Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name		Steven Kosky
Organisation (where relevant)	Vistry and The Quy Estate	Turley
Job Title (where relevant)		Planning Director
Address, including Post Code		Turley, Nine Hills Rd, Cambridge CB2 1GE
Telephone		07920 546582
Email address		steven.kosky@turley.co.uk

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Development Strategy and **Policy S/DS**
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Policy S/DS: Development Strategy – Object

1.1 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

1.2 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 previously been 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.

1.3 The Regulation 19 GCLP now 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. 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 close proximity to key transport infrastructure largely mirrors that of the nearby strategic NEC site.

1.4 The synergy of the promoted Fen Ditton site (see **Appendix 1** of attached representations) with 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.

1.5 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 key 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.

1.6 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.

1.7 Concern is again also raised regarding how the proposed strategy has been interpreted into the allocations proposed. We 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.

1.8 Vistry and the Landowner are supportive of the long-term enlargement of Cambourne *in principle*. However, the accelerated 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.

1.9 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.

1.10 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 small number of strategically constrained sites.

1.11 Our objection is that there is currently an 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.

1.12 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.

1.13 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.

1.14 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.

1.15 As is demonstrated in **Section 4** of the attached representations, 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.

1.16 As such, early delivery is assured. 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.

1.17 **Section 4** of the attached 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.

1.18 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).

1.19 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.

1.20 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.

1.21 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.

Resolution to Objection

1.22 Fen Ditton has been incorrectly discounted as a viable and sustainable residential-led allocation and should be allocated as a main modification to the submission version of the GCLP to provide greater resilience and flexibility within the Development Strategy.

1.23 The site area shown in **Appendix 1** of the attached representations should be allocated for residential development for around 1,500 new market and affordable homes and associated public open space to help deliver some of the new homes displaced from nearby NEC.

Please provide a 100 word summary of your representation.

The revised development strategy in the Regulation 19 Plan is not positively prepared and is not effective as it relies upon the displacement of new homes away from North East Cambridge (NEC) to alternative strategic locations which are themselves vulnerable to the risk of future housing delivery failure. The development strategy is not justified as it requires additional layers of growth from further locations. Our promoted site at Fen Ditton is well placed to fill this gap, as being a northern city fringe site, it benefits from all the same locational advantages as NEC in terms of nearby access to the city centre and high quality public transport.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see attached Regulation 19 submissions and Appendices.

- Regulation 19 Written Statement – Turley
- Appendix 1 – Fen Ditton Vision Document
- Appendix 2 - Fen Ditton Landscape and Technical Note
- Appendix 3 – Sustainability assessment of Fen Ditton

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Proposed Modification

To allocate the site area shown in Appendix 1 of the attached representations for residential development for around 1,500 new market and affordable homes and associated public open space.

Amend Policy S/DS to include a new criterion vi under b) On the edge of Cambridge

New criterion b) vi

Land at Fen Ditton – a new allocation for around 1,500 new homes and associated public open space and green infrastructure, for completion within the plan period.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	YES

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Fen Ditton has been omitted from consideration to accommodate any of the new homes recently displaced from NEC, by reason that it is still classified as a Group Village.
The Council's Green Belt and SA assessments of the promoted site are not however accurate when compared to later evidence produced by Vistry and the Landowner (attached to these representations). They also fail to recognise the urban relationship Fen Ditton has with the city and close synergy with NEC, making it an ideal alternative solution to housing delivery in the northern fringe of Cambridge. As such, Vistry and the Landowner request the right to appear in person to test the Council's site selection evidence for Fen Ditton against the contrasting evidence submitted as part of these representations.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	YES
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	YES
Informed of adoption of the Local Plan	YES