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

24th September 2026

BY EMAIL

Dear Sir/Madam,

GREATER CAMBRIDGE LOCAL PLAN 2024-2045 (REGULATION 19 CONSULTATION) – REPRESENTATION ON BEHALF OF ASHWELL & MORDEN LANDOWNER CONSORTIUM

This representation is made on behalf of an emerging Landowner Consortium that has begun working on a collaborative basis to explore the potential of forming a stand-alone new settlement adjoining and either side of Ashwell & Morden Railway Station. The respondent is herein referred to under the abbreviation of "AMLC", reflecting that they comprise an emerging Ashwell & Morden Landowner Consortium. The AMLC has engaged in the Local Plan process to date, submitting representations to the previous Regulation 18 consultation.

a. The Need for NPPF Conformity

Whilst it is acknowledged that the Plan's soundness will be tested against the previous National Planning Policy Framework published in 2024 (herein referred to as NPPF 2024), a newly published and significantly evolved version of the NPPF (herein referred to as NPPF 2026) was recently published in August 2026.

Annex A of NPPF 2026 is explicit that from the date of publication of NPPF 2026, any local plan policies that are *"materially inconsistent with national decision-making policies in this Framework should be given very limited weight. The only exception is where they have been examined and adopted or made against this Framework"*.

In the interests of sound plan making and having an enduring Greater Cambridge Local Plan that maintains primacy from the point of adoption, the AMLC consider that minor modifications are required to the Plan. These will ensure that the Plan is consistent with national planning policy - particularly in respect of key draft Plan policies where conflict with NPPF 2026 currently exists and where the new policies risk being afforded only very limited weight upon adoption.

b. Soundness Concern with Strategic Policy S/DE (Defined Development Extents)

NPPF 2026 contains a new signature policy to drive housing growth around railway stations. The policy serves to enable housing and mixed-use development to be channelled to suitable qualifying railway station locations either as an essential component of a Development Plan's spatial strategy, or effectively as a form of housing "windfall" additionality, over and above what might be delivered through Local Plans. This policy is relevant to Greater Cambridge, as there are a number of qualifying railway stations within the plan-making area that have the potential to deliver significant levels of growth over and above the levels positively identified in the draft Greater Cambridge Local Plan, both during and beyond the plan period.

The Greater Cambridge Local Plan is silent on this key Government change of policy and its implications for Greater Cambridge. Furthermore, the failure to recognise the policy creates a clear

policy conflict between the key strategic policy S/DE (defined development extents) and NPPF 2026 Policy S5 (and GB7). If this conflict is left unresolved, it would render railway station growth schemes that are brought forward in conformity with the NPPF 2026 with an immediate in-principle Development Plan conflict. This would result in S/DE being afforded very limited weight upon adoption. Clearly, plan makers should be seeking to resolve this conflict.

The AMLC considers that the conflict can be easily resolved through the insertion of additional text (proposed in bold below) to Policy S/DE, so that it reads as follows:

> *1. Development and redevelopment of unallocated land and buildings within defined development extents (as shown on the Policies Map) will be permitted provided that:*
> *a. Development is of a scale, density and character appropriate to the location, and is consistent with other policies in the Local Plan;*
> *b. Retention of the site in its present state does not form an essential part of the local character, and development would protect and enhance local features of green space, landscape, ecological or historic importance; and*
> *c. There is the necessary infrastructure capacity to support the development.*
>
> *2. Outside defined development extents, development will not be permitted except for:*
> *a. Allocations within Made Neighbourhood Plans;*
> *b. Rural Exception sites meeting local need for affordable housing;*
> *c. Development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside;*
> ~~*or*~~ *d. Where development is supported by other policies in this plan; or*
> ***e. Where development is brought forward in conformity with provisions outlined in NPPF policy, including railway station related growth***

The AMLC would be supportive of alternative additional wording to Policy S/DE from that proposed above, subject to the wording clearly reconciling the existing conflict between the NPPF 2026 and the Greater Cambridge Local Plan on this key point.

c. Reflecting Railway Station Growth Locations on the Plan Proposals Map

The Government's signature new railway station policy is outlined in Policy S5 of NPPF 2026 for railway station related land that lies outside of a settlement (and beyond the Green Belt). The policy amounts to a clear and deliberate approach to enable and secure housing and mixed-use development in locations that, if not already identified for growth in the Development Plan for the area, amount to windfall additionality over and above planned levels of growth.

The policy channels growth to locations where prized infrastructure is already in existence and where the requisite connectivity to economic centres is in place. In this way, the policy enables homes and mixed-use development to be delivered in locations that will support the continued economic growth of successful centres in a highly sustainable way.

Policy S/JH establishes that the housing requirement for the Greater Cambridge area is in accordance with the Standard Method requirements for Cambridge City and South Cambridgeshire District. Whilst the Plan approach is supported, national policy is clear that meeting an area's objectively assessed needs should only be a minimum and that Plans should be prepared positively. The housing additionality that can be achieved through the Government's railway station policy should be considered through the Plan strategy and the infrastructure implications associated with unlocking this growth should be factored in and reflected, if possible.

In order for the Plan to be positively prepared, it is requested that the Plan Proposals Map be updated to identify and notate those locations where railway station related windfall growth might be delivered through NPPF 2026 Policy S51h (and its Green Belt counterpart GB7).

d. Ashwell & Morden

Greater Cambridge falls within a top 60 GVA Travel to Work Area and so all railway stations within the plan area are potentially engaged, subject to their train frequency. In this regard, Ashwell & Morden railway station on the southern edge of the Plan area is one such railway station that is served throughout the daytime by four trains per hour overall, meaning the location conforms to the NPPF 2026 railway station growth policy. The location benefits from a number of additional key locational and site characteristic credentials that would suggest that the site could be successfully developed, including:

- Adjacent A505 connectivity to provide excellent local road connectivity, as well as rail connectivity to the economic growth poles of Cambridge and London;

- Scope to provide strategic cycle routes between Letchworth, Baldock, Ashwell & Morden and Royston to strengthen local connectivity and support highly sustainable travel behaviours;

- Developable land, located entirely within Greater Cambridge with the scope to create an exemplar development that can deliver significant societal benefits;

- An operational quarry to provide key materials for the construction of infrastructure at source; and

- A relatively small existing local community at the location, with the railway station serving only a handful of existing homes despite being a fully functioning station on the London-Cambridge Thameslink line

Notwithstanding the location's compliance with Policy S51h, the location's existing transport infrastructure and the land attributes that would indicate development could be delivered in this location, the AMLC recognise that there are a multitude of issues that will determine whether growth in this location is feasible or not. Accordingly, the AMLC has begun exploring the availability, suitability and developability of the land in this location through engaging with the market to identify a prospective development partner. The requested change to identify Ashwell & Morden Railway Station on the Proposals Map for railway station related windfall growth would therefore be justified.

e. Summary

The AMLC welcomes the opportunity to continue to engage in the evolution of the Draft Greater Cambridge Local Plan. The AMLC is supportive of the Plan strategy, but considers that the Plan should be amended to be consistent with both NPPF 2024 (upon which the Plan's soundness is tested) and NPPF 2026 (to ensure primacy of the Plan and avoid key policies being afforded very limited weight upon adoption in 2027).

Key strategic policy S/DE (defined development extents) conflicts with NPPF 2026 in its current form and should be modified through the remaining plan process to enable NPPF promoted railway station growth to be brought forward without Plan conflict, avoiding one of the Plan's key strategic policies being afforded very limited weight upon adoption.

The Plan should further consider the potential additionality of housing delivery through NPPF 2026 policies and the certain forms of development that can be unlocked through the application of decision-making policies. The appropriate change would be to notate railway station related windfall growth locations on the Proposals Map.

The emerging AMLC is currently exploring the feasibility and extent of a developable railway station related development. Should the plan making process identify soundness concerns relating to housing provision across the plan period and/or a shortfall of deliverable development sites, there may be potential for Ashwell & Morden to form part of an alternative growth strategy. In this Plan scenario, the AMLC and its prospective future development partners would welcome the opportunity to engage with GCPS during the remaining Plan process to consider if and how the Plan might accommodate Ashwell

& Morden within the growth strategy, as well as how such a development could be reflected in infrastructure strategies that support the Plan.

Should you wish to discuss this or require any further information, please do not hesitate to contact me on [redacted] or jwaterhouse@iceniprojects.com, or my colleague Oliver Ricketts on [redacted] or oricketts@iceniprojects.com.

Yours sincerely,

[redacted]

James Waterhouse
Director