Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Greater Cambridge Shared Planning Services
South Cambridgeshire Hall
Cambourne Business Park
Cambridge
CB23 6EA

25th September 2026

JL – I002468
BY EMAIL

Dear Sir/Madam,

GREATER CAMBRIDGE PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION: REPRESENTATION ON BEHALF OF VISTRY GROUP RELATING TO NORTHSTOWE TOWN, PHASE 3B, STATION ROAD, LONGSTANTON, CAMBRIDGE (POLICY S/NST)

This representation is made on behalf of Vistry Group (hereafter 'Vistry'), who welcome the opportunity to submit representations to the Greater Cambridge Local Plan Regulation 19 Consultation ('GCLP') in respect of Northstowe New Town, Phase 3B, Station Road, Longstanton (the 'Site'). This is shown on the accompanying site plan for reference.

Vistry strongly supports the identification of the wider Northstowe New Town as an important location for growth within the Regulation 19 Local Plan and associated key evidence base documents. This supports the ongoing growth and vitality of the new town – which is a specific priority of the Government. The delivery of the new town is also specifically supported by Government, with the scheme benefitting from accelerator funding.

Notwithstanding, Vistry wishes to make comments on some of the specifics of the associated draft allocation policy to improve the 'soundness' the draft Plan. In doing so, these representations set out comments with a specific consideration of the requirements of Paragraph 36 of the National Planning Policy Framework ('NPPF') (2024) which states that when examining local plans, they should be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are 'sound'. A plan is considered 'sound' if it is:

a) ***Positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs[20]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;*
c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant*

It is noted that subject to being submitted by 31 December 2026, the GCLP will be examined against the NPPF (2024). However, once adopted the NPPF (2026) will be the relevant material consideration

that future development proposals will be assessed against. Annex A (Paragraph 2) of the NPPF (2026) states that development plan polices which are materially inconsistent with the national decision-making polices ('NDMPs') in the NPPF should be given very limited weight. As such, the below representations also take account of this and where necessary comment on the material consistency of draft polices with the NDMPs set out within the NPPF (2026).

a. Site Allocations – New Settlements - Policy S/NST: Northstowe New Town

Vistry supports the identification of Northstowe New Town in draft Policy S/NST for a community of approximately 10,180 homes, supported by a range of employment, retail, and community uses, served by the busway connecting Northstowe with Huntingdon, St Ives and Cambridge.

Northstowe Phase 3B represents an excellent opportunity for Greater Cambridge to meet its growth needs through a highly sustainable location within proximity of public transport services and community facilities. In particular, given the site's proximity to Longstanton Park & Ride and Cambridgeshire Guided Busway, it can deliver growth as part of a truly sustainable development with convenient, frequent and sustainable connectivity to central Cambridge and other well-connected employment centres around Cambridgeshire. This sustainable community will be embedded within a landscape setting and include a range of different housing to meet local needs, supported by community infrastructure and sustainable transport connectivity.

The Outline planning permission (20/02142/OUT) for Phase 3B demonstrates that the site can sustainably and successfully accommodate the scale of growth identified in the allocation.

Up to 1,000 new homes alongside a primary school and a mixed-use zone with retail, food and drink, community, leisure, employment and residential uses, would provide a diverse range of housing and accommodation to meet the needs of different groups within the community. Phase 3B would deliver a wide a range of benefits that would support the creation of a sustainable, healthy and well-connected community in Northstowe.

Whilst Vistry supports the continued allocation of the wider Northstowe New Town, we request amendments to some of the requirements and wording of draft Policy S/NST, as follows:

- Point 2: *"a site wide masterplan, prepared by the landowners / promoters in conjunction with the Council and in consultation with the local community and other stakeholders…*

  … The masterplan should be agreed by the Council prior to the approval of any ***outline*** *planning applications (and may be subsequently updated by the landowners / promoters and agreed by the Local Planning Authorities)."*

- Point 5: "*Among these will be a town centre supported by smaller local centres* ***which could*** *includ~~eing~~ commercial and retail uses, employment uses and sports hub, sports pitches, mixed use zones, a water park, open space and green corridors, incorporating active travel routes and associated infrastructure works.*

- Point 6: "*The new town of Northstowe is allocated for mixed-use development, comprising:*

  a. Approximately 10,180 homes (delivering 6,201 homes within the plan period) in a wide range of dwelling types and tenures including:

    i. Affordable housing;

    ii. ~~24~~ Permanent Gypsy and Traveller pitches ~~(within two sites of 12 pitches, each on approximately 1 hectare of land)~~ located ~~within but on the edge of the development, or~~ outside but in close proximity to the site, meeting requirements of Policy H/GT;

    iii. Community led homes and self/custom build homes; and

iv. ~~Approximately 850 units of~~ Specialist accommodation (Use Class C2 and C3), particularly for older people or those with disabilities;"

The proposed amendment to point 2 is to make clear that a site-wide masterplan is not expected to be approved in advance of any phase gaining Reserved Matters consent, as this would be unnecessary with elements of a masterplan being approved as part of Outline planning permissions, and if this was required ahead of Reserved Matters then the delivery of different phases would be significantly delayed.

Point 5 revision is in order to clarify that not every local centre will have to include all of the facilities listed, which would be undeliverable and unnecessary.

Point 6a requires Northstowe to provide 24 permanent Gypsy and Traveller pitches and approximately 850 units of specialist accommodation (Use Class C2 and C3). These requirements are not committed to or consistent within the Phase 3B outline development description and are therefore introducing unnecessary prescription and uncertainty, which could constrain the delivery of the approved development. The draft policy wording risks undermining the effectiveness of the Northstowe New Town allocation and the draft Local Plan, as the policy is not sufficiently flexible to support the implementation of the extant permissions and would be inconsistent with national policy and guidance on positive plan-making and deliverability, rendering the draft Local Plan not effectively prepared.

Similarly, these requirements should be removed from Policy S/DS (Development Strategy) as follows:

~~"2.95. …Gyspy and Traveller pitches are therefore required within the following strategic sites (as set out in the allocation policies): …~~
~~Northstowe: 24 pitches"~~

~~"2.102. …Specialist housing is therefore required within the following strategic sites (as set out in the allocation policies): …~~
~~Northstowe: 850 units for specialist housing (within the up to 8,500 dwellings on phases 2, 3A and 3B)"~~

The requirement for 24 permanent Gypsy and Traveller pitches should be removed from the policy, given that this requirement has not been demonstrated to be deliverable within the extant outline permissions. The policy should therefore avoid establishing a prescriptive requirement for 24 pitches without evidence that suitable and deliverable sites are available, whether within Northstowe or in close proximity to the development. If retained in its current form, there is a risk that the requirement could conflict with the uses and development already planned and consented at Northstowe, or result in delays to delivery, contrary to national policy and guidance on positive plan-making and deliverability.

The requirement for 850 units of specialist accommodation should also be removed, as it introduces unnecessary complexity and an additional layer of policy that undermines the clarity of the outline permissions. Phase 3B outline permission (20/02142/OUT) condition 53 already requires a minimum of 5% of residential dwellings within Reserved Matters areas to meet the M4(2) standard of The Building Regulations 2010. This is a significant level of specialist accommodation provision, and it is unclear if the draft policy takes account of this. Notwithstanding our view that the policy requirement should be removed, this 5% requirement secured by the conditions could be included in policy for completeness (as outlined in Policy H/SS below). Furthermore, the SA identifies the provision of specialist accommodation as contributing to a significant positive housing effect for Northstowe, but does not explain whether the existing requirements for accessible and adaptable homes secured through the outline permissions have been taken into account in determining the additional quantum of specialist accommodation required, meaning the policy may be mandating a far larger number of units of specialist accommodation across Northstowe. This should also be considered alongside the draft Development Management policies, including Policy H/SS, which already provides for accessible and adaptable homes through the M4(2) requirements, although we recommend minor amendments to the current draft wording. The relationship between these existing requirements and the policy S/NST requirement of 850 units of specialist accommodation is therefore unclear, and this requirement should be removed so as to avoid introducing unnecessary complexity and uncertainty that could compromise the delivery of housing in Northstowe.

Vistry also wishes to raise concerns regarding the wording of point 35, relating to the 'Lifespan Validation Checklist'. As currently worded, it could lead to duplication and documents being unnecessarily resubmitted at Reserved Matters stage (which are already controlled by associated planning conditions on the Outline planning permission) This in turn could lead to unnecessary delays in terms of expedient delivery of the latter phases of Northstowe New Town. Vistry therefore requests the following wording amendment: *"In addition to the requirements on the Validation Checklist, the following will be required at the submission of an outline or major planning application,* ***excluding for Reserved Matters applications where the Outline planning permission already specifies approval of these documents (including through associated planning conditions) …"***

Notwithstanding the above minor requested amendments to the wording of the draft policy, Vistry strongly supports the allocation of the Site for residential-led development, in supporting ongoing important delivery of new housing and associated facilities. The following sections set out our response to other draft policies in the Local Plan Regulation 19 document, focusing on areas of support as well as any soundness concerns (warranting review and amendment prior to submission for Examination).

b. Vision

Vistry supports the overall vision of the Local Plan. This aligns with NPPF 2024 paragraph 15 to provide a positive vision and a framework for meeting housing needs whilst addressing other economic, social and environmental priorities. As part of this, the allocation of Northstowe New Town is required in order to support the Council to deliver its draft Vision as outlined on pages 29-30 of the draft Plan. This is further supported by the Council through its inclusion of the site within the key diagram at figure 4 as a retained site allocation. It is considered that the proposals at Northstowe Phase 3B play an important role in achieving the vision, including through the delivery of a new sustainable community which includes the provision of a wide range of different homes (including in size, tenure and type), mixed uses, extensive open space and infrastructure, such as improved connectivity to public transport and a new primary school.

c. Policy WS/NC: Meeting the needs of growing communities

Point 11 refers to the implementation of services and facilities in "early phases" of development. We raise concern with the current drafted terminology, as 'early phases' is ambiguous and lacks clarity and clear definition for developers on when 'early phases' is. We therefore suggest in order to ensure sufficient flexibility, the policy should be reworded to adopt a case-by-case basis for the delivery of services and facilities and allows the timing of infrastructure to be aligned with the cash-flow and peak debt of individual developments. Appropriate mechanisms already exist for securing the delivery of such items in the form of S106 agreements and conditions.

As currently worded the policy is ambiguous, creating uncertainty that will place an additional and unwarranted adverse financial burden on development, challenging viability. We therefore contend the policy is revised as set out below to ensure the Local Plan is justified.

" … Implementation

*11. The tim**ing**~~ely~~ delivery of **infrastructure,** services and facilities will be **determined on a case-by-case basis** ~~required, including the provision of key services and facilities in early phases of the development~~. Phasing will be established through planning obligations or conditions, and this may include requirements for the use of meanwhile or temporary uses to ensure local needs can be supported until permanent facilities are delivered."*

d. Policy GP/QD: Achieving high-quality development

Vistry objects to point 2(h) of Policy GP/QD, which requires design to integrate security measures such as 'Hostile Vehicle Mitigation' which we understand relates to bollards, road blockers, traffic-management schemes, and reinforced street furniture. Within the policy there is no guidance on where this is required and as currently worded appears to apply this approach as a blanket across all development. This also seems to be a duplication of point (d) which requires developments to *"create*

safe open spaces and active streets that design out crime and consider counter-terrorism protective security measures that are proportionate to the building, street or place, particularly places with higher crowd densities."

A separate Hostile Vehicle Mitigation requirement is therefore considered overly onerous, problematic and does not take into account the specific circumstances, setting and contexts of individual developments and can have an adverse effect on residential environments and public realm through the introduction of hard landscape features and street clutter. To be effective and justified the policy should be reworded as below to state that such design measures will only be required where necessary.

*"1. **Where necessary,** development proposals will be expected to demonstrate how they have addressed the following design principles and requirements:…"*

Further, point 2(i) requires permeability of spaces and routes through development that must be supported by hard and soft landscaping. Vistry raises concern of potential conflict between points g. (requiring Hostile Vehicle Mitigation Measures) which often include bollards and barriers and point h., which notes landscape design should enhance permeability. It is suggested a review of the policy and competing points raised by points g and h/ d should be undertaken to ensure development remains deliverable and the requirements placed on developers are clear. This would ensure the policy is effective and justified.

e. Policy GP/QP: Establishing high-quality landscape and public realm

Whilst Vistry supports the inclusion of high-quality landscape and public realm (as permitted for Northstowe New Town under Outline planning permission ref (20/02142/OUT), Vistry wishes to raise concerns regarding Policy GP/QP as currently drafted and advocates that the policy is revised to read as follows:

"1. Development proposals are required to deliver high quality landscape and public realm by: …

b) Enhancing connectivity: …

*… VI. Parking should not reduce the functionality of open spaces, and if on-street parking **is proposed, inset parking will be encouraged** ~~should be inset~~. An expanded footway will be required for pedestrian movements when not occupied;"*

As currently drafted, point 1(b)(vi) requires on-street parking to be inset which will necessitate an expanded footway for pedestrian movements. We raise concern that this is an overly onerous requirement that goes beyond design guidance such as the Manual for Streets. Such requirements represent an unnecessary requirement and onerous land take of hard engineering features, creating additional unwarranted infrastructure costs for development. Development proposals should be designed and developed with regards to their contextual setting and determined in such respect as well. As such, development should not be blanket required at a Local Plan level to provide inset parking where it may be wholly inappropriate.

The amendment detailed above would ensure the GCLP is both justified and reflective on national guidance and policy.

f. Policy H/HM: Housing mix

Vistry suggests that point 4 is revised as follows:

*"Development proposals will be supported where a mix of housing types (e.g. houses, flats and bungalows) are provided proportionally across all ~~market and~~ affordable tenures, taking account of the local character and built form and up-to date evidence of **affordable** housing need. **Where affordable provision is met or exceeded a flexible, market led, approach to market provision will be supported**."*

Point 4 sets out a requirement for proposals to be supported by a mix that takes into account local character, built form and up-to-date evidence of housing need. However, HO8(3) of the NPPF (2026) notes where affordable housing requirements are met or exceeded by a development proposal, then a flexible approach should be taken to the application of development plan requirements for the bedroom mix of market provision – taking into account prevailing market conditions.

The suggested amendment reflects HO8(3) and explicitly states that up-to-date evidence will only be required to inform the affordable housing mix provision. Also, Tables 7 and 8 should be revised to remove the housing mix preference for market housing to maintain suitable flexibility.

g. Policy H/SS: Residential space standards

We also raise concern at the length of the draft policy, which is considered to unnecessarily repeat the requirements of the NDSS. This risks making the policy too convoluted and difficult to navigate. We suggest point 2 is removed in full as there is no need to repeat the standards; which may be updated during the lifetime of the GCLP, and would thus render the point irrelevant.

Point 4(e) sets out the required standards for balconies. We consider that proposals should be designed and determined on their own merits based on an appreciation of a site's context and surroundings and the policy should not be overly prescriptive. As such, we suggest that the policy is reworded to simply state:

"Provide balconies that are designed as integral elements of the building's architecture~~. and not appear as bolt on additions, with semi inset or inset balconies encouraged, to support cohesive façade compositions and support usability;"~~

It is considered that point 4(g) should also be revised so that it does not introduce amenity space standards that are unduly onerous and go beyond those within the Building Regulations. As such the policy should reduce the minimum quantum of private external amenity space for ground floor apartments to 5m^2. The policy should therefore read as follows:

*"Provide a minimum of ~~10~~**5**m² private external amenity space for ground floor apartments (irrespective of the number of bedrooms) immediately outside their living accommodation, with a minimum depth of 2500mm; and…"*

Point 4(h) should be revised as follows to not unduly place unachievable requirements for private external amenity space for apartments based on the number of bedrooms. The requirement for an additional 1m^2 per additional bedroom goes beyond the requirements of the Building Regulations and hence should be deleted from the draft policy in full.

"Provide a private external amenity space of 5 square metres for upper floor apartments ~~with 1 bedroom (one or two bedspaces)~~ through the use of a private balcony with a minimum depth of 1,500 millimetres and a minimum usable width of 3,000 millimetres. ~~Within upper floor apartments an additional 1 square metre will need to be provided for each additional person (bedspace)."~~

Point 6 requires all new dwellings to be of M4(2) standard. This is considered onerous and again goes beyond the requirements of the Building Regulations. Point 6 should hence be revised as follows to provide for an appropriate amount of M4(2) compliant dwellings. We suggest 5% of the overall development being of M4(2) standard is appropriate.

*"~~All~~ **5% of** new build residential units (including residential annexes) must be designed to be accessible and adaptable in accordance with the Building Regulations M4(2) standard."*

The draft policy should be revised as outlined above to ensure it is both justified and consistent with national policy and guidance. In turn this will ensure residential development remains viable and is not subject to unduly onerous requirements.

h. Policy H/CB: Self and custom build homes

Vistry suggests that draft Policy H/CB is revised to recognise site-specific circumstances with regards to the requirement for self-build homes at individual sites. As such, the current 'blanket' approach to 5% self-build being required as part of 'any development' is not supported (acknowledging this could cause issues with wider site delivery). This would be inconsistent with the Self-build and Custom Housebuilding Act, which focuses on demand registers, not quotas.

The specific types of housing schemes that are not appropriate should also be included in the wording. The current wording of the draft policy requires that even flatted developments must provide 5% custom-build units. While the supporting text clarifies that self-build flats would be delivered as custom-finish units, these are often already incorporated by developers as part of standard delivery models. As such, the requirement does not result in any meaningful additional benefit but instead is considered to place an unnecessary and disproportionate burden on developers, particularly in higher-density schemes where viability and deliverability is already constrained by the requirements of the draft Plan.

It should also be clarified how the requirement would be applied on multi-phase developments, and how the policy would retain flexibility for strategic sites that are delivered over a long period of time (i.e. Northstowe New Town).

We therefore request the policy wording is amended as per the below:

"1. ***Subject to viability, deliverability, and individual site circumstances,*** *development proposals including 20 or more dwellings must provide at least 5% of the new homes as serviced plots for custom and self-build houses and/or serviced custom-build flats. Specific types of housing schemes* ***such as flatted developments and [any other scheme types]*** *are not appropriate for custom and self-build homes and are therefore excluded from this requirement."*

h. Conclusion and Summary

Vistry strongly supports the identification of Northstowe New Town as a location for growth within the Regulation 19 GCLP and key evidence base documents. Northstowe Phase 3B will support the sustainable delivery of new housing and associated facilities and can successfully accommodate the scale of growth identified through the allocation, as outlined by the outline planning permission (20/02142/OUT). This will in turn support the ongoing vitality of the new town as a whole, which is a key priority at a national level.

However, there are minor requested amendments to the wording of a number of the draft policies to ensure the Local Plan is found sound at examination.

It is considered that subject to amendments as per the above, the concerns raised here can be adequately overcome. Vistry is keen to continue engaging with the Council on this basis and to support the authority in securing a sound Plan which can maximise the opportunity of a new community at Northstowe Phase 3B.

Yours sincerely,

[redacted]

Ellen Neumann
Senior Planner