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 Group (CGV)	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 Vistry has not previously objected, in principle, to any particular aspect of the emerging Local Plan and remains broadly supportive of its wider objectives. However given the structural change to the new development strategy Vistry's position has now changed, due to the relocation of housing numbers associated with the NEC/AMC allocation.

1.2 The former 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 plan period to 2045. Given the fundamental issues which affect the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) and the withdrawal of central government funding, the Local Plan has had to fundamentally alter its approach to the delivery of these new homes.

1.3 As large-scale housing on the NEC site cannot be brought forward until the CWWTW is 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 a greatly enlarged Cambourne and at a new settlement at Grange Farm.

1.4 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 major housing delivery numbers from NEC.

1.5 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.

1.6 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 two new settlements and ensure that the required housing trajectory can be maintained, particularly over the first five years of the plan period.

1.7 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, including at Croxton Garden Village.

1.8 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. 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.

1.9 Whilst Vistry has concerns over the wider development strategy as a whole, notably in terms of the relocated housing delivery within the required timeline, Vistry broadly concurs with the strategy for the longer 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. The strategic planned growth of Cambourne to become a major, rail-linked, settlement in the area is considered to be a sound approach 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.

1.10 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, including 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.

1.11 A new Garden Village in this location, as part of this Local Plan 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 a growing 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. Therefore it is incumbent on the Council's to reconsider the Croxton Garden Village option in the light of the issues which affect the NEC/AMC.

Resolution to Objection

1.12 Croxton Garden Village has been incorrectly discounted as a sustainable residential-led mixed-use allocation and should be allocated as a main modification to the submission version of the GCLP, to help provide greater resilience and flexibility within the Development Strategy. The site shown in **Appendix 1** of the attached representations should be allocated for residential-led mixed-use development for around 1,500 new market and affordable homes and public open space to help deliver some of the new homes displaced from 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 still requires additional layers of growth from new locations to be viable. Our promoted site at Croxton Garden Village is well placed to accommodate some of these homes as it lies in close proximity, and has a functional relationship with, the future rail-linked settlement at Cambourne, which is planned for major expansion.

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 – Croxton Garden Village - Vision Document

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 shown in Appendix 1 of the attached representations (Croxton Garden Village) for residential-led mixed-use 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 c) At New Settlements:

New criterion c) vi

Croxton Garden Village – a mixed-use, new settlement allocation for around 1,500 new homes and associated community infrastructure, public open space, landscaping and new 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.

Croxton Garden Village has been omitted from consideration to accommodate any of the new homes recently displaced from NEC. In contrast, the expectations of delivery from Cambourne in plan period have been substantially increased, as has the expectations from Grange Farm. We consider this approach to be vulnerable to further delivery delay as both are highly complex sites that require similarly complex advance infrastructure to accommodate the scale of development required during the plan period.

As such, Vistry requests the right to appear in person to test the Council's evidence for relocating so many new homes into two strategic locations and to contrast the evidence submitted for Croxton Garden Village as part of these representations, against the Council's delivery assumptions.

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