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	Rest of rural area
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.

Figure 9[1] shows how the development strategy is increasingly focussing larger sites including new settlements. Whilst these have an important role in housing delivery, they can take years to deliver new homes and employment opportunities. Indeed, 81% of the homes to be delivered across Greater Cambridge are on sites of 1,000 or more homes. Therefore, the development strategy could be made more robust by offering more opportunities for developers of sites of 100 dwellings or less that are more likely to be built out faster if they are allocated through the emerging Local Plan. This approach 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 until such time as the larger sites start to deliver new homes.

Requiring developers of sites of 100 dwellings or less to have a greater reliance on unallocated sites means that applications for such sites have greater risks of not being approved if they are outside settlements. As the principle of their development is not established through an allocation even when they are in sustainable locations. This means that developers inevitably have to look for less certain sites where the costs of attempting to secure a planning consent, and the risks of not achieving one would inevitably be higher.

Our client, Martin Grant Land Ltd., is promoting their site at 'Land off Ambrose Way, Histon' (HELAA Site ID 40392 -Site ID 115061). This site is physically well-related to the Rural Centre of Histon and Impington and could deliver up to 100 dwellings near to employment opportunities and the Guided Busway. This offers a more sustainable form of development than other sites that are proposed to be allocated through the emerging Local Plan. Through previous call for sites Martin Grant Land Ltd. has demonstrated that the site is deliverable and any impacts of its development could be mitigated.

The Councils recognise that to help Greater Cambridge transition to net zero carbon by 2050 it is essential that development is sited in places that help to reduce carbon emissions. Accordingly, the development strategy seeks in part to maximise opportunities for growth by the location of existing and committed public transport schemes. Examples of this are development north of Cambourne taking advantage of the proposed East West Rail station and Cambridge East being supported by the proposed Cambridge Eastern Access public transport corridor improvements. Weight is also attached to the potential for a new rail station to be delivered on the site to make it more sustainable.

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

It is clear from this strategy that significant weight is being attached to delivering growth around future public transport routes. This broadly accords with the approach taken by the Government in the 2026 revisions of the NPPF, which seek to focus growth around existing, well-connected stations. Specifically, compliance with decision-making Policy S5(h) meaning that applications for sites near to well-connected stations should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. Whilst 'Land off Ambrose Way' is not near a well-connected station, it is near to the Guided Busway, which provides rapid public transport connectivity with Cambridge and all three of its railway stations.

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 all applications, including those for unallocated sites. This is important as the Councils recognise that windfall sites are a valuable supply of new homes and employment opportunities. However, the emerging Local Plan is failing to capitalise on the benefits of windfalls sites that are now likely to come forward on sites that are physically well-related to existing settlements where an unmet need can be evidenced in accordance with Policy GB7(1)(G) and S5. This is a missed opportunity to strengthen the supply of new homes and mixed-use developments whilst also providing greater opportunities for developers of sites of 100 dwellings or less. Therefore, the emerging GCLP needs to acknowledge the potential for more sites to deliver new homes as part of a plan led process, rather than through allowing them to come forward as windfalls on unallocated sites.

The allocation of sites of 100 dwellings or less, like 'Land off Ambrose Way', on the edge of a Rural Centre that is on the edge of Cambridge would not compromise the development strategy. Rather, it would offer an opportunity to deliver 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 Rural Centres and Minor Rural Centres that are within the rural area. This change 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 focused around sites that are physically well-related to existing settlements is a reasonable alternative that needs to be considered. If not, then it risks undermining the emerging Local Plan through speculative applications supported by Policies S5(j) and GB7(1)(G) resulting in unplanned growth.

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, the Rural Centres that are physically well-related to Cambridge.

Please provide a 100 word summary of your representation.

Our client has submitted separate representations to highlight the importance of sites on the edges of Rural Centres like Histon and Impington through draft Policy S/DS. However, there is also an opportunity to positively plan for growth on the edge of the settlement through the allocation of 'Land off Ambrose Way, Impington' (HELAA Site ID 40392 -Site ID 115061). If Policy S/DS were not amended, then an allocation could be included together with those of the 'Rest of rural area'. Whilst this does not necessarily reflect the sustainability of the site, it would nonetheless be a logical place to list the new allocation.

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.

Under the Rest of rural area, a specific allocation is included for:

Up to 100 dwellings on 'Land off Ambrose Way, Histon' (HELAA Site ID 40392 -Site ID 115061).

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