

Greater Cambridge Local Plan 2024–2045

Regulation 18 Consultation December 2025 – January 2026

Land at Ambrose Way, Histon, Cambridge

Representations on behalf of Martin Grant Land Ltd.

Date: January 2026 | Pegasus Ref: P18-1588



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Appendix 1: Red Line Boundary Plan – ref: edp5518_d027

Appendix 2: Potential Site Access Arrangement – ref: ITB14652-GA-011



1. Introduction

- 1.1. Our client Martin Grant Land (formerly Martin Grant Homes) supports the aims of the emerging Local Plan to minimise carbon emissions and reliance on the private car by creating thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure needed for Greater Cambridge. However, the Councils' strategy needs to allow for greater flexibility with a recognition of the role that Rural Centres, and sites well-related to them can play in achieving these aims. Accordingly, the purpose of these representations is primarily to respond to the emerging Vision; Development Strategy; and Draft Allocations proposed by Greater Cambridge Local Plan (GCLP) Regulation 18 consultation.
- 1.2. Our client has been promoting their site 'Land at Ambrose Way, Impington' (HELAA Ref: 40392) through previous call for sites as a logical and deliverable site to be allocated for a residential development of circa 170–200 dwellings. The site was first assessed by the Councils in 2021. And then again in 2023 and 2025. In the time that has passed MGL have continued to progress technical and design work and are now in a position to make a new Call for Sites submission for up to 100 dwellings. This submission also seeks to reaffirm the deliverability of the site and highlight the need for a revision to the Green Belt to support a site-specific policy that allocates the site for a residential development in the emerging Local Plan.
- 1.3. This latest submission includes an updated red line plan (Red Line Boundary Plan ref: edp5518_d027 – Appendix 2) and a detailed access drawing (Potential Site Access Arrangement ref: ITB14652-GA-O11 – Appendix 3). The development of the site would deliver the following benefits:
 - Up to 100 dwellings including a range of different dwelling types in a sustainable location on the edge of an existing Rural Centre
 - Provision of affordable housing in accordance with the Council's policies to deliver a balanced community that would be well integrated into the scheme and enhance social cohesion whilst meeting some of the local housing needs of the village
 - An internal network of streets that would promote walking and cycling as the most appropriate means of travelling through the site and accessing nearby services and facilities
 - SUDs integrated into the design of the development ensuring that no new or existing properties would be at risk of flooding
 - Significant landscape buffers and open space that would accommodate play spaces, allotments, informal open space and walking routes
 - Environmental enhancements that would deliver significant gains in biodiversity through the creation of new habitats on site
 - Creation of a defensible edge to the village through enhanced boundary planting that would limit views into the grey belt site from the surrounding green belt and ensure that the development of the site respected the wider landscape and village setting



- 1.4. The following responds to the Council's 2025 HELAA appraisal of the site in the context of the revised proposals and new technical work that is hereby submitted for consideration.

2. A Sustainable Location

- 2.1. The level of local services, transport and employment services within the area remain largely the same as when previous assessments were carried out. And the Councils have consistently acknowledged that the site has good accessibility to these. In addition to the existing employment sites, the emerging Local Plan proposes the redevelopment of the 1.7-hectare site at Compass House, Vision Park for additional employment floorspace through draft Policy S/RRA/CH. This additional employment floorspace further highlights the need to accommodate new homes near to established employment sites like Vision Park. To the south of Vision Park there are also proposals for additional commercial uses (workshops, retail, café / restaurant (in Use Classes E(a), E(b), and E(g) (iii)) and community uses at the Histon and Impington Station Area. Once these are delivered, in accordance with draft Policy S/AMC/HIS, they would add further services and facilities within walking and cycling distance of our client's site. Increasing the sustainability of our client's site.
- 2.2. By designating Histon and Impington as a Rural Centre it has been identified as one of the most sustainable rural settlements in the District. Unlike other Rural Centres, Histon and Impington are also on the edge of Cambridge with excellent cycle and public transport connectivity with the City. The allocation of our client's site would therefore support the aims of the established hierarchy of settlements by focusing growth on one of the most sustainable Rural Centres in the district with excellent connectivity. The National Planning Policy Framework (NPPF) and successive Local Plans have recognised the need for new growth to be accommodated near to existing public transport infrastructure. Indeed, other allocations are predicated on the delivery of such infrastructure for them to be acceptable. Therefore, great weight must be attached to this material consideration in considering the benefits of our client's site being allocated for development.
- 2.3. The increasing importance of growth around travel hubs is highlighted by the recent consultation on changes to the NPPF. The approach to maximising opportunities for sustainable development by making the most of high levels of connectivity and improving access to jobs and services is applicable to our client's site. The Cambridgeshire Guided Busway connects Histon and Impington with central Cambridge, the biomedical campus and all three rail stations. Moreover, the shared surface alongside the Busway provides a traffic free route for thousands of users every day. Both these existing pieces of infrastructure are within cycling distance of our client's site and would be attractive to new residents as a viable alternative to the congested roads into Cambridge.
- 2.4. The draft changes to the NPPF would introduce the principle of a "default yes" for development around 'well-connected' train stations outside settlements, including on green belt land. Whilst the Busway is not a railway it was constructed on the route of a former railway and has regular buses into Cambridge and to St Ives and beyond. In terms of the criteria for being 'well-connected', it would meet these as it already provides a high level of connectivity to jobs and services. This approach would also accord with draft Policy GP/HD, which recognises the need to focus development on site well served by existing high quality public transport and specifically identifies the Busway as one of these.

3. Landscape and Green Belt Matters

- 3.1. The Councils' latest assessment of the landscape impact resulted in them maintaining their view that the development of our client's site would likely have a negative impact on wide views and landscape character. Our client believes that the assessments of the landscape impact are flawed and that insufficient weight was attached to the Preliminary Landscape and Visual Appraisal (PLVA) submitted previously. Accordingly, additional evidence is hereby submitted to allow the Councils a further opportunity to consider the landscape impacts of allocating the site alongside the benefits of new homes being delivered on the edge of one of the District's most sustainable rural settlements.
- 3.2. The development of the site would allow space for green and blue open areas and enhanced landscape buffers for the boundaries of the site. The enhancement of the site's boundaries would be achieved by a further reduction in the number of dwellings to be accommodated on the site, which would now be up to 100. Our client believes that this figure strikes the right balance between housing provision and environmental and ecological enhancements that would respect the village edge character of the site.
- 3.3. Our client maintains their view that the previously submitted PLVA provides robust evidence that there should be no 'in principle' landscape and visual constraints that would preclude the development of their site. Our client believes they are in a position to demonstrate that bringing forward sustainable development on the site would allow the key purposes of the green belt, in the context of the wider merged settlements of Histon and Impington and in relation to landscape and visual matters, to be maintained. The development of the site would also offer the opportunity for the site to enhance the green belt through a comprehensive landscape design.
- 3.4. A key part of any assessment of whether the site meets the definition of 'grey belt' would be with regards to the contribution it makes towards the purposes of the green belt. A detailed assessment is likely to conclude that the site does not contribute strongly to any of the purposes of green belt set out in the NPPF and that the site comprises grey belt land.
- 3.5. Subject to further assessment, it is considered that the site could reasonably be removed from the green belt without harm to the integrity of the surrounding landscape or setting of the village. Moreover, the proposed measures to mitigate landscape harm, through the retention and enhancement of landscape features and significant buffers of new planting, would result in an attractive, cohesive settlement edge. A new edge that would help to limit views into the site and mitigate light pollution on the landscape from new and existing properties in this part of the village. In contrast to the existing edge treatment, that is in part defined by the boundary fences of residential properties and their curtilages that encroach in varying degrees into the countryside, the development of the site would result in a more defensible boundary to the green belt. Especially, to the north of the village.
- 3.6. It is evident from the land being promoted to the south of the site (SHLAA – ref: 115155) and previous residential schemes developed off Impington Lane and Mill Lane that the land to the northeast of Histon is a logical area for the village to accommodate further growth. The Appraisal confirms that this is the least sensitive area for development. Especially, when taking into consideration whether it would erode the open land between Histon and the villages of Cottenham, Landbeach and Milton. Without a holistic approach to how this land is developed, there is a risk of further piecemeal development that would result in an

incongruous edge to the village and little ecological or environmental benefits from a more strategic and holistic approach to boundary landscaping.

- 3.7. No further information is submitted in response to the Archaeology Officer Comment that archaeological investigations would be necessary in advance of development. Based on the initial Desk Based Assessment, there is no reason to believe that impacts upon archaeological assets would represent a constraint to the development of the site.

4. Flood Risk

- 4.1. The most recent Flood Risk Officer's comments are noted. The impact of flooding across parts of the site have been a known constraint from the very first iteration of a potential layout for the site. As further evidence has been provided of the extent of different flood zones the masterplan for the site has been evolving. Throughout the design process an integrated approach to water management will be taken with surface water drainage being managed close to its source. The extensive SUDs network will be integrated into the any layout in a way that would create amenity benefits, enhance biodiversity, and contribute to a network of high-quality green and blue open space across the site. Development would be sequentially located within the site to avoid any homes or road infrastructure being located in areas of flood risk. The mitigation modelling previously submitted has demonstrated that the site is deliverable with onsite mitigation of surface water that can be designed to accommodate the impacts of climate change. Any layout would demonstrate how the surface water mitigation would also form part of the significant buffer to the south of the site that would help mitigate the impact upon the green belt.

5. Ecology

- 5.1. The 2023 RAG Assessment of 'green' for Biodiversity and Geodiversity confirms that there are no ecological constraints to the development of the site. Increased areas of green and blue open space from the reduction in numbers would inevitably provide greater opportunities to enhance the biodiversity value of the site. Whilst our client has concerns about the implications of the proposed blanket requirement of 20% BNG across all major developments proposed by draft Policy BG/BG, in the case of their site, it is likely that the Councils' aspiration for 20% BNG could be achieved and even exceeded.
- 5.2. Throughout the Councils' assessment of the site the Policy Officer has confirmed that the site is not part of a protected open space designation and that any impact of the proposed development could be reasonably mitigated or compensated. That remains the case. In allocating the site for development there is the opportunity to secure the beneficial use of grey belt land alongside environmental enhancements that would create more defined, stronger eastern and northern boundaries to the village that would not cause harm to the openness of the adjacent land remaining in the green belt.

6. Access

- 6.1. Notwithstanding the good level of accessibility of the site, the Site Access Officer has maintained their view that the proposed access link to the public highway is unacceptable. The 2021 comments were based on the number of units proposed, with the 2023 comments providing further clarification that the proposed access was not considered

practical to provide suitable connectivity for non-motorised users. To demonstrate that an acceptable access can be delivered, this latest submission includes an updated access plan prepared by i-Transport. This plan shows the interface of the site access with the public highway of Ambrose Way and includes a 2.0m wide footway to the north of the new 5.0m wide vehicular access.

- 6.2. The further reduction in unit numbers, from the original number of circa 200 units, means that the roadways within the site would be lightly trafficked. Given the proximity of the site to the services at the heart of the villages, there is every opportunity for new residents to access these by foot and cycle. With services and facilities in Cambridge accessible by cycle utilising the existing cycle lanes alongside Water Lane and Bridge Road and the shared path alongside the Guided Busway. If necessary, any deficiencies in cycle and pedestrian infrastructure in the surrounding highway network, and in particular the routes linking the site with the Guided Busway and Cambridge, could be secured through a planning application.
- 6.3. All other technical matters related to ground contamination, air quality, noise, etc. are either identified as 'green' or 'amber' in previous assessments. There is no reason to believe any of these matters would represent constraints to the delivery of the site.

7. Summary

- 7.1. The development of our client's site would help support the vitality of Histon and Impington through new homes in a location with access to services and facilities at the heart of the villages. Importantly, they could be delivered early on in the plan period so that less reliance was needed on the early delivery of homes proposed through the increased reliance on strategic scale residential sites. The services and facilities for Histon and Impington are set to increase with the aforementioned employment and commercial allocations in the emerging Local Plan. Further strengthening the argument that Histon and Impington is a sustainable location to focus future housing growth. Especially on site where that growth can be accommodated without significant harm to the character of the villages or the green belt.
- 7.2. In this case, there is a strong argument that the development of our client's site offers an opportunity to deliver a holistic approach to the development of the parcel of land to the east of the village that will inevitably be developed in the future. Land that has seen incremental growth and is likely to see more pressure for development if other sites allocated in the emerging Local Plan are stalled. Through taking a holistic approach to growth in this area, and the development of our client's site in particular, the Councils have the opportunity to create new landscaped boundaries for the village. One that would define a new and defensible green belt boundary by creating a continuous landscaped edge to the village.
- 7.3. An initial assessment of our client's site confirms that it performs poorly when assessed against the purposes of green belt as set out in the NPPF. Since the site was originally promoted in the early stages of the Local Plan process the concept of grey belt has become part of national planning policy and is one of the means by which the government seeks to significantly boost the supply of homes in sustainable locations in accordance with paragraph 61 of the NPPF. The latest reduction in the number of new homes would result in more land for SUDs, environmental and ecological enhancements, public open

space and increased boundary landscaping. All of which would deliver the proposed new homes in an environment that would create more appropriate edges to the village.

- 7.4. The additional information provided in this latest submission warrants further review and assessment of the acceptability of the site and the important role it can play in delivery new homes needed for the Greater Cambridge Area.

8. Deliverability

- 8.1. In terms of delivery, the estimated 48-month completion period, following allocation in an adopted Local Plan and the subsequent receipt of all necessary planning applications and reserved matters, remains realistic.

9. Specific policies

Housing Need: Policy S/JH: New jobs and homes

- 9.1. The 'Greater Cambridge Employment and Housing Needs Updated 2024–2025 (September 2025)' has informed the housing needs for Greater Cambridge for the period 2024–2045. These needs and the assessment, which broadly aligns with the standard methodology, result in a strategy of 2,295 new homes being delivered per annum to achieve a minimum of 48,195 new homes over the plan period. Of these new homes the Councils' adopted Local Plans (2018) are anticipated to deliver around 37,865 homes by 2045. The additional 13,460 new homes are to be delivered through proposed allocations, achieved via strategic sites, and windfalls sites.
- 9.2. The government's growth aspirations for Greater Cambridge are well documented with the Cambridge Growth Company (CGC) being set up to promote and accelerate growth in the area. The CGC is yet to publish any plans for how it will deliver the government's growth aspirations and what levels of growth it is seeking to promote. It is clear that in order to deliver the growth needs for Greater Cambridge a balance is needed to ensure that delivery rates do not stall due to issues related to specific sites being delayed in their planning or build out phases. This has happened with a number of the sites identified in the 2018 Local Plans, which have failed to deliver the new homes anticipated when they were allocated.

Housing Supply: Policy S/DS: Development strategy

- 9.3. Our client supports the principle of focussing development in the most sustainable locations and note that this is identified 'as far as possible' in draft Policy S/DS (Development strategy). The emerging Local Plan needs to allow for greater flexibility for interim growth needs to be located on sites well-located to Rural Centres. Such as at our client's site at Ambrose Way, Histon. Without a balanced approach to meeting future housing needs there is a risk that Greater Cambridge will fail to deliver the homes it needs within the plan period. Homes that are essential to support the economic growth aspirations of Greater Cambridge.
- 9.4. Paragraph 23 of the NPPF requires strategic policies to provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. In accordance with paragraph 77 d) of the NPPF, the Councils must make a

realistic assessment of likely rates of delivery and take into account the lead-in times for large scale sites.

- 9.5. Of the 13,463 homes identified for the period 2024–2045 only 205 of these would be accommodated in the rural area outside the southern cluster. Given the availability of sites such as our client's, which can be delivered without the need for major infrastructure upgrade, more flexibility needs to be provided through further allocations to mitigate delays that are inevitable with strategic sites.
- 9.6. In January 2026 the Office for National Statistics released the quarterly figures for the monthly construction output statistics for Great Britain. Total construction output is estimated to have fallen by 1.1% in the three months to November 2025; this is the largest fall since March 2023 (1.4% fall). This latest report highlights the precarious situation that the construction industry is in with increasing material prices and decreasing numbers of people entering the industry. This adds further weight to the argument that a greater range of development sites are needed to meet future housing needs. Rather than relying on larger sites that may face more challenges in getting the volumes of materials and staff needed to maintain projected build out rates.
- 9.7. Without more flexibility and a greater balance between strategic and medium sized sites, the Councils risk failing to maintain a sufficient supply of new homes in the early years of the Local Plan. That could result in the inability to defend appeals for sites in less desirable and less sustainable locations that our client's site at Ambrose Way.

Policy S/SH: Settlement hierarchy and Policy S/DE: Defined development extents

- 9.8. Focusing development only within the defined development extents of settlements is inconsistent with the proposed changes to the NPPF. The changes proposes a more flexible approach to the location of development with weight given to sites that are well-related to existing settlements. If the Councils were to adopt a more flexible approach to the development of sites well-related to defined development extents, it would result in greater opportunities for the new homes identified to come through on windfall sites to be delivered.
- 9.9. Defined development extents do not necessarily guard against incremental growth in unsustainable locations. Indeed, new homes in demonstrably sustainable locations can be restricted from coming forward due to locations being just outside defined development extents of highly sustainable settlements. Such as on the edges of Rural Centres. Where any harm to the countryside can be mitigated through landscaping and design, such sites should not be restricted in coming forward if they can demonstrate sustainable development. The Councils' approach is not consistent with the proposed changes to the NPPF, which takes a more pragmatic approach to allowing appropriate development where it is well located to existing settlements. This is clearly the direction of travel that the government is taking to significantly boost the supply of new homes in accordance with paragraph 61 of the NPPF.

Recommended change: part 5 of Policy S/SH needs to be amended to read *“Residential development and redevelopment without any limit on individual scheme size will be permitted within the defined development extents of Rural centres, and on land well-related to the defined development extents of Rural centres, as defined on the Policies*

Map, provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development.”

Recommended change: part 1 of Policy S/DE needs to be amended to read *“Development and redevelopment of unallocated land and buildings within defined development extents, and on land well-related to the defined development extents, (as shown on the Policies Map) will be permitted provided that:”*

Policy S/GB: The Cambridge Green Belt

- 9.10. The government’s initial reforms of the NPPF in December 2024 included a modernisation of the way the green belt works. This included the consideration of development being permitted on low-quality green belt land that is identified as ‘grey belt’. An initial appraisal confirms that our client’s site is likely to be seen as grey belt as it performs poorly against the purposes of green belt in the NPPF.
- 9.11. Given the importance of grey belt land in the government achieving its aim of significantly boosting the supply of new homes, greater flexibility is needed for more sites to come forward on land well-related to the development frameworks. Of all the Rural Centres, Histon and Impington is one of the most sustainable with excellent public transport and cycle connectivity with Cambridge.
- 9.12. In previous representations we have highlighted the need for the Councils to undertake a thorough green belt review as part of the Local Plan process. With the 2024 changes to the NPPF this review is even more essential to ensure that the development strategy for Greater Cambridge is based on a sound assessment of the strategy allocating more sites nearer to Cambridge. It is inconceivable that the development strategy for an area so tightly constrained by green belt is not supported by an up to date review of the green belt, and the contributions that land parcels within it make to its purposes.
- 9.13. Whilst Policy S/GB follows the themes of the NPPF there is one clear area of divergence. That is in criterion c), which seeks to *“prevent communities in the environs of Cambridge from merging into one another and with the city”*. Criterion b) of paragraph 143 of the NPPF relates to preventing neighbouring ‘towns’ merging into one another. As the environs surrounding Cambridge are villages, draft Policy S/GB needs to be consistent with the NPPF.

Recommended change: criterion c), of Policy S/GB needs to be amended to read *“prevent communities in the environs of Cambridge from merging into one another and with the city.”*

Further recommendation: That a comprehensive review of the green belt be carried out to identify further sites for development in sustainable locations that can be delivered without harm to the purposes of land being designated as green belt.

Policy BG/BG: Biodiversity and geodiversity

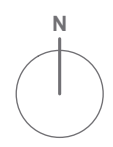
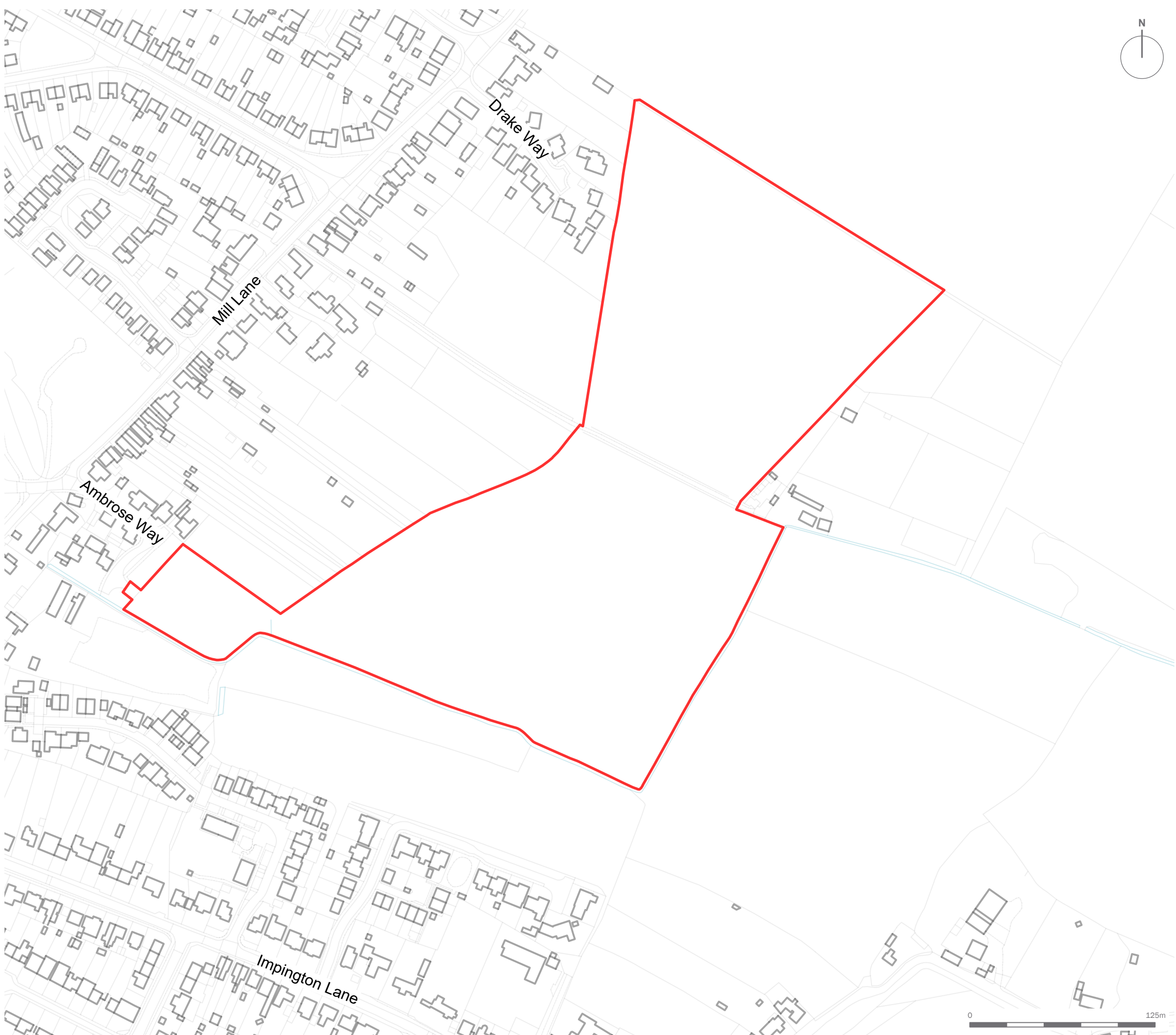
- 9.14. Draft NPPF Policy N2 highlights the growing recognition of the burden that delivering biodiversity net gain (BNG) can have on developments with the following text:

“Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and

is fully justified and deliverable. Any such requirements should not extend to categories of development which are exempt from statutory biodiversity net gain.”

- 9.15. Draft Policy BG/BG is unclear as to whether, if it is proven not to be feasible and effective to provide 20% BNG on major development sites, the purchase of biodiversity credits should also be for 20% BNG. If it is not feasible and effective to provide 20% BNG onsite, then the financial implications of biodiversity credits to deliver 20% offsite could affect the viability of major developments.
- 9.16. Delivering 20% BNG onsite would inevitably require more land, reducing the developable area of major sites and reducing their gross development value. Similarly, a higher degree of offsite mitigation would be required in order to deliver a 20% net gain, which would mean a higher cost to the developer.
- 9.17. The supporting text of draft Policy BG/BG recognises that requiring smaller sites to deliver 20% BNG would be unreasonable and may impact on viability. Some major developments would also experience the same impacts upon viability. Whilst it may be feasible to deliver 20% BNG on sites, there needs to be a clear definition of how the efficacy of its delivery would be measured, draft Policy BG/BG risks creating uncertainty about how major developments could comply with it. Any policy that adds uncertainty to the determination of planning applications risk delays and unnecessary costs for developers and Councils. And is therefore not fully justified and deliverable.

Recommended change: deletion of part 2. ~~“Major development in Greater Cambridge must provide a minimum 20% biodiversity net gain (BNG), (unless exempt under the Environment Act 2021), to be provided on-site where this is feasible and effective.”~~



Site Boundary (8.55 ha)

DRAFT

client
Martin Grant Homes

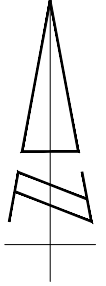
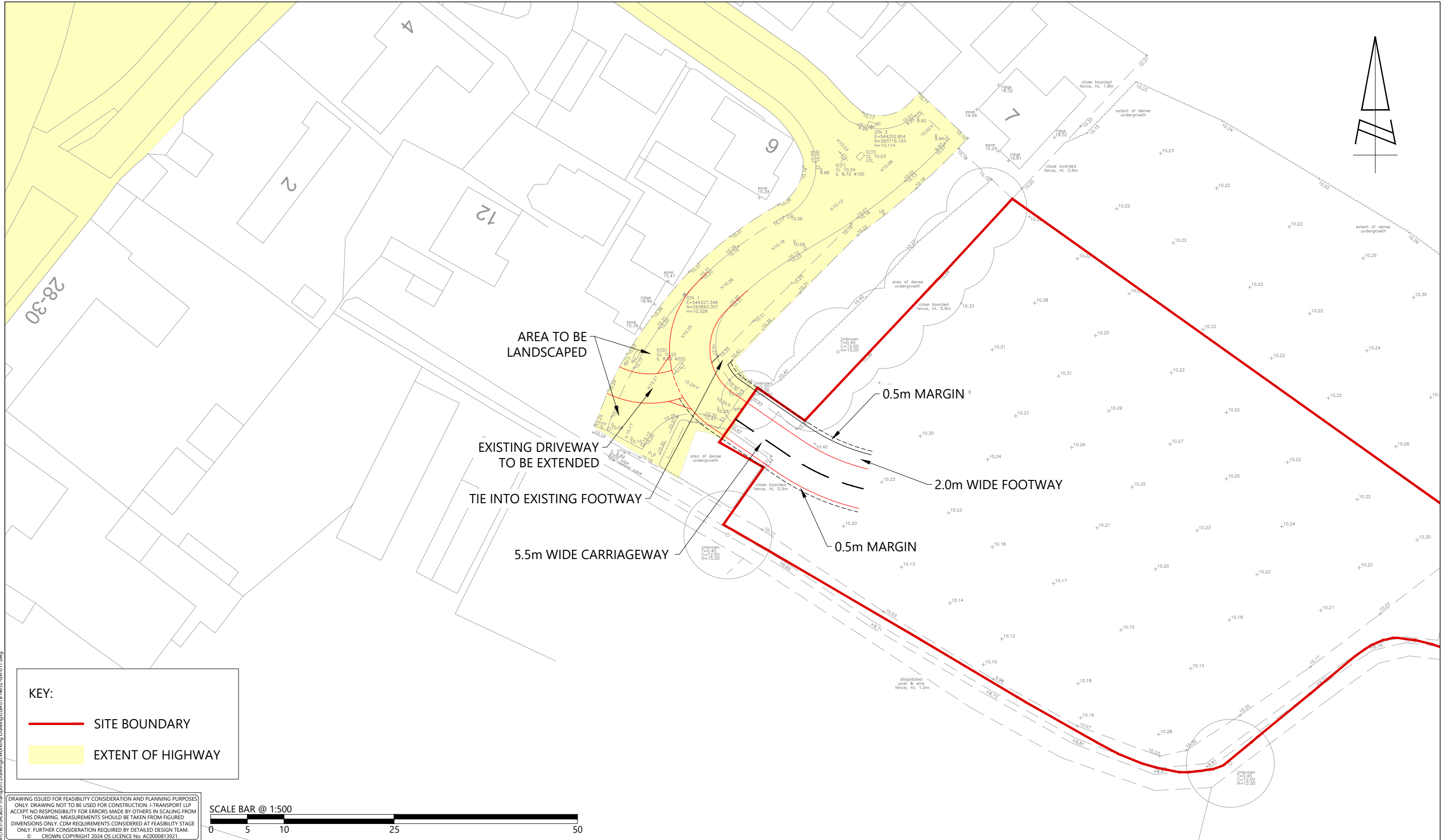
project title
Ambrose Way, Impington

drawing title
Red Line Boundary Plan



date	27 OCTOBER 2025	drawn by	MLS
drawing number	edp5518_d027	checked	PWI
scale	1:2,500 @ A3		QA



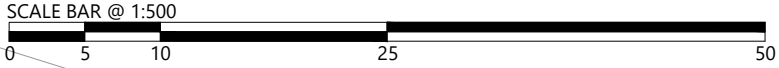
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KEY:

	SITE BOUNDARY
	EXTENT OF HIGHWAY

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REV	DATE	BY	DESCRIPTION	CHK	APD
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TITLE: POTENTIAL SITE ACCESS ARRANGEMENT	
PROJECT: AMBROSE WAY, HISTON	CLIENT: MARTIN GRANT HOMES

DRAWN: JD	CHECKED: IN	APPROVED: PH
PROJECT No: ITB14652	SCALE @ A3: 1:500	DATE: 08.01.26
DRAWING No: ITB14652-GA-011		REV: -

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Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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