

British Land response to S/GB

Site ID 115169 / HELAA Site ID: 40048

Whilst it is understood LUC are in the process of preparing a revised Green Belt Assessment to support the emerging plan, given the existing Green Belt Assessment (LUC) was prepared in 2021 it is now considered to be out of date and not represent the current position in terms of policy (noting the introduction of grey belt in the NPPF, 2024) or in terms of growth targets which underpin the Local Plan.

It is noted that the revised Green Belt Assessment has not been published for consultation in support of the Regulation 18 Consultation and as such the GCSP's approach to allocating and discounting sites for release within the Green Belt is unclear.

The NPPF (2024) is clear that in exceptional circumstances (including where an authority cannot meet its identified needs for homes, commercial or other development) Green Belt boundaries should be reviewed and fully evidenced and justified through the preparation or updating of plans (Paragraph 145).

It is acknowledged within the *Development Strategy Topic Paper (2025)* that exceptional circumstances do exist to justify the release of proposed allocation S/CBC at Cambridge Biomedical Campus though it is identified that no further sites within the Green Belt have been identified where exceptional circumstances exist.

However, as outlined in Volterra's *Employment and Housing Needs Case (2026)* prepared for British Land and submitted with their Regulation 18 response and Sites Update, it notes the objectively identified needs in terms of housing and employment is likely considered to be underplayed and it is argued a higher level of growth should be planned for. As such it is considered in line with paragraph 145 of the NPPF, the Councils should revisit and reconsider that exceptional circumstances do exist to justify the need to release additional land from the Green Belt to meet these needs in full.

NPPF Paragraph 148 requires that once Green Belt release has been deemed necessary the following hierarchy should be adopted when releasing land:

- Previously Developed Land.
- Grey Belt which is not PDL.
- Other Green Belt locations.

In the absence of a revised Green Belt Assessment within the Councils' evidence base, it is unclear if the Councils have fairly adopted the above sequential approach to allocating sites.

Whilst it is noted LUC have prepared the *Greater Cambridge Green Belt Assessment – Response to comments on First Proposals Consultation and Site Submissions Update 2025, (2025)* it is disappointing that the Report does not account for the additional information submitted pursuant to site ref. 40283 (Land south of High Street, Hauxton). British Land request this report be reviewed to

incorporate evidence submitted pursuant to site 40283 in both the Sites Submission Update Consultation (2025) and the Regulation 18 Consultation.

The identification and recommendation set out in these representations that the Councils should plan for a greater level of growth in turn indicates that the Councils have potentially failed to comply within national policy and guidance with regards to justifying the release of Green Belt land and have not completed the duty to complete an assessment to identify grey belt land. However, it is understood a Green Belt Assessment (which will identify grey belt) is currently being undertaken, though at present it is considered the plan does not accord with national policy as required by paragraph 36(d) of the NPPF. We welcome the opportunity to provide further comment on this assessment at Regulation 19 stage.