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**Andy Moffat**

E: [REDACTED]  
DL: [REDACTED]

Unex House  
132 - 134 Hills Road  
Cambridge CB2 8PA  
savills.com

Dear Sir / Madam,

**SUBMISSION TO THE DRAFT GREATER CAMBRIDGE LOCAL PLAN FOR CONSULTATION ON BEHALF OF BARRATT REDROW**

**LAND EAST OF BRIDGE ROAD, IMPINGTON**

Savills (UK) Ltd are instructed by Barratt Redrow (BR) to make representations as part of the Draft Greater Cambridge Local Plan for Consultation in respect of development at Land East of Bridge Road, Impington.

Barratt Redrow has previously engaged during the plan making process and previously submitted the Site through the Greater Cambridge Call for Sites. The Site remains available, suitable, and achievable within the plan period and presents a sustainable, deliverable opportunity to help meet the identified housing need for Greater Cambridge.

It is Barratt Redrow's position that the Draft Local Plan does not currently provide sufficient land to meet the housing requirement, and that Land East of Bridge Road, Impington is best placed to help meet that additional requirement. This covering letter makes representations in relation to Policy S/JH: New Jobs and Homes and Policy S/DS: Development Strategy & Key Diagram as it is important that they are read holistically together.

These representations are accompanied by a Landscape Summary Report January 2026 prepared by Golby + Luck landscape Architects.

As part of the Call for Sites the following documents were submitted:

- Vision Document;
- Access Appraisal;
- Preliminary Ecological Appraisal;
- Technical Note – Noise and Vibration Constraints;
- Air Quality Technical Note; and
- Landscape Summary Report May 2022

**Site Context and Background**

The Site has the potential to deliver up to 224 dwellings, including a mix of house types, tenure and densities with provision for affordable housing. The Site lies north of Cambridge and the A14, and on the southern edge of Histon & Impington. The Site is approximately 3 miles from Central Cambridge, which is roughly a 15-minute



cycle. The Site is currently in agricultural use, largely for hay-making, and for large social events. The Site is also used by dog walkers, owing to the tolerance of the owners.

The Site is accessed from Bridge Road via a private drive serving an existing dwelling abutting the Site's western boundary. There is also an orchard to the north-west of the site, providing a buffer to Bridge Road. The eastern boundary is formed by hedgerows and trees separating the Site from the Chivers Lake area. Gaps in the north-eastern corner facilitate further access to informal routes around the lake.

The southern boundary of the Site follows the ditch running through the field from west to east. Two extensions at the eastern and western end jut south, with the western parcel fully enclosed by mature trees and the western parcel an extension to the main Site. A parcel of land outside the site boundary remains as an agricultural field and further south is a hotel complex and its grounds including parking.

There is convenient access to the National Cycle Network (NCN) Route 51 and the Cambridgeshire Guided Busway from the Site. The Site's location provides quick and direct access to key employment locations within Cambridge as demonstrated by the table below which is taken from the previously submitted Vision Document for the Site.

PUBLIC TRANSPORT	
Histon & Impington Busway Stops (Services A, B, and C)	11 min walk / 4 min cycle
Chivers Way bus stop (Service Citi 8)	13 min walk / 4 min cycle
Cambridge North Rail Station	17 min cycle / 11 min walk + 8 min bus journey
EDUCATION	
Impington Village College	19 min walk / 6 min cycle
EMPLOYMENT	
Vision Park	13 min walk / 4 min cycle
Cambridge Science Park	12 min cycle
St John's Innovation Park	16 min cycle
CITY CENTRE	
City Centre (Grand Arcade)	16 min cycle / 15 min walk + 16 min bus journey

The Draft Local Plan proposes to retain the Site's designations as being within the Green Belt and remaining outside of the defined settlement boundary of Impington. The draft plan proposes to designate the land to the south and east as Local Green Space.

**Policy S/JH: New Jobs and Homes**

BR's position is that the Draft Local Plan does not currently provide sufficient land to meet the housing requirement.

The Regulation 18 Draft Plan proposes to meet the objectively assessed needs between 2024-2045 for 73,300 jobs and a minimum of 48,195 new homes. BR supports the increase in jobs being planned for in the Draft Local Plan to around 73,300 additional jobs, up from the 66,600 jobs referenced in the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023 and the 58,500 included in the Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021).

The Draft Plan proposes around 25% more jobs across the plan period than the First Proposals. When compared to the First Proposals Draft, Greater Cambridge are proposing 8.5% more homes annually, meaning that there has not been a corresponding increase in the proposed housing requirement. This is also against the background of a significantly increased Standard Methodology figure for Greater Cambridge meaning there is an increasing disparity between the jobs target and the housing target. Greater Cambridge needs to plan for a corresponding increase in housing delivery, because anything else jeopardises the continued economic success of Cambridge and the delivery of the required housing in the right locations. The current Government is clear that they intend to capitalise upon the previous success of the region, and the delivery of sufficient housing in the right locations is a critical part of this.

It is evident that the housing land identified in the Draft Local Plan is insufficient to meet the real-world need in and around Cambridge for two further key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites. The latter point is expanded upon under the S/DS: Development Strategy & Key Diagram heading below.

In terms of in-commuting:

The Councils' Development Strategy Topic Paper recognises that "a critical assumption informing the relationship between the number of jobs and homes - is imperfect." It is understood why the 2021 census information is not considered robust, as it was influenced by the COVID-19 pandemic, but it is not robust to use "Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this" as the basis for justifying the housing requirement. Previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. Using previous commuting assumptions will result in increased numbers of workers commuting into the area. Some will use public transport, but this will inevitably result in an increased number of workers using Greater Cambridge's constrained road network. The proper planning of the area would see a greater housing requirement identified, and that requirement being met by sites that can readily access existing and 'currently being delivered' public transport and cycle links. The proposed (inadequate) identified housing requirement risks increasing strain on key infrastructure whilst also driving up property values due to a shortage of supply relative to demand. As evidenced within the Case for Cambridge report, it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country. ONS data confirms that the median house price reached £425,025 in 2024, equating to 9.5x median earnings, compared to a median house price of £290,000 (7.7x median earnings) across England as a whole.

### **Policy S/DS: Development strategy**

A strategy that includes a focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. It does though lead to the conclusion that Greater Cambridge needs to adopt a more substantial housing supply buffer than the 6.5% (excluding any potential delivery at the former Waste Water Treatment Works site which the Councils acknowledge cannot be relied upon) currently proposed. A higher housing supply buffer would provide the required flexibility of delivery, and ensure a robustness of supply. The current buffer of 6.5% is insufficient and fails to recognise the delivery challenges which have historically held back early delivery on the large-scale strategic sites within Greater Cambridge. As a result, BR contend that Greater Cambridge should employ a housing land supply buffer over 10% and we would suggest circa 15-20% above the identified requirement. For the reasons set out under the Policy S/JH: New Jobs and Homes heading above, the housing requirement figure also needs to be higher than the Standard Methodology figure.

An analysis of housing supply in Greater Cambridge in recent years all bears out the need to plan for a greater supply. The Plan's proposed supply of 51,328 dwellings (excluding North East Cambridge), which equates to 2,444 dwellings a year, has not been achieved in any year of the past 23 years. The Councils' supply over the 6 years 2018/19 – 2023/24 since the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018 were adopted equates to 1,790 dwellings a year, and with supply in 2023/24 actually falling to 1372. The Greater Cambridge Housing Delivery Study Addendum October 2025 includes a Trajectory for the draft Local Plan as its Appendix E. This assumes the Local Plan is adopted in the 2028/29 monitoring year, and the five-year housing land supply calculations period is therefore 1st April 2028 to 30th April 2033. Even by the Councils' own calculations, the land supply would be only 5.34 years at that stage, and completions are predicted to fall in 2030/31 and fall further in 2031/32. If the Local Plan was to be adopted in the 2027/29 monitoring year, which is quite possible, the land supply would be only 5.15 years. Any delay to the delivery of the newly allocated sites, or the pace of delivery on the previous allocations, could mean the Council falling below the required 5 years. Additional identified supply through small and medium sized sites coming forward in the first five years post adoption would provide the necessary contingency to ensure the Councils maintain a five year supply and the plan remains up to date.

The 'Supporting information' to Policy S/DS states that "We made sure to consider the sustainability impacts of focusing growth outside the green belt in comparison with alternatives of releasing green belt land, as we are required to do by national planning policy". It is not evident though that the Councils have given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which would justify a more flexible and permissive approach to grey belt release in particular. We understand that the Councils are undertaking a Grey Belt review which is due to be published after the Draft Local Plan consultation. It will be important to ensure that this review is published and the opportunity provided for it to be reviewed and commented upon in advance of the consultation on the Proposed Submission Consultation (Regulation 19) scheduled for Summer / Autumn 2026.

Growth within villages, including villages within the Green Belt, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. Such sites are necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

As part of a robust sustainable housing supply to meet the needs of all of Greater Cambridge, it is clear that medium sized sites, including sustainable Grey Belt sites, are needed as part of a blended development strategy (reducing the reliance / dependency on strategic sites) to ensure that dwellings are delivered throughout the Plan period to meet all needs.

### **North East Cambridge (NEC)**

The Local Plan for consultation states that:

"In August 2025, the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) through the Housing Infrastructure Fund, which means that there is uncertainty as to whether the effective delivery of a significant proportion of the residential component of the Councils' vision for North East Cambridge will take place in the time period previously envisaged, including the assumed delivery of a significant amount of housing within the plan period. Building on the previously adopted policies for this area, for this draft Local Plan consultation, the Councils are retaining the draft allocation for North East Cambridge incorporating the vision previously set out in the Proposed Submission North East Cambridge Area Action Plan, noting the significant benefits that a comprehensive mixed use development at this site would bring. Delivery of this vision would be subject to alternative funding being found to enable the relocation of the Cambridge Waste Water Treatment Plant.

“Ahead of the Local Plan Proposed Submission stage in 2026, the Councils will continue to engage with relevant partners to confirm a refined position for the site, including the scale, type and amount of development proposed and any necessary updates to the spatial framework.”

Recent years have seen a considerable number of planning permissions granted and resolutions to grant permissions for employment development in NEC including St John’s Innovation Park, Land North Of Cambridge North Station Milton Avenue, Merlin Place, Vitrum Building, 440 Cambridge Science Park, 210-240 Cambridge Science Park and Trinity Hall Farm Industrial Estate. With the exception of the residential element of Land North Of Cambridge North Station Milton Avenue, there have been no corresponding permissions for residential development in NEC. The decision on the relocation of the Cambridge Waste Water Treatment Plant currently makes any residential development on that site or its immediate surrounds uncertain, and indeed unlikely.

With these recent employment permissions, the continuing support for employment development in NEC in the Draft Local Plan and the Milton Road trip budget, sites such as Land East of Bridge Road, Impington, which are readily accessible by existing public transport and cycling infrastructure to / from NEC, need to be developed for residential development to ensure that NEC and its surrounding area is a balanced, vibrant mixed use area with convenient opportunities for travel to / from work by means other than the car.

### **HELAA Assessment**

The Land East of Bridge Road, Impington site reference is 116103 and HELAA Site ID 200829.

#### Adopted Development Plan Policies – Amber

The HELAA recognises that *“Development of the site has some potential*

BR welcomes the Councils’ assessment that policy constraints could be overcome through the planning application process.

#### Flood Risk – Amber

The HELAA states *“Flood zone: Wholly in Flood Zone 1; Surface water flooding: 5% lies in a 1 in 30 year event, 5% lies in a 1 in 100 year event and 13% lies in a 1 in 1000 year event”*

The site is within Flood Zone 1 with the large majority of the site also at low or very low risk of surface water flooding. The Masterplan introduces SUDs basins and swales to ensure flooding on the site can be mitigated.

#### Landscape – Red

The HELAA states *“The site is within the Green Belt. The site plays a role in maintaining the Green Belt purposes. Development would have an adverse impact on the setting of Cambridge and separation between Cambridge and Impington. The site is open and edged with the Guided Busway along the north. Generally, development would have a negative impact on the landscape character, which highlights that the character is settled and in some areas, such as this parcel, have had their rural qualities eroded.”*

A Landscape Summary Report January 2026 is submitted alongside this letter as part of these representations and sets out BR’s case in detail. In summary, it demonstrates that:

- The visual setting of the site is contained and there are few receptor groups local to the site that can be considered as being highly sensitive to change. The visual sensitivity of the site is considered to be moderate to low;
- The site should be considered as grey belt when set against the most up to date policy and guidance. In addition, there is no reason why a considered and high quality design response cannot overcome the issues raised in the LUC Response; and

- Adherence to the Guidelines for Development set out in the Report for the Site would ensure that the impacts of development would be adequately mitigated.

#### Biodiversity and Geodiversity – Amber

*The HELAA states “A development of the size and scale described would likely meet the criteria set out by Natural England that would raise concerns regarding impacts to statutory protected sites. This includes increases in recreational pressure on nearby statutory protected sites. The proposed site may contain priority habitat, which will require assessment and possible compensation if removed. Where there is a likelihood of protected and priority species being impacted a full assessment must be undertaken. Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.”*

The proposal will seek to deliver a minimum of 10% Biodiversity Net Gain on-site and where not possible secure appropriate mitigation off-site. The creation of a community orchard as well as enhancement of biodiversity through the introduction of SuDS basins and swales will help create an ecologically-rich development and a pleasant environment where people want to live. A planning application would be supported by the appropriate assessments and demonstration that the impact could be reasonable mitigated or compensated. BR agrees that any impact could be reasonably mitigated or compensated.

#### Open Space / Green Infrastructure – Amber

*The HELAA states the “Site is not on a protected open space designation, however there are some protected open space designations on the periphery of the site. Development of the site may have a detrimental impact on the peripheral open space designation, but the impact could be reasonably mitigated or compensated. Within 50m of a Semi-natural Green Space and within 50m of a Outdoor Sports Facility.”*

The Vision Document previously submitted takes account of the designated local green space to the south, west and east of the Site. The illustrative masterplan demonstrates careful design has been considered to account of semi-natural green space or outdoor sports facilities between the designated local green space and the residential elements of the proposed Site. Any planning application would be supported by an appropriate assessment which assesses and addresses any potential impact on these designated spaces. BR agree that any impact could be reasonably mitigated or compensated.

#### Historic Environment – Green

*The HELAA states “Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.”*

BR welcomes the Councils’ assessment of the impact on the historic environment.

#### Archaeology – Amber

*The HELAA states “A trackway is recorded in the area, recorded as Iron Age in date. This may however be associated with a Roman site located to the east. Originally identified by archaeological works on the guided busway, recent investigations indicate that this is the edge of a significant, high status which is likely to extend to the south and west. Archaeological investigations would be necessary in advance of development.”*

Any planning application would be accompanied by an appropriate assessment of the existing archaeological conditions and necessary mitigation measures. As is standard practice, this process will involve consultation with Cambridgeshire County Council Archaeologist.

### Accessibility – Green

The HELAA states *“Good accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services”*

BR welcomes the Councils’ accessibility assessment. As set out above, in addition to the employment, facilities and services within the village, journeys between the Site and employment opportunities in NEC and the employment, facilities and services available across Cambridge are readily accessible by existing public transport and cycling infrastructure, including the Guided Busway / adjacent cycleway and onwards to Cambridge North Rail Station. Indeed, given the unlikelihood of residential development coming forward on the Cambridge Waste Water Treatment Plant or its immediate surrounds, residential development is required on this Site to ensure that NEC and its surrounding area is a balanced, vibrant mixed use area with convenient opportunities for travel to / from work by means other than the car.

### Access – Red

The HELAA states *“The site has been scored as Red. The proposed access cannot be delivered within land under the ownership of the applicant and therefore cannot be achieved.”*

The Call for Sites submission included an Access Appraisal (May 2022, Paul Basham) which provides an indicative access proposal which is capable of serving the development. Subject to the recommendations in that report and the access is capable of being delivered from a technical perspective.

BR is undertaking the necessary survey work and engaging with CCC, and also another landowner over an alternative access, to demonstrate the deliverability of safe, convenient access to the Site. We will keep the Councils updated on this matter.

### Transport and Roads – Amber

The HELAA states *“Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use. A Transport Assessment and a Travel Plan will be required.”*

BR agree that any impact could be mitigated.

### Noise, Vibration, Odour and Light Pollution

The HELAA states *“The proposed site will be affected by road traffic noise from nearby main roads, but is acceptable in principle, subject to appropriate detailed design considerations and mitigation.”*

BR agree that any impact could be mitigated. Moreover, and as outlined as part of the Call for Sites submission for the Site, BR recognise the impact the A14 Improvement Scheme has had on the village, and they continue to undertake work to assess how development of this site can not only be designed to provide good living conditions for new residents, but could also act as a ‘barrier’ and thereby improve noise from the A14 on the existing village.

### Air Quality – Amber

The HELAA states *“The site has been scored as Amber. Inherent/intrinsic designed-in air quality mitigation measures and conditions may be necessary to offset impacts on designated Air Quality Management Areas (AQMA).”*

BR agree that any impact could be mitigated.

### Contaminated Land – Amber

The HELAA states *“The site is likely to be capable of being developed after appropriate mitigation or remediation of contamination / ground stability issues. Potential for historic contamination, conditions required.”*

BR agree that any impact could be mitigated

### Available – Amber

The HELAA states *“The site was submitted by the landowner and / or site promoter who has confirmed that the site is available for development in the timescale indicated”. Site will be available in 0 to 5 years. Estimated start date 0-5 years. Development completion timescales 6-10 years.*

BR can confirm that the Site can indeed be brought forward within 0-5 years with completion in years 6-10.

### Achievable – Green

The HELAA states *“The Land has been promoted by the landowner and or developer and is known to be available for development. This site has a low existing use value and development is likely to be economically viable”.*

BR can confirm that the Site is indeed achievable and would be economically viable.

### Overall Suitability Score – Red

The HELAA provides an overall suitability score of ‘red’, which is wholly due to Landscape and Access matters.

In relation to Landscape, the updated Landscape Summary Report now submitted demonstrates that the visual sensitivity of the site is moderate to low, and the Site is grey belt when set against the most up to date policy and guidance.

In relation to Access, the previous submitted Access Appraisal provides an indicative access proposal which is capable of safely and conveniently serving the development. BR is undertaking the necessary survey work and engaging with CCC, and also another landowner over an alternative access, to demonstrate the deliverability of safe, convenient access to the Site.

### Conclusion

In summary:

- The Local Plan needs to make provision for more housing land than currently proposed in the Draft Local Plan to meet the needs arising from the proposed additional jobs, to avoid an exacerbation of in-commuting into the area and to provide an adequate buffer.
- To ensure they continue to be vibrant, inclusive communities, growth within villages is essential as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and this should include sustainable Grey Belt sites within villages in the Green Belt.
- Land East of Bridge Road, Impington is Grey Belt.
- Land East of Bridge Road, Impington is also in a sustainable location. Moreover, given the unlikelihood of residential development coming forward on the Cambridge Waste Water Treatment Plant or its immediate surrounds, residential development is required on this Site to ensure that NEC and its surrounding area is a balanced, vibrant mixed use area with convenient opportunities for travel to / from work (and to / from facilities and services) by means other than the car.
- There are exceptional circumstances to justify the alteration of the Green Belt to include the release of sites such as Land East of Bridge Road, Impington;

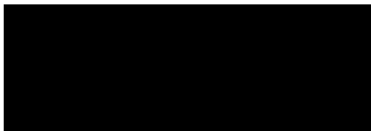


- Survey work and engagement is being undertaken to demonstrate the deliverability of safe, convenient access to the Site.
- All other planning matters, including landscape / visual effects, can be satisfactorily addressed;
- The Site is suitable, available (in 0-5 years) and deliverable (with completion in years 6-10); and
- As part of a robust, sustainable housing supply to meet the needs of all of Greater Cambridge, sustainable Grey Belt village sites such as Land East of Bridge Road, Impington need to be allocated as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs.

We would welcome the opportunity to provide any further information in relation to the site that may be helpful to enable the Councils to include the site as an allocation in the next version of the emerging Local Plan.

If there is any further information and/or clarification that we can usefully provide to assist your consideration of these proposals, please do not hesitate to contact the undersigned in the first instance.

Yours faithfully



**Andy Moffat BA(Hons) MPhil MRTPI**  
Planning Director and Head of Department

Accompanying Document: Landscape Summary Report January 2026 prepared by Golby + Luck landscape Architects