

CONSULTATION

RESPONSE

Greater Cambridge Local Plan

Regulation 18

Sites at Park Farm, Histon

On behalf of NIAB Trust

January 2026

TABLE OF CONTENTS

1. INTRODUCTION.....	1
2. PLANNING POLICY CONTEXT.....	6
3. THE LOCAL GROWTH PLAN.....	13
4. THE PROPOSED SITES	17
5. CONCLUSION AND SUMMARY	31
APPENDIX A - Redgate Road, Girton - Access Appraisal	
APPENDIX B - South Road, Impington - Access Appraisal	

1. INTRODUCTION

- 1.1 These representations in respect of the Greater Cambridge Draft Local Plan (Regulation 18 Consultation January 2026) ('the DLP') are made on behalf of NIAB Trust (NIAB). This representation relates to the following sites, which were previously submitted as part of the earlier Issues and Options and Call for Sites consultation stages:
- Land East of Redgate Road, Girton (HELAA 40241)
 - Land West of South Road (HELAA 40232)
 - Land North-East of Villa Road, Impington (HELAA 40236)
 - Barn 3, Park Farm (HELAA 200772)
- 1.2 It is important to recognise that NIAB is a charitable trust and that while development of the proposed employment sites has a clearer link to the research work undertaken at Park Farm, any profit realised from the development of the two proposed housing sites would be reinvested to support the Trust's continued research work and expand facilities. Furthermore, some of the housing could potentially be developed as key worker homes suited to occupation by some of NIAB's employees.
- 1.3 Park Farm is located on the south-western side of Histon with the Cambridgeshire Guided Busway running along its north-eastern boundary, providing accessible public transport links between St Ives to the north and the centre of Cambridge to the south. The A14 forms the southern boundary of the holding, beyond which is Darwin Green, currently being developed as a major urban extension to Cambridge. NIAB have the benefit of access via a private bridge over the A14 which provides them with a link to their existing headquarters, shared with University of Cambridge in Lawrence Weaver Road. This bridge could become a vital active travel route for pedestrians and cyclists connecting Histon, Impington and Girton with Cambridge over NIAB's land.
- 1.4 Park Farm itself forms an important green gap between the conjoined villages of Histon and Impington, and Girton, and also with Cambridge in the south. The use of the Farms fields for agricultural trials provides a valuable productive use for this piece of relatively enclosed landscape which helps maintain the openness of the area and a diverse wildlife habitat, while supporting its beneficial use and the important agricultural research and innovation activities undertaken by NIAB, one of the leading UK independent crop science organisations.

1.5 It is therefore important to consider these proposals as a whole; a potential development opportunity at Park Farm, which could release some modest levels of housing, new employment opportunities, active travel connections, in a highly sustainable location, while respecting the contribution that the wider farm makes to the landscape and biodiversity between its surrounding settlements.

1.6 In summary, NIAB's respective housing and employment sites at Park Farm which were previously put forward as development opportunities were:

Land East of Redgate Road, Girton

1.7 The Site is located to the east of Redgate Road, Girton. In March 2023, the Site was submitted as part of the Call for Site's Update consultation, for up to 25 dwellings, including public open space, recreation and leisure facilities. The Site can be positively assessed against Grey Belt policy and can deliver the additional benefits established by the NPPF Golden Rules.

Land West of South Road, Impington

1.8 The Site is located to the west of South Road, Impington. In March 2023, the Site was submitted as part of the Call for Site's Update consultation, for up to 78 dwellings, including public open space, community, recreation and leisure facilities. The Site can be positively assessed against Grey Belt policy and can deliver the additional benefits established by the NPPF Golden Rules.

Land North-East of Villa Road, Histon

1.9 The Site is located to the north-east of Villa Road, Histon. In March 2023, the Site was submitted as part of the Call for Site's Update consultation, for office or research space to support NIAB's agri-tech research and development services, linked to NIAB's established research facilities at Park Farm. The Site can be positively assessed against Grey Belt policy.

Barn 3, Park Farm, Histon

1.10 The Site is at Park Farm, Villa Road, Histon. The Barn 3 Site does have extant planning permission, however NIAB are considering how to make more efficient use of the land. Two new barns are proposed, a two storey Barn 03 and a further single storey Barn 05. This would provide additional floorspace to support the existing agri-food and tech research facilities at Park Farm. The Site is previously developed land and can be positively assessed against Grey Belt policy.

1.11 All the above Site's are suitable, available and achievable. It is considered that the Sites align with the Shared Planning Services Preferred Development Strategy which is to focus growth around Cambridge as the most sustainable location for development.

Extension of Vision Park, Chivers Way, Histon – Employment Allocation

1.12 In addition to the sites previously submitted (as referred to above), a further extension to the employment facilities at Park Farm is also being put forward as part of these representations. (A New Sites Form has been completed and submitted separately).



Figure 1 Aerial Image of Proposed Expansion Area

- 1.13 It is considered that this would make a logical extension to the existing Vision Park, Chivers Way employment area as shown on the Histon Policies Map extract below. While this does cross the guided busway potentially a new station could be included to improve access. Alternatively, it could be new employment allocation in its own right with an Agri-Food and Tech focus.
- 1.14 While the site is relatively unconstrained in terms of flood risk, heritage, and access, it is noted that existing powerlines cross part of the site. These may require a no build corridor to be provided

unless they can either be undergrounded or diverted. This may impose a minor limitation on the total quantum of development, but does not represent an insurmountable constraint.

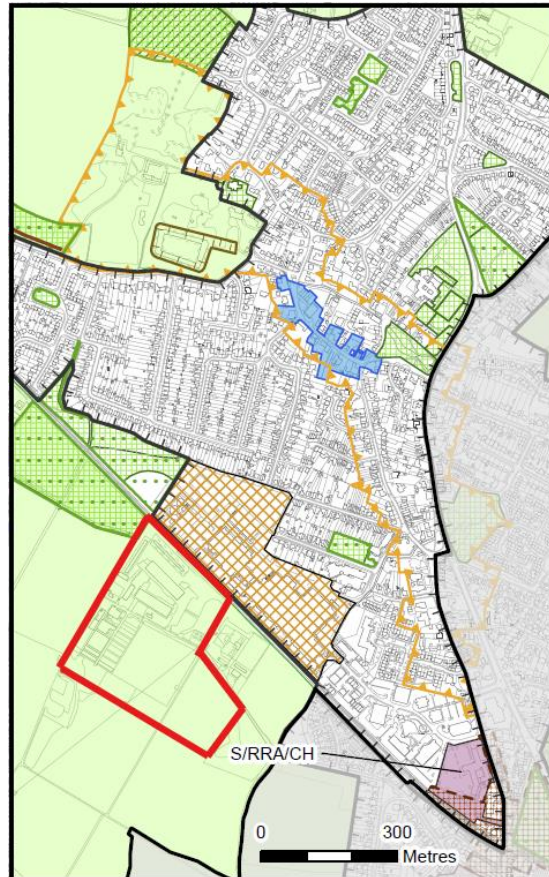


Figure 3: Proposed Extension of Histon Employment Area to create a Regional Centre of Excellence Agri-Food & Tech Research

- 1.15 This proposal would include the allocation of existing modern research facilities including Barns 1, 2 & 4 recently constructed for NIAB at Park Farm, as well as their extensive glasshouses and their exemplar Low-Carbon conference facility, the Sophie Taylor Building – the First BREEAM Outstanding Building in Cambridge.
- 1.16 Further expansion of the NIAB research facilities would also be supported by the extensive established field trials farmland already available at Park Farm.
- 1.17 In addition, these proposals could build on the success of the Barn 4 Innovation Centre, established with the support of Greater Cambridgeshire and Peterborough Combined Authority, which has demonstrated a need for such facilities to support the growth of the Agri-Food and Agri-Tech sector in Cambridge. It has, however, highlighted that there is a gap in the market for companies to upscale, at affordable rents within the area.

- 1.18 It will allow NIAB to further develop its established and renowned cutting edge genetic technologies work and AI based services in one focus area, creating a 'Centre of Excellence' within the region.
- 1.19 Further development with a range of building sizes will provide the scope for upscaling and as well as space for business support teams to be located adjacent to companies as they transition and grow. This could all be developed in a sustainable location, supported by the public transport connections provided by the guided busway, which links Histon with the heart of Cambridge. This project, along with the other projects listed above, could also deliver vastly improved footway and cycleway links between Histon and Cambridge, utilising the private bridge which crosses the A14 to Darwin Green.
- 1.20 As explained below it is concluded that these ambitions are fully aligned with the recently published Local Growth Plan, which has highlighted the importance of the Agri-Food and Tech sector to the region's future growth, as well as the Global Importance of the City of Cambridge and the Fens Growth Triangle, to the sector.

2. PLANNING POLICY CONTEXT

- 2.1 NIAB supports the vision for Greater Cambridge to be a place where a big decrease in climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all communities.
- 2.2 However, achieving this vision is contingent upon the adoption of a sound Local Plan which is positively prepared, justified, effective and consistent with national policy (in accordance with the tests set out in Paragraph 36 of the National Planning Policy Framework 2024 (NPPF).
- 2.3 As acknowledged in the DLP, the Plan is still very much a draft.
- 2.4 However, as set out in this representation, in its current form the DLP is considered unsound and amendments will be required to ensure it is capable of adoption.

The Case for Cambridge

- 2.5 In March 2024 'The Case for Cambridge' was published by the government, which set out ambitious plans for growth in Cambridge noting: *'population growth is causing problems: pressure on house prices; high levels of congestion... a truly ambitious plan for growing the city and population will bring benefits, as opposed to frustrations, to residents'*.
- 2.6 Two illustrative scenarios were put forward:

- *Building 100,000 new homes by 2050 has the potential to add approximately £4.3 billion to the economy (between £2.1 billion and £6.4 billion with a central estimate of £4.3 billion). This in turn has the potential to translate in today's terms into an annual increase of approximately £1.5 billion of additional receipts for the exchequer (income from taxes and other sources), which can be spent on public services.*
- *Building 150,000 new homes by 2050 has the potential to add approximately £6.4 billion to the economy (between £3.2 billion and £9.7 billion with a central estimate of £6.4 billion). This in turn has the potential to translate in today's terms into an annual increase of approximately £2 billion of additional receipts for the exchequer (income from taxes and other sources), which can be spent on public services.*

2.7 The Labour government subsequently reconfirmed its commitment to growth in Cambridge. In August 2024 Matthew Pennycook MP said the government was "*ambitious for Cambridge*" and that the city had been "*constrained economically by the lack of housing*". Again, the importance of setting bold aspirational targets for growth in Cambridge are highlighted at the highest levels of government.

Plan Period

2.8 The Local Development Scheme currently envisages Adoption of the plan in 2028 and the plan period is suggested to cover a period until 2045.

2.9 Paragraph 22 of the NPPF states that strategic policies should look ahead to a minimum of 15 years period from adoption to anticipate and respond to long term requirements and opportunities, such as those arising from infrastructure. Where large scale developments such as new settlements or significant extensions to existing villages or towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account of the timescale for delivery.

2.10 The emerging Local Plan proposes a number of new settlements and significant urban extensions, which make up the vast majority of growth in the plan. Table 2 of the emerging Local Plan sets out a housing trajectory for the draft allocated sites. All the larger strategic draft allocations have a growth trajectory that is well in excess of the plan period.

2.11 In October 2025 the Greater Cambridgeshire and Peterborough Combined Authority Board approved the Local Growth Plan which has a core ambition to double the size of the economy of the area by 2050. The Local Growth Plan looks ahead to 2050, as does the government's Case for Cambridge.

2.12 As part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will be built on the Local Growth Plan. It will include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028 when the DLP is due to be adopted.

2.13 There will be a requirement for the new Local Plan to align with the mayor's spatial strategy, particularly given they are both due for adoption in 2028.

2.14 It is also relevant to note that, as a result of local government reorganisation, it is a distinct possibility that this will be the last Local Plan prepared to guide the growth and development of the Greater Cambridge area. It would seem sensible that the Council took this opportunity to deliver a

development strategy which reflects and supports the approach being taken at the regional level and ensures that the District can maximise the benefits and opportunities available at the local level.

- 2.15 Therefore, to align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the Plan, it is considered that the plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives. This amendment is required in order for the DLP to accord with national policy and for it to be justified.

Employment Growth

- 2.16 DLP Policy S/JH New Jobs and Homes, sets out that development will meet the objectively assessed needs in Greater Cambridge over the period 2024-2045 for: 73,300 additional jobs and a minimum of 48,195 new homes.
- 2.17 The level of employment and housing growth proposed over the plan period is underpinned by the Employment and Housing Evidence Update 2025 (EHEU 2025), which forms an evidence based document published to support the Regulation 18 version of the Local Plan. The key driver for the proposed jobs and housing growth appears to be predicated mainly on how many jobs the government's mandatory minimum housing need calculation would support.
- 2.18 For jobs, the EHEU 2025 identifies a "Central" most likely future jobs forecast. The Central forecast assumes growth of around 4,000 additional jobs per annum or more through to 2045 – continuing the recent period of rapid growth seen in Greater Cambridge's Knowledge Intensive sectors, but also building in an assumption that there will be slower or contracting periods and unforeseen shocks. The EHEU 2025 also identifies a higher growth forecast, placing greater weight on rapid growth in the recent past, particularly in key sectors, and recommended providing flexibility in employment land in case the market delivers more jobs than anticipated.
- 2.19 For homes, the EHEU 2025 identifies that the outcome of the Government's Standard Method for calculating minimum housing need, which increased significantly in 2024, would support the most likely forecast for future jobs.
- 2.20 The Development Strategy Topic Paper includes the table below which sets out the Standard Method, Central and High projected job increases and housing needs (Figure 3).

Table 1: Projected housing need – range of job growth forecasts – Greater Cambridge (2024-45)

	Jobs change 2024-45 (Census 2011 commuting)	Dwellings per annum (Census 2011 commuting)	Dwellings change 2024-45 (Census 2011 commuting)
Standard method	73,362	2,295	48,195
Central	73,248	2,292	48,132
High	90,936	2,829	59,409

Source: Icen analysis

Figure 2: Development Strategy Topic Paper Table 1

- 2.21 It is argued that as the Standard Method figures broadly correlate with the Central (suggested most likely) job and housing projections, that adoption of these figures is appropriate. However, in accordance with the requirements of the NPPF this is not considered to be an appropriate strategy taking into account reasonable alternatives and other publicly available evidence. As it stands, for reasons explained above and below Policy S/JH is not justified and the DLP should not be considered sound.
- 2.22 Paragraph 36 a) of the NPPF is clear that to be positively prepared, the Local Plan should, *as a minimum, seek to meet the areas objectively assessed housing needs.* The standard method housing requirement should be a minimum starting point for housing growth. Therefore, it is unclear why the Development Strategy Topic Paper identifies housing figures that are marginally below the standard method requirements for both housing and job growth as a ‘central growth’ figure. In reality, this is the absolute minimum level of growth that should be planned for and clearly is not in line with the growth ambitions set out at the national level or in the Local Growth Plan.
- 2.23 As acknowledged in the Supporting text for Policy S/HJ:
- ‘the continuing strength of the nationally important Greater Cambridge economy provides justification for exploring higher employment and related housing figures.’*

- 2.24 In this regard, it is considered that within Greater Cambridge there is a compelling case that the level of growth should be higher than the minimum level of growth as proposed using the Central level of growth or standard method housing and job figures.
- 2.25 Whilst it is now dated, the Cambridgeshire and Peterborough Independent Economic Review September 2018 (CPEIR), which is referenced in detail within the evidence based documents to support the emerging Plan, sought to develop an authoritative evidence base on the economic performance and potential of Cambridgeshire and Peterborough and informed choices on policy, priorities and strategic investment. Regarding employment and housing the report sets out:
- 'we have reached the clear conclusion that recent employment growth rates have been rather stronger than indicated by official figures, and we believe that the area can continue to deliver rapid growth with the right support' ... 'growth in employment has not been matched by corresponding house-building, or developments in infrastructure'.*
- 2.26 Further to the above, it is explained that:
- 'success here is of national significance... but it will only be attained if there is more ambition with regard to the development of new housing, and a careful prioritisation of infrastructure projects'.*
- 2.27 Clearly, basing proposed growth on employment projections alone is too narrow an approach and more ambitious aspirational targets should be set.
- 2.28 The emerging Local Plan currently covers a plan period to 2045. The provision for 48,132 dwellings proposed over that period, therefore will deliver less than 50% of the government's lower aspiration of delivering 100,000 dwellings in the Greater Cambridge Area by 2050 or less than 33% of the housing required using the higher figure of 150,000 dwellings. If the housing growth in the Local Plan is continued on a pro rata basis using the 2,295 dwellings per annum for another 5 years, this would still only deliver 59,670 by 2050, still over 40,000 dwellings below the government's lower growth scenario.
- 2.29 Based on this evidence, it is considered that the levels of job and housing growth targeted are not justified and are not an appropriate strategy taking into account the reasonable alternatives. A far more ambitious level of job and housing growth should be planned for. As it stands Policy S/JH is considered unsound and requires amendment.

Housing Growth

- 2.30 Policy S/DS: Development strategy sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge, for the current plan period to 2045 and beyond.

This is one of the key strategic policies within the plan. The policy is set out in different parts. Part 1 of the policy states the following:

Policy S/DS: Development Strategy, sets out that the need for jobs and homes will be met in the following order of preference, having regard to the purposes of the Cambridge Green Belt:

- a) Within the Cambridge Area*
- b) On the outer edge of Cambridge*
- c) At an expanded Cambourne*
- d) At other new settlements*
- e) In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres*
- ...*

- 2.31 Part 1 of Policy S/DS is supported. It is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge, accounting for the global importance of Cambridge as the focus for growth.
- 2.32 Part 2 of Policy S/DS sets out a number of strategic scale allocations. It should be noted that a number of these have significant constraints which will likely result in significant delays to delivery. As a result, the proposed strategy is not appropriate and is considered to be unjustified.
- 2.33 Policy S/NEC: North East Cambridge identifies north-east Cambridge will deliver, inter alia, approximately 8,350 new homes (including around 5,500 homes on the existing Cambridge Waste Water Treatment Plant site (CWWTP)), up to 320,000 square metres of additional business floorspace and 27,300 square metres of industrial floorspace. In August 2025, the Government announced that it will not be funding the relocation of the CWWTP through the Housing Infrastructure Fund. Delivery of the development is subject to alternative funding being found to enable the relocation of the CWWTP, which means there is significant uncertainty as to whether, or when, the development might come forward.
- 2.34 Although this allocation is not objected to in principle, additional sites need to be allocated to avoid a situation where large sites like North-East Cambridge do not come forward for development in a reasonable timeframe. Allocation of additional small deliverable sites, such as NIAB's proposed sites

a Park Farm, would provide greater flexibility and help mitigate against slow or non-delivery of strategic sites.

3. THE LOCAL GROWTH PLAN

3.1 In October 2025 the Greater Cambridgeshire & Peterborough Combined Authority Board approved the Local Growth Plan. This Growth Plan was heavily informed by the CPIER Report and it includes three growth scenarios:

- *Baseline growth, or 'business as usual' would see the size of the economy grow to £42.5bn by 2050 - an annual growth rate of 1.2%.*
- *Doubling our Economy: our core scenario - would see the economy double in size by 2050 to £62.3bn GVA.*
- *Aspirational Growth: our growth ambition is to see the economy triple in size by 2050 to £97.1bn GVA, unlocking an economic powerhouse*

3.2 It is also noted that: 'these growth scenarios have undergone rigorous modelling and can be deliverable by 2050 with the right levels of support and investment'.

3.3 Page 155 of the Local Growth Plan is clear that to support a doubling of the economy by 2050 would require a minimum of 214,760 dwellings to be delivered in the County during this timetable. Whilst the Local Growth Plan does not define a District by District breakdown of housing figures, it is clear that Greater Cambridge, as a focus for growth within the area, should be responsible for a substantial proportion of this housing delivery. On a pro-rata basis, if the 214,760 dwellings was delivered equally between the six local authority areas in Cambridgeshire & Peterborough, this would result in Greater Cambridge having a requirement to deliver a minimum of 71,586 dwellings between now and 2050. In reality, accounting for Cambridge's role as the International Life-Science and employment driver for the County, as well as the government's Case for Cambridge, the growth within the Cambridge City and South Cambridgeshire administrative areas should be substantially higher.

3.4 As part of the reforms to the current planning system, the Greater Cambridgeshire and Peterborough Combined Authority will have to produce a Spatial Development Strategy for their area which will be built on the Local Growth Plan. It will include geographical and land-use designations. The mayor has committed to producing a spatial development strategy as a priority and it is anticipated this will be in place in 2028.

- 3.5 Paragraph 25 of the NPPF is clear that strategic policy making authorities should collaborate to identify strategic matters which they need to address in their plans. They should engage with elected Mayors and Combined Authorities. Paragraph 26 of the NPPF then goes onto state that effective and ongoing joint working between strategic plan making authorities and relevant bodies is integral to the production of a positively prepared joint strategy.
- 3.6 In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging DLP is aligned to the Local Growth Plan and the emerging Spatial Development Plan for Cambridgeshire. As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives for Cambridgeshire & Peterborough.
- 3.7 As set out above, delivering growth in Greater Cambridge is of national significance. In the past, employment growth rates have been stronger than official figures and have outstripped delivery of housebuilding and infrastructure. The government has confirmed its continued support for high levels of growth in Greater Cambridge. This ambitious level of growth is also supported by the Local Growth Plan and will be reflected in the Spatial Development Strategy, the DLP needs to be amended to properly reflect this.

Agri-Food and Tech Sector

- 3.8 As explained within the Local Growth Plan, the Agri-Food & Tech sector uses science, innovation and technology to develop the value chain from farm production to final consumption. The purpose is to integrate technology to support the management of agriculture and food practices, helping meet challenges related to changing climate, increasing input costs, food security and improvements in nutrition.
- 3.9 In Cambridgeshire and Peterborough, the Agri-Food & Tech sector employs 3,500 people across 115 companies, generating approximately £1 billion in revenue. Agri-Food & Tech businesses benefit from excellent land quality for farming, world-renowned academic institutions, a strong supply chain in terms of international food processing, food packing, distribution and logistics, and world leading R&D facilities.
- 3.10 The Local Growth Plan projection maps predict growth of the agri-food and tech sector by £1.2bn by 2050 and expect to see employment growth in this sector of 7,700, a 57% increase from now. NIAB are recognised in the Local Growth Plan for their facilities and proposed developments to provide the potential for rapid growth in this sector. The Local Growth Plan provides background on NIAB as an agri-tech research center:

“The National Institute of Agricultural Botany (NIAB) is one of the oldest agricultural science research centres in the country, established in 1919. NIAB specialises in genetics and breeding, varieties and seeds as well as agronomy. It has actively contributed towards the development of seed testing and certification as well as the adoption and advancement of modern field trial techniques.”

3.11 The Local Growth Plan identifies that NIAB has invested in developing a national capability in this space through their Precision Breeding Centre:

“We are keen to partner with CPCA to drive a significant expansion of this capability which is already leading within Europe with regards scale and quality. Through this move we can better leverage the fundamental research carried out by our partner, the Crop Science Centre at the University of Cambridge, and the world-class translational research undertaken by NIAB. In addition to providing research, translational and regulatory services in agriculture and horticulture, NIAB provides facilities including laboratory, office and glasshouse space to Agritech companies through incubator facilities on its Cambridge site. Alongside this, Agri-Tech E offers award winning networking support to the sector. The underlying infrastructure offered by these organisations, coupled with proposed developments for scale-up space both at NIAB and other facilities across the region provide the potential for rapid growth in the sector.”



Figure 3: NIAB, extract from the Local Growth Plan

3.12 The Local Growth Plan indicates that it will support the agri-food and tech sector by:

- *Developing a multidisciplinary skills taskforce to support our food manufacturing businesses to upskill and encourage the adoption of digital technology and automation technology within local production and processing.*
- *Supporting the development of Agri-Food Tech testbeds for piloting automation, robotics and digital solutions in agriculture and food production.*
- *We will leverage our expertise in agri-science as a catalyst for achieving our Net Zero objectives by deploying innovative nature-based solutions that enhance sustainability and reduce agricultural emissions across the region.*

3.13 To supercharge the sectors, The Cambridgeshire & Peterborough Combined Authority will align their approach to the Governments industrial strategy, including:

- *Support regional businesses to access the £200m Farming Innovation Programme up to 2030.*
- *Utilise the new Agri Tech Export Accelerator Programme to improve access to international markets.*
- *Influence with Government around the evolving regulatory environment.*
- *Support the collaboration of our other growth sectors and Agri-Food & Tech.*

3.14 As set out in this representation, sustainable sites which can be delivered early in the plan period, such as NIAB's sites at Park Farm, would support this ambitious level of growth in the agri-food and tech sector, and as such it is considered that they should be allocated in the DLP.

4. THE PROPOSED SITES

4.1 This representation relates to the following sites, which were previously submitted as part of the earlier Issues and Options and Call for Sites update consultation stages:

- Land East of Redgate Road, Girton (HELAA 40241)
- Land West of South Road (HELAA 40232)
- Land North-East of Villa Road, Impington (HELAA 40236)
- Barn 3, Park Farm (HELAA 200772)

4.2 These are discussed in turn below.

Land East of Redgate Road, Girton (HELAA 40241)

4.3 The Site is located to the east of Redgate Road, Girton.

4.4 In March 2023, the Site was submitted as part of the Call for Site's Update consultation, for up to 25 dwellings, including public open space, recreation and leisure facilities. It also includes a potential footway/cycleway link over the A14 private bridge, connecting with Darwin Green and Cambridge beyond, a significant public benefit.

4.5 Access can be provided directly from Redgate Road and a supporting updated access technical note prepared by KMC Transport Planning has been included at Appendix A.

HELLA

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

4.7 The latest HELLA Assessment notes that the additional representation does not alter the original assessment. The assessment notes that development on this site would have a significant adverse impact to the rural landscape character. A significantly reduced development with landscape measures could be acceptable. The assessment also notes that there is evidence of archaeology in this area, which would require further investigation. The assessment concludes that any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.

Grey Belt

- 4.8 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.

- 4.9 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
- 4.10 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.
- 4.11 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;
- 4.12 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 shown on the accompanying 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

- 4.13 The proposed 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”.

- 4.14 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 and to meet the needs of small and medium Enterprise housebuilders.
- 4.15 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.
- 4.16 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. In respect of the concerns previously raised about landscape impact, this is a small logical site, which is not a visually prominent site in the wider landscape. While it would move the edge of the settlement to the east, it would not result in residential development projecting further east than the existing residential development does in Mayfield Road to the south. The Council will have to rely on the release of greenfield sites to meet its housing delivery and it is therefore reasonable to make the most efficient use of those sites in sustainable locations which represent the lowest levels of landscape impact. However, NIAB would be open to discussing a smaller allocation if planning officers felt that was all that was acceptable.

The amendments 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, support NIAB’s overall growth ambitions at Park Farm and as such, in our opinion, the Site should be included as an allocation in the Draft Local Plan.

Land West of South Road (HELAA 40232)

- 4.17 The Site is located to the west of South Road, Impington. In March 2023, the Site was submitted as part of the Call for Site’s Update consultation, for up to 78 dwellings, including public open space, community facilities and recreation and leisure facilities.

- 4.18 In March 2023, the Site was submitted as part of the Call for Site's Update consultation, for between 50 to 78 dwellings, including public open space, recreation and leisure facilities. In support of the neighbourhood plan aspiration for additional walking and cycling routes, this Site also included land running parallel to the A14 in order to deliver a footway/cycleway link over the A14 private bridge, providing a connection between Histon and Darwin Green, and Cambridge beyond. At the time land was also set aside for development as a potential Pump Track in support of local demand for such a facility.
- 4.19 Access can be provided directly from South Road and a supporting updated access technical note prepared by KMC Transport Planning has been included in Appendix B.

HEELA

- 4.20 The updated HEELA assessment confirms that the Site would have an adverse effect on the rural landscape surrounding Cambridge, as well as on visual context due to extensive views from the north, south and west. The reduction in residential dwellings does not change this assessment.
- 4.21 The assessment states that development of the Site may have a detrimental impact on a designated site, or those with a regional or local protection, however it recognises that the impact could be reasonably mitigated or compensated. The assessment notes that the proposed access connecting the Site to the adopted public highway is unsuitable to serve the number of units proposed.
- 4.22 The assessment confirms that the site has good accessibility to key local services, transport, and employment opportunities. The proposed development would not require the delivery of accompanying key services.

Grey Belt

- 4.23 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.

- 4.24 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

4.25 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.

4.26 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;

4.27 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

4.28 The proposed 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”.

4.29 The emerging strategy includes:

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

- 4.30 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.
- 4.31 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.
- 4.32 Further revisions to the NPPF are also currently the subject of public consultation. Importantly, in respect of Green Belt the emerging NPPF Policy GB 7 g iii and GB 7 h i indicate that development that is in close proximity to stations and in the top 60 travel to work areas should not be treated as inappropriate development. This Site is in close proximity to the Histon Guided Busway Station (less than 500m walking distance) and as such should be considered an appropriate location for a housing development.
- 4.33 While the assessment suggests that development of the Site could have an adverse impact on the rural landscape surrounding Cambridge, this is not accepted. The built development as shown on the feasibility plans would be limited to the areas adjacent to the existing settlement, in the limited public views from the north, south and west this would be seen against the backdrop of the existing settlement edge, rather than as a prominent extension into it. It would not introduce built development further west of the existing rear gardens of residential properties in South Road and as such would maintain the overall openness and rural landscape which the farmland at Park Farm provides between Histon, Impington, Girton and Cambridge. While the submitted plans include an area of land running parallel along the A14, this is simply there to provide a footway and cycleway connection to the bridge over the A14, and on to Darwin Green to the south. This footway cycleway could be suitably screened by planting which would also have a positive impact on the character of the wider site.
- 4.34 The assessment raised concerns in respect of the suitability of the Site access. As set out in the accompanying access technical note prepared by KMC Transport Planning (Appendix B), suitable highway access can be delivered, although this does require a small strip of land from the South Road recreation ground (which is in the ownership of the Parish Council and can be compensated for) to enable the existing route to be sufficiently widened.

- 4.35 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.
- 4.36 The Council will have to rely on the release of greenfield sites to meet its housing delivery, and it is therefore reasonable to make the most efficient use of those sites in sustainable locations which represent the lowest levels of landscape impact. However, NIAB would be open to discussing a smaller allocation if planning officers felt that was all that was acceptable.
- 4.37 The amendments 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, support NIAB's overall growth ambitions at Park Farm and as such, in our opinion, the Site should be included as an allocation in the Draft Local Plan.

Land North-East of Villa Road (HELAA 40236)

- 4.38 The Site is located to the north east of Villa Road, Histon on the existing private access road which serves the comprehensive research facilities at Park Farm.
- 4.39 In March 2023, the Site was submitted as part of the Call for Site's Update consultation, for office or research space to support NIAB's agri-tech research and development services, linked to NIAB's established research facilities at Park Farm.

HELAA

- 4.40 The Site was previously discounted in respect of concerns around flood risk, landscape impact, site access and strategic highway capacity associated with the A14.
- 4.41 The HELAA comments in respect of the site access are incorrect. In the 2024 Call for Sites representation, it was confirmed that 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 expanded at Park Farm, without any problems of congestion or highway safety. However, the recent HEELA assessment states that the sites access assessment remains unchanged as the site does not have a direct link to the adopted public highway.
- 4.42 The previous HELAA assessment scored the site as 'red' in with regards to landscape. Following the Call for Sites in 2024, this has been amended to amber on the basis that development would need to be of good design, limited height and screened behind a generous landscape buffer along the

northern and southern boundaries to filter views in and out of the development. Based on this, the assessment scoring has been amended to Amber. The views from the north and south of this particular site are very limited and are already screened by the existing landscape on the south-western side of Villa Road, the hedgerow along the public drain, the hedgerow to the north-west and the existing substation beyond. As such, it is considered that the Site should be 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 Business Park (Vision Park), sitting between the established development at Park Farm, the intervening electricity substation to the north and the recently developed Primrose Lane housing estate to the south. It will not be visible from the north, other than localised views from the guided busway.

- 4.43 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 recent HELAA assessment confirms the Site's accessibility to services and facilities which are scored 'Green'.
- 4.44 In respect of flood risk the original submission contained a Flood Note prepared by Cannon Consulting Engineers. Since this further work was undertaken by Rossi Long in consultation with the LLFA which included some initial flood modelling that demonstrated (subject to some further work) a land raising and compensatory storage solution would be feasible. This detail was submitted as part of the 2025 Call for Sites consultation update. 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, was provided as further information. Despite this, the updated HELAA assessment scores flood risk as red, and notes that the submitted information depicts potential mitigation to flood risk and the site remains mostly at high risk from flooding, and the content is not sufficiently detailed to verify its suitability.

Grey Belt

- 4.45 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.

- 4.46 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
- 4.47 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.
- 4.48 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
- 4.49 Further revisions to the NPPF are also currently the subject of public consultation. Importantly, in respect of Green Belt boundaries emerging NPPF Policy GB 7 g iii and GB 7 h i indicate that development that is in close proximity to stations and in the top 60 travel to work areas should not be treated as inappropriate development. This site is in close proximity to the Histon Guided Busway Station (less than 600m walking distance) and as such should be considered an appropriate location for development.

Conclusion

- 4.50 The proposed 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".

- 4.51 It is important to noted 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.

- 4.52 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.
- 4.53 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.
- 4.54 The amendments 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 provide flood risk protection benefits area and support NIAB's overall growth ambitions at Park Farm and as such, in our opinion, the Site should be included as an allocation in the Draft Local Plan.

Barn 3, Park Farm (HEELA 200772)

- 4.55 The Site is located at Park Farm, Villa Road Histon where on 5th June 2017 (S/3441/16/FL), South Cambridgeshire District Council, granted planning permission to NIAB for the erection of four new Barns to provide offices, laboratories and storage space with other associated facilities along with new Glass Houses. This permission was subsequently implemented, with a series of amendments, and three of the four approved Barns have now been constructed and are occupied by NIAB. However, at the present time while still extant, approved Barn 03 has not been constructed.
- 4.56 NIAB established the Barn 4 initiative at Park Farm as an Innovation Centre. This was constructed with the support of Greater Cambridgeshire and Peterborough Combined Authority, and 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.
- 4.57 In 2023 on behalf of NIAB Carter Jonas undertook a review of research & development/laboratory accommodation around Cambridge. The conclusions of this work were included as part of the 2025

Call for Sites update. They clearly confirmed a lack of alternative sites and the benefits of co-location for Agric-Tech companies, reinforcing NIAB's own experience with their Barn 04 initiative.

- 4.58 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. Siting between the Norwich Research Park and Rothamsted Research in Harpenden, Park Farm's location is ideally suited for further engagement and enhanced collaboration with these world renowned research organisations.
- 4.59 Feasibility plans were prepared by pHp Architects to accompany the updated call for sites consultation, which showed the site could be developed to provide two new Barns, a two storey Barn 03 and a further single storey Barn 05. This could significantly increase the available floor space. It is considered that this proposal would represent a much more efficient reuse of this existing, previously developed land.
- 4.60 Such a development would allow NIAB to further develop its well established and renowned genetic technologies work in one focus area, contributing to the creation of a 'Centre of Excellence' within the region. In tandem with additional development at the Villa Road Site (HELAA 40236) which would also support and align with these particular ambitions and their proposed new expansion of the Vison Park, Chivers Way Employment Area. With a range of building sizes, these sites would provide the scope for upscaling and provide space for business support teams to be located adjacent to companies as they transition and grow.

HELAA

- 4.61 The Site was submitted as part of the Call for Sites updated consultation. The Site was not previously assessed. The updated assessment scores flood risk as 'red' as the site was identified to partly fall within flood zones 2 and 3. However, the updated flood maps for planning now confirm that the site does not fall within Flood Zones 2 and 3 (see Figure 2 below).

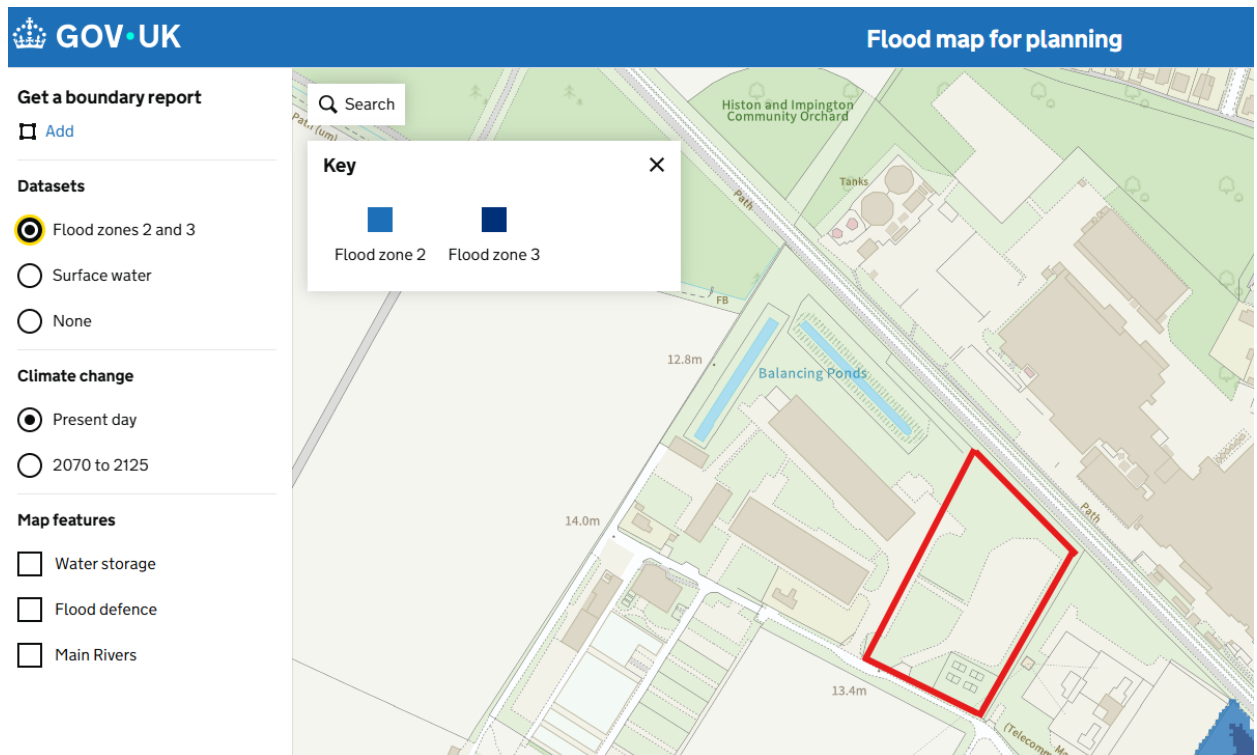


Figure 4: Flood Map for Planning (source Gov.UK)

- 4.62 While there are small parts of the site along the northern boundary next to the guided busway which are at low risk of surface water flooding these issues can be addressed. It is noted that the FRA submitted with the original planning application successfully demonstrated the development potential of the entire site. A further technical note is currently being prepared by Rossi Long to confirm that the Site remains suitable for employment development without the need for any significant mitigation.
- 4.63 The Site is a logical infill and would represent a more efficient completion of the existing Park Farm site with minimal landscape impact. It will complement the existing successful research facilities and could deliver its own dedicated link to the guided busway, improving access to transport options for future employees, in an already sustainable location. This is confirmed in the HELAA assessment, where the Site is scored Green for landscape and accessibility.
- 4.64 The HELAA assessment scored the Site amber for site access. Whilst it acknowledges that the Site is acceptable in principle, it indicated that a significant level of infrastructure will be required outside the Site boundary to encourage more sustainable transport links. The Site also scored amber for transport and roads, where the development would need to provide mitigation to reduce the vehicle impact and encourage active travel and public transport use.

- 4.65 While the Site is adjacent to an existing substation, and overhead wires cross its southern corner, these are not matters which represent a development constraint.

Grey Belt

- 4.66 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.

- 4.67 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
- 4.68 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.
- 4.69 Importantly, this site has an established development planning permission, is previously developed land and as such, should be considered grey belt.

Conclusion

- 4.70 The proposed 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".

- 4.71 It is important to note that the emerging development strategy acknowledges the locational limits of some new jobs floorspace is centred upon national and global economic clusters. The Local Growth Plan acknowledges the European and International importance of the Cambridge Agri-tech sector. These employment allocations proposed by NIAB would go some significant way to support further growth, helping to facilitate the expansion of this regionally, and nationally important sector.
- 4.72 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 already supports a strong employment area at Vision Park, located on the opposite side of the Guided Busway.
- 4.73 This proposed site allocation clearly aligns with the Shared Planning Services Preferred Development Strategy and the Local Growth Plan which is to focus growth around Cambridge as the most sustainable location for development, making the most efficient use of existing sites, and supporting the particular locational opportunities associated with the Agri- Food and Tech sector. It will also support NIAB's overall growth ambitions at Park Farm and as such, in our opinion, the Site should be included as an allocation in the Draft Local Plan.
- 4.74 NIAB would be pleased to discuss this and the other potential site allocations at Park Farm, with a view to bring forward some or all of these important development opportunities which could have an extremely positive impact delivery of rapid economic growth in the Agri Food and Tech in Greater Cambridge.

5. CONCLUSION AND SUMMARY

5.1 This representation relates to the following sites, which were previously submitted as part of the earlier Issues and Options and Call for Sites consultation stages:

- Land East of Redgate Road (HELAA 40241)
- Land West of South Road (HELAA 40232)
- Land North-East of Villa Road (HELAA 40236)
- Barn 3, Park Farm (HELAA 200772)

5.2 In addition to the sites previously submitted (as referred to above) a further extension to the employment facilities at Park Farm is being put forward as part of these representations:

- Allocation of Park Farm as an extension to Vision Park, Chivers Way, Histon.

It is considered that this would make a logical extension to the existing Vision Park, Chivers Way employment area as shown on the Histon Policies Map or alternatively a new employment allocation in its own right. A new sites form has been completed and submitted alongside this representation.

5.3 In Cambridgeshire and Peterborough, the Agri-Food & Tech sector employs 3,500 people across 115 companies, generating approximately £1 billion in revenue. The Local Growth Plan projection maps predict growth of the agri-food and tech sector by £1.2bn by 2050, and expect to see employment growth in this sector of 7,700, a 57% increase from now. NIAB are recognised in the Local Growth Plan for their facilities and proposed developments to provide the potential for rapid growth in this sector.

5.4 It is important to recognise that NIAB is a charitable trust and that while development of the proposed employment referred to above has a clearer link to the research work undertaken at Park Farm, any profit realised from the development of the two proposed housing sites would be reinvested to support the Trust's continued research work and the development and expansion of their facilities. Furthermore, some of the housing could potentially be developed as key worker homes suited to occupation by some of NIAB's employees.

5.5 In terms of the emerging Local Plan, NIAB supports the vision for Greater Cambridge to be a place where a big decrease in the climate and environmental impacts comes with the continued

flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all communities.

5.6 However, while elements of the emerging Local Plan are supported, in order for it to be found sound, for the reasons set out above, it is considered that the following changes are required:

- The level of housing and employment growth as set out in Policy S/JH seeks to only meet the minimum levels of housing and employment as required under the standard method. It is not considered that this is the most reasonable approach when considered against the alternatives. Higher housing and employment growth would align with the Local Growth Plan and the government's Case for Cambridge. It is also imperative that housing supply is boosted to address the very acute housing affordability crisis in the area and to readdress the imbalance with job and employment growth within Greater Cambridge.
- The Local Plan period should be increased to 2050 as a minimum in order for it to align with the Local Growth Plan, the Case for Cambridge and with paragraph 22 of the NPPF. This is considered to be particularly appropriate given the number of strategic scale new settlements/urban extensions proposed.
- There is a clear need to increase the number of new allocated sites both to increase housing delivery and suitable sites for employment sectors to support the objective set out in the Local Growth Plan.
- It is imperative that additional sites are allocated that can be delivered within the early years of the plan period. This would significantly boost housing land supply and provide choice and competition for market land. It will also ensure that a 5 year housing land supply can be maintained.
- In addition, more flexible employment sites are required to support the ambitious growth aspirations set out in the Local Growth Plan and to support the focus sectors such as NIAB's Sites at Park Farm.

5.7 As set out above, delivery of growth in Greater Cambridge is of national and regional significance. In the past, employment growth rates have been stronger than official figures and have outstripped delivery of housebuilding and infrastructure. The government has confirmed its continued support for high levels of growth in Greater Cambridge. This ambitious level of growth is also supported by the Local Growth Plan and will likely be reflected in the new Spatial Development Strategy.

5.8 The proposed expansion of NIAB's research facilities at Park Farm could deliver both new employment space and some housing in a sustainable location while safeguarding in long term

landscape and biodiversity contribution the continued field trails use of the farmland provides to the area. The Local Growth Plan highlights the importance of the Agri-Food and Tech sector to the region's future growth, as well NIAB's national importance to the Sector. Including NIAB's proposals for the sensitive development of their Park Farm sites as allocations in the emerging Local Plan would support the delivery of the vision set out in the draft Plan for the future development of Greater Cambridge.

APPENDIX A – Redgate Road, Girton – Access Appraisal

Project Name Redgate Road, Girton

Subject Access Appraisal

Reference 25258

Date November 2025

1 INTRODUCTION

1.1 Background

1.1.1 KMC Transport Planning (KMC) have been instructed by Ceres Property, on behalf of NIAB Trust, to provide transport advice and prepare an Access Appraisal for land east of Redgate Road, Girton. The appraisal relates to a potential residential development of 28 dwellings.

1.1.2 This Access Appraisal has been prepared to identify the opportunities and constraints associated with delivering a suitable vehicular access to the site, together with indicative recommendations.

1.2 The Site

1.2.1 The site is located to the east of Redgate Road, within the administrative boundary of South Cambridgeshire District Council. Cambridgeshire County Council (CCC) is the local highway authority. The site location is shown in **Figure 1.1**.

Figure 1.1 – Indicative Site Location



1.2.2 The site is bounded by residential properties to the west and south, private woodland to the north, and agricultural land (owned by NIAB Trust) to the east. The proposed development will require a new point of access to the public highway. Following a desktop review, two potential primary access opportunities have been identified:

- Redgate Road.
- Track south of Peter Graves Florist.
- Access between 13 and 15 Redgate Road

1.3 Content of the Note

1.3.1 The appraisal has been undertaken using the following sources of information:

- Adopted highway information from CCC.
- Online mapping and imagery including Google Earth and Google Streetview; and,
- Land ownership information (for some, but not all, relevant areas).

1.3.2 The review has not had the benefit of any of the following:

- Traffic surveys.
- Topographical survey information.
- Utilities data.
- Detailed highways boundary information.

1.4 Structure of the Note

1.4.1 The remaining sections of this note are structured as follows:

- Section 2: Local Highway Authority Access Requirements
- Section 3: Review of Access from Redgate Road
- Section 4: Other Access Opportunities
- Section 5: Summary and Next Steps

2 LOCAL HIGHWAY AUTHORITY ACCESS REQUIREMENTS

2.1.1 This appraisal has been prepared with reference to the following guidance:

- Cambridgeshire County Council’s Cambridgeshire Highways Development Management – General Principles for Development (Guide) (January 2023).
- DfT’s Manual for Streets (DfT, 2007); and,
- LTN 1/20 Cycle Infrastructure Design (DfT, 2020).

2.2 Number of Accesses

2.2.1 The Cambridgeshire Highways Development Management Guide states that developments of fewer than 100 dwellings normally require only one vehicular access point.

2.3 Visibility and Junction Spacing

Visibility

2.3.1 The Cambridgeshire Highways Development Management Guide states that vehicle to vehicle inter-visibility splay ‘Y’ distances should reflect the posted speed limit unless empirical speed survey data supports a reduction.

2.3.2 Manual for Streets (MfS) visibility principles apply where 85th percentile speeds are up to 37mph. Relevant stopping sight distances (SSD) are provided in **Table 2.1**.

Table 2.1 – Stopping Sight Distances (Manual for Streets)

Speed (mph)	10	15	20	25	30
SSD (m)	9	15	22	31	40
SSD (m) adjusted for bonnet length	11	17	25	33	43

2.3.3 A minor road ‘X’ distance of 2.4m is generally applied.

2.3.4 It is not anticipated that 85th percentile vehicle speeds exceed the posted speed limits; therefore, visibility splays of 2.4m x 25m are expected to be required of any site access to land west of South Road.

Junction and Carriageway Geometries

2.3.5 The Cambridgeshire Highways Development Management Guide states that junction radius kerbs should be related to the following:

- the proposed land use.
- the largest vehicle expected to access the site regularly.

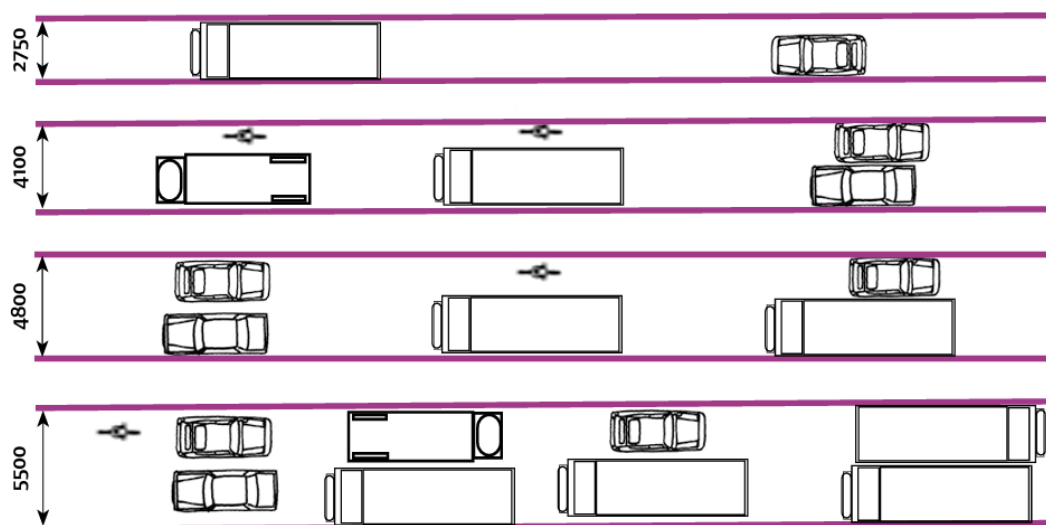
- the nature of the highway from which access is gained; and,
- the width of the internal access road.

2.3.6 In built-up residential areas, 6.0m kerb radii are generally required.

2.3.7 Adoptable access roads serving up to 100 dwellings must have a minimum carriageway width of 5.0m. For developments of 100–300 dwellings, 5.5m is required.

2.3.8 **Figure 2.1**, extracted from Manual for Streets, illustrates typical vehicle passing allowances for various carriageway widths.

Figure 2.1 – Carriageway Widths



Source: Manual for Streets

2.3.9 Both Cambridgeshire guidance and MfS are consistent: a 5.5m carriageway allows comfortable two-way vehicle passing.

Junction Spacing

2.3.10 For residential streets, the Guide states that minimum stagger distances between junctions on the same side of the road should equal the SSD for the design speed (typically 25m). Similar principles apply to staggered junctions on opposite sides, though localised reductions may be considered.

2.4 Pedestrian and Cycle Infrastructure

2.4.1 The Cambridgeshire Highways Management Guide states that footways should be 2.0m wide. A reduction to a minimum of 1.5m will be considered at width constraints over a limited length (site specific).

2.4.2 Shared cycle and pedestrian provision shall accord with the requirements of Local Transport Note (LTN) 1/20 ('Cycle Infrastructure Design'). **Table 2.2** provides a summary of the minimum widths for a shared use route carrying up to 300 pedestrians per hour.

Figure 2.2 – Recommended Minimum Widths for Shared Use Routes

Cycle flows	Minimum width (m)
Up to 300 cyclists per hour	3.0m
Over 300 cyclists per hour	4.5m

Source: LTN 1/20

2.5 Applicable Guidance for Site

2.5.1 The proposed development is for circa 28 dwellings and therefore will be subject to the following design requirements:

- One vehicular access, with the following geometries:
 - 6.0m radius kerbs.
 - 5.0m width.
- Access location at least 25m from any existing junction.
- Visibility splays of 2.4m x 25m (20mph speed limit).
- 2.0m-wide footways alongside the access (unless constrained).

2.5.2 The two potential site accesses will be assessed against this guidance in the following sections.

2.5.3 2.5.3All conclusions are based on a desktop study only. No detailed design or survey-validated measurements have been undertaken.

3 REVIEW OF ACCESS FROM REDGATE ROAD

- 3.1.1 Redgate Road lies to the west of the site and connects to Cambridge Road, a local distributor. Cambridge Road becomes Girton Road and subsequently links to Huntingdon Road and the M11.
- 3.1.2 Redgate Road is a residential road with footways provided on both sides of the carriageway. It is subject to a 20mph speed limit. Near the site, Redgate Road has an existing carriageway width of approximately 5.5m and footways of approximately 2.0m. This indicates that a car and HGV would likely be able to pass on the road, as per **Figure 2.1**.
- 3.1.3 **Figure 1.2** presents the extent of adopted local roads close to the site, with the indicative site location shown in red. There are no Public Rights of Way in the vicinity of the site.

Figure 1.2 – Adopted Roads in Vicinity of Site



Source: Cambridgeshire County Council

- 3.1.4 The location of the potential access from Redgate Road to the site is shown in **Figure 3.1**.

Figure 3.1 – Potential Access on Redgate Road



Source: Google Maps with KMC Annotations

3.1.5 This potential access is also shown in **Figure 3.2**.

Figure 3.2 – Potential Access from Redgate Road



Source: Google Streetview

3.1.6 A vehicular access in this location appears feasible, with the following opportunities:

- Sufficient space to deliver a 5.5m carriageway and 2.0m footways, consistent with existing street geometry.
- There is no other junction within 25m of the proposed access.
- Visibility splays of 2.4m × 25m are likely achievable.

3.1.7 It is noted, however, that there is the presence of a ransom strip between the site boundary and the adopted highway. The client does not own this land. A Land Registry search is recommended to confirm ownership and enable discussions with the landowner.

4 OTHER ACCESS OPPORTUNITIES

4.1 Track South of Peter Graves Florists

- 4.1.1 A track south of Peter Graves Florist provides a connection to Cambridge Road. Images are provided in **Figures 4.1 and 4.2**.

Figure 4.1 – Track South of Peter Graves Florists



Source: Google Streetview

Figure 4.2 – Track South of Peter Graves Florists



Source: Google Streetview

- 4.1.2 Based on a desktop review, the track is approximately 3.5m wide, this is not wide enough for two vehicles to pass. As shown in Figure 4.3, the track is bounded by commercial and residential

buildings to the north and south, which present a substantial barrier to widening the track to adoptable standards.

Figure 4.3 – Track South of Peter Graves Florists



Source: Google Maps

- 4.1.3 Accordingly, vehicular access is not recommended. However, subject to landowner agreement, a pedestrian/cycle link may be feasible. Based on LTN 1/20, a 3.0m shared use route would be suitable for the anticipated low flows and could be accommodated within the existing width.

4.2 13 Redgate Road

- 4.2.1 A stub access exists between 13 and 15 Redgate Road (Figure 4.4).

Figure 4.4 – Potential Access near 13 Redgate Road



- 4.2.2 The stub adjoins land owned by CCC. Although this land was submitted in the Call for Sites process, its suitability for access was not confirmed. The building footprint of 13 Redgate Road suggests that the existing stub cannot be extended in its current alignment without significant alteration to the highway layout.
- 4.2.3 Any access in this location would require:
- Review of title and boundary plans for 13 and 15 Redgate Road and CCC land.
 - Agreement with CCC for access across their land.
- 4.2.4 Given these constraints, this option is not preferred.

5 SUMMARY AND NEXT STEPS

5.1 Summary

- 5.1.1 KMC have been instructed by Ceres Property, on behalf of NIAB Trust, to prepare an Access Appraisal for land east of Redgate Road, Girton, for a proposed development of 28 dwellings.
- 5.1.2 This note has assessed the potential for a primary access at two locations on Redgate Road and the track south of Peter Graves Florists. All three of the access points appraised will require third-party land to be achievable. As such, engagement with the various landowners will be necessary.
- 5.1.3 Based on the information assessed as part of this appraisal, it is recommended that the client pursue a primary access at the end of Redgate Road as a preferred option. This location is preferred as, based on the desktop review, it appears possible to extent the road directly into the proposed site. However, the constraint to overcome will be the existence of a ransom strip in between the proposed site and the adopted highway.
- 5.1.4 The access near 13 Redgate Road is constrained by land ownership uncertainties and geometric limitations. Access via the Peter Graves track is unsuitable for vehicles.

5.2 Next Steps

- 5.2.1 The following actions are suggested as next steps:
- Undertake a Land Registry search to confirm ownership of the ransom strip, followed by engagement with the landowner.
 - Review title plans for 13 and 15 Redgate Road and relevant CCC land.
 - Confirm highway boundary extents via a formal boundary search.
 - Undertake traffic speed and volume surveys on Redgate Road to inform access design.

APPENDIX B – South Road, Impington – Access Appraisal

Project Name South Road, Impington

Subject Access Appraisal

Reference 25258

Date November 2025

1 INTRODUCTION

1.1 Background

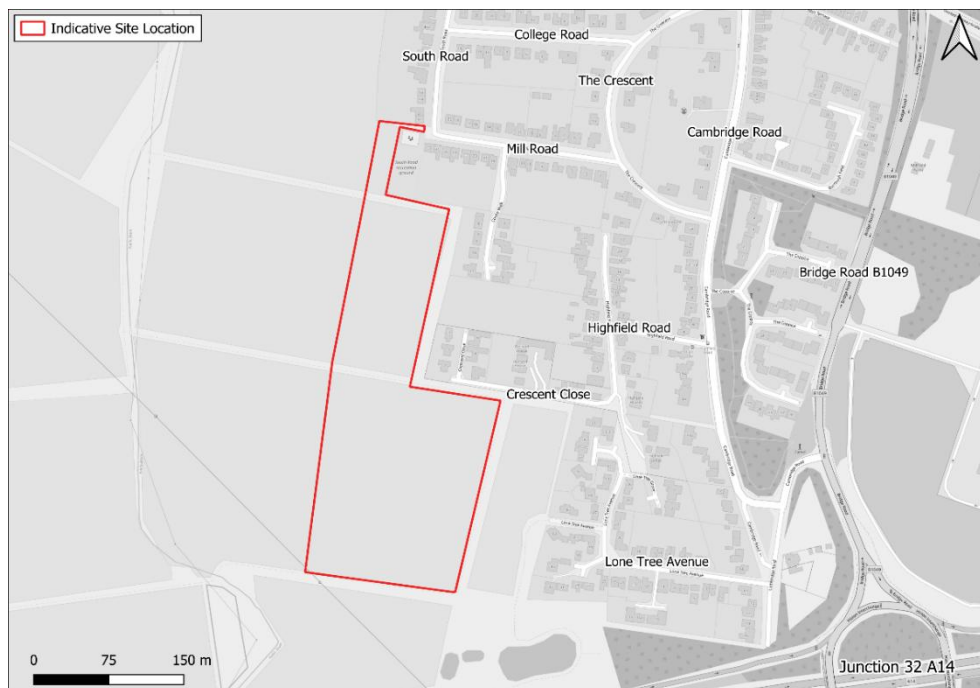
1.1.1 KMC Transport Planning (KMC) have been instructed by Ceres Property, on behalf of the NIAB Trust, to provide transport advice and prepare an Access Appraisal for land west of South Road, Impington. This relates to a potential residential development of approximately 80 dwellings.

1.1.2 This Access Appraisal assesses the opportunities and constraints associated with providing suitable vehicular and pedestrian access to the site and sets out indicative recommendations.

1.2 The Site

1.2.1 The site is located to the west of South Road, Impington.

Figure 1.1 – Indicative Site Location



- 1.2.2 It lies within the administrative boundary of South Cambridgeshire District Council. Cambridgeshire County Council is the local highway authority.
- 1.2.3 The site is bounded by third-party agricultural land to the north, west, and south, and by residential properties to the east.
- 1.2.4 The proposed development will require a new access point onto the existing highway network. Following a desktop review, three potential access opportunities have been identified:
- South Road
 - Lone Tree Avenue
 - Cresswell Close

1.3 Content of the Note

- 1.3.1 This appraisal has been undertaken with reference to the following available information:
- Adopted highway information sourced from Cambridgeshire County Council;
 - Online mapping resources including Google Earth and Google Streetview; and,
 - Land ownership information (for some, but not all, relevant areas).
- 1.3.2 The appraisal has not had the benefit of the following:
- Traffic data.
 - Topographical surveys.
 - Utilities surveys.
 - Detailed highway boundary information.

1.4 Structure of the Note

- 1.4.1 The remainder of this note is structured as follows:
- Section 2: Local Highway Authority Access Requirements
 - Section 3: Review of Access from South Road
 - Section 4: Other Access Opportunities
 - Section 5: Summary and Next Steps

2 LOCAL HIGHWAY AUTHORITY ACCESS REQUIREMENTS

2.1.1 This access appraisal has been undertaken with reference to:

- Cambridgeshire County Council’s Cambridgeshire Highways Development Management – General Principles for Development (Guide) (January 2023); and,
- Manual for Streets (DfT, 2007).

2.2 Number of Vehicular Access Points

2.2.1 The Cambridgeshire Highways Development Management Guide states that developments of fewer than 100 dwellings normally require only one vehicular access point.

2.3 Visibility and Junction Spacing

Visibility

2.3.1 The Cambridgeshire Highways Development Management Guide states that vehicle to vehicle inter-visibility splay ‘Y’ distances should reflect the posted speed limit unless empirical speed survey data supports a reduction.

2.3.2 Manual for Streets (MfS) visibility principles apply where 85th percentile speeds are up to 37mph. Relevant stopping sight distances (SSD) are provided in **Table 2.1**.

Table 2.1 – Stopping Sight Distances

Speed (mph)	10	15	20	25	30
SSD (m)	9	15	22	31	40
SSD (m) adjusted for bonnet length	11	17	25	33	43

Source: Manual for Streets

2.3.3 A minor road ‘X’ distance of 2.4m is generally applied.

2.3.4 It is not anticipated that 85th percentile vehicle speeds exceed the posted speed limits; therefore, visibility splays of 2.4m x 25m are expected to be required of any site access to land west of South Road.

Junction and Carriageway Geometries

2.3.5 The Cambridgeshire Highways Development Management Guide states that junction radius kerbs should be related to the following:

- the proposed land use;
- the largest vehicle expected to access the site regularly;
- the nature of the highway from which access is gained; and,

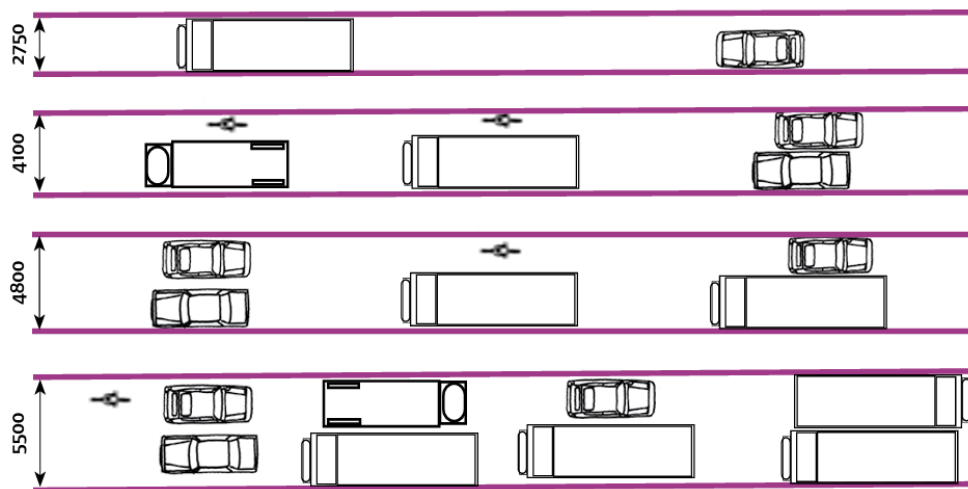
- the width of the internal access road.

2.3.6 In built-up residential areas, 6.0m kerb radii are generally required.

2.3.7 Adoptable access roads serving up to 100 dwellings must have a minimum carriageway width of 5.0m. For developments of 100–300 dwellings, 5.5m is required.

2.3.8 **Figure 2.1**, extracted from Manual for Streets, illustrates typical vehicle passing allowances for various carriageway widths.

Figure 2.1 – Carriageway Widths



Source:

Manual for Streets

2.3.9 Both Cambridgeshire guidance and MfS are consistent: a 5.5m carriageway allows comfortable two-way vehicle passing.

Junction Spacing

2.3.10 For residential streets, the Guide states that minimum stagger distances between junctions on the same side of the road should equal the SSD for the design speed (typically 25m). Similar principles apply to staggered junctions on opposite sides, though localised reductions may be considered.

2.4 Pedestrian Infrastructure

2.4.1 Footways should normally be 2.0m wide. Localised reductions to 1.5m may be permitted where constraints exist.

2.5 Applicable Guidance for Site

2.5.1 For a development of approximately 80 dwellings, the following design requirements are expected:

- One vehicular access, with the following geometries:

- 6.0m radius kerbs.
- 5.0m width.
- Access location at least 25m from any existing junction.
- Visibility splays of 2.4m x 25m (20mph speed limit).
- 2.0m-wide footways alongside the access (unless constrained).

2.5.2 The three access opportunities identified are assessed against this guidance in the following sections.

2.5.3 All conclusions are based on a desktop study only. No detailed design or survey-validated measurements have been undertaken.

3 REVIEW OF ACCESS FROM SOUTH ROAD

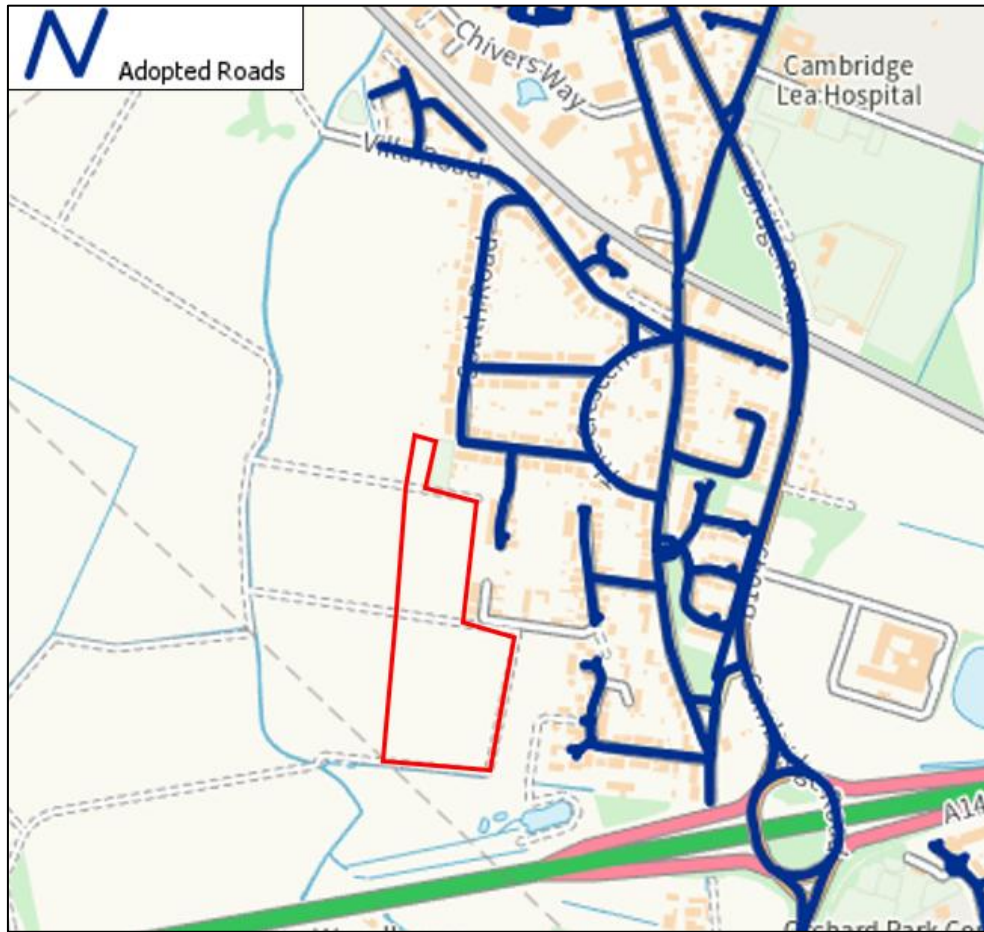
- 3.1.1 South Road lies to the north-east of the site and connects to Mill Road and College Road, which in turn link to The Crescent and the wider Histon and Impington area.
- 3.1.2 South Road and Mill Road are residential streets featuring footways on both sides and are subject to a 20mph speed limit. Their relationship to the site is shown in **Figure 3.1**.

Figure 3.1 – Local Highway Network



- 3.1.3 **Figure 3.2** shows the extent of adopted local roads near the site.

Figure 3.2 – Adopted Roads in Vicinity of Site



Source:

Cambridgeshire County Council

- 3.1.4 There are no Public Rights of Way immediately adjacent to the site. The nearest is the pedestrian/cycle route alongside the Guided Busway.
- 3.1.5 South Road has a carriageway width of approximately 5.0–5.5m, while Mill Road is approximately 5.5–6.0m wide.
- 3.1.6 Based on the MfS guidance, this indicates that a car and HGV would likely be able to pass on these roads, as per **Figure 2.1**.
- 3.1.7 At the bend where Mill Road and South Road meet, a pedestrian access to the South Road recreation ground is present, as shown in **Figure 3.3**.

Figure 3.3 – Pedestrian Access to South Road Recreational Ground



Source:

Google Streetview

- 3.1.8 Access in this location is considered feasible, subject to agreement with Histon and Impington Parish Council, who own the recreation ground. Delivery of an access here would affect the recreation ground and require its reposition within the development site. Figure 3.4 includes an extract of the concept plan showing how an access could be accommodated.

Figure 3.4 – Concept Plan



3.1.9 **Figure 3.4** also identifies Parish Council-owned land relative to the site boundary. Opportunities associated with a South Road access include:

- Required access geometries (5.0m width, 6.0m kerb radii) appear achievable, ensuring alignment with existing carriageway widths and appropriate vehicle tracking.
- It is also anticipated that the access be wide enough to provide one 2.0m footway, on the western side of the carriageway.
- There is no other junction within 25m of the proposed access.
- The speed limits of Mill Road and South Road are 20mph, which necessitates visibility splays of 2.4m x 25m.
- Previous engagement with the Parish Council has been positive, including early support for an enhanced recreation ground and potential cycleway connection to the A14 bridge to Darwin Green (noting that no recent engagement has occurred).

3.1.10 However, to achieve the access in this location, the following key constraint will need to be overcome:

- Delivery of this access requires the Parish Council to agree to land acquisition or land swap involving the recreation ground.

4 OTHER ACCESS OPPORTUNITIES

4.1 Lone Tree Avenue

4.1.1 Lone Tree Avenue is an adopted road linking to Cambridge Road. A spur provides access to several dwellings and to an access to an attenuation pond. This spur is not adopted.

Figure 4.1 – Lone Tree Avenue



Source: Google Maps with KMC Annotations

Figure 4.2 – Potential Access on Lone Tree Avenue



Source: Google Streetview

Figure 4.3 - Potential Access on Lone Tree Avenue



Source: Google Streetview

4.1.2 The spur is not of adoptable standard (surface condition), consistent with adopted-roads mapping.

4.1.3 The access is approximately 5m wide, which is sufficient for vehicular access. However:

- Providing 2.0m footways would require land from the front gardens of adjacent dwellings.
- Land between Lone Tree Avenue and the application site is third-party owned; access would require a legal agreement.

4.2 Cresswell Close

4.2.1 Cresswell Close is a private, unadopted road off Highfield Road, adjacent to the eastern site boundary. A desktop review indicates:

- Approximately 5.0m width at the entrance (consistent with Cambridgeshire design guidance for the first 8m)
- Reducing to approximately 4.5m thereafter

Figure 4.4 – Cresswell Close



Source: Google Maps with KMC Annotations

4.2.2 To deliver an adoptable access from Cresswell Close:

- The carriageway would need widening to 5.0m along its full length.
- Existing footways are narrower than 2.0m; widening would almost certainly require third-party land on the south side.

5 SUMMARY AND NEXT STEPS

5.1 Summary

5.1.1 KMC have been instructed to provide transport advice and prepare an Access Appraisal for a potential development of approximately 80 dwellings at Land West of South Road, Impington.

5.1.2 Three potential access points have been assessed: South Road, Lone Tree Avenue, and Cresswell Close. All options require third-party land, necessitating engagement with relevant owners.

5.1.3 It is recommended that the client pursue South Road as the preferred access option. This is because:

- Engagement would be primarily with Histon and Impington Parish Council rather than multiple homeowners.
- The site is large enough to re-provide an enhanced recreation ground, addressing the impact of providing site access in this location.

5.1.4 Accesses from Lone Tree Avenue and Cresswell Close are considered less favourable due to:

- Requirement for agreements with multiple private landowners
- Need for carriageway widening, resurfacing, and footway upgrades to reach adoptable standards

5.1.5 These may still be possible but should be treated as secondary options.

5.2 Next Steps

5.2.1 The following step is identified as the immediate priority:

- Re-engage with Histon and Impington Parish Council regarding land at the South Road recreation ground.

5.2.2 Should engagement be positive, the following next steps are suggested:

- Undertake a formal highway boundary search to confirm extents.
- Consider commissioning a topographical survey to inform detailed access design.