Representations to the Greater Cambridge Local Plan Regulation 19 Consultation

Land at Croxton Garden Village
On behalf of Vistry

September 2026

Vistry

Turley Planning

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Appendix 1: Land at Croxton Garden Village – Vision Document



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1. Introduction

1.1 These representations have been prepared by Turley on behalf of Vistry Strategic Land (Vistry) in relation to the Draft Greater Cambridge Local Plan (GCLP) Regulation 19 Consultation. Previous submissions on behalf of Vistry have been made in relation to the Regulation 18 consultation, held earlier in 2026.

1.2 Vistry have various land interests within the Greater Cambridge Local Plan area, which are the subject of separate, individual, submissions to this Regulation 19 consultation. The following representations however relate specifically to Vistry's land interest to the north of the current alignment of the A428 at Croxton, hereafter referred to as **Croxton Garden Village** (see Section 3 and the attached Vision Document for further details). Therefore, these representations should be read in conjunction with the above technical documentation, attached at **Appendix 1**.

1.3 These representations do not seek to respond to every policy of the emerging GCLP, as a detailed commentary on various development management policies of the GCLP was provided at the Regulation 18 stage in responses prepared by Turley on behalf of Vistry to support other site interests in the area. Further comments on these policies have also been made in other Vistry submissions as part of this current consultation.

1.4 However as the land, the subject of these representations, is not currently proposed as a residential development allocation in the emerging GCLP these representations make an overarching commentary on the proposed spatial strategy of the emerging Local Plan. These representations advocate why the inclusion of the proposal site at Croxton Garden Village, would help to support, and make more resilient, the currently proposed growth strategy for the wider Cambridge area.

1.5 As part of our Regulation 18 submissions Vistry did not formally object to any specific aspect of the emerging Plan and was broadly supportive of the overall framework, albeit with some caveats. However, since the publication of the Regulation 18 Plan, significant changes to the plan have taken place, which has subsequently modified Vistry's position, notably, in relation to the GCLP's modified spatial strategy.

1.6 These 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 sufficient housing numbers during the plan period.

1.7 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.

1.8 Whilst it is noted that the plan attempts to redistribute housing numbers lost from the strategic NEC allocation, Vistry is not convinced that the spatial redistribution of these homes is achievable in real world terms due to the vulnerability of the plan to systemic delays beyond its powers to resolve.

1.9 This means that the Regulation 19 version of the plan is fundamentally under-allocated in terms of new housing provision during the plan period and thereby 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.

1.10 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.

1.11 In this regard, the proposals at Croxton Garden Village, as set out in the Vision Document at **Appendix 1**, and these Regulation 19 submissions, are particularly well suited, as part of an effective and broader-based spatial development strategy, to help deliver these additionally required new homes in the relevant plan period.

1.12 For the avoidance of doubt, Vistry remains broadly supportive of the Local Plan, taken as a whole. However, Vistry objects to the Development Strategy (Policy S/DS) of the Local Plan on the basis that the revised strategy presented in the Regulation 19 version is not positively prepared and is therefore not effective due to the risk of future housing delivery failure from strategic locations with the revised development strategy, which requires additional layers of supportive growth. Consequently the development strategy of the Plan is not justified.

1.13 As such, Vistry requests the right to participate in the forthcoming examination of the Local Plan to further articulate the Development Strategy objections which have been made in these Regulation 19 representations. However, Vistry's broad support for the Local Plan in other respects, remains unchanged.

2. Overarching Response to the Consultation

2.1 Cambridge is one of the most economically dynamic and nationally significant regions in the UK and one of 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 attract highly skilled workers and investment.

2.2 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.

2.3 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. 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.

2.4 Vistry has not previously objected, in principle, to any particular aspect of the emerging Draft Local Plan and remains broadly supportive of its wider objectives. However given the structural change to the spatial strategy, identified above, Vistry's position has been modified, due to the loss of housing numbers associated with the NEC allocation.

2.5 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 (Policy S/NEC). 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 plan period to 2045.

2.6 Given the fundamental issues which affect the relocation of the Cambridge Waste Water Treatment Plant and the withdrawal of central government funding, the Local Plan has therefore had to fundamentally alter its approach to the delivery of these new homes.

2.7 As large-scale housing on the NEC site cannot be brought forward until the sewage works are relocated, the allocation is now framed around what can realistically occur alongside the operational plant in the short to medium term, with the effect of driving the housing-led phase out of the immediate 20-year housing delivery trajectory. This has required the Local Plan to source replacement housing numbers from new and revised strategic allocations, including at Cambourne North and Grange Farm.

2.8 Whilst Vistry recognises the attempts to redistribute these housing numbers lost from the strategic NEC allocation, Vistry is 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. In this regard, there is a cascading risk to delivery as the Local Plan has already suffered a major strategic setback by having to defer the housing delivery numbers from the NEC site.

2.9 To make up for this housing deficit, the spatial strategy is looking 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.

2.10 As such, the only sustainable remedy is to allocate additional new housing sites as part of this emerging Local Plan to help 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. Therefore, whilst Vistry considers that the emerging Local Plan is broadly ambitious in its outlook, the revised growth strategy of the Plan urgently requires additional layers of strategic growth within the wider Cambridge area.

2.11 With regards to Cambourne, this growing new settlement is planned to become the largest and one of the best connected settlements in the Cambridge region with the A428 upgrade, currently well under construction, and a new public transport corridor proposed by the Greater Cambridge Partnership. This new infrastructure will operate in conjunction with the new East West Rail service, connecting Cambridge with Oxford and delivering a new railway station to the north of the existing Cambourne.

2.12 Whilst Vistry has concerns over the wider spatial strategy as a whole, notably in terms of effective housing delivery within the required timeline, Vistry broadly concurs with the focused strategy for the long term strategic planned growth of Cambourne to 2045 and beyond, whereby over time it continues to grow to become the largest settlement centre outside of Cambridge within the Local Plan area.

2.13 The strategic planned growth of Cambourne to become the most major, and rail-linked, new settlement in the area is considered to be a sound in principle, as this element of the strategy provides interim and longer-term further local opportunities for additional complementary ‘satellite’ growth around this major new rail-linked hub.

2.14 The rationale for such complementary ‘satellite’ growth in this part of the A428 corridor is that this would allow for other local sustainable schemes to also come forward within the catchment of Cambourne, such as at Croxton Garden Village. The primary advantage of the Croxton Garden Village scheme is that it is of sufficient critical mass to provide for some of its own community needs (such as a new primary school) but is of a scale which would not require an extensive lead in period and could be developed relatively quickly. In this regard, the whole scheme proposed at Croxton can be built out in the first 10 years of the operative plan period, as the site is not dependent upon the delivery (or the relocation of) any major infrastructure and is almost entirely unconstrained.

2.15 A new Garden Village in this location would have a highly functional relationship with Cambourne and would look to this expanded settlement to provide a wider range of goods and services. Importantly, the proximity of Croxton Garden Village to Cambourne would also allow for viable transport connections by active modes. A new Garden Village in this location would also be equally highly accessible to St Neots, as illustrated below:



2.16 The principal benefit to the spatial strategy is that further complementary growth in suitable satellite locations around Cambourne within the A428 corridor would help to provide further housing capacity without any increased risk of coalescence. In addition, additional intermediate-scale development in this section of the A428 corridor would help to accelerate overall housing delivery within this important area, without the over-reliance on Cambourne, as currently proposed in the revised spatial strategy.

2.17 The rationale and functionality of the proposals at Croxton Garden Village and how these proposals can help to further support the draft spatial strategy, in circumstances where substantial further housing growth, beyond that currently envisioned by the emerging Local Plan is likely to be required, are set out in the next section.

3. The Case for the Allocation of Land at Croxton

3.1 Vistry is broadly supportive of the vision, themes, and strategic priorities set out within the Local Plan, but objects to the adapted spatial strategy, as set out above. The principal case made by Vistry is that the revised spatial strategy risks delivery failure and would be materially strengthened by the inclusion of a wider variety of site scales and locations, particularly medium-scale sites on the edge of Cambridge, and in the key transport corridors, such as the A428, close to existing hub locations benefitting from future new rail infrastructure investment, such as at Cambourne.

3.2 The additional allocation of well-located sites in these locations can play an important role in both accelerating and maintaining required housing delivery rates, whilst also providing greater resilience and short term flexibility in the housing trajectory. Thereby reducing reliance on early delivery from a small number of larger strategic sites.

3.3 The absence of sufficient medium-scale allocations of the scale of Croxton Garden Village (circa 1,500 new homes) is a notable feature of current spatial strategy, which Vistry considers could be enhanced by allocating additional sites of this scale, in key transport corridors which have the ability to deliver housing early in the new plan period in an effective and timely manner. The primary attributes which make Croxton Garden Village a suitable location for such additional growth allocation are discussed in context below.

The Key Opportunity Presented by the Croxton Garden Village Proposals

3.4 The core vision for Croxton Garden Village is to create a new sustainable, Garden Village, of around 1,500 new homes, plus supporting community infrastructure, consistent with the intermediate scale of the proposals. The diversion of the A428 northwards at Croxton is now considerably progressed and this has created an ideal opportunity to deliver a new, sustainably located, mixed-use development between the alignment of the former and new A428 corridors, which is fully contained to the north by the realigned A428.

3.5 The Vision Document which is attached at **Appendix 1** of these representation confirms that there are no overriding constraints to the delivery of the site in terms of highways, landscape, heritage, drainage, or other matters, which would prevent early delivery.

3.6 The largely flat, unconstrained nature of the site means that the proposals for Croxton Garden Village can come forward early in the new Local Plan period and significantly contribute to meeting any enhanced housing needs arising from the concurrent growth strategy, under consideration by the Cambridge Growth Company.

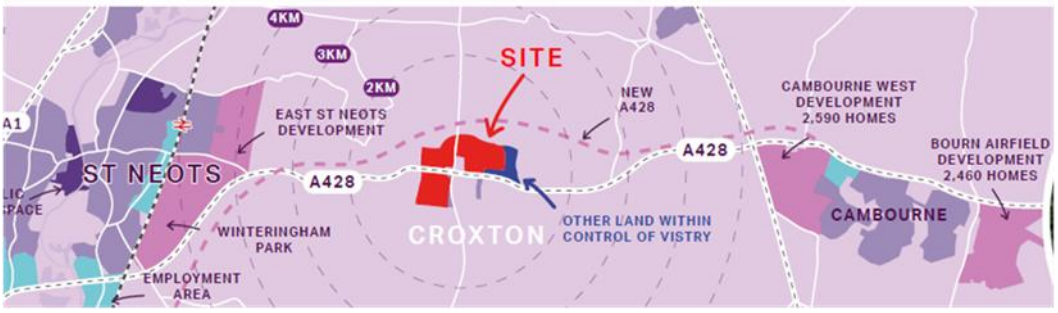
3.7 The new Garden Village can also provide for some of its own day to day needs, including primary education, but will additionally look to nearby Cambourne for further service provision and to access strategic public transport, using active transport modes from the new Garden Village at Croxton (utilising the former route of the A428) to connect with the expanded new settlement at Cambourne to the east.

3.8 The proposals for Croxton Garden Village are predicated on the key delivery of social and environmental sustainability, via excellence in core design and exemplary place making. This approach also promotes the use of technical best practice, social inclusion and the provision of new high-quality community infrastructure, which is articulated further in context, within the attached Vision Document.

3.9 The proposed Garden Village at Croxton will deliver a range of public benefits which makes it highly suitable in principle for inclusion within the next stage of the emerging GCLP, as a freestanding, intermediate-scale mixed-use allocation, located close to a major settlement hub. These benefits are also consistent with the various 'Big Themes' sought by the emerging Local Plan from inception and include the following principles:

3.10 Croxton is located within the western section of the A428 corridor wherein the existing Local Plan has successfully directed significant levels of new growth in the recent past (West Cambourne and Bourne Airfield). As such, the Garden Village proposals would not be developed in isolation, but would form part of a network of active-transport-linked settlements around the major new growth hub of Cambourne.

3.11 In terms of site suitability, the realignment of the existing A428 at Croxton has presented a unique opportunity for an intermediate scale mixed-use development in the contained parcel of land created between the old and new alignments of the A428. This location is also ideally located for new and existing residents to access nearby St Neots for key employment and retail purposes, as well as Cambourne locally for retail, recreation and education, via sustainable, transport modes, using the former A428 alignment.



3.12 As can be seen from the Vision Document extract above, the realigned A428 will pass just to the north of the Site within a new cutting. Toseland Road is to be realigned slightly to the west, crossing over the newly built dual carriageway via a new bridge.

3.13 The new A428 alignment is substantially under construction and fundamentally alters the current context of the existing site, with the introduction of a major new dualled road adjacent to the northern boundary of the site.

3.14 This creates the opportunity to use the alignment of the former Cambridge Road to the south of the scheme as a high-quality public transport corridor running between St Neots and Cambridge.

3.15 The site proposal is of modest, intermediate, scale compared to some of the other larger strategic allocations proposed in the Local Plan. However, the proposals are of sufficient critical mass to create a viable and sustainable new village community, with a degree of self-containment, whilst also being of a scale that does not require significant advance enabling infrastructure.

3.16 Where required, a Primary School can be accommodated on-site, with access to a very high quality state secondary school available in nearby West Cambourne to the east of Croxton (Cambourne Village College, which is an academy of The Cam Academy Trust, which opened within new premises in September 2013 at West Cambourne).

3.17 Other complementary social and small scale retail infrastructure can also be provided within the site in small hubs to help further establish the viability of the new Garden Village community. Furthermore, the site is mostly in existing, active, arable use and so offers good prospects for tangible enhanced Biodiversity Net Gains to be delivered as an intrinsic part of the proposed Garden Village development.

Placemaking Principles

3.18 The fundamental placemaking principles of the Croxton Garden Village proposals are set out in full in the Vision Document, attached at Appendix 1. These placemaking principles can however be broadly summarised as follows:

- To provide up to 1,500 high quality, attractive, highly energy efficient new market and affordable homes, of a range of scales, styles and tenures.
- To provide supporting uses, including a new primary school and village centre, to create a thriving hub of activity that supports a strong sense of new community.
- To create an attractive and high-quality public realm, with multi-functional and connected open spaces that support and encourage a range of outdoor activities to promote strong community interaction, healthier lifestyles, and greater wellbeing.
- To encourage active travel by prioritising pedestrians and cyclists within the new Garden Village, and maximising public transport opportunities along Cambridge Road, including the provision of a mobility hub.
- To work both with and enhance the existing landscape features of the site, and to respect the setting of Croxton Park and the Croxton Conservation Area.

Technical Assessment Summary

3.19 To support the promotion of the new Garden Village, Vistry has commissioned a number of technical studies both on and around the site and each separate study is available for consideration. These technical studies have not identified any significant constraints or any other site issues that would preclude the early delivery of a new Garden Village of the scale proposed, from coming forward in this specific location.

3.20 The Opportunities and Influences Plan set out at Figure 1.4, on page 10, of the attached Vision Document summarises the key findings from the initial technical surveys and assessments and how these have been used to inform the vision and the Concept Masterplan set out at page 26 of the Vision Document.

3.21 In terms of the **Highways Strategy**, the overall vision for Croxton Garden Village is to create a healthy, socially inclusive, and well-connected new community where residents can easily travel within, around and beyond the village by sustainable modes of travel. The new neighbourhood will maximise emerging opportunities for new types of mobility and will also be flexible to adopt future active travel technologies when available.

3.22 The proposed **C2C Project** has now been commissioned, and will vastly improve bus services both to and from Cambourne and Cambridge and thereby accessibility to a large hub of employment and education will be enhanced. This will also create an opportunity for these services to be potentially extended to include the new Croxton Garden Village via the de-trunked, former A428.

3.23 With regard to **Flood Risk and Drainage,** the entire Site is located in Flood Zone 1 and, therefore, at the lowest risk from fluvial flooding. Most of the Site is also at very low risk from surface water flooding. The proposed new SuDS strategy will deliver long-term mitigation of development generated surface water runoff, by attenuating and treating surface water flow, with an allowance for climate change factored into the design.

3.24 With regard to **Landscape & Visibility**, the site is visible from some public footpaths within near distance, however the site is well screened in views from within Croxton. Views from further afield, including from within the Croxton Park and Garden, are also generally well screened by mature vegetation within the wider surrounding landscape.

3.25 The site is capable of visually accommodating the sensitively designed development and the existing landscape structure of field boundary hedgerows and trees can be retained. Structural planting to the western and southern boundaries of the southernmost parcel will also provide containment to the proposed development with carefully designed gaps to allow for vistas across the valley landscape to the south.

3.26 Existing **Public Footpaths** can also be retained on their alignments within green corridors through the new village. There is a small number of trees covered by Tree Preservation Orders (TPOs) along Toseland Road. The sensitive design of the new Garden Village will however allow for the full retention of all trees covered by these existing TPOs.

3.27 Further details of the other technical assessments undertaken to inform the vision and Concept Masterplan are set out in the Vision Document at **Appendix 1**.

The Benefit of an Intermediate Scale New Settlement in the Spatial Strategy

3.28 The Development Strategy Topic Paper for this Regulation 19 consultation, considers the benefit of including further new settlements as a spatial option, which is discussed at Appendix 5 of the Topic Paper.

3.29 The key factors identified to inform the identification of these reasonable alternatives are access to High Quality Public Transport Corridors (HQPT's) and development of a suitable minimum scale to help maximise the internalisation of trips. With regard to HQPT's, as stated earlier in these representations, the overall vision for Croxton Garden Village is to create a well-connected new community where residents can travel beyond the Garden Village by sustainable modes. The new Garden Village will also maximise opportunities for future new methods of sustainable mobility.

3.30 The approved C2C Project will improve local bus services locally to and from Cambourne and will create an opportunity for these services to be potentially extended to the former A428. The latter of which is likely to be more viable if there is a further development catalyst along the former route of the A428, such as at Croxton. This would help provide a direct frequent bus link to Cambourne and its future strategic rail connection.

3.31 With regards to scale, a new settlement in this particular location is not dependent upon a minimum scale to ensure that most trips can be internalised, as Croxton Garden Village would have a very functional and sustainable future relationship with the larger growth hub at nearby Cambourne. This allows for more intermediate scales of new settlement development to be sustainable and viable in this particular section of the A428 corridor.

3.32 Accordingly, Vistry does not concur that a new settlement in this location needs to be of a minimum scale, as has previously been suggested by the Councils (Regulation 18 Topic Paper) by reason that such an assessment does not take into account local circumstances and site locations with potentially strong functional relationships with nearby existing settlements. Notably, relationships with neighbouring settlements that have access to existing, or future, strategic public transport infrastructure, such as Cambourne.

3.33 This proximity principle was previously recognised at Paragraph 1.10b of the Regulation 18 Topic Paper, wherein the council previously stated:

> *'… it is acknowledged that the location and pattern of development of new communities will influence the appropriate size and smaller developments may be appropriate in certain circumstances'.*

3.34 The above statement is relevant in the case of Croxton Garden Village and justifies a departure from any minimum benchmark scale to a 'village scale' of 1,500 new homes and community infrastructure in this particular location.

4. Summary and Conclusions

4.1 These representations confirm that Vistry is supportive of the Local Plan in terms of its broader objectives, but Vistry does not support the revised development strategy as proposed (see specific objections raised in Section 1). This is because Cambridge is one of the most economically dynamic and nationally significant regions in the UK and the new Greater Cambridge Development Corporation, has therefore been tasked to further harness this potential to secure even more ambitious and high quality sustainable growth in the Cambridge area.

4.2 The emerging Local Plan represents an important first stage towards shaping the future growth of the City and the region in advance of more significant further growth to come. For this reason, the emerging Local Plan must be more ambitious by focusing not just on capacity, but also on more diverse spatial models for early housing delivery.

4.3 The absence of sufficient medium-scale allocations of the scale of Croxton Garden Village is a notable feature of current spatial strategy, which Vistry considers could be enhanced by allocating additional sites of more intermediate scale, in key transport corridors which have the ability to deliver housing earlier in the new plan period.

4.4 As such, Vistry considers that the spatial strategy objections raised would be addressed by the inclusion of an additional medium-scale site within the A428 corridor, close to the new expanded hub location of Cambourne, given its pending strategic rail infrastructure. The allocation of a new site in this location can play an important role in accelerating and maintaining delivery rates, whilst providing greater resilience in the housing trajectory.

4.5 The primary attributes which make Croxton Garden Village a suitable location for such additional medium-scale growth are fully set out in the accompanying Vision Document. However in summary, the realignment of the existing A428 at Croxton presents a unique opportunity for an intermediate scale, mixed-use development in the contained parcel of land created between the old and new alignments of the A428.

4.6 This strategic location is ideally located for new and existing residents to access nearby St Neots for key employment and retail purposes, as well as the enlarged Cambourne for additional retail, recreation and education, via sustainable, transport modes, using the former A428 alignment.

4.7 In the context of the need to reallocate housing numbers away from the strategic NEC allocation, Vistry considers that the allocation of Croxton Garden Village is fully justified to ensure that the Local Plan is positively prepared, effective and justified and therefore more capable of meeting the full scale of housing need being driven by the economic potential of Greater Cambridge. The inclusion of such a deliverable new allocation in the A428 corridor would also help to enhance flexibility, improve deliverability, and support the Councils' wider spatial, environmental, and sustainability objectives.

4.8 In conclusion, national policy and other overarching growth strategies for the Cambridge area are continuing to rapidly evolve. The proposals set out for Croxton Garden Village in these submissions represent a sustainable, deliverable, and strategically important opportunity that can further support the emerging draft development strategy.

4.9 Accordingly the Councils are requested to give full consideration to the case made within these representations and allocate the site at Croxton Garden Village, as set out in the Vision Document, for development in the submission version of the emerging Local Plan.

4.10 Finally, Vistry requests the right to participate in the forthcoming examination of the Local Plan to further articulate the development strategy objections which have been made in these Regulation 19 representations. However, Vistry's broad support for the Local Plan in other respects, remains unchanged.



Appendix 1

Croxton Garden Village – Vision Document

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