

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 north-east of Villa Road, Impington

HELAA REF: 40236

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
Council Offices
London Road
Saffron Walden
Essex CB11 4RL

[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 West of South Road (HELAA 40232)
- 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 intend 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

The red line site as been amended to demonstrate the connection to the adopted section of Villa Road

HELAA Assessment

It is noted from the HELAA assessment that the site was provisionally discounted, notably in respect of concerns around flood risk, landscape impact, site access and strategic highway capacity associated with the A14.

The HELAA comments in respect of the site access are incorrect. It is clearly possible to provide a vehicle connection along the existing private access road which is within NIAB's control and connects directly to the adopted section of Villa Road. This access road is in regular daily use and successfully provides suitable access to the existing extensive NIAB facilities recently developed at Park Farm, without any problems of congestion or highway safety.

With regard to the landscape the assessment, it noted that the site has been scored as 'Red' yet the commentary states the following:

"The site is an agricultural field on the western edge of Impington which has gappy hedges to the east and west but is open to the south and north with extensive level views to the southwest towards the A14. The development of the site would have limited negative landscape impact (emphasis added). It may be possible at an appropriate height and design to include some development with a landscape buffer."

This suggests that actually the site should have been scored 'Green'.

The site is a logical infill site which will have minimal landscape impact. From the south-east and south-west it will be seen against the backdrop of the existing Chivers Way Industrial Park, sitting between the established development at Park Farm, the intervening electricity substation to the north and the recently developed housing estate to the south. It will not be visible from the north, other than localised views from the guided busway. It is a logical infill site.

In respect of the strategic highway concerns, substantial upgrades have recently been delivered in respect of the A14. Furthermore, 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 deliver a direct access to the guided

busway which adjoins the site along its northern boundary, the location can be considered sustainable and offer genuine choice of transport modes. The original HELAA assessment confirms the site's accessibility to services and facilities which are scored 'Green'.

In respect of flood risk the original submission contained a Flood Note prepared by Cannon Consulting Engineers. Since this further work has been undertaken by Rossi Long in consultation with the LLFA which has included some initial flood modelling which demonstrates that with some further work a solution should be feasible. This solution would also potentially deliver some flood alleviation to Histon Village. An email from Rossi Long summarising the current position, along with relevant attachments, is provided as further information.

In addition, in summer 2022 pre-application discussions were held with officers at South Cambs District Council. While the response at the time was not entirely positive the concerns focused on the sites Green Belt location and lack of evidence to demonstrate a need for agri-tech research and development floor space, along with the associated locational cluster benefits linked to NIAB's established research facilities at Park Farm.

Following this response Carter Jonas undertook a review of research & development/laboratory accommodation around Cambridge and reached the conclusions set out in Appendix 1 below. This clearly confirmed a lack of alternative sites and the benefits of co-location for Agric-Tech companies.

More recently NIAB has been considering how it can increase its capability around agri-tech businesses and genetic technologies, allowing further linkages with other regional research institutions such as the Norwich Research Park that hosts the John Innes Centre.

NIAB's established Barn 4 initiative at Park Farm as an Innovation Centre, established with the support of Greater Cambridgeshire and Peterborough Combined Authority, has proved the need for such facilities. It has however highlighted that there is a gap in the market for companies to upscale at affordable rents within the Cambridge area, especially if local funding to develop this environment is not available.

It has also highlighted the requirement for additional floor space for the many aspects of research business support, which further expands the local resource requirements.

Initial thoughts are a redevelopment of the established, yet unbuilt Barn 3 Site at Park Farm (see accompany new site submission) which will allow NIAB to further develop it's well established and renowned genetic technologies work in one focus area creating a 'Centre of Excellence' within the region. Further development at the Villa Road Site would also support and align with these particular ambitions. With its range of building sizes it will provide the scope for upscaling and provide space for business support teams to be located adjacent to companies as they transition and grow.

In January this year NIAB held preliminary discussions with Stephen Kelly, Joint Director of Planning and Economic Development for Greater Cambridge Shared Planning to discuss their Barn 3 project and he was interested in the approach to the idea of creating a Centre of Excellence in the region. As the proposals for the Barn 3 Site development this year, there will be further engagement.

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.

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 significant economic benefits in a sustainable location.

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.

It is important to note that the emerging development strategy acknowledges the locational new jobs floorspace association with national and global economic clusters. Paragraph 3.2 confirms that some sectors have particular locational needs that are not currently met in full. This is clearly the case for the

Agri-tech research and development sector. These employment allocations proposed by NIAB would clearly go some way to redressing this particular sectorial imbalance, and help to facilitate the growth of this regionally, and nationally important sector.

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. 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
Associate Partner – Planning



Appendix 1

6 NIAB SITE AND SUITABILITY TO SERVICE THE DEMAND

The report has demonstrated that there is a wealth of demand for research & development/laboratory accommodation around Cambridge from a variety of scientific sectors. This is driven by the dominance of science in the city, the excellent university providing a highly educated pool of talent, the interaction between the sciences and funding availability. The supply of floorspace has failed to meet the demand although there is more stock coming forward in the short-medium term subject in many cases to planning and funding.

It is recognised that research & development in the plant and crop science arena would be beneficial in order to improve food production and sustainability for mankind and the planet. There is significant scope for success as there is relatively little automation or data analysis in agriculture. Increasing the amount of research & development in Cambridge would be prudent given the presence of NIAB. NIAB, founded in 1919 in Cambridge, is one of the country's oldest agricultural science research centres and is now a leading player in UK crop research and is internationally recognised. It is an important employer in the city, being at the forefront of its area of expertise.

Collaboration with like-minded and complementary businesses and research institutes is a well-recognised method of generating superior new ideas. Opportunities for teamwork, formal meetings and ad hoc discussions are important factors considered in locational decision making. Agri-tech more than other industries relies on the combination of different technologies in a field in which they haven't been applied before. As a result, no company can be an island. Most new companies require significant support both with regard to expensive specialist facilities such as glasshouses, etc. and specialist understanding of the science and commercial realities of agriculture. These can only be gained through collaboration with NIAB and similar organisations. Thus there is a strong "pull factor" for agri-tech companies towards NIAB to benefit from their support and expertise.

Not only would the R & D companies benefit from NIAB's personnel, but many would also be attracted by or even require for their working practices, adjacent glasshouses, growth chambers or fields for their experimentation. In Cambridge, these are only located at the NIAB Histon site presenting companies with no choice. The café reception area will be shared and can act as a hub for innovation and idea generation.

NIAB has had a large number of agri-tech companies approach it for support in the form of facilities and services that cannot be found in conventional business parks and incubator facilities. These include glasshouses, growth chambers, field trials and others. At present there are three Barn4 members using space in NIAB's glasshouses and a number of others planning field trials for the coming season.

There is a lack of alternative other supply nearby which could cater for the growing demand of the sector. Any laboratories available are scattered around the city. Agri-tech companies would be unlikely to select another location due not only to the cost, but also because of the lack of glasshouses/fields/growth chambers and the reduced opportunities for collaboration with other experts in the same field of science. It would also be less convenient for them to be away from the NIAB facilities and staff.

If suitable new premises are not developed at NIAB's Park Farm site, with R & D being a global business, there is no guarantee if the companies do not have the opportunity to locate at NIAB, they will select another location in the UK let alone Cambridge.

Kate Lea MRICS
Carter Jonas
21 February 2023