

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

Ref: AD/23-395

Number: [REDACTED]

Email: [REDACTED]

Date: 7th March 2024

Dear Sir/Madam

RE: Greater Cambridge Shared Planning - Call for Sites Update

Site: Land east of Redgate Road, Girton

HELAA REF: 40241

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:

Adam Davies
Ceres Property

[REDACTED]

[REDACTED]

Context

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

- Land West of South Road, Impington (HELAA 40232)
- 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.

HELAA Assessment

It is noted from the HELAA assessment that the site was provisionally discounted, notably in respect of concerns around our landscape impact and strategic highway capacity associated with the A14. Substantial upgrades have recently been delivered in respect of the A14.

With regard to the landscape the assessment, it noted that a significantly reduced development with landscape measures could be acceptable. Accordingly, we would request that the site is considered on this basis with development numbers reduced and compensatory landscaping included.

In respect of the highway concerns, it is noted that the revisions to the National Planning Policy Framework (NPPF) which came into effect on 12 December 2024, now require that highway solutions are based on a 'vision-led' approach. Given that this development proposal could facilitate the delivery of an important cycleway connection between Girton and Darwin Green via the A14 overbridge, the location can be made more sustainable and offer genuine choice of transport modes. In addition, there would also be wider recreational benefits associated with this limited scale development. The small scale nature of the proposal would not generate a substantial number of additional vehicle trips and as such would not result in severe or unacceptable highway impacts as suggested by the original HELAA assessment.

It is noted that neighbouring land, Land east of the Recreation Ground, Girton (HELAA 40194) is also being promoted by Cambridgeshire County Council. NIAB would be happy to work with the County Council in order to deliver a combined development and maximise the benefits which can be provided through the delivery of this important potential cycleway link.

Revised Green Belt Policy

As part of the revisions to the NPPF there were substantial changes to Green Belt policy. 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.

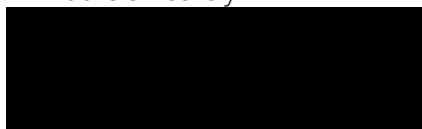
The requirement to include 10% of housing allocations on sites of less than one hectare, such as this site remains a policy requirement of the NPPF.

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 Transport policy and 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

