



Mulberry House, Titchwell, Kings Lynn, Norfolk, PE31 8BB

7th March 2025

Greater Cambridge Shared Planning
Via Online Form

Dear Sir / Madam

LAND SOUTH OF VILLA ROAD, IMPINGTON
GREATER CAMBRIDGE LOCAL PLAN: SITE SUBMISSIONS UPDATE 2025

We act on behalf of Cirrus Land Limited ('Cirrus') who are promoting a site for residential development located on land south of Villa Road, Impington ('the Site').

The Greater Cambridge Councils are undertaking a Site Submissions update and have invited promoters to submit new information on previously submitted sites where:

- The boundary of the site has changed
- The proposed land uses or quantum of development have changed
- The site's available date has changed since it was first submitted
- There are other material changes to the site (such as the identification of a new development constraint), or
- The site is no longer available for development.

The Site has previously been promoted through the Call for Sites process (Site ID 40041), however there are proposed amendments to the development quantum and delivery dates, as well as a material change in light of the publication of the updated National Planning Policy Framework ('NPPF') and introduction of 'grey belt' provisions. Please therefore accept this letter and the completed e-form as our updated submission of the Site for inclusion in the Council's Housing and Economic Land Availability Assessment ('HELAA'), on behalf of Cirrus.

The following documents were submitted in support of the previous Call for Sites submissions and remain relevant to the proposed development:

- Vision Document (October 2021)
- Technical Note: Summary of Flood Risk and Drainage Matters (22 September 2021)
- Initial Access Appraisal (23 June 2021)
- Ecological Appraisal (September 2021)

An Introduction to Cirrus Land Limited

Cirrus have a portfolio of strategic land sites totalling over 10,000 plots of residential dwellings, retirement dwellings and commercial development that they are taking through the planning system. They work with end-users such as housing associations, housebuilders, retirement operators and business groups who who join the promotion and take up and deliver the sites when planning consent is achieved.

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Site Context

The Site is approximately 6.5 ha in size and is located on the southern side of Villa Road, to the west of the settlement of Impington. The Site comprises of two agricultural land parcels, with the larger, eastern parcel currently being used for crop testing. The Site is bounded by hedgerows / vegetation along its boundaries, with several trees located across the smaller, western parcel and along the north of the larger, eastern parcel. The Site is subject to a TPO (TPO 0006) on the east of the Site. Existing vehicular access is from the south-west of the Site. An electricity substation is located to the north of the Site off Villa Road, and pylons cross the Site from north-east to west.

The surrounding area to the north and east of the larger parcel is predominantly residential in nature. The area north and west of the smaller parcel comprises a mix of industrial / employment and agricultural land. The Site is bounded by further agricultural land to the south.

The Site is currently designated as Green Belt and located outside of the Development Framework of Impington as identified within the adopted Local Plan. The Site is identified as Grade 2 agricultural land, and also falls within a Mineral Safeguarding Area for Sand and Gravel.

The Site is not located within a Conservation Area, nor are there any listed buildings on the Site. The nearest listed buildings are located circa 350m east of the Site (Impington Mill and Mill Cottage, both Grade II listed).

Portions of the Site either side of an existing drainage ditch fall within Flood Zones 2 and 3, as shown on the Environment Agency's ('EA') flood map for planning. However, modelling has been undertaken and the Lead Local Flood Authority ('LLFA') have agreed that the extent of flooding is less than that shown on the EA map. Please refer to the previously submitted Technical Note for further details.

Histon and Impington is identified as a Rural Centre in the adopted Local Plan, defined as the 'largest, most sustainable villages of the district' with *"good access to a secondary school, employment opportunities, a variety of services and facilities and have good public transport services to Cambridge or market town"*. The settlement benefits from a number of schools (including primary, secondary and SEN provision), GP services, dental practices, convenience stores, takeaways, public houses, a petrol station, ATM facilities and a Post Office. Cambridgeshire Guided Busway, which provides circa 6 services an hour to Cambridges and St Ives, and National Cycle Route 51 are a 6-minute walk from the Site.

Development Proposals

The Site has previously been submitted through the Call for Sites process (Site ID 40041), first in 2021, proposing 50 units, and then again in 2022 proposing 120 units.

Having reviewed the Site's constraints and opportunities, Cirrus have developed proposals for the Site which would allow for the provision of circa 200 residential units. These may be in the form of Class C3 dwellings (with policy compliant affordable provision), or a retirement village scheme. Any development of built form would be confined to the eastern parcel, whilst the western parcel would allow for the necessary open space provision. A new vehicular access would be provided from the north of the Site via Villa Road.

The proposals would provide a high-quality development which encourages sustainable and healthy living through the provision of much needed new homes within walking distances of existing services, amenities and public transport. The scheme would incorporate green infrastructure and provide for new and enhanced habitats to deliver a net gain in biodiversity and offer amenity for existing and future residents alike. Development of the Site would contribute towards the vitality of the local area, enhancing the use of local business and services, and the scheme will deliver infrastructure proportionately in line with local needs.

Further details are set out in the previously submitted Vision Document.

Planning Considerations

Grey Belt

The Site is designated Green Belt in the adopted Local Plan. However, following the publication of the updated NPPF in December 2024, the Site is considered to be 'Grey Belt' land as per the terms of paragraph 155 of the NPPF. We therefore consider there to be a material change in site constraints which would necessitate an updated Call for Sites submission.

Paragraph 154 of the NPPF sets out that development in the Green Belt is inappropriate unless certain exceptions apply. In addition to those exceptions, paragraph 155 confirms that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

We consider each criterion of paragraph 155 in turn below.

Part (a) – Grey Belt:

‘Grey Belt’ is defined at Annex 2 (Glossary) of the NPPF 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, namely:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another; and
- to preserve the setting and special character of historic towns.

The Greater Cambridge Green Belt Assessment (2021) (‘GBA’) identifies the ‘Cambridge Green Belt purposes’ which are considered an application of the NPPF purposes in the local context. The assessment methodology for the GBA was therefore based on the three following Cambridge Green Belt purposes:

1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.
2. Maintain and enhance the quality of its setting.
3. Prevent communities in the environs of Cambridge from merging into one another and with the city.

The table below provides an assessment of the Site against the abovementioned NPPF purposes, drawing on the findings of the GBA.

Green Belt Purpose	Assessment
a) To check the unrestricted sprawl of large built-up areas.	The GBA does not specifically consider sprawl in the Greater Cambridge Area. However, Planning Practice Guidance (‘PPG’) confirms that this purpose relates to the sprawl of large built up areas and that villages should not be considered large built up areas. The adopted Plan confirms that Rural Centres, such as Impington, are the largest, most sustainable <u>villages</u> of the district (our emphasis). As

	the Site does not lie adjacent to settlements defined as large built up areas in local policy documents, the area cannot be considered subject to sprawl and the Site therefore makes no contribution to this purpose.
b) To prevent neighbouring towns merging into one another.	Parcel HI18 is identified in the GBA as providing a relatively significant contribution to preventing merging. However, this purpose relates to the merging of towns, not villages. As above, Impington is identified as a village, as is Girton, which lies to the west of Impington. Although the separation between the settlements of Impington and Girton would be reduced in the event of development within the Site, strong structural separating elements would maintain their separate identities, noting that these are not 'Towns' in terms of Green Belt. Furthermore, development of the Site would not extend the built form of Impington further south than existing, and the presence of the A14 would further ensure separation between Impington and Cambridge. The Site therefore provides a limited contribution to this purpose.
d) To preserve the setting and special character of historic towns.	The GBA identifies parcel HI18 as providing a moderate contribution to preserving the character of Cambridge as a historic centre, and a relatively limited contribution to maintaining and enhancing the quality of its setting. There is no physical, visual, or character relationship with the historic centre of Cambridge given the intervening A14 road network. The Site therefore makes no contribution to this purpose.

'Grey Belt' also 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. Whilst footnote 7 includes reference to flood zones, this is not considered applicable to the Site. The majority of the Site itself is not subject to the designations listed at footnote 7, with the exception of those areas falling within Flood Zones 2 and 3 on the EA's map, however these areas will not be subject to built form. We comment on this matter further below and do not consider footnote 7 to be triggered.

Furthermore, the Site would not undermine the purposes (taken together) of the remaining Green Belt across the area. As set out above, we disagree with the assessment of parcel HI18 in terms of its Green Belt contributions as identified in the GBA, and in any event the provision of appropriate landscape buffers and careful consideration of the design and layout of any built form will prevent impacts to the surrounding Green Belt land.

In light of the above, the Site constitutes 'Grey Belt' land and would meet part (a) of NPPF paragraph 155.

Part (b) – Demonstrable Need

Footnote 56 of the NPPF confirms that, in the case of applications involving the provision of housing, 'demonstrable need' means a lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years.

The new standard method figures for South Cambridgeshire and Cambridge are 1,174 and 1,135 dwellings per annum ('dpa') respectively. As of April 2024, the Councils claim to have a combined housing land supply of 6.5 years when assessed against the adopted Local Plan figures of 975 and 700

dpa for each local authority area respectively. The Councils should now be assessing their land supply against the standard method figures (plus 5% buffer), and we therefore do not consider the Councils to have a 5-year housing land supply at present. Part (b) of NPPF paragraph 155 is therefore triggered.

Part (c) – Sustainable Location

Paragraph 110 of the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 goes on to state that, in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

The Council's spatial development strategy under the adopted Local Plan seeks to direct development first to the edge of Cambridge, then to new settlements, then to Rural Centres and Minor Rural Centres. The Site lies adjacent to Impington, which is identified as a Rural Centre in the settlement hierarchy, and benefits from a number of services and amenities within walking distance, as well as good connections to the Cambridgeshire Guided Busway and national Cycle Route 51. The Site is also sustainably located in proximity to a number of employment uses to the north and west.

The Site represents a natural extension to the settlement, with strong natural boundaries preventing further encroachment to the west and south in the form of topographical and landscape features, and to the north and east by the existing settlement. Development of the Site would therefore result in a sustainable pattern of development.

The Site is located in proximity to existing walking / cycling routes and public transport, and there are opportunities for active travel and the exploration of enhancements to local walking and cycling connections and potential contributions existing public transport infrastructure.

As such, the Site is a sustainable location and meets part (c) of NPPF paragraph 155 accordingly.

Part (d) – Golden Rules

a. Affordable Housing:

NPPF paragraph 156 requires a 15% uplift on Local Plan adopted targets, subject to a 50% provision cap. The adopted target under Policy H/10 is 40% affordable provision, therefore the requirement for affordable provision on the Site would be 50% should it come forward as 'grey belt' development.

Cirrus will look to provide affordable housing in accordance with policy requirements, subject to viability.

b. Infrastructure - Necessary improvements to local or national infrastructure:

Contributions to necessary improvements to local and national infrastructure will also be provided for, including contributions to education, healthcare, public transport and highway infrastructure provision as appropriate.

c. Green Spaces – The provision of new, or improvements to existing, green spaces that are accessible to the public:

The Site provides opportunities for open space provision, providing green infrastructure and multi-functional green spaces that will be made accessible for public use.

The proposals therefore meet part (d) of NPPF paragraph 155 and will provide affordable housing, green spaces and infrastructure in accordance with policy requirements.

Flood Risk & Drainage

According to the EA Flood Map for planning, portions of the Site fall within Flood Zones 2 and 3. However, modelling has been undertaken which shows that, by and large, the Site remains unimpacted by fluvial flood events with updated allowances for climate change. The LLFA have also agreed that this modelling can be used as a proxy for surface water flooding. Built form will be restricted to those areas in Flood Zone 1 only, and the proposed development will deliver integrated, sustainable drainage solutions. Flows in the local drainage network will not be significantly affected as runoff will be restricted to as near to greenfield runoff rates as possible. Please refer to the previously submitted Technical Note for further details.

Access & Highways

To support vehicle movements to and from the Site, new vehicular access will be provided from Villa Road to the north. Active travel will form a significant part of developing a car-free scheme on the Site, supported and underpinned by safe and attractive travel networks for pedestrians and cyclists and providing key links to existing services, amenities and public transport.

Please refer to the previously submitted Initial Access Appraisal for further details.

Heritage

The nearest listed buildings, Impington Mill and Mill Cottage (both Grade II listed), are located 350m east of the Site, though screened by intervening residential development. Nevertheless, the proposed development will be carefully designed to sensitively respond to these heritage assets, with appropriate mitigation provided where necessary.

Agricultural Quality

The Site comprises Grade 2 agricultural land. Development of the Site will provide substantial public benefits, including a significant contribution to meeting housing needs, such that the loss of such land for agricultural purposes is justified.

Arboriculture and Ecology

There are a number of trees and hedgerows across the Site. Where practicable, Cirrus will retain high quality green assets to contribute to the Site's amenity and ecological value.

Additional protected species surveys will be undertaken to inform the proposals, however there are considered to be no 'in principle' ecological constraints to development of the Site. Please refer to the previously submitted Ecological Appraisal.

The proposals for the Site will deliver the mandatory 10% biodiversity net gain requirement.

Delivery and Next Steps

The Site is under option with Cirrus in its entirety and is available for development in the short to medium term, with there being no land ownership constraints on delivery. There are no technical impediments to delivery and Cirrus anticipates start on site 12-18 months from approval of any forthcoming full application, with completion of all units 24 months from this. The Site is therefore suitable, available, and deliverable and could assist in meeting housing targets early in the plan period.

Cirrus will promote the redevelopment of the Site through the emerging Greater Cambridge Local Plan. We welcome the opportunity to engage with the Council further to develop the proposals for the Site as the Local Plan progresses.

Summary

In summary, the redevelopment of the Site would contribute significantly to housing provision in the Great Cambridge area and there are no technical constraints to the delivery of housing on the Site. Accordingly, the Site is considered to be suitable for development, available and deliverable, and should therefore be taken forward for inclusion in the HELAA, and for allocation in any forthcoming Local Plan.

Yours sincerely,

Cirrus Land Limited