Greater Cambridge Local Plan Regulation 18 Consultation submission

Land at Impington Lane, Impington

January 2026

Turley

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[redacted]

Our reference

30 January 2026

1. Introduction

1.1 These representations have been prepared by Turley, on behalf of Mr R Raywood, Mr A Bradney and Mr D Unwin (hereafter referred to as 'The Client'), in response to the consultation on the Draft Greater Cambridge Local Plan (GCLP) (2024-2045).

1.2 The Site at Impington has previously been promoted for residential development as part of the Greater Cambridge Local Plan process, through the Call for Sites exercise in March 2025 (Site ID 115115).

1.3 Having reviewed the draft GCLP, it appears that the strategy taken towards allocation sites for residential development is disproportionately skewed in favour of major sites, with over approximately 12,670 dwellings proposed across 6 sites; an approach considered to be inconsistent with national guidance and contradictory to past decisions by Planning Inspectors during examination.

1.4 It is proposed that this approach should be re-evaluated and updated, to include a higher percentage of small to medium sized sites, such as the Site at Impington.

Duty to cooperate

1.5 Section 110 of the Localism Act and Section 33(A) of the Compulsory Purchase Act 2004 (as amended) requires Local Planning Authorities to cooperate with other Councils and other relevant bodies.

1.6 This 'Duty to Cooperate' is to be implemented in accordance with the principles set out in the Framework at paragraphs 24-28.

1.7 It is recognised that the Duty to Cooperate (DtC) is a process of ongoing engagement and collaboration. As set out in Planning Practice Guidance (PPG) it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet needs (including housing need). This is not simply an issue of consultation but a question of effective cooperation to ensure that housing needs are met in full.

1.8 Whilst we raise no concerns at this stage and are generally supportive of the Plan, as the DtC is a process of continued cooperation, it is recommended that the Council continue to prepare a DtC statement to effectively demonstrate the steps that the Council has taken through each round of consultation. This is necessary to ensure that the plan has been subject to ongoing and effective cooperation with any interested parties to which a strategic cross boundary issue, such as unmet housing needs, may affect.

2. Development Strategy Policy

2.1 The GCLP identifies a high-level vision for the growth and future land use of the area, timeframes for this growth, as planning policies which set the parameters for this growth. It identifies the need for new homes and jobs, and the services and infrastructure to support them, and guides where this development should happen.

2.2 The identification of Greater Cambridge as a priority for sustainable economic growth by the government has resulted in the creation of an ambitious plan, which seeks to deliver the homes and infrastructure needed to achieve this growth.

2.3 Sites have been identified that will deliver around 13,460 further homes by 2045 to meet the needs and provide a buffer to ensure the target is met.

Policy S/DS: Development Strategy for Greater Cambridge

2.4 The Draft Plan identifies the following order of preference for land to accommodate development.

- *Within the Cambridge urban area;*
- *On the edge of Cambridge whilst considering the impact on Green Belt purposes;*
- *At Cambourne and new settlements; and*
- *In the rural area at Rural Centres and Minor Rural Centres.*

2.5 The preference of land identification set out in the development strategy is reflected in draft policy **S/SH, Settlement Hierarchy**. There is a clear and significant sway towards the allocation of major sites, with a considerable proportion of housing land supply coming from urban extensions and new settlement.

2.6 This approach has repeatedly been shown to be problematic, particularly regarding delivery timeframes, and is inconsistent with key principles of the NPPF. Paragraph 72 of The Framework acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites, regarding availability, suitability and economic viability.

2.7 Furthermore, the NPPF identifies the importance that small and medium sized sites can make to meeting the housing requirements of an area, especially for small and medium enterprise housebuilders. The primary benefit of allocating small and medium sized sites is the often quick build out rate, compared to major sites, particularly new settlements and the fact that the majority do not rely on major infrastructure improvements.

2.8 Paragraph 72a states that *'land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the*

preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved'.

	Homes 2024 - 2045	Site Numbers	Percent
Cambridge Urban Area	413	7	3
Edge of Cambridge	7,450	3	55
New Settlements	5,220	3	39
Rural Southern Cluster	180	2	1.3
Rest of the Rural Area	205	3	1.5
TOTAL			**13,463**

2.9 The data taken from Table Two of the Draft Plan (summarised above), presents the breakdown of housing delivery through allocation for new homes between 2024 and 2045.

2.10 According to this data, 94% of all new dwellings proposed between 2024 and 2045 are allocated across only 6 sites, 3 of which are new settlements. The 'Rest of the Rural Area' comprises rural centres and group villages, a total of 48 settlements, and has only 3 sites allocated for a total of 205 new homes.

2.11 The proportion of development attributed to major, strategic sites not only carries a huge risk to deliverability but is also inconsistent with The Framework.

2.12 Identified Rural Centres include Great, Shelford, Stapleford, Histon, Impington and Sawston. These are defined as *the largest, most sustainable villages within Greater Cambridge. They have good access to a secondary school (either within the settlement or accessible by good public transport), employment opportunities, a variety of services and facilities and have high quality public transport in the form of a segregated public transport route services.*

2.13 Since the Rural Centres comprise of the most sustainable villages in Greater Cambridge there is no strategic constraint on the amount of development or redevelopment of land for housing that can come forward within the defined development extents, provided that the proposals are in accordance with other policies in the Plan.

2.14 Out of the new sites identified above to meet housing need, Rural Centres consist of only 1 site for residential allocation for up to 120 dwellings, despite being described as *'one of the largest and most sustainable sites in Cambridge'.*

2.15 No allocations are made in Great Shelford, Stapleford, Histon or Impington.

3. Site Context

The Site

3.1 The Site comprises 2.4 hectares of agricultural land, located north of Impington Lane, Impington.

3.2 Impington village is located just under 5 kilometres north of central Cambridge, across the A14. Histon is located immediately adjacent to Impington to the northwest, connected by Water Lane and Station Road.

3.3 The site comprises a rectilinear agricultural field, with some existing tree and hedgerow cover. The Site is bound by agricultural land and open space to the north and east, residential development to the south and west, and more open space to the northeast (see figure one below).

3.4 The northern and western boundary are lined with an existing tree belt / hedgerow.

Figure One: Site Context Plan (Google Earth 2026)

3.5 There are linear areas of Flood Risk Zones two and three running along the Site's northern boundary, where an existing watercourse is located. There are also three small areas of surface water flood risk location within the Site boundary.

3.6 There are no designated heritage or environmental assets either within or immediately adjacent to the Site.

3.7 The Site is located outside of, but immediately adjacent to the Impington Settlement Boundary, and within the designated Green Belt.

4. Site Assessment

4.1 The Site was previously submitted to the Call for Sites exercise in March 2025 (Site ID: 115115), for the erection of between 40 and 55 dwellings, to be delivered within 5 years.

4.2 Overall, the HELAA shows that the Site was considered to be unsuitable for residential development and scored an overall red, primarily due to concerns over impacts on landscape and the existing building line and access to the public highway.

4.3 The HELAA assessment considered both the opportunities and potential challenges / impacts that the development may bring, finding that in terms of policy 'the site has some potential policy constraints, but these could be overcome through the planning application process.'

4.4 It is noted that the HELAA methodology states an Amber rating does not preclude a site from being proposed for allocation. All other scores for the Site were Green or Amber.

Sustainable Location

4.5 The importance of a sustainable location has been reinforced numerous times in adopted and emerging central government policy. It is considered of primary importance in identifying suitable sites to deliver sustainable development.

4.6 It is therefore worth reiterating this in relation to the Site.

4.7 As set out in the table below, the Site is sustainably located within Impington, with safe and convenient access to a range of local amenities, sufficient to meet day to day needs of the local community.

	Distance (miles)	Walking Time (mins)	Cycle Time (mins)
Convenience			
Stations Convenience Store			
Tesco Express	0.2	12	3
The Co-Op	0.4	10	3
Hospitality			
Station House	0.8	18	6
Tawa Lounge	0.4	8	2
The Boot	0.5	10	3

Sir Histon	0.7	16	4
King William	0.7	16	4
The Rose & Crown	0.3	7	2
Education			
Impington Village College	0.4	8	2
The Cavendish School	0.6	13	4
Histon & Impington Brook Primary School	0.5	11	3
Histon & Impington Park Primary School	0.9	18	5
Recreation			
Impington Sports Centre	0.6	12	3
Histon & Impington Recreation Ground	0.7	15	4
Community Facilities			
Spire Private GP Surgery	0.7	16	4
St Andrews Church	0.8	18	5
Well Pharmacy	0.6	13	4

4.8 Impington and Histon are served primarily by the Cambridgeshire Guided Busway, offering fast, frequent links to Cambridge, St Ives, Huntingdon, and Trumpington, with multiple services (A, B, T1) stopping directly in the villages.

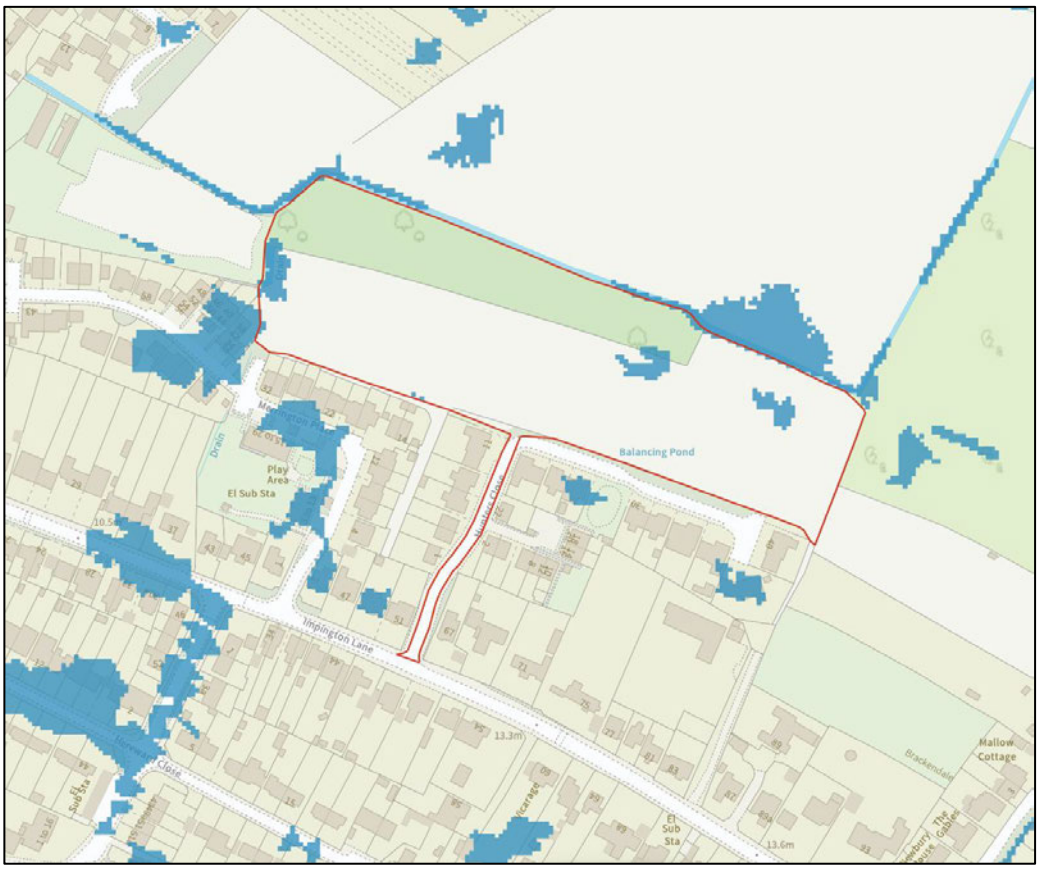
4.9 These bus services also provide direct and convenient access to Cambridge Train Station, which provides regular connectivity to East Anglia, London and places further afield.

4.10 The Site is therefore considered to be well connected in terms of access to sustainable transport choices. It is noted the Site scores green in the HELAA for accessibility.

Flood Risk

4.11 The Site scored Amber for flood risk. However, this is worth further consideration as the degree of flood risk makes a considerable difference to the ability to deliver the Site.

4.12 There are linear areas of Flood Risk Zones Two and Three along the northern Site border which is a small brook. These Zones do not extend into the Site. Given their location tight against the boundary these areas can reasonably be taken to be outside any developable area. The areas of surface water flooding are small and only impact a very negligible amount of the Site area (see below) and could comfortably be addressed through layout, landscaping and the sustainable drainage strategy for the Site as a whole.



Flood Risk Map (gov.uk 2026)

4.13 Since this Site was assessed in early 2025 as part of the HELAA, national guidance on flood risk has been updated, most recently of which was in September 2025. Relevant to this Site and proposed development, is the changes to the Planning Practice Guidance (PPG), which no longer requires a site at risk of flooding to pass a sequential test.

4.14 The 2025 updates removed the following sentence from paragraph 23, which stated that *'Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied.'*

4.15 Furthermore, changes to the guidance now mean that in situations where a site specific Flood Risk Assessment can demonstrate that design, layout, and mitigation would keep future occupiers safe from surface water flood risk without increasing risk elsewhere, a sequential test is not required. Moreover, the absence of a 5-year housing land supply

is no longer a relevant consideration in applying the sequential test for individual applications.

4.16 The Site is scored Amber under the HELAA methodology as it meets the criteria which acknowledges development can take place on a site with some part in a Flood Zone. However, that makes no distinction between the percentage of the site in the Flood Zone. If, as with this site the area is so small and in such a location that it would not feasibly be part of any developable area on any site then this should be recognised. Equally the percentage of site affected by surface water flooding is again so low that mitigation would not impact the extent of available developable area (and capacity of the Site).

Landscape

4.17 The HELAA states development will remove one of the distinctive small-scale paddocks, mature native hedgerow and trees at the village edge, exposing the site. Development will extend into the open countryside beyond the existing built line.

4.18 However, the Site sits within a wider edge of village area between Milton Road to the east and Mill Lane to the west and should reasonably be considered within this context. The building line along Mill Lane and Impington Lane steps in and out. Development of the Site would not be at odds with this overall pattern of development in this part of the village.

4.19 The Site does benefit from the existing mature trees and hedge on the boundaries which is a positive feature and can be retained. This would be in character with the immediate area creating a village edge as evidenced in Merington Place, Ambrose Way and Drake Way.

4.20 The Site was viewed positively from a biodiversity and geodiversity perspective, acknowledging that there would be no adverse impact on ecology.

Access

4.21 The Site has been scored red as t is considered there is no direct access to the public highway. However, the Client already has established access to the Site via Hunters Close and onto Impington Lane. As such access to the public highway is in place and with no impediment to delivery. The Site should therefore be at the very least scored Amber.

5. Conclusion

5.1 Although the introduction of a joint approach to strategic growth between Cambridge City and South Cambridgeshire through the creation of the Greater Cambridge Local Plan is welcomed, the strategy taken towards the allocation of growth is not supported.

5.2 The considerable tilt of residential allocation on large, strategic sites is considered inconsistent with national policy and guidance. A more balanced approach to residential site allocation is encouraged, both for delivery purposes and to adhere to national guidance. The importance that small and medium sized sites in ensuring a more resilient, viable and deliverable approach to housing should not be overlooked, as it appears to be in the draft Plan.

5.3 The Site is sustainably located, and of appropriate scale for the character of Impington. Since the previous consultations on the GCLP, changes to national guidance have been implemented, which are considered valid in assessing the suitability of the Site for residential development. As a result, it is considered that the Site would be scored more positively.

5.4 It is widely recognised that a site of this size, as well as others of a similar size have unique benefits, primarily being able to offer quicker build out and delivery rates than larger, strategic sites. The allocation of the Site would be a valuable contribution to a Rural Centre settlement and contribute towards the percentage of housing need that could be met by small to medium sized sites.

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