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	Jonathan Ordidge	Edward Durrant
Organisation (where relevant)	Martin Grant Land	Pegasus Group
Job Title (where relevant)	Senior Planning Manager	Associate Planner
Address, including Post Code	C/O agent	2nd Floor, Victory House, Vision Park, Histon, Cambridge, CB24 9ZR
Telephone	C/O agent	[redacted]
Email address	C/O agent	[redacted]

* 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	Policy S/DS
Proposed Submission Policies Map	N/A
Sustainability Appraisal	N/A
Habitats Regulations Assessment	N/A

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.

Whilst this local plan is being prepared under the legacy plan making system, with soundness in relation to consistency with national policy being considered against the NPPF of December 2024, the decision-making policies of the NPPF 2026 will nonetheless be material considerations in the determination of any applications for sites not allocated through the Local Plan. This is especially relevant for sites that are physically well-related to existing settlements but outside their development boundaries. These are likely to come forward as speculative applications where there is an evidenced unmet need in accordance with decision-making Policy S5 and GB7. If this unmet need is established, then sites like 'Land off Ambrose Way, Impington' (HELAA Site ID 40392 -Site ID 115061), which is being promoted by our client, Martin Grant Land Ltd., are logical locations to deliver sustainable development. Notwithstanding the fact that the site is within the Green Belt, under the decision-making policies of the revised NPPF there is still a policy route to secure planning permission where a housing need is not being met, and the site meets the criteria for being considered as grey belt.

Rather than allowing sites like 'Land off Ambrose Way' to come forward unplanned, the Councils should positively allocate such sites where they would clearly deliver sustainable forms of development. In the case of 'Land off Ambrose Way', the site is located on the edge of one of only two Rural Centres that are on the fringes of Cambridge. A Rural Centre that has rapid public transport connectivity with the city (via the Cambridgeshire Guided Busway that connects the city with St Ives) as well as infrastructure that supports walking and cycling connectivity. This would result in new residents being within a twenty-minute walk to the Guided Busway and a twenty-minute cycle to the centre of the city. Accordingly, the 'Land off Ambrose Way' site is inevitably more sustainable than sites in the rural southern cluster and at Rural Centres and Minor Rural Centres within the rural area of South Cambridgeshire. The order of preference listed in part 1 of Policy S/DS should be amended to reflect the greater sustainability of sites within and near to the Rural Centres that are on the fringe of Cambridge. Especially, in light of the approach taken by the Government in the revised NPPF, which recognises the benefits of growth through the development of sites physically well-related to existing settlements.

Given the public transport connectivity of Histon and Impington in particular, allocating sites that are physically well-related to the settlement must form part of the development strategy for the Greater Cambridge area. Especially, as it is inevitable that sites will come forward as speculative applications when an unmet need for housing can be evidenced. What constitutes 'unmet need' is likely to be determined by legal cases. Indeed, the text of Policy S5(j) confirms that it is not limited to development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent

Housing Delivery Test. This indicates that there are other unmet needs that could trigger Policy S5(j), such as an unmet need for affordable housing on the edge of one of the least affordable cities in the country.

The allocations in the emerging Local Plan do not recognise the role that sites of 100 dwellings or less, like the 'Land off Ambrose Way' site, can play in delivering a more diverse growth strategy through a greater range of sites in sustainable locations where levels of car use for travel to work would not necessarily be higher than in the Rural Centres and Minor Rural Centres within the wider rural area. Allocating more sites on the edges of Rural Centres on the edge of Cambridge would be a positive response to the challenges of net zero carbon and Climate Act obligations and not undermine the Councils' vision and strategic priorities.

National planning policy states that plans should set out "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence". The 2026 revisions of the NPPF now mean that growth utilising sites that are physically well-related to Rural Centres is a reasonable alternative that needs to be considered. If not, then it risks undermining the emerging Local Plan through speculative applications supported by Policy S5(j) resulting in unplanned growth.

Figure 9[1] shows how the development strategy is focussed on larger sites including new settlements. Indeed, 81% of the homes to be delivered across Greater Cambridge are on sites of 1,000 or more homes. These can take years to deliver new homes as has been evidenced by sites like Eddington and Cambridge East. The allocation of a greater range of sites would offer greater resilience to changes in the housing market and increases in materials and energy costs that may slow the build out of larger strategic sites. There would also be the added benefit of ensuring a more robust five-year supply position in the early years of the plan. As well as the delivery of more affordable housing nearer to the city.

The benefits of delivering housing near to public transport infrastructure (the Guided Busway that provides connectivity with all three Cambridge stations) that provides access to London has wider, regional benefits in meeting some of the housing needs of the capital. The recently published draft London Plan indicates that there would be a significant undersupply of housing in the first ten years after its adoption. The draft London Plan's approach to increasing housing supply towards the end of the plan period will inevitably have an impact upon settlements outside of London that have traditionally been used by commuters reliant on the railway. This potential wider housing need for the southeast of England is likely to put further pressure for development in the Greater Cambridge area.

The emerging Local Plan proposes to allocate more employment sites within and near to Vision Park, Histon. These are in addition to new employment opportunities that will be created by the densification of both the Cambridge Science Park and Cambridge Business Park. These sites are on the route of the Guided Busway and within cycling distance of the 'Land off Ambrose Way' site. Delivering more new homes near to these large employment sites would meet the requirements of paragraph 111 of NPPF by seeking to minimise the length and journeys needed for employment opportunities.

[1] Figure 9: Distribution of growth in comparison to previous Local Plans

Given the Councils' reliance on windfall sites for part of their development needs, the revisions to the NPPF and the impact they will have on delivery of housing on sites physically well-related to existing settlements where an unmet need can be evidenced must now be acknowledged. The Councils' evidence for its windfall allowance is based on in-depth analysis of historic housing completions on windfall sites and consideration of future trends taking account of national legislation, and national and local planning policy. Given the timing of this consultation, it is inevitable that this in-depth analysis could not have taken into account the recent revisions of the NPPF and the implications of applications coming forward in compliance with Policies S5 and GB7 in particular. Accordingly, the development strategy must consider the implications of Policies S5 and GB7 on the determination of applications for unallocated sites and use this as an opportunity to allocate more sites of 100 dwellings or less that are physically well-related to existing settlements, especially those high order settlements on the fringes of Cambridge.

The Government is clear that sustainable development in line with Policy S3 of the 2026 NPPF can be delivered by the development of sites within that are physically well-related to existing settlements. Sites such as 'Land off Ambrose Way' have effectively been given a green light for applications to be supported where they comply with Policy GB7(1)(G) and S5(j). However, there is still a risk for developers in attempting to secure planning permission for such sites. This risk could be removed by the emerging Local Plan allocating them for development.

Given the clear sustainability of Rural Centres on the edge of Cambridge the development potential of land physically well related to them cannot be ignored as they now offer a reasonable alternative for meeting some of the growth needs of Greater Cambridge. In light of the 2026 NPPF changes, Policy S/DS should recognise how sites like 'Land off Ambrose Way' can deliver more sustainable development than sites in rural areas.

Please provide a 100 word summary of your representation.

Policy S/DS should be amended to provide a more resilient strategy for housing delivery, including through the allocation of further sites for residential development on sites that are physically well-related to the Rural Centers such as 'Land off Ambrose Way'.

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.

N/A

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.

Criterion 'b' of Part 1 of Policy S/DS should be amended by way of the text highlighted in bold below:

1. The need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge Green Belt:

a. Within the Cambridge urban area;

b. On the edge of Cambridge **or on the edges of Rural Centres that abut the City;**

c. At an expanded Cambourne;

d. At other new settlements; and

e. In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.

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.

Because the existing strategy for the distribution of housing growth ignores the role that sites physically well-related to Rural Centres that abut the City. In considering this strategy the Inspector should have every opportunity to assess the appropriateness of alternative sites for the delivery of new homes on sites well-related to higher order settlements on the edges of Cambridge.

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