

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

Ref: [REDACTED]

Number: [REDACTED]

Email: [REDACTED]

Date: 7th March 2024

Dear Sir/Madam

RE: Greater Cambridge Shared Planning - Call for Sites Update

Site: Land West of South Road

HELAA REF: 40232

This letter has been prepared by Ceres Property on behalf of NIAB Trust (NIAB) in relation to the above site, following previous representations made in respect of the 2019 Call for Sites and the subsequent First Proposals consultation in 2021.

We acknowledge that comments regarding wider planning or Local Plan matters are discouraged as part of this consultation and accordingly have kept this response brief and limited it to site specific matters.

Agent

Please can you update the revised agent details to the following:

[REDACTED]

[REDACTED]

Context

We would ask this site is also considered in the context of NIAB's other site submissions:

- Land east of Redgate Road Girton (HELAA 40241)
- Land north-east of Villa Road, Impington (HELAA 40236)
- Barn 3, Park Farm, Villa Road, Impington (proposed new allocation)

For clarification as part of the original Call for Sites submissions, larger proposed allocations were included by NIAB. Their proposals have now been refined, and it is no longer intended to pursue the allocation of these larger sites. In addition, joint submissions were submitted with the Kings Gate Management Company (Cambridge) Ltd, there have been no further discussions in respect of the potential to bring a joint allocation forward.

Site Red Line

Unfortunately, while trying to update the site Red Line on the e-form system, it was not possible to correctly draw the relevant polygon. The site Red Line needs to be extended to include the land to the south of the proposed housing in order to include the land necessary to provide a potential BMX Pump Track, or a similar recreational facility, along with a linear park and footway / cycleway connection to the A14 overbridge, facilitating a connection to the Darwin Green development and improving connectivity between Histon, Impington and Cambridge. The extent of this land is shown on the Site Masterplan (inc. Flood Alleviation Proposals) in the previously submitted Prospective Site Feasibility Study document. This cycleway connection is also shown as an infrastructure improvement aspiration in the made Histon and Impington Neighbourhood Plan.

An update set of Masterplans which have been used for preliminary discussions with the Parish Council are included with this submission for completeness. We will arrange for a new red line plan to be prepared and email across separately.

Revised Green Belt Policy

The revisions to the National Planning Policy Framework came into effect on 12 December 2024. The changes included a new definition of Grey Belt as follows:

Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

On 27th February 2025, further guidance on the interpretation of the revised Green Belt policies was published in the Planning Practice Guidance. This includes some important clarifications in respect of judgements as to whether land is grey belt. Importantly, it confirms that Purpose A, checking the unrestricted sprawl of large built up areas, does not (emphasis added) apply to villages.

Section 13 of the NPPF requires Green Belts to be reviewed as part of the plan making process and encourages the use of previously developed land and grey belt where this aligns with the promotion of sustainable development and the development strategy. Once reviewed, Green Belt boundaries should then not need to be altered at the end of the plan period. Paragraph 155 confirms the circumstances

where the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate and paragraph 156 sets out the Golden Rules which apply to land proposed for release from Green Belt for housing.

The Golden Rules can be summarised as follows:

- Delivery of 50% Affordable Housing;
- Necessary improvements to local or national infrastructure; and
- Provision of new publicly accessible green spaces;

The NPPF indicates that significant weight should be given to development proposals which comply with the Golden Rules. Importantly, as set out in the original representations and feasibility plans this proposed site should now be assessed as grey belt and can clearly deliver the significant benefits required by the Golden Rules.

Conclusion

At present the basis of the development strategy is:

“The proposed development strategy is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way. It also seeks to be realistic around the locational limits of some new jobs floorspace which is centred upon national and global economic clusters”.

The emerging strategy includes:

- development at North East Cambridge, Cambridge East, and the existing Cambridge Biomedical Campus; and
- the principles set out above.

However, to deliver the necessary homes and jobs, and redress the current fall in housing land supply, as recognised at NPPF paragraph 73, it will be important that the allocations include a range of small and medium sized sites to promote development, maintain consistency of supply, avoid an overreliance on a small number of strategic sites, and to meet the needs of small and medium Enterprise housebuilders.

As set out in the previous submission, Histon and Impington is identified as a Rural Centre in the settlement hierarchy which should have no limitation on the size of development. It is a highly sustainable location, in close proximity to Cambridge with excellent transport links, including the Guided Busway and other bus services. It also has a strong employment area located alongside the Guided Busway.

In our opinion this proposed site allocation clearly aligns with the Shared Planning Services Preferred Development Strategy which is to focus growth around Cambridge as the most sustainable location for development.

The amendments recently introduced by the revised NPPF to Green Belt policy, and particularly the assessment of Grey Belt, mean that this site can now be positively assessed. Furthermore, its allocation and subsequent development will deliver the additional benefits established by the Golden Rules, and as such in our opinion it should be included as an allocation in the Preferred Options Draft Local Plan.

We wish to stress NIAB's desire to work collaboratively with the Council in respect of their proposed site allocations, and to emphasise the flexibility that exists in respect of this land to respond to potential local development needs. Accordingly, we would welcome the opportunity for further discussions with the Council with regard to these respective site allocations.

Yours sincerely



Adam Davies

