. However this discounts the fact that this is precisely what the Government aims to achieve in Greater Cambridge, given force by the creation of the Greater Cambridge Development Corporation, in July 2026.

2.19 The EHNU also draws parallels with Milton Keynes as an area that is noted to have seen '*huge population and economic growth*' as a result of '*an unrivalled programme of investment and development*'. Fundamentally such growth was led by a development corporation of the kind that the Government has now established in Greater Cambridge.

[1] Iceni (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, paragraph 3.62

2.20 Furthermore, the Government has also recently announced a £400 million investment in Cambridge to help overcome such barriers to growth, including housing supply and affordability. Accordingly, there is clearly the ambition to sustain the economic growth of the area over the long term, which provides significant justification for adopting a higher growth scenario to ensure that housing need is not a barrier to future investment.

2.21 Vistry and the Landowners therefore advocate that the GCLP should be more ambitious in terms of job growth, targeting the creation of 90,900 jobs rather than the 73,300 proposed at draft Policy S/JH. It should equally plan to meet what the EHNU reports to be the associated need for circa 2,829 homes per annum, surpassing what should be viewed as only the '*minimum*' need suggested by the standard method, which is reflected by the minimum 2,289 dpa currently proposed by the GCLP.

Policy S/DS: Development Strategy - Object

2.22 The updated proposed Development Strategy states that the need for jobs and homes will be met as far as possible in the following sequential order of preference, having regard to the purposes of the Cambridge Green Belt:

a. Within the Cambridge urban area;

b. On the edge of Cambridge;

c. At an expanded Cambourne;

d. At other new settlements; and

e. In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres

2.23 The proposed development strategy for Greater Cambridge previously directed the majority of new growth to the CUA, the edge of Cambridge, and to the new settlements. A smaller proportion of growth was directed to the Rural Southern Cluster and other rural areas. Vistry and the Landowner have been previously supportive of the principle of the proposed development strategy, recognising that a range of sites will be required in order to deliver the wider Development Strategy.

2.24 However, the Regulation 19 GCLP proposes a different approach to the Development Strategy. Essentially, within the CUA, which is the most sustainable strategic location for development and top of the spatial hierarchy, only 520 new homes can be delivered. This reflects the fact that the original quantum of homes proposed cannot be delivered during the plan period and so have been currently allocated to other locations lower down the spatial hierarchy. As stated above, this misses the point that the CUA remains the most sustainable location for development. In this regard, whilst Fen Ditton does not lie within the CUA and is categorised as a Group Village, it locational context, within the inner boundary of the A14, and proximity to key transport infrastructure largely mirrors that of the nearby strategic NEC site (see response to Policy S/SH below).

2.25 The synergy of the promoted Fen Ditton site with that of NEC is that the Fen Ditton site is located only approximately 1.4 miles from Cambridge North Station and just 1.1 miles to the nearby Newmarket Road Park and Ride. The Fen Ditton site is also less than 3 miles from Cambridge City Centre and the Science Park. Accordingly, notwithstanding its Group Village status, in terms of its functional relationship with the city, situated within the A14 boundary and close to Cambridge North Station it shares a number of locational and sustainability characteristics with that of the NEC allocation. As such, Fen Ditton is exceptionally well located to contribute to the earlier delivery of the displaced NEC housing allocation as well as supporting the Cambridge East allocation.

2.26 It is therefore incumbent upon the Council's to objectively reassess the wider suitability of the Fen Ditton site, given these highly urban characteristics, which mirror that of NEC, against that of the other (effectively lower-order) spatial alternatives.

2.27 Concern is again also raised regarding how the proposed strategy has been interpreted into the allocations proposed. We would highlight that the GCLP is still heavily reliant on allocations for large and complex sites, many of which are dependent on the timely delivery of strategic infrastructure to facilitate delivery. Of notable concern are the revised housing proposals for Cambourne, in the light of the demise of NEC.

2.28 For the avoidance of doubt, Vistry and the Landowner are supportive of the long-term enlargement of Cambourne *in principle*. This is justified in that Cambourne is growing into the first town to be located within South Cambridgeshire and will in time be fully linked to East West Rail. In addition, the recently approved C2C rapid bus service will directly link the new settlement to Cambridge by sustainable transport means.

2.29 However, the enhanced growth strategy for Cambourne is overly ambitious and carries significant development risk as it has been heavily weighted to help compensate for the homes lost at NEC during the plan period to 2045. This is exemplified by the fact that the original development strategy for Cambourne was to deliver approximately 13,000 new homes over the much longer term, but with only 2,550 new homes delivered within the active plan period. This development was intended for North Cambourne and aligned to the location of the new station and reflected the fact that the consented 2,350 new homes at West Cambourne would still be under construction well into the 2030's.

2.30 However, as the NEC allocation is no longer viable in the plan period, a further allocation has been made to Cambourne (south of the A428) which is considered by Vistry and the Landowners, in combination with North Cambourne, to be unrealistic and undeliverable during the plan period. The rationale of this further allocation to Cambourne is to steer the continual expansion and renewal of the existing settlement in line with the wider vision for Cambourne, including 2,720 homes (2,170 homes within the plan period) and 34,600 square metres of new employment floorspace, focused at West Cambourne, Cambourne Business Park and Cambourne Town Centre. This equates to a new total of **4,720** new homes in the period to 2045 over and above the existing commitment at West Cambourne, which is only partially constructed.

2.31 In contrast, Vistry and the Landowner consider that the Development Strategy would be better served and strengthened by the inclusion of a wider variety of site sizes and locations, particularly medium-scale sites within or proximate to North East Cambridge, which play an important role in maintaining delivery rates, providing greater flexibility in the housing trajectory, and reducing reliance on a relatively small number of strategically constrained sites. Our objection is that there is currently a notable absence of sufficient medium-scale allocations, such as Fen Ditton, despite their lack of any infrastructure constraint and their ability to deliver housing early within the plan period in a timely and effective manner.

2.32 It is also noted that Cambridge East is a key allocation at the Cambridge Airport site for a vibrant, inclusive well-connected new city district, reshaping eastern Cambridge while complementing the city centre, comprising: an allocation at Cambridge Airport for mixed use development with supporting services and facilities, including approximately 8,000 homes (delivering 3,950 homes within the plan period).

2.33 Against this background, Vistry and the Landowners consider that the opportunity now available at Fen Ditton is both convincing and self-evident. Primarily, the western A428 corridor is very well supported by both existing active allocations (West Cambourne and Bourn Airfield) and proposed new strategic growth (North Cambourne) and so does not need further, competing, development located directly within these main allocations. Similarly, East West rail will bring a new strategic rail corridor and associated major growth into the south of Cambridge. This leaves a structural deficit at the northern urban fringe of Cambridge as a result of the loss of NEC during the active plan period.

2.34 However, the allocation of Vistry and the Landowner's proposals at Fen Ditton, would greatly augment the current 520 new homes proposed in the area and would also have a functional relationship with nearby Cambridge East. Importantly, the Fen Ditton site would have more sustainable access to nearby rail infrastructure (Cambridge North) than that proposed at Cambridge East. Another important consideration is that the development of Fen Ditton early in the plan period would not be prejudicial to the later delivery of NEC as previously envisaged. Indeed, Fen Ditton would be a complementary, linked, scheme within the wider emerging, wider, north eastern Cambridge Fringe.

2.35 The conclusion to be drawn is that Fen Ditton has been incorrectly discounted as a viable and sustainable residential-led allocation and should be subject to further consideration, as a main modification to the submission version of the GCLP to provide resilience and flexibility within the Development Strategy. Furthermore, once the full housing needs arising from the scale of economic growth proposed in Cambridge are taken into account it will also be necessary to reassess the need for further Green Belt release. As is clearly demonstrated in **Section 4** below, the proposed allocation at Fen Ditton is considered to meet the exceptional circumstances test through the provision of much needed housing in circumstances where other nearby allocations have been stalled. As stated above, all of the land in question at Fen Ditton is within a single ownership and the joint promoter (Vistry) is a national housebuilder. As such, early delivery is assured.

2.36 In addition, the wider public benefits of the scheme are self-evident, both through the proposals themselves and by the relationship of the scheme with the wider area, with the resultant sustainability benefits growth in this location would bring.

2.37 **Section 4** of these representations sets out the findings of a Green Belt Review prepared by SLR, which demonstrates that the site performs weakly against the purposes of the Green Belt set out within draft Policy S/GB and that its consideration as Grey Belt would not undermine the overall integrity or function of the Cambridge Green Belt. The Green Belt Review is submitted as part of these representations at **Appendix 2** and provides robust evidence in support of the allocation of the site and its consideration as Grey Belt, as it does not perform strongly against NPPF Purposes a), b) or d).

2.38 Importantly, the Fen Ditton site also offers clear benefits in terms of early deliverability. As a medium-scale site, it can be brought forward early without reliance on the provision of significant strategic infrastructure, unlike many of the larger allocations within the GCLP, notably the over-scaled proposals at Cambourne.

2.39 This is particularly relevant given that delivery of the largest development components of the spatial strategy are dependent on infrastructure provision by a range of external partners, including water supply, waste water treatment, and transport bodies, over which the Councils have limited or no control. The inclusion of smaller, medium-scale, sites such as at Fen Ditton would therefore materially reduce associated housing delivery risk and support a much more effective and resilient housing trajectory.

2.40 The Sustainability Appraisal (October 2025) prepared by LUC recognises the benefits of accommodating growth in close proximity to Cambridge and places a strong emphasis on delivering an appropriate quantum and mix of housing. Vistry and the Landowners continue to maintain that opportunities such as Fen Ditton perform well against these objectives, benefiting from proximity to existing services and facilities, whilst also being of a scale capable of delivering its own complementary infrastructure and contributing meaningfully to the delivery of the Development Strategy.

Policy S/SH: Settlement hierarchy - Object

2.41 Under this policy the Councils set out a settlement hierarchy as follows:

- Cambridge
- Towns
- Rural Centres
- Minor Rural Centres
- Group Villages
- Infill Villages

2.42 The hierarchy is the same as drafted within the first proposals for the Greater Cambridge Local Plan (2021) and the Regulation 18 Local Plan. Within the Regulation 19 GCLP, Fen Ditton continues to be identified as a Group Village.

2.43 The Settlement Hierarchy Review Update (2025) has been prepared to consider whether the existing categorisations of settlements remains appropriate. All the existing Group Villages, including Fen Ditton, are proposed to remain as such.

2.44 The Settlement Hierarchy Study Update represents a proportionate review of the earlier assessment rather than a comprehensive reassessment of settlement roles and relationships between settlements. As such, it provides limited analysis of how committed and proposed growth, improved connectivity and changing functional relationships may influence the suitability of settlements such as Fen Ditton to accommodate additional development.

2.45 Whilst Vistry and the Landowner recognise the value of consistency in the application of the settlement hierarchy, it is considered that the approach taken through the update remains overly focused on existing services and facilities and does not sufficiently account for committed growth, proposed allocations, or the dynamic role that some settlements play within the wider spatial strategy.

2.46 In particular, the assessment gives limited weight to the strong functional relationship between certain Group Villages and Cambridge itself, or to the sustainability benefits arising from proximity to major growth locations and to the strategic transport corridors. For example, the Landowner's site in Fen Ditton is located approximately 1.4 miles from Cambridge North Station and just 1.1 miles to the nearby Newmarket Road Park and Ride. The site is also less than 3 miles from Cambridge City Centre and the Science Park.

2.47 Fen Ditton is exceptionally well placed to benefit from, and contribute to, the delivery of the North East Cambridge allocation as well as the Cambridge East allocation, including the sustainability measures and infrastructure investment proposed as part of that wider growth location. These factors materially enhance the sustainability credentials of Fen Ditton and should be more fully recognised within the settlement hierarchy assessment.

2.48 It is important that the hierarchy is applied flexibly and in a manner that supports the effective delivery of the development strategy. Opportunities such as Fen Ditton, which are capable of sustainably accommodating additional growth, can play an important role in contributing to housing delivery, particularly in northern Cambridge fringe, where they are of a scale that both complements existing services and facilities and supports long-term viability. The suitability and sustainability of Fen Ditton to accommodate additional growth is addressed in more detail elsewhere within these representations.

Policy S/GB: The Cambridge Green Belt - Commentary

2.49 In connection with the promotion of land at Fen Ditton, Vistry and the Landowner maintain that the Fen Ditton site should be released from the Cambridge Green Belt and incorporated within the settlement boundary of Fen Ditton through its allocation for residential-led development.

2.50 We would highlight that **Section 4** of these representations sets out the findings of a Green Belt Review prepared by SLR on behalf of Vistry, which demonstrates that the site performs weakly against the purposes of the Green Belt set out within draft Policy S/GB and that its consideration as Grey Belt would not undermine the overall integrity or function of the Cambridge Green Belt.

2.51 The Green Belt Review is submitted as part of these representations at **Appendix 2** and provides robust evidence in support of the allocation of the site and its consideration as Grey Belt.

Policy S/AMC/NEC: North East Cambridge - Object

2.52 Notwithstanding the issues surrounding the CWWTP, referenced above, North East Cambridge (NEC) is designated as an **Area of Major Change** (**AMC**) in the Regulation 19 Local Plan, with the following key objectives:

> a. Contributing positively to Greater Cambridge's internationally significant role in research, innovation and knowledge-based industries;
>
> b. Supporting integration of different uses across the area, including complementary uses such as residential, mid-tech and industrial uses;
>
> c. Enabling the delivery of high quality, inclusive and distinctive urban places that integrate successfully with the wider City; and
>
> d. Delivering and/or contributing to measures that enhance and prioritise active travel and public transport connections throughout the area and into neighbouring areas, building on the excellent strategic connectivity provided by Cambridge North Railway Station and the Cambridge Guided Busway.

2.53 Vistry and the Landowner broadly support these objectives for the NEC/AMC, to deliver a walkable, low-carbon, mixed-use environment combining new homes, employment, services, cultural amenities, and high quality public spaces. However as currently worded the policy is not positively prepared or effective.

2.54 The policy makes clear that the full development potential of NEC/AMC is dependent on the relocation of the CWWTP, together with enhanced public transport and active travel connections, which will unlock the intensification of commercial and industrial space alongside the delivery of significant new housing, civic spaces, and new community infrastructure.

2.55 Importantly, the delivery of NEC would generate wider sustainability and infrastructure benefits that extend beyond the allocation itself. In particular, the proposed public transport, active travel improvements and the concentration of services and facilities would materially enhance the sustainability of surrounding areas, including locations such as Fen Ditton.

2.56 The nearby proximity and immediate availability of Fen Ditton in relation to the NEC/AMC means that it would be well placed to benefit from, and contribute to, the critical mass of services, employment opportunities and sustainable movement networks introduced through the development of the NEC/AMC, further strengthening the case for additional growth in this location.

2.57 Vistry and the Landowner also note that the comprehensive delivery of NEC remains dependent on significant infrastructure interventions and funding arrangements that are not resolved. In this context, it is essential that the Local Plan does not therefore disproportionately rely on enhanced delivery from other strategic sites to compensate for the reduced housing delivery of the NEC/AMC during the operative plan period.

2.58 Medium-scale, well located and sustainable sites, such as Fen Ditton, are capable of coming forward early in the plan period to supplement the reduced housing numbers at the NEC, without any reliance on the relocation of existing development, such as the CWWTP, or any other strategic infrastructure and can therefore play a critical role in supporting the housing trajectory and ensuring robust delivery in this area of Cambridge against the required timescales of the Local Plan.

2.59 The proposed development at Fen Ditton would indeed reflect many of the principles which underpin the rationale for the NEC/AMC and, as such, represents an opportunity that supports, rather than competes with, the NEC vision. The allocation of Fen Ditton would therefore provide important flexibility and resilience within the development strategy, helping to ensure the delivery of an appropriate and effective quantum of housing to support the wider aspirations of the Plan up to 2045, particularly in the event of further delivery delays to the NEC allocation.

Policy S/CE: Cambridge East - Support

2.60 Vistry and the Landowner broadly support the objectives and place identify of Policy S/CE for Cambridge East (CE) which is intended to be "*a vibrant, inclusive new city district that reflects the spirit of Cambridge while shaping its future…offering welcoming, walkable neighbourhoods which support an intergenerational community to live well, work purposefully, learn and thrive*".

2.61 Vistry and the Landowner recognise the long-term benefits that the successful delivery of CE would bring. Importantly, the delivery of CE would generate wider sustainability and infrastructure benefits that extend beyond the allocation itself. In particular, the proposed public transport, active travel improvements and the concentration of services and facilities would materially enhance the sustainability of surrounding areas, including nearby locations such as Fen Ditton.

2.62 The proximity of Fen Ditton to CE means that it would be well placed to benefit from, and contribute to, the critical mass of services, employment opportunities and sustainable movement networks introduced through the CE development, strengthening the case for additional growth in this broad location.

2.63 In addition, East West Rail are actively currently considering the potential inclusion of a fourth new city railway station to the east of Cambridge (Cambridge East). The station is proposed to be built on the Newmarket line branch near Cherry Hinton, which would provide a step change in public transport connectivity in eastern Cambridge and the wider surrounding area such as Fen Ditton.

2.64 Whilst CE is not reliant on the relocation of major existing infrastructure (as is the case with the CWWTP at NEC) it is essential that the Local Plan does not disproportionately rely on the allocation at CE to meet housing delivery requirements within the early and middle stages of the plan period. Medium-scale, well located sites such as Fen Ditton are more capable of coming forward early without reliance on strategic infrastructure and can therefore play a critical role in supporting the early years of the housing trajectory and ensuring longer term delivery against the required timescales of the Local Plan.

2.65 The proposed development at Fen Ditton would reflect many of the same principles underpinning the CE allocation and the Local Plan aspirations for development on the edge of Cambridge and, as such, it represents an opportunity that supports, rather than competes with, the wider CE vision. The allocation of Fen Ditton would therefore provide important flexibility and resilience within the development strategy, helping to ensure the delivery of an appropriate and effective quantum of housing to support the wider aspirations of the Local Plan up to 2045.

Other Conditionally Supported Local Plan Policies

Biodiversity and Green Spaces

Policy BG/BG: Biodiversity and geodiversity

2.66 Vistry and the Landowner note that policy continues to require development to achieve a minimum 20% biodiversity net gain, which exceeds the mandatory requirement set out in the Environment Act 2021. Vistry and the Landowner fully support the objective of delivering meaningful biodiversity enhancements and are committed to achieving high levels of net gain, with at least 10% already embedded as a baseline commitment.

2.67 However, a fixed requirement of 20% clearly represents a strong aspiration and it will be important to understand its overall viability implications particularly when considered alongside the cumulative impact of other plan policies. It is therefore important this requirement is considered on a site-specific basis and assessed alongside the cumulative impact of other plan policies as site capacity and viability work progresses.

2.68 Vistry and the Landowner support the recognition that on-site delivery of biodiversity net gain may not always be achievable. Paragraph 2 of the policy appropriately states that, where on-site options have been exhausted to the satisfaction of the Local Planning Authority, biodiversity net gain may be delivered off-site through registered habitat banks, bespoke schemes or statutory biodiversity credits. This flexible approach is welcomed, as it reflects the overarching objective of biodiversity net gain.

Policy BG/GI: Green infrastructure

2.69 Vistry and the Landowner support the objectives of Policy BG/GI in seeking to secure high quality green infrastructure as an integral part of new development. Vistry have extensive experience in delivering sensitive and innovative, landscape-led masterplans that maximise the potential of the natural environment, protect and enhance existing landscape assets, and create places with a strong sense of character and maturity. These principles underpin the proposals for Fen Ditton, with green and blue infrastructure forming a fundamental component of the development. The proposals will provide a range of key green infrastructure features to include:

- Pockets of green and expansion of recreation ground to connect new and old;
- Green corridor from river to railway; and
- Creation of a landscaped interface with the A14.

Policy BG/TC: Tree canopy cover and the tree population

2.70 Vistry and the Landowner support the overall objective of the policy to increase tree canopy cover and enhance the quality and resilience of the treescape across Greater Cambridge.

2.71 However, while the policy appropriately allows for flexibility where a scheme can demonstrate *"significant ecological, historical, landscape or operational reasons to justify a canopy cover of less than 30% on site"*, it is considered that this flexibility should be more clearly and consistently applied throughout the policy.

2.72 In particular, paragraph 3 states that development *"will not be permitted which involves felling, significant surgery, and potential root damage to trees of amenity value, unless otherwise approved by the Local Planning Authority",* but does not clearly acknowledge that tree removal may in some circumstances be necessary due to factors such as disease, age, structural condition or safety concerns, or where the benefits of development demonstrably outweigh the harm arising from tree loss.

2.73 Vistry and the Landowner also note that paragraph 1 of the policy sets out detailed submission requirements, including the need for an Arboricultural Impact Assessment, tree Protection Plan and/or Hedgerow Survey. It is considered that these requirements would be more appropriately addressed through the Local Plan validation requirements.

2.74 In addition, paragraph 7 of the policy states that development proposals *"should maintain a buffer zone of at least 15 metres"* from ancient woodland, ancient and veteran trees and ancient hedgerows, but then goes on to state that *"the size and type of buffer zone will vary depending on the scale, type and impact of the development".* As currently drafted, this appears contradictory and could lead to uncertainty in interpretation. The policy would benefit from clarification as to whether the 15 metre buffer represents a fixed minimum or a guideline that is subject to variation based on site-specific circumstances.

Policy BG/RC: River corridors

2.75 Vistry and the Landowner recognise and support the importance of protecting river corridors in Greater Cambridge, including the River Cam, the River Ouse and their tributaries, and the role these corridors play in supporting biodiversity, water quality, landscape character and climate resilience.

2.76 However, concern is raised in respect of paragraph 2 of the policy, which states that development proposals should retain or reinstate *"a buffer zone of at least 10 metres from the watercourse bank top, or 5 metres from a ditch bank top,"* within which *"no development shall be permitted except for domestic extensions, soft landscaping, small amenity areas, or proposals where it is necessary for the nature and function of the development."* While the principle of buffer zones is supported, Vistry and the Landowner consider that further clarity and flexibility is required either within the policy wording or supporting text to ensure consistent application across sites.

2.77 In particular, the policy would benefit from clarification as to whether the buffer requirement applies consistently to both sides of a watercourse in all circumstances, or whether a more flexible, site-specific approach may be appropriate depending on the nature of the watercourse, surrounding land uses and environmental constraints.

Policy BG/EO: Providing and enhancing open spaces

2.78 Vistry and the Landowner recognise the importance of delivering high quality and accessible open spaces as an integral part of new development and support the overarching objective of Policy BG/EO to ensure that development *"addresses the open space needs it generates",* secured through an appropriate mix of on-site provision and/or financial contributions for off-site provision, enhancement and management. As set out in response to Policy BG/GI, the proposals at Fen Ditton would deliver a range of open space opportunities and green infrastructure, and Vistry and the Landowner would welcome ongoing engagement with the Councils, key stakeholders, and the local community to ensure that provision responds effectively to local needs and aspirations.

2.79 Vistry and the Landowner note the Councils' intention to develop locally prescribed standards for inclusive and accessible open space, informed by the Green Infrastructure Strategy and Open Spaces Study. While local context is important, it is essential that any such standards are robustly justified, aligned with national policy and guidance and capable of being viably delivered. Given that a number of the standards remain under exploration, Vistry and the Landowner reserve the right to comment further on the detailed requirements of Policy BG/EO as the plan progresses.

Wellbeing and Social Inclusion

Policy WS/HD: Creating healthy new developments

2.80 Vistry and the Landowner broadly support the objectives of the policy and the Council's proposed approach to creating healthy new developments. The proposed development at Fen Ditton would strongly align with the aspirations of the policy, providing the opportunity to create a healthy and inclusive community supported by appropriate infrastructure for health, education and wellbeing.

2.81 The site lends itself to a compact, landscape-led master planned approach, meeting daily needs within walking distance, delivering integrated green infrastructure and encouraging active travel. This would reduce reliance on the private car, enhance the public realm, promote social interaction and contribute positively to both environmental quality and residents' physical and mental health. Built in the right way and in the right place, the proposed development would make a positive contribution to nature and deliver long-term health and wellbeing benefits for future residents.

2.82 However, Vistry and the Landowner consider that the policy would benefit from greater flexibility in its application to reflect local circumstances. In particular, it is suggested that the policy more clearly recognises that health principles should be applied to new development 'wherever possible' and 'as appropriate', drawing on the ten principles of creating healthy places from the Healthy New Towns programme or any future equivalent. This would ensure the policy remains proportionate and adaptable across a range of site types and scales.

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

2.83 Vistry and the Landowner support the overall aspirations of the policy. However, we consider that minor clarification is required in relation to the requirements set out in paragraph 4 of the policy.

2.84 In particular, the policy states that proposals for residential developments of "*200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure)"* must be informed by detailed assessments of community needs and include strategies demonstrating engagement with local communities and stakeholders. It is unclear whether this requirement is intended to be addressed through existing submission documents, such as a Statement of Community Involvement or Statement of Community Engagement, or whether it represents an additional and separate requirement. Clarification on this point would assist in ensuring the policy is applied consistently and proportionately.

2.85 The policy further states that *"developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in delivering the facilities off site."*

2.86 Whilst Vistry and the Landowner broadly support the principle of providing appropriate community infrastructure, it is important that this requirement is applied flexibly and takes full account of site-specific circumstances, including viability considerations and the capacity of existing or planned off-site facilities. In some cases, off-site provision or financial contributions may represent a more effective and sustainable means of meeting community needs, particularly where developments are well integrated with existing settlements.

Policy WS/HS: Pollution, health and safety

2.87 Vistry and the Landowner support the aims and overall approach of the policy in seeking to ensure that development protects human health and amenity and avoids adverse impacts arising from pollution and safety risks. However, clarification is requested in relation to paragraph 2 of the policy, which refers to *"sensitive residential premises".*

2.88 As currently drafted, this term is not defined and introduces unnecessary ambiguity. It would be helpful for the policy or supporting text to clearly set out what uses are intended to fall within this definition.

2.89 In addition, the policy refers to the need for Noise Impact Assessments and Air Quality Assessments where relevant. Vistry and the Landowner consider that such requirements should be referenced within the Council's validation requirements instead of being included in the policy.

Great Places

Policy GP/PP: People and place responsive design

2.90 Vistry and the Landowner support the objectives of the policy. In particular, support is given to the emphasis on development responding to local character and distinctiveness. Given the significant variation in character across Greater Cambridge, it is important that the policy is applied in a way that avoids a homogenised approach to design and instead allows proposals to respond appropriately to the specific qualities, scale and identity of their local context.

2.91 Vistry and the Landowner also consider it important that the policy is implemented proportionately through the planning process. Where appropriate, design matters should be assessed at the detailed design stage, with clear design principles established at outline planning application stage.

Policy GP/QD: Achieving high quality development

2.92 Vistry and the Landowner support the vision of the proposed policy. However, we wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate.

Policy GP/HD: Housing density

2.93 Vistry and the Landowner broadly support the overall principles of the policy. Although, we consider that the policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.

Policy GP/LC: Protection and enhancement of landscape character

2.94 Vistry and the Landowner support the principles of the policy and recognise the importance of protecting and enhancing landscape character. However, it is essential that the policy is applied in a balanced manner to ensure that it does not excessively constrain the delivery of much-needed housing in sustainable locations.

2.95 The policy requires that development must "*protect and enhance the setting of Cambridge within the landscape by strengthening the well-defined, vegetated edges of the city and by protecting and enhancing the green corridors which extend into the city and along the River Cam corridor."*

2.96 Whilst this objective is supported in principle, Vistry and the Landowner consider that the assessment of landscape setting and contribution should be undertaken on a site-specific, case by case basis, having regard to the existing condition and character of the land concerned.

2.97 In this respect, it should be recognised that not all land within the wider landscape setting of Cambridge currently makes a meaningful contribution to its character or special qualities. Where development proposals can deliver landscape enhancement, strengthening green infrastructure and reinforcing defensible settlement edges, they can positively contribute to the objectives of the policy while also supporting the wider growth strategy.

Policy GP/HE: Historic Environment

2.98 Vistry and the Landowner support the broad intentions of this policy. However, it is considered that the reference within the policy to proposals being supported by a Heritage Impact Assessment would be more appropriately addressed through the Council's validation requirements, rather than forming part of the policy wording itself.

Policy GP/HA: Designated heritage assets

2.99 Vistry and the Landowner support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. In our view, the policy would benefit from being combined with Policy GP/HE.

Jobs

Policy J/AL: Protecting the best agricultural land

2.100 The policy states that "*planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless"* specific criteria are met. Vistry and the Landowner acknowledge the importance of protecting the best and most versatile agricultural land, however, it is important that the weight attached to the loss of such land is proportionate and evidence led. In addition, the context of agricultural land is also important to consider in respect of viability. For example, Land at Fen Ditton was part of the wider Quy Estate which covers the surrounding areas of Fen Ditton / Horningsea / Stow-cum-Quy.

2.101 Following the construction of the A14 this parcel of land was segregated from the wider farm. As a result, the land is now difficult to farm in the context of the wider farming practices within the Quy Estate and thus reduces its viability as agricultural land. Modern farming is presented with logistical challenges that mean whilst the soil quality itself may not have changed, the context, such as the above, changes its viable productivity. Furthermore, the Natural England Guide to assessing development proposals on agricultural land (2021) clarifies how impacts on agricultural land quality should be considered in decision-making.

2.102 The guidance identifies that consultation with Natural England is only required where development would result in the loss of 20 hectares or more of best and most versatile agricultural land, as set out under Schedule 4(y) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This threshold provides a clear indication of the scale at which the loss of high quality agricultural land is considered significant in planning terms.

2.103 Accordingly, the application of the policy should reflect both the scale of any proposed loss and the wider planning balance, including housing need, sustainability, deliverability and the availability of alternative sites. Where the loss of best and most versatile agricultural land is limited in extent and outweighed by the benefits of development, including the delivery of much-needed housing in sustainable locations, the policy should allow for a balanced and proportionate assessment rather than operating as an absolute constraint.

Homes

Policy H/AH: Affordable housing

2.104 Vistry and the Landowner recognise the importance of delivering affordable housing, particularly in areas such as Greater Cambridge which continue to experience acute levels of need and affordability pressure. The objective of the policy to secure a mix of affordable housing tenures as part of new development is therefore supported in principle.

2.105 Vistry and the Landowner note the conclusions of the Local Plan Viability Assessment (2025), which states that *"based on the assumptions, appraisals and sensitivity analyses contained herein, the proposed Local Plan policies do not undermine the viability of development on the whole within Greater Cambridge."* Notwithstanding this conclusion, it is important that the Councils continue to review viability as the Plan progresses.

2.106 In seeking to deliver the affordable housing tenures identified within the policy, it is important that the Councils allocate a sufficient number of sites of varying sizes, types and locations across the District. In particular, the inclusion of an appropriate proportion of medium to large scale sites will be critical to ensuring that affordable housing is delivered consistently and within the plan period.

2.107 Sites, including those promoted by Vistry such as Fen Ditton, present clear opportunities to deliver a broad mix of tenures and a variety of affordable housing sizes and types as part of well-designed, mixed and balanced communities.

2.108 Paragraph 6 of the policy states that *"within major developments for housing, the new affordable homes must be dispersed in small groups or clusters."* Whilst the principle of tenure integration is supported, further clarification is required as to what constitutes *"small groups or clusters"* in practice.

Policy H/HM: Housing mix

2.109 Vistry and the Landowner support the approach taken within the policy, which sets out housing mix as a series of recommendations expressed as a range, rather than as fixed requirements. This provides an appropriate level of flexibility, allowing development proposals to respond to changing market conditions and housing needs over the plan period, while still supporting the delivery of a balanced mix of homes.

2.110 To reiterate, it is important that the implementation of the housing mix policy is supported by the allocation of a sufficient number of sites across a range of sizes, locations and settlement types. In particular, the Councils should ensure that an appropriate proportion of medium to large scale sites are allocated to enable the delivery of a broad mix of tenures and dwelling types, including affordable housing, within the plan period.

Policy H/SS: Residential space standards and accessible homes

2.111 Vistry and the Landowner support the principle of the policy. Although, it is important that the policy is applied with sufficient flexibility in order to respond to site-specific circumstances, particularly where the rigid application of minimum standards may not be achievable without undermining deliverability or viability in certain locations.

2.112 Where the policy refers to the *Government's Technical Housing Standards – Nationally Described Space Standard (2015),* it is essential that these requirements are fully reflected within viability and site capacity assessments that underpin site allocations and housing numbers.

Policy H/SH: Specialist housing and homes for older people

2.113 Vistry and the Landowner support the objective of the policy. However, concern is raised regarding the requirement that *"unallocated strategic sites of 1,000 dwellings or more will be expected to provide at least 10% of homes as specialist housing",* alongside the additional criteria set out within the policy.

2.114 Whilst the principle of encouraging specialist housing on larger sites is understood, Vistry and the Landowner consider that the policy, as it is currently worded, risks having unintended consequences for scheme viability and deliverability.

Infrastructure

Policy I/ST: Sustainable transport and connectivity

2.115 Vistry and the Landowner support the aspirations of the proposed policy and consider the proposed development at Fen Ditton well aligned with this approach advocated through delivering a sustainable and inclusive community. The Fen Ditton site is in a highly accessible location by cycle, with a number of nearby sustainable transport improvements proposed.

2.116 In particular, the site at its eastern most extent is less than 2 miles to Cambridge North Station and under a mile at its closest (average of 1.4 miles) and to the Newmarket Road Park and Ride (with the eastern parcel being the closest and under a mile away) and less than 3 miles from the centre of Cambridge city and the Science Park.

2.117 In addition, it is envisaged that development at Fen Ditton would be supported by a range of transport measures which could include:

- Potential to divert an existing bus service into the site;
- Free/discounted bus travel for residents;
- Cycle initiatives such as cycle training for residents and e-bike incentives;
- Marketing information for residents and the surrounding area to promote travel by sustainable means;
- The introduction of the Fen Ditton Smarter Choices and Better Points schemes for residents of the development and the surrounding area to incentivise sustainable travel with a reward based scheme; and
- IT assistance campaign to promote working from home or a work hub and reducing the need to travel.

2.118 Vistry and the Landowner note that the policy states that developers of *"large developments"* or proposals with *"significant transport implications"* will be required to demonstrate that opportunities for sustainable travel have been maximised through the submission of a vision led Transport Assessment and Travel Plan. Whilst the intent of this requirement is supported, it is considered that this wording more appropriately relates to validation requirements rather than policy itself.

Policy I/EI: Energy infrastructure Masterplanning

2.119 Vistry and the Landowner are supportive of the policy. Although, Vistry and the Landowner wish to reiterate the importance of ongoing and meaningful engagement with key stakeholders in this process to ensure they are willing to support facilities coming forward through new development.

Policy I/ID: Infrastructure and delivery

2.120 Vistry and the Landowner support the principles of the policy. However, it is essential that the approach set out in the policy is underpinned by continued and meaningful engagement with key stakeholders to ensure that the facilities and networks required to support growth are deliverable and supported by those responsible for their provision.

Policy I/DT: Digital and telecommunications infrastructure

2.121 Vistry and the Landowner support the aspirations of the policy and recognise the importance of appropriate digital infrastructure in supporting new development. However, concerns are raised in respect of the requirements set out at paragraphs 6 and 7 of the policy and the practical implications of these for applicants.

2.122 Paragraph 6 states that *"planning applications that include either 30 dwellings or more, or commercial floorspace of 1,000m2 or more must include suitable infrastructure that would support any future rollout of appropriate telecommunications equipment such as small cell mobile communications technology or mobile masts and towers."* While the principle of future proofing development is supported, it is unclear how applicants are expected to deliver or secure infrastructure that is ultimately dependent on network operators' investment decisions, which are outside the control of developers.

2.123 Similarly, paragraph 7 requires that *"planning applications that include the development of either 250 dwellings or more or 10,000m2 or more commercial floorspace must assess the suitability of mobile coverage… and, where mobile coverage deficiencies are identified, provide details of proposed improvements and agreements with network operators or neutral host providers."* Vistry and the Landowner consider this requirement to be disproportionate, as developers have no direct control over mobile network coverage or the delivery of off-site upgrades, in a similar manner to utilities such as water and electricity.

2.124 Vistry and the Landowner therefore consider that paragraphs 6 and 7 should be clarified or amended to ensure that the policy does not place unreasonable or undeliverable obligations on applicants.

Policy I/CM: Construction management

2.125 Vistry and the Landowner are supportive of the principle and intent of the policy.

2.126 Paragraph 1 of the policy states that *"all major development, infrastructure development, or development that, due to its nature or location, is likely to have an adverse impact on the local environment and amenity during construction must be informed by a Noise and Vibration Demolition Environmental Management Plan (DMP) and Construction Environmental Management Plan (CEMP), or a combined Demolition and Construction Environmental Management Plan (DCEMP), which should be agreed by the Local Planning Authority prior to the commencement of development."*

2.127 It is unclear whether this requirement is intended to operate as a validation requirement at application stage or whether such documents are expected to be secured by planning condition. Vistry and the Landowner consider that this requirement should be secured through appropriately worded planning conditions rather than as a policy requirement at plan level. Similarly, the requirements set out in paragraph 2 of the policy would be more suitably addressed through the use of standard or bespoke planning conditions.

3. GCLP Climate Change

3.1 These representations to the Greater Cambridge Local Plan (GCLP) have been produced by Turley Sustainability and ESG on behalf of Vistry and the Landowner with respect to their existing land interests within the Greater Cambridge Area and specifically those at Fen Ditton. These representations are focused on the Climate Change Theme of the GCLP and the following policies:

- CC/SD Sustainable Development and the Climate Emergency
- CC/DC Designing for a Changing Climate
- CC/NZ Net Zero Carbon new buildings
- CC/WE Water Efficiency in new developments
- CC/IW Integrated Water Management, sustainable drainage and water quality
- CC/CE Supporting a circular economy and sustainable resource use
- CC/CS supporting land-based carbon sequestration and carbon sinks

3.2 In addition to the draft Policies, Vistry and the Landowner have also reviewed the following evidence base documents which have been referenced in our representations where appropriate;

- Climate Change Topic Paper (The Topic Paper); and
- Greater Cambridge Shared Planning – Update to Net Zero policy Cost Analysis Report. 2025 (The Evidence Base)

3.3 Vistry and the Landowner fully supports the strategic commitment by the GCLP to positively address the issue of climate change mitigation and adaptation within the plan period and welcome the opportunity to comment on the draft policies to ensure they evolve to meet the tests of soundness and are both deliverable and viable whilst supporting the delivery of much needed high quality, private and affordable homes within Greater Cambridge.

3.4 Vistry and the Landowners proposed interests at Fen Ditton have been discounted by the Local Plan as a sustainable location for residential development, however, Vistry and the Landowner are committed to working with the Councils and the draft Policies to ensure the proposed development is as sustainable as possible and implements the draft Policies in a commercially and technically viable manner. As described in **Section 2** of these representations, the land at Fen Ditton is considered to be in a sustainable location for development with access to a network of footpaths and cycle networks and a nearby high frequency train station.

3.5 Locating homes in sustainable locations is one of the most powerful steps to reducing carbon emissions given that approximately one third of UK Greenhouse gas (GHG) emissions are emitted from the transport sector and private vehicles is to locate housing close to sustainable modes of transportation.

The Greater Cambridge Local Plan Policies

Policy CC/SD: Sustainable development and the climate emergency

3.6 Vistry and the Landowner consider that the requirements for a *"standalone Sustainability Statement"* for all major development, and for Sustainability Statements to accompany minor development applications are reasonable. Vistry welcomes the recognition that the Sustainability Statement should be "*proportionate to the scale and nature of the application*".

3.7 With respect to the content of the Sustainability Statement, Vistry and the Landowner believe that the list of content described in paragraph 2 will need to be amended to reflect the final approved policies post examination which may include the need to remove the requirement for 'net zero carbon' should the proposed NPPF changes be implemented.

Policy CC/DC: Designing for a changing climate

3.8 Vistry and the Landowner have concerns regarding the prescriptive nature of part 3 of the policy, which states that *"all new dwellings shall be designed to benefit from cross ventilation where possible, and take passive, design-led approaches to reducing excess solar gain."* While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Vistry and the Landowner consider that this Policy should be deleted to reduce reporting and administration associated with the Draft Plan.

Policy CC/NZ: Net zero carbon new buildings

3.9 Vistry and the Landowner note that the Government is progressing the Future Homes Standard (FHS), which is intended to deliver highly energy-efficient, low-carbon homes through Building Regulations at a national level. The FHS seeks to ensure new homes produce significantly lower carbon emissions than current standards, supporting the transition to net zero in a consistent and coordinated manner across the country. Delivering these requirements through Building Regulations, rather than through locally specific standards, provides certainty to the development industry, avoids unnecessary variation between authorities, and supports efficient delivery at scale. As discussed in paragraph 3.6, the Government is proposing to change legislation to prevent local authorities from setting standards above Building Regulations and if this legislation is approved then draft policy CC/ NZ will need to be significantly amended or deleted.

3.10 Vistry and the Landowner note that the space heating (15-20kWh per m^2) and the Total Energy Use Intensity (EUI – no more than 35 kWh per m^2) are broadly equivalent to that required to meet the Passivhaus standard[2]. This standard is recognised as the most difficult and costly sustainability standard to meet with only a very small number of homes being built to these standards every year. Table 3.1 of the Evidence Base document identifies that the projected cost of meeting the space heating and EUI standards in the draft Policy is £11,964 for a semi-detached house. Vistry and the Landowner consider the actual cost is likely to be higher given that the government has estimated the cost of meeting the FHS to be £6,170 for a similar property[3] leaving only a small sum of c£5,800 to cover the costs of a substantial increase in construction type to achieve the specified targets.

3.11 As yet, the housebuilding industry has not delivered homes at volume to these standards which, if required, would require huge investment in construction and supply chains, thereby reducing housing delivery. Vistry and the Landowner consider the forthcoming FHS to be the correct blend between carbon emissions reductions and deliverability at scale and, given the housing demand in Greater Cambridgeshire, request that the draft Local Plan adopts this as its main construction standard for new housing.

3.12 In light of the representations above, Vistry and the Landowner request that the space heating and EUI targets within draft Policy CC/NZ be removed and replaced with the requirement to build to the FHS 2025.

3.13 Vistry and the Landowner support the requirement of draft Policy CC/NZ 2 although with respect to CC/NZ 3, Vistry and the Landowner consider that there are certain building types (e.g. heavy manufacturing or R&D) where a gas supply could be required and therefore flexibility with this draft Policy would be appropriate.

3.14 In relation to Part C, the policy states that *"proposals must seek to maximise opportunities to generate on-site renewable energy to enable the development, where possible, to achieve all energy demands through onsite energy generation".* Vistry and the Landowner consider that further clarification is required as to what level and type of information would be expected to demonstrate compliance with this requirement. In particular, it is unclear how the phrase *"where possible"* will be interpreted in decision-making, or how site-specific constraints, design considerations and viability will be taken into account.

3.15 Furthermore, Vistry and the Landowner consider it to be extremely challenging for new dwellings to deploy sufficient renewable energy to meet all its energy demands on site, particularly given the substantial power requirement from Electric Vehicles (EV'). For an average semi-detached house, Vistry and the Landowner consider it reasonable to assume that a maximum of c 3-4 kWp of PV could be installed on the available roofspace for those homes that have optimum orientation (a number will not because they are

[2] What is Passivhaus?

[3] Future Homes Standard consultation stage impact assessment. Table 5

north facing). To meet all energy demands on site would require c8 kWp of PV which simply cannot be provided on the roof space. Vistry and the Landowner consider the draft policy to be undeliverable and request that it be amended to:

> *"Proposals should maximise the deployment of renewable energy where feasible and viable."*

3.16 Part D of draft Policy CC/NZ introduces the concept of an "Energy offset fund" to enable developers to make payments in lieu of failure to meet the energy and carbon standards. Vistry are concerned that the policy does not give any detail with respect to the cost of the fund and therefore do not believe this aspect of the draft Policy is sound and in accordance with Paragraph 59 of the NPPF which requires local plan policies to be accompanied by up-to-date viability assessments.

Policy CC/WE: Water efficiency in new developments

3.17 Vistry and the Landowner fully support the need to improve water efficiency in new developments given the serious issue within the Greater Cambridge area with respect to water stress. We acknowledge the need to find practical and viable solutions that can go beyond current targets but any solutions must also be reliable and acceptable to the home owner.

3.18 In relation to criterion 2 of the policy, Vistry and the Landowner consider that the practical and viability implications of the proposed standards should be carefully considered. In particular, the requirement for residential developments of 100 or more dwellings to achieve water usage of no more than *"80 litres/person/day",* which the policy acknowledges will necessitate *"some form of water reuse or recycling… with dual pipe systems for potable and non-potable water",* represents a significant uplift above current Building Regulations and typical industry practice.

3.19 Paragraph 6.31 of The Topic Paper references a report (Shared Standards in Water Efficiency for Local Plans (June 2025) which has been prepared by several water companies and the Environment Agency. The Topic Paper (paragraph 6.32) states that a water efficiency standard of 85 l/p/d can be achieved without the use of greywater recycling and through the use of efficient fixtures and fittings.

3.20 Vistry and the Landowner have reviewed the exact specific proposed and note that this is only achieved if a bath is not supplied which is of course a basic necessity for the vast majority of homeowners, particularly those with children or the elderly. Vistry and the Landowner consider the 85 l/p/d to be extremely challenging with the solutions presented in the topic paper (without greywater recycling) still not sufficient to meet the draft Policy requirement of 80 l/p/d.

3.21 Vistry and the Landowner conclude that greywater recycling is therefore necessary to meet the draft Policy target and note that paragraph 6.29 of The Topic Paper estimates the cost of such a unit to be £4,000 with the Viability assessment allocating a cost of

c£6,000 per unit[4] for the purchase of water efficiency equipment only. The Viability study does not make allowance for on-going maintenance costs which are anticipated to be significant, especially for greywater recycling systems.

3.22 When considered alongside the cumulative impact of other policy requirements relating to affordable housing, infrastructure contributions, design, energy efficiency and biodiversity net gain, this standard has the potential to materially affect development viability. The Councils will therefore need to ensure that an appropriate balance is struck between the ambition of the policy and the deliverability of development, supported by robust viability evidence.

3.23 Vistry and the Landowner also note that the requirement for developments of fewer than 100 dwellings to achieve water usage of between 90 and 100 litres/person/day is more closely aligned with existing best practice and is likely to be more readily achievable without disproportionate cost implications. In this context, Vistry and the Landowner consider that the draft Policy should be amended to allow for greater flexibility as follows:

3.24 Amend draft Policy 2a and 2b to apply *a target of 100 litres/person/ day to apply to all dwellings where practical and viable*. The reliability of greywater systems apply to all homes regardless of the development size. The 100 l/p/d target is far more achievable and practical than the 80 l/p/d proposed in the draft Plan.

3.25 In respect of criterion 5, which requires all new dwellings with private outdoor amenity space to provide a water butt and prioritises the use of rainwater for outdoor irrigation, Vistry and the Landowner support the principle of encouraging rainwater harvesting. However, consideration should be given to how this requirement would be secured and monitored in practice, particularly in relation to long-term management, maintenance and enforcement. Clarification on the intended implementation mechanisms, would assist in ensuring the policy is applied consistently and effectively.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

3.26 The Topic Paper presents the changes to the draft Policy since the previous consultation exercise. It would appear that very little has changed with respect to the technical requirements. Vistry and the Landowner fully support the need for integrated water management and strategic thinking on all new development and indeed this has been an absolute priority at Fen Ditton.

3.27 Vistry and the Landowner repeat concerns expressed previously with respect to the application of paragraph 6 of the policy, which states that, *"To protect and enhance water quality, all development proposals must demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to*

[4] Microsoft Word - 251024 Cambridge Main Viability Report_v3.0. Page 17

ensure the provision of the necessary infrastructure prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).” While it is reasonable to ensure that development is appropriately served by water and wastewater infrastructure, the policy as currently drafted risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage.

3.28 The provision and timely upgrading of wastewater treatment and conveyancing infrastructure is a statutory responsibility of water companies, who are required to plan for and accommodate growth through the relevant regulatory and investment frameworks.

3.29 Vistry and the Landowner consider that Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.

Policy CC/CE: Supporting a circular economy and sustainable resource use

3.30 Vistry and the Landowner support the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where *“practical and viable”* to meet all requirements in full.

3.31 However, we have concerns regarding paragraph 5 of the policy, which introduces a requirement for the submission of a Circular Economy (CE) Statement. It is considered that this requirement relates to the information needed to support a planning application rather than to the policy tests against which proposals should be assessed.

3.32 As such, this requirement would be more appropriately addressed through the Council’s validation requirements, rather than embedded within the policy itself. Vistry and the Landowner also believe that the submission of such a statement and/ or information within a Sustainability Statement should be limited at outline planning application stage given that building design information is very limited at that stage.

3.33 A CE statement should be reserved for detailed design stage only where it will be more meaningful in terms of information.

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

3.34 Paragraph 1 of the policy states that *“Where major development is proposed on land containing peat soils, a proportionate evaluation of the impact of the proposal on the soil’s carbon content and an appropriate soil management plan must be submitted as part of the planning application.”*

3.35 Whilst peat soils are not relevant to Land at Fen Ditton, Vistry and the Landowner consider that, where relevant, the preparation and implementation of a detailed soil management plan could appropriately be secured by planning condition, informed by site-specific investigations undertaken at application stage.

3.36 There are varying types and quantities of peat, some of which are in poor condition and emitting carbon. Vistry and the Landowner consider that there could be the opportunity for overall carbon benefits with a suitable peat restoration plan which should be encouraged within the policy to allow developers the flexibility to build new homes whist protecting or enhancing valuable peat soils.

3.37 This approach would ensure that the policy's objectives are met, while avoiding the imposition of unnecessary upfront requirements that could affect the timely determination of applications.

4. The Case for Land at Fen Ditton

4.1 Full details of Vistry and the Landowners interest at Fen Ditton are provided within the accompanying Vision Document at **Appendix 1**. A summary is provided here for context of the comments provided on the consultation document.

Site Description and Context

4.2 The site at Fen Ditton is located south of the A14 on the north east of Cambridge. The site is in a highly accessible location by cycle, with a number of proposed sustainable transport improvements coming forward. In particular, the site is less than 1.4 miles to Cambridge North Station (and under a mile at its closest), as well as the Newmarket Road Park and Ride (with the eastern parcel being under a mile away).

4.3 The site is also less than 3 miles from the Cambridge City Centre and the Science Park. The site will also benefit from its proximity to the North East Cambridge and Cambridge East developments which will further enhance the sustainability of this area. There is also a good network of footpaths and cycle routes in the vicinity, with new 'super' cycleways proposed nearby providing a range of sustainable transport opportunities.

4.4 The site has good potential to become a sustainable extension to Fen Ditton at the edge of Cambridge that enhances the natural landscape assets and connects to sustainable movement corridors coming forward, whilst respecting the setting of the necklace village of Fen Ditton.

4.5 Land at Fen Ditton is characterised by the rich heritage architecture and landscapes within the Conservation Area that run along the High Street and River Cam. The site is visually well contained from the wider landscape and Green Belt, with the A14 forming a visual detractor in the Green Belt. To the north of the of the A14 is the proposed site for the relocation of the Cambridge Waste Water Treatment Plant (WWTP), which, if funding is found now that the Government are no longer funding, would change the character of the landscape of this area and block long distance views towards the site.

The Proposed Vision

4.6 Development of Land at Fen Ditton could take the form of a cluster of smaller settlements, collectively forming 'The Dittons', which would be set within and amongst its landscape, connected by a network of landscape and wild infrastructure, and not imposing on it. The site would benefit from its existing connectivity to Fen Ditton as well as to Cambridge City and its associated transport opportunities. The Dittons would respect the existing Conservation Area and views to key listed buildings such as the Church tower. Development parcels could be carefully sized and placed so they do not compete with the historic necklace villages of Fen Ditton and Little Ditton. Each cluster will draw inspiration from character generators in the historic village and landscape, creating places that are distinctively local and beautiful.

4.7 There is an opportunity to improve the biodiversity of land currently within the Green Belt through connecting the fen edge to the riverine landscape with green corridors and a nature recovery network. The proposals would establish a green link from Milton Country Park, across and through the site, linking with High Ditch Road and the Marleigh development to the south and beyond to the regeneration proposed at Cambridge Airport. Landscaping along the A14 would be reinforced to form a robust and defensible edge to the Green Belt and transition to the wider landscape.

4.8 The new community at Fen Ditton will cater to a wide range of families and individuals by facilitating flexible lifestyles and choices. This includes opportunities to work from home or shared co-working spaces, creating vibrant spaces and a work-life balance. Co-locating schools and care services with community spaces, flexible working and mixed uses, will create better connected communities that shorten the commute and take the juggle out of people's daily lives.

4.9 The land at Fen Ditton provides the opportunity to create a happy and healthy community with infrastructure supporting community activity, health, education and quality of life.

Green and Grey Belt Assessment

4.10 SLR Consulting Ltd ('SLR') have prepared a Landscape and Visual Technical Note and provided an initial Green Belt Review for the site at Fen Ditton. The initial Green Belt Review (2026) is based on the then prevailing (December 2024) NPPF and subsequent guidance released in 2025. The document can be found at **Appendix 2** and is submitted in support of these representations.

4.11 The Greater Cambridge Green Belt Assessment (LUC, 2021) is the latest document which presents a detailed review of the Cambridge Green Belt. Previous studies included the Inner City Green Belt Study (LDA, 2015). LUC have also provided a Greater Cambridge Green Belt Assessment Review of Representations (2025) as part of the GCLP consultation evidence base. The assessment prepared by SLR Consulting on behalf of Vistry is provided to inform an updated Greater Cambridge Green Belt Assessment we understand is due to be published later this year.

4.12 The western parcel of the site (assessed in the LUC Green Belt Assessment August 2021 as parcel FD4) is assessed as Very High; Moderate High harm for Green Belt Release. For the eastern parcel (FD5) this is assessed as Very High; High.

4.13 However this August 2021 assessment contrasts with the more recent findings of SLR. For completeness, we summarise below the findings of the 2021 LUC Assessment, in comparison with that of SLR.

Table 4.1: LUC Green Belt Assessment Findings

Green Belt Purpose	LUC Assessment FD4	LUC Assessment FD5	LUC Review of Representations
1 – to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	Land is open and is adjacent to Fen Ditton, which is nearly contiguous with Cambridge but which retains some distinction from the main City area. The parcel has some relationship with the urban area but also a degree of distinction from it. Overall, the parcel makes a relatively significant contribution to Cambridge Purpose 1.	Land is open and is adjacent to Fen Ditton, which is nearly contiguous with Cambridge but which retains some distinction from the main City area. It has strong distinction from the urban area, which increases the extent to which development would be perceived as diminishing Cambridge's compact character. Overall, the parcel makes a relatively significant contribution to Cambridge Purpose 1.	The physical separation between Fen Ditton and Cambridge is so small that expansion of Fen Ditton in FD4 and FD5, even though it would not reduce that physical gap, would still be associated with the City. The fact that Fen Ditton has a distinct character, and is classified as a separate settlement in the hierarchy, does not negate the impact on the City's compact character but has limited the contribution to Purpose 1 to 'relatively significant'. Had there been a stronger relationship with Cambridge the rating for FD5's contribution would have been 'significant'.

Green Belt Purpose	LUC Assessment FD4	LUC Assessment FD5	LUC Review of Representations
2 – to maintain and enhance the quality of Cambridge's setting	Land comprises open farmland that has a strong distinction from the edge of Fen Ditton, meaning it contributes to an open rural setting that is fundamental to the character and identity of the village. Land also contributes to the rural landscape setting experienced when approaching the wider city along Horningsea Road (B1047) from the north-east, creating positive perceptions of the city on arrival. Overall the parcel makes a relatively significant contribution to Cambridge Purpose 2.	Land comprises open farmland that has a strong distinction from the edge of Fen Ditton, meaning it contributes to an open rural setting that is fundamental to the character and identity of the village. Land also contributes to the rural landscape setting experienced when approaching the wider city along the A14 from the east and along Horningsea Road (B1047) from the north-east, creating positive perceptions of the city on arrival. Overall the parcel makes a relatively significant contribution to Cambridge Purpose 2.	Both FD4 and FD5 were rated as making a 'relatively significant' contribution to Purpose 2 because of their role in preserving Fen Ditton's rural character as perceived on approach from the east and north-east, despite its proximity to Cambridge. Urbanising development diminishes this rural character. The GCGBA did not assess the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals and their mitigation measures. The methodology recognises (at para 3.113) that "…there is potential for mitigation measures such as boundary strengthening and density of development within an inset area to influence [the level of adverse impact on retained Green Belt land]".

Green Belt Purpose	LUC Assessment FD4	LUC Assessment FD5	LUC Review of Representations
3 – to prevent communities in the environs of Cambridge from merging into one another and with the city	The land is adjacent to Fen Ditton but there is no other settlement close enough to be considered neighbouring. Overall, the parcel does not make a contribution to Cambridge Purpose 3.	Land lies in a wide gap between Fen Ditton and Stow-cum-Quy, with the A14 transport corridor as a significant separating feature. Although the settlement gap is robust, there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as narrowing the gap. Overall, the parcel makes a Moderate contribution to Cambridge Purpose 3.	It is recognised that the gap between Fen Ditton and Stow-cum-Quy is wide, but the open, low-lying arable landscape within it, which contributes to FD5's strong distinction from Fen Ditton, reduces perceived settlement separation. The A14 is cited as a separating feature. Development associated with Fen Ditton that is perceived from the A14 would, therefore, contribute to the perceived merger. In this context a 'moderate' contribution rating is in our view correct. The harm ratings assigned to FD4 and FD5 take into consideration the impact on release on adjacent land in addition to the loss of contribution to Green Belt purposes. In this instance it is noted that adjacent land to the east (which is already close to the Marleigh development) would be weakened although, as noted above, this does not take into consideration the potential for mitigation measures to limit harm.

4.14 Development of the majority of the site is assessed (by LUC) as having the potential for 'Very High Harm' to the Cambridge Green Belt functionality. The LUC assessment concludes that any development of the site would require a review of the Green Belt boundary in the vicinity of the site. The Council's Green Belt Review is now out of date in the context of the latest NPPF and its guidance and will need to be reviewed.

4.15 The preliminary Green Belt appraisal prepared by SLR assesses the functionality of the site for each of the five purposes of the Green Belt as set the 2024 NPPF from a landscape and visual perspective. It also assesses whether the site can reasonably be considered to be grey belt.

4.16 The Planning Practice Guidance on Green Belt clarifies the concept of grey belt land in the context of plan-making and decision-making. For these purposes, the NPPF (as referenced in the PPG) defines grey belt as land within the Green Belt that comprises previously developed land and/or any other land that does not strongly contribute to the relevant Green Belt purposes in paragraph 143 of the NPPF, in particular, Green Belt purposes a, b and d.

4.17 The following tables sets out SLR's initial Green Belt appraisal, undertaken in accordance with the latest NPPF and its guidance. The tables assess the site against the illustrative grey belt features identified in Government planning practice guidance in order to determine the site's level of contribution to the Green Belt.

Table 4.2: Purpose A – To Check the Unrestricted Sprawl of Large Built-up Areas

Contribution	Illustrative Features	SLR Assessment
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: • be adjacent or near to a large built up area • if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt)	Whilst the site is free of existing development, the existing settlement abuts it on two (of three) sides and there are physical features (including the A14 and future WWTW) which could restrict and contain development to the north and north-east. The site is adjacent to the village of Fen Ditton which presents as a small linear village beyond the large built-up area of Cambridge. If developed the site would be seen to be contained by the A14 which (as illustrated on Plate 1) presents a logical boundary for future expansion of Cambridge. If developed alongside other planned development in the area it would not result in an incongruous pattern of development.

Contribution	Illustrative Features	SLR Assessment
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built-up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to): • having physical feature(s) in reasonable proximity that could restrict and contain development • be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development • contain existing development • being subject to other urbanising influences	The site is near to a large built-up area, but its contribution is weakened by the factors below: The A14 and future Waste Water Treatment Works (WWTW) would restrict and contain development to the north. Existing settlement edges restrict and contain development to the south and west. The site is partially enclosed by existing development along its southern and western boundaries and where it abuts Horningsea Road. New development would not result in an incongruous pattern of development. The site is influenced by views of built form, traffic noise and lighting.
Weak/None	Assessment areas that make only a weak or no contribution are likely to include those that: • are not adjacent to or near to a large built-up area • are adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development.	The site is adjacent to the village of Fen Ditton which presents as a small linear village beyond the large built-up area of Cambridge. It does also lie adjacent to (although separated by vegetation along High Ditch Road) the Marleigh Park development which could be seen to form part of the large built-up area of Cambridge. The site is adjacent to a large built up area and is largely enclosed by development.

Table 4.3: Purpose B – To Prevent Neighbouring Towns Merging into One Another

Contribution	Illustrative Features	SLR Assessment
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: • forming a substantial part of a gap between towns • the development of which would be likely to result in the loss of visual separation of towns	The site is free of existing development but does not include either of the following features: It does not form part of the gap between two Towns. The site would not result in any loss of visual separation of towns.

Contribution	Illustrative Features	SLR Assessment
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): • forming a small part of the gap between towns • being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation.	It does not form part of the gap between two Towns. Its development would not result in the loss of any visual separation between two Towns.
Weak/None	Assessment areas that contribute weakly are likely to include those that: • do not form part of a gap between towns, or • form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation	The site does not form part of a gap between towns.

Table 4.4: Purpose D – To Preserve the Setting and Special Character of Historic Towns

Contribution	Illustrative Features	SLR Assessment
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: • form part of the setting of a historic town • Make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town.	The site is free of existing development. It does not abut the historic City Centre and there are no views (to be reviewed in winter) towards the City Centre or its features. It falls within the Cambridge Green Belt which has its own unique purpose of preserving the rural setting to Cambridge (Cambridge Green Belt Purpose 2) but the 2015 LDA Inner City Green Belt Review demonstrates that it is at some distance from the Historic Core of the City.

Contribution	Illustrative Features	SLR Assessment
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one of more features that weaken their contribution to this purpose, such as (but not limited to): • Being separated to some extent from historic aspects of the town by existing development or topography • Containing existing development • Not having an important visual, physical or experiential relationship to historic aspects of the town	The site falls within the Cambridge Green Belt which has its own unique purpose of preserving the rural setting to Cambridge (Cambridge Green Belt Purpose 2). It is separated from the historic aspects of the town centre. The 2015 LDA Inner City Green Belt Review demonstrates that it is at some distance from the Historic Core of the City. It does not contain existing development. It does not have an important visual, physical or experiential relationship to the historic aspects of the town.
Weak/None	Assessment areas that make no or only a weak contribution are likely to include those that: • do not form part of the setting of a historic town • have no visual, physical or experiential connection to the historic aspects of the town	The site falls within the Cambridge Green Belt which has its own unique purpose of preserving the rural setting to Cambridge (Cambridge Green Belt Purpose 2). It is separated from the historic aspects of the town centre. The 2015 LDA Inner City Green Belt Review demonstrates that it is at some distance from the Historic Core of the City. It does not have an important visual, physical or experiential relationship to the historic aspects of the town.

4.18 In summary, the SLR assessment concludes that the site makes:

- a **Moderate to Weak contribution** to purpose a.
- a **no contribution** to purpose b.
- a **moderate contribution** to purpose d.

4.19 The assessment above concludes that the site does not perform strongly against NPPF Purposes a), b) or d) and could be classified (from a landscape and visual perspective) as grey belt. Any consideration for its development would need to be considered in the context of the emerging local plan which shows its location in the context of potential development areas.

4.20 The A14 has previously been identified as the boundary to the Inner City Green Belt and presents a logical boundary to expansion of the settlement area. Development of the site would have the potential to reinforce this as a Green Infrastructure corridor and reinforce it as a permanent green edge to the extended settlement area. It can therefore be concluded that development of this site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Plan.

Response to the HELAA

4.21 The evidence base for the GCLP includes the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (October 2025). Within the HELAA the site is assessed under two separate parcels: east of Horningsea Road (site reference 115494) and east of Horningsea Road & west of Ditton Lane (site reference 115182).

4.22 The document provides a site assessment through a 'traffic light' colour coding. East of Horningsea Road (site reference 115494) receives a 'red' outcome for suitability, 'amber' for availability, and 'green' for achievability. East of Horningsea Road & west of Ditton Lane (site reference 115182) receives a 'red' outcome for suitability, and 'green' for both availability and achievability.

4.23 The suitability assessment contains a number of issues that the Councils have considered. These are set out within **Table 4.5** below, with comments provided in response to this on behalf of Vistry and the Landowner together with our revised assessment of the site when considered as a whole.

Table 4.5 HELAA Assessment Comments

Issue	HELAA Assessment 115494	HELAA Assessment 115182	Vistry and The Quy Estate Comments	Vistry and The Quy Estate assessment
Adopted Development Plan Policies			Whilst it is agreed that the site is currently outside of the development framework and within the Green Belt, these are both policy designations which are appropriate to be reviewed through the Local Plan process.	
Flood Risk			As identified by the HELAA the majority of the site is wholly within Flood Zone 1. Whilst 1% of the site lies within Flood Zone 3 and 3% of the site in a 1 in 100 year surface water flooding event, given the scale of the site this can be appropriately mitigated through the design of the development.	

Issue	HELAA Assessment 115494	HELAA Assessment 115182	Vistry and The Quy Estate Comments	Vistry and The Quy Estate assessment
Landscape			It is acknowledged that the site falls within the Fen Ditton Fen Edge Chalklands landscape character area, however, it is considered that the site represents a transitional and modified part of this character area, strongly influenced by existing settlement edges and major infrastructure. The western parcel is bounded by existing development to the south and west, with further development on the opposite side of the B1047, and consequently reads as visually and functionally related to the existing settlement edge of Fen Ditton. While the eastern parcels are less directly enclosed by built form, they are physically and perceptually separated from the wider fen landscape by the A14, a containment that will be further reinforced by the approved Waste Water Treatment Works to the north. The WING development has already extended the built form eastwards, and the potential development of the Marshalls site would further consolidate development along the southern boundary of the site. In this context, the site does not function as open fen countryside but rather as land influenced by successive layers of urbanising development. It is also notable that both the Wicken Fen Vision and the Cambridge Nature Network identify the A14 as the effective boundary to the fen landscape, extending northwards beyond the site. Development of the site would therefore create a new, clear and defensible settlement edge, with the A14 forming a robust and permanent Green Belt boundary, consistent with the principles set out in the NPPF and PPG.	
Biodiversity and Geodiversity			The proposed development would be landscape led and would achieve a minimum 10% biodiversity net gain. It is considered that the onsite biodiversity areas, which are the reason behind the different scoring of the sites, can be accommodated within the site and will form a strong landscape framework for the proposals. The proposals would allow for the ongoing management and maintenance of these features and therefore this would be a benefit of the proposals.	

Issue	HELAA Assessment 115494	HELAA Assessment 115182	Vistry and The Quy Estate Comments	Vistry and The Quy Estate assessment
Open Space / Green Infrastructure			As explained in the vision for the site above and the accompanying Vision Document, the proposals would deliver significant areas of open space and green infrastructure for the benefit of new and existing residents. This would include connecting in to wider links.	
Historic Environment			The historic environment of Fen Ditton is a key feature of its character and the proposals would seek to positively respond to these and enhance them. It is therefore considered any impacts on the historic environment can be appropriately mitigated.	
Archaeology			It is recognised that the site could have archaeological potential and appropriate levels of assessment would be required in due course to inform the proposals. At this stage there is nothing to suggest that any archaeological remains could not be appropriately mitigated. Indeed the development of the site would have benefits through archaeological investigation in increasing understanding of the area.	
Accessibility to Services and Facilities			It is considered that the site is highly accessible to services and facilities both within Fen Ditton and through connectivity to the wider area including Cambridge City. The site will also benefit from its proximity to the North East Cambridge and Cambridge East developments and the further enhancements to the sustainability of the area that it will bring. The site is within 2 miles of Cambridge city centre and the transport opportunities as well as services and facilities that it affords. The site at Fen Ditton benefits from both the services and facilities of the village as well as a comparable level of accessibility to the city as an urban extension of the city. The proposed development would also benefit from the delivery of additional services and facilities within it and Vistry and the Landowner would look to engage with the Councils, stakeholders, and the local community on the nature of these services and facilities to complement the existing offer and mitigate the impacts of the proposals.	

Issue	HELAA Assessment 115494	HELAA Assessment 115182	Vistry and The Quy Estate Comments	Vistry and The Quy Estate assessment
Site Access			We support the conclusion that the proposed site access is acceptable in principle subject to detailed design. Whilst we note the reference to potential access constraints, it is unclear what these are.	
Transport and Roads			It is considered that the potential impacts identified are capable of being overcome. Vistry have a strong track record in promoting alternative modes to the private car and as set out in the Vision Document would seek to implement a range of measures as part of the proposed development.	
Noise, Vibration, Odour and Light Pollution			Given the commentary from the HELAA confirming that the site is capable of being developed subject to mitigation it is unclear why the site has been scored as amber.	
Air Quality			As confirmed by the HELAA the site does not lie within an AQMA. The Councils' anticipated impacts are dependent on the level of traffic generated. As set out above, it is considered that appropriate mitigation can be secured and will encourage sustainable modes of travel. It should be reflected that a greater quantum of development also brings the potential for a wider package of mitigation measures to be secured.	
Contamination and Ground Stability			The comments are noted but are considered to be capable of being overcome through appropriate assessment and mitigation.	

Issue	HELAA Assessment 115494	HELAA Assessment 115182	Vistry and The Quy Estate Comments	Vistry and The Quy Estate assessment
Constrains to Development	Agricultural Land Classification: 81% Grade 2; 19% Grade 3	Agricultural Land Classification: 77% Grade 2; 19% Grade 3; 5% Grade 4	The Councils have acknowledged they will need to release greenfield land to accommodate development, and this will therefore result in the loss of agricultural land.	

4.24 In overall summary, it is therefore considered that the issues identified by the Councils as being 'red' or 'amber' would not prohibit the allocation and eventual development of the site. All of these issues can be dealt with through the provision of additional information to a planning application or through mitigation as part of the development of the site. As such, the site is considered to be suitable for the development proposed, and the Councils are therefore urged to reconsider the site for allocation as part of the Greater Cambridge Local Plan.

5. A review of the Sustainability Appraisal supporting the draft Local Plan

5.1 To support these representations, Vistry and the Landowner have reviewed the Sustainability Appraisal (SA) supporting the draft Local Plan consultation. The SA process is a legal requirement for all plans and programmes with a significant effect on the environment

5.2 Land at Fen Ditton is identified in the SA as site reference 200770 (Land to the East of Horningsea Road & west of Ditton Lane, Fen Ditton). It is scored by the SA in Table 4.4 of the SA report. The scoring is replicated in Table 4.5 of these representations.

5.3 Land at Fen Ditton was not allocated for development in the draft Local Plan with the SA noting the following reasons for rejection of the site:

5.3.1 Land to the east of Horningsea Road & west of Ditton Lane, Fen Ditton - Development in this location would have a significant adverse impact on the landscape character. Development would be an encroachment into the landscape and an urbanisation of the rural landscape, which is an important backdrop to the village. The Cambridge Green Belt Study (2021) identifies that release of land in this area would result in a moderate high / high / very high level of harm to the Green Belt. The proposed development strategy has identified alternative locations to meet development needs, and it is not considered that there are exceptional circumstances for a Green Belt release in this location.

5.4 Vistry and the Landowner have reviewed the SA Report and present the reasons and evidence for rejection below to demonstrate it is a sustainable site for residential development that fully supports the preferred spatial strategy.

Conformity with the Spatial Strategy

5.5 Land at Fen Ditton is compatible with the preferred spatial strategy assessed by the SA. Page 185 of the SA confirms that Spatial Option 9a was ultimately selected by the draft Local Plan. Paragraph 4.17 of the SA presents Spatial Option 9a of which the following elements are supportive of Land at Fen Ditton:

5.5.1 *Growth is focused in a range of locations including the edge of Cambridge on non-Green Belt land around Cambourne.* Fen Ditton is located on the edge of Cambridge south of the A14 on the north east of Cambridge. A map identifying its location relative to other proposed allocations and major transport nodes is presented on Page 2 of Appendix 1 of these representations.

5.5.2 It is evident that the only aspect of the spatial strategy that is not supportive is the fact that land at Fen Ditton is still within the Green Belt. Paragraphs 4.21-4.22 of these representations present evidence to demonstrate the site does not currently perform as Green Belt but should in fact be regarded as Grey Belt

5.5.3 *Growth is also placed in Group Villages with very good public transport access.* The Vision Document (Appendix 1, pages 3-4) presents information to demonstrate that Land at Fen Ditton is in a sustainable location, close to sustainable transport nodes and ideally located to promote the use of cycling and bus to reach key services and facilities including Cambridge North Station. Furthermore, a sustainable transport strategy is being developed with a number of commitments and proposed initiatives which include:

- Potential to divert an existing bus service into the site;
- Free/ discounted bus travel for residents;
- Cycle training and e-bike incentives; and
- The introduction of the Fen Ditton Smarter Choices and Better Points schemes for residents to incentivise sustainable travel.

5.5.4 This evidence confirms that Land at Fen Ditton fulfils a key aspect of the proposed growth strategy given its location in the Group Villages with very good public transport access.

The Sustainability Performance of Fen Ditton

5.6 Table 4.4 of the SA scores Land at Fen Ditton under reference number 200770. The scores are replicated in **Appendix 3** below. Vistry and the Landowner have reviewed the scoring and the reasons for rejection of the site (replicated in paragraph 6.3.1) and have the following comments:

5.6.1 There are two main reasons for the rejection of the site which are: *A significant adverse impact on the landscape character release of land would result in a high/very high level of harm to the Green Belt.* These representations (paragraphs 4.11 to 4.22) summarise the results of a Landscape and Green Belt review undertaken by SLR which concludes that the site should be regarded as Grey Belt and that the landscape impact is much lower than stated in the SA.

5.7 Vistry and the Landowner have revised the scoring of the site by the SA and undertaken their own scoring using the latest technical information available and the scoring matrix used by the SA and make the following comments:

5.7.1 The application of the latest technical information (such as that included in **Appendix 1**) significantly increases the scoring of the site compared to the LUC assessment in the SA:

- There are now three major positive (++) compared to two in the LUC SA
- There are now six minor positive scores compared to one in the LUC SA

5.8 Table 4.4 of the SA also assesses two other sites at Fen Ditton – Land at Fleam End Farm (SA ref 200756) and Land to the East of Ditton Lane (SA ref 40217). It is clear that Land at Fen Ditton is evidently more sustainable than both of these reasonable alternatives.

Summary

5.9 Following the review of the SA and the sustainability performance of Fen Ditton it is evident that:

- The site is in a highly sustainable location and supports the proposed growth strategy with the exception of the sites location in the Green Belt;
- A Green Belt and Landscape Character assessment has been carried out which demonstrates that site is currently performing as Grey Belt with a lower landscape impact that considered by the SA; and
- The sustainability performance of the site is far higher than presented in the SA and is currently the most sustainable reasonable alternative within Fen Ditton.

6. Conclusions

6.1 The emerging GCLP represents an important opportunity to shape the future growth of one of the UK's most economically dynamic and nationally significant regions. Vistry and the Landowner are broadly supportive of the vision, themes and strategic priorities, of the Local Plan taken as a whole. However, Vistry objects to three specific elements of the Plan on the grounds of soundness. These elements and grounds are:

> A) The revised development strategy presented is not positively prepared and is also not effective as it relies upon the displacement of new homes away from NEC to alternative strategic locations which are also vulnerable to the risk of future housing delivery failure. The development strategy is therefore not justified as it clearly requires additional layers of supportive growth from other locations which can delivery earlier, such as Fen Ditton.
>
> B) Notwithstanding that the Cambridge urban Area is the most sustainable location for new development in the spatial hierarchy, insufficient housing growth is proposed at the NEC/AMC during the plan period because the CWWTW simply cannot be relocated for the foreseeable future. The operational boundaries of the NEC/AMC allocation should therefore be extended to include other immediately available land in this broad location of Cambridge, where the land demonstrates the same sustainability and accessibility characteristics of that of NEC allocation, such as at Fen Ditton. As such, this policy is also not positively prepared, effective or justified.
>
> C) In terms of the spatial hierarchy, Fen Ditton remains classified as a Group Village. This is despite being located within the southern confines of the A14 and having a close functional relationship with the key services and transport infrastructure provided in the city that mirrors that of the NEC/AMR. Accordingly, the continued classification of Fen Ditton as a Group Village is anomalous when compared to the usual typology of other such Group Villages in the wider rural area. Fen Ditton essentially falls within the urban influence of Cambridge and not the rural influence of the wider hinterland associated with other Group Villages. As such, Policy S/SH is also not positively prepared, effective or justified.

6.2 The evidence demonstrates that Greater Cambridge must accommodate substantially higher levels of employment and housing growth than currently planned for, supported by major national interventions by the Greater Cambridge Development Corporation, and significant associated infrastructure investment.

6.3 The Local Plan must therefore plan more positively for a higher housing requirement, supported by a more diverse and resilient portfolio of sites capable of delivering early, sustained, and flexible supply throughout the plan period.

6.4 Medium-scale, well-located opportunities such as the land at Fen Ditton are essential to achieving this objective. The site performs weakly against the purposes of the Green Belt, benefits from strong functional and spatial relationships with both NEC and wider Cambridge, and is uniquely positioned to capitalise on the transformative infrastructure and connectivity improvements associated with NEC and Cambridge East.

6.5 Crucially, Fen Ditton is within a single land ownership, has no up-front infrastructure requirements and is jointly promoted by a national housebuilder with a strong brand and reputation for market and affordable housing delivery. As such, the site at Fen Ditton can deliver new homes at pace without reliance on the relocation of other uses or the delivery of complex, long-term strategic infrastructure, thereby reducing delivery risks and strengthening the overall housing trajectory.

6.6 In addition, our review of the Sustainability Appraisal concludes that the sustainability performance of the Fen Ditton site is far higher than presented in the SA and is currently the most sustainable reasonable alternative within the north eastern Cambridge fringe.

6.7 Whilst Fen Ditton is currently classified as a Group Village, almost all other Group Villages are separated by material distance from the Cambridge urban edge. However there is virtually no separation with Fen Ditton by distance, and none visually. Fen Ditton should therefore be treated as a more functional part of the Cambridge Urban Area and situated much higher in the settlement hierarchy, to reflect its close proximity to the city centre and nearby sustainable public transport.

6.8 Vistry and the Landowner maintain that the allocation of Fen Ditton in this Local Plan is both justified and necessary to ensure the Local Plan is more positively prepared, effective, justified, and capable of meeting the full scale of housing need arising from Greater Cambridge's economic potential. The inclusion of the Fen Ditton site, set out at Appendix 1, would greatly enhance the flexibility of the plan, improve its deliverability, and support the Councils' wider spatial, environmental, and sustainability objectives.

6.9 As such, Vistry and the Landowner requests the right to participate in the forthcoming examination of the Local Plan to further articulate the spatial strategy objections which have been made in these representations. Vistry and the Landowner seek specifically to participate in the development strategy hearing session (**Policy S/DS**) the North East Cambridge (NEC) hearing session (**Policy S/AMC/NEC**) and the Settlement Hierarchy matter hearing session (**Policy S/SH**).

6.10 Vistry and the Landowner's broad support for the GCLP in other general respects, remains unchanged from our previous Regulation 18 submissions, subject to the conditional comments made within these representations.

Appendix 1: Land at Fen Ditton - Vision Document

Appendix 2: Land at Fen Ditton - Preliminary Landscape and Visual Technical Note and Green Belt Review

Appendix 3: Review of the Sustainability Performance of Fen Ditton