



Representations to the Greater Cambridge Local Plan Regulation 18 Draft

Land at South Trumpington
Site ID: 115169
HELAA Site ID: 40048

January 2026

Prepared for:
British Land PLC

Prepared by:
Stantec UK Limited

Project Number:
333100720

Registered Office: Stantec House, Kelburn Court,
Birchwood, Warrington, WA3 6UT

Office Address: 50/60 Station Road, Cambridge CB1 2JH
T: 01223 882 000 E: cambridge.uk@stantec.com

Revision Schedule


Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
01	Draft	SG	01.26	RM	01.26	RM	01.26
02	Draft	SG	01.26	RM	01.26	RM	01.26
F	Final	SG	01.26	RM	01.26	RM	01.26

Disclaimer

The conclusions in the Report titled **Representations to the Greater Cambridge Local Plan Regulation 18 Draft** are Stantec’s professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient’s own risk.

Stantec has assumed all information received from **British Land PLC** (the “Client”) and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Stantec’s contract with the Client. While the Report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

Prepared by: 


 Signature
 SG

 Printed Name

Reviewed by: 

 Signature
 RM

 Printed Name

Approved by: 

 Signature
 RM

 Printed Name



Contents

1 Introduction 1

 1.1 Preamble 1

 1.2 The Representor 1

2 Policy S/JH: New Jobs and Homes 2

 2.1 Policy S/JH Response 2

3 Policy S/DS: Development Strategy 7

 3.1 Introduction 7

 3.2 Policy S/DS Response 7

 3.3 North East Cambridge (NEC) 8

 3.4 Cambridge East 8

 3.5 Alternative Edge of Cambridge Sites 8

 3.6 Draft NPPF Considerations 9

 3.7 Overarching Comments on the Development Strategy and Approach to Allocating Sites 10

4 Policy BG/BG: Biodiversity and Geodiversity 12

 4.1 Policy BG/BG Response 12

5 Policy BG/TC: Improving tree canopy cover and tree population 13

 5.1 Policy BG/TC Response 13

6 Policy BG/EO: Providing and enhancing open spaces 14

 6.1 Policy BG/EO Response 14

7 Policy CP/ST: Skyline and tall buildings 15

 7.1 Policy CP/ST Response 15

8 Evidence Base 16

 8.1 Introduction 16

 8.2 Employment and Housing Needs Evidence Update 16

 8.3 Green Belt and grey belt Assessment 17

 8.4 Cambridge Biomedical Campus (CBC) 18

9 Draft Local Plan Response Summary 20

10 HELAA Appraisal of Land at South Trumpington 22

 10.1 HELAA Assessment 2021 22

 10.2 HELAA Assessment 2025 22

 10.3 Suitability 22

 10.4 Availability 26

 10.5 Achievability 27

 10.6 Summary 27



Figures

No table of figures entries found.

Tables

Table 3.1: Affordable Housing Delivery 5



1 Introduction

1.1 Preamble

1.1 This report ('the Representations') has been prepared by Stantec (Planning Consultant) on behalf of British Land PLC ('the Representer') and sets out the Representer's responses to the draft Greater Cambridge Local Plan (GCLP) which is currently out for consultation until 30 January 2026 17:00. These Representations follow the Sites Submission Update in March 2025.

1.2 The Representer

- 1.2.1 British Land owns and operates several sites in Cambridge and South Cambridgeshire, namely Land at South Trumpington, Cambridge Retail Park, and Peterhouse Technology Park. In respect of Land at South Trumpington, British Land are committed to promoting the Site through the emerging Greater Cambridge Local Plan. British Land have a strong reputation of delivering state-of-the-art developments, in the best strategic locations, built and managed to British Land's industry-leading standards. They do this by bringing together their unique expertise in the delivery of complex developments, as well as their award-winning sustainability practices.
- 1.2.2 British Land are the sole owner of Land at South Trumpington, Cambridge (the Site) and are committed to promoting the Site through the emerging Greater Cambridge Local Plan. The Site ID is 115169 and HELAA Site ID is 40048.
- 1.2.3 British Land's "Regulation 18 Consultation" submission, which this document forms part of, demonstrates that the Site is suitable, achievable and deliverable for allocation and, ultimately, development (subject to future planning permission(s)). The supporting evidence concludes that the Site should be designated as grey belt and as such, should be prioritised for release from the Green Belt for development in order for Greater Cambridge to meet its unmet housing and employment needs. Land at South Trumpington is a sustainable, achievable and deliverable site that can make a powerful contribution to Greater Cambridge's needs in the short-term, with strong alignment with emerging local and national visions.
- 1.2.4 The Representations consider whether the Plan is sound and assess the Plan specifically against Paragraph 36 of the NPPF (2024) which identifies that Plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'*
- 1.2.5 These Representations also offer general comment on the GCLP and supporting evidence base, largely in relation to Land at South Trumpington. The remainder of this report sets out the comments to the relevant draft policies but does not repeat the policies in full. These comments have also been submitted online via the Council's consultation portal.



2 Policy S/JH: New Jobs and Homes

2.1 Policy S/JH Response

- 2.1.1 British Land note the objectively assessed identified need within Greater Cambridge over the period 2024-2045 for the creation of 73,300 additional jobs across a diverse range of sectors and a minimum of 48,195 new homes to meet the needs of the total population. The approach to deliver specialist accommodation to meet the specific needs of older people and those with disabilities over the plan period is supported.
- 2.1.2 Notwithstanding this, British Land suggest that future planned growth in Greater Cambridge, facilitated by the emerging Local Plan, ought to be more aspirational and aligned with regional and national growth ambitions.

2.2 Jobs

- 2.2.1 The Government's commitment to growth in Cambridge has been mandated through a combination of investment in the Cambridge Growth Company (and suggested proposed Development Corporation) and the 'Oxford-Cambridge Growth Corridor' ('the Growth Corridor'). It was noted on 23 October 2025 the ambition is for collaboration across the public and private sectors to transform the Arc in 'Europe's Silicon Valley'.¹
- 2.2.2 On 23 October 2025 the Government announced the intention to consult on the formation of a centrally led Development Corporation which would be supported by £400 million of government funding to kickstart development, a pledge to increase supply of affordable housing, investment in infrastructure and business expansion with £15 million for the University of Cambridge. It is also understood the Cambridge Growth Company (CGC) are currently preparing their own evidence base to inform growth within Greater Cambridge. Whilst the details of the evidence base are unknown at present it is anticipated the CGC evidence base will seek to realise national ambitions for growth within Greater Cambridge and in turn may plan for a significantly higher level of growth than the GCLP.
- 2.2.3 As detailed within the Employment and Housing Needs Case, prepared by Volterra and submitted in support of British Land's Regulation 18 Consultation Submission, the Employment and Housing Evidence Update (Iceni 2025) will now likely need to evolve to align with the Government's broader growth agenda while ensuring the vision can be achieved sustainably, considering infrastructure capacity and deliverability.
- 2.2.4 The Iceni report provides an analysis of Greater Cambridge's commercial space requirements based on job forecasts, historical completions, and market signals. It is estimated that there is a need for 1.22 million square metres of commercial floorspace between 2024 and 2045, with R&D space accounting for almost half of this need. Iceni's approach to calculating these requirements combines three evidence sources: employment growth forecasts, recent development trends (completions), and market signals such as vacancy rates and take-up.
- 2.2.5 The final figures blend these inputs, applying buffers for market flexibility (10%) and vacancy (7.5%). For office space, Iceni adopt the central employment scenario directly. For R&D, they set a target slightly above the employment-based projections but below recent gross completions. For industrial space, they rely primarily on the 10-year market absorption rate rather than employment forecasts, recognising the limitations of modelling this sector through labour demand alone.

¹ "Jobs, homes and better transport links for the Oxford Cambridge Growth Corridor". *HM Treasury and The Rt Hon Rachel Reeves MP*. Published 23 October 2025, accessed 15 December 2025. Available at: <https://www.gov.uk/government/news/jobs-homes-and-better-transport-links-for-the-oxford-cambridge-growth-corridor>



- 2.2.6 While this approach provides a structured framework, several aspects warrant scrutiny. The choice of employment scenario, the treatment of historical suppressed demand, the absence of a replacement factor for ageing stock, and the reliance on pipeline supply that may not materialise all affect the reliability of the final figures.
- 2.2.7 This required need reflects a central scenario of 73,200 jobs planned for over the period of 2024-2045. IcenI themselves, and other bodies, identify higher employment growth potential reflecting more ambitious growth, which would see a much greater spatial requirement. The most ambitious scenario published to date sees job projections of over twice (229,000) as high as IcenI's central scenario (this is done over the period of 2023-2050 to allow for comparison).
- 2.2.8 The IcenI central scenario estimates further do not fully account for suppressed demand, where a persistent lack of available supply has constrained potential growth over the past decade. The following chart illustrates that R&D vacancy rates in Greater Cambridge have consistently remained below the equilibrium or frictional vacancy level necessary for a healthy market, highlighting this unmet demand.
- 2.2.9 Additionally, the estimates focus on net additional floorspace but overlook the need for gross completions to replace ageing or converted stock. Between 2011/12 and 2023/24, data from the IcenI report shows gross completions for R&D space exceeded net completions by 15%, indicating that a dynamic market requires a higher level of gross supply to meet net demand.
- 2.2.10 While the IcenI report provides a valuable foundation, we believe it underestimates the scale of future demand and overestimates the certainty of delivery. Suppressed demand, the need to replace ageing stock, and challenges in delivery all suggest that Greater Cambridge faces a greater shortfall in employment floorspace than currently anticipated, particularly for sites required to retain and enhance Cambridge's global competitiveness in this area. Deliverable sites like this one at South Trumpington will therefore be vital for supplying the flexible, high-quality spaces needed to support the region's strategic growth sectors – particularly as local policy evolves to reflect the Government's intensified focus on Cambridge's role as a driver of national economic growth.
- 2.2.11 Although the pipeline quantum looks substantial on paper for offices and labs, planning permission is not the same as delivery. The pipeline identified is reliant on a small number of very large schemes: the ten largest commitments account for over half of all outstanding floorspace, and the top twenty account for around three quarters. If even a handful of these stall or are scaled down, the headline supply picture changes materially. Many of these are large, complex projects where phasing, viability and delivery risk are heightened.
- 2.2.12 The Council's Office and Laboratory Employment Trajectory (2024) underscores these delivery risks. It shows that a significant share of commitments are at outline stage or have flexible use class permissions, meaning the eventual mix of office versus lab space can shift prior to delivery. As the Council's own evidence notes, proposed developments can change through reserved matters and in response to market conditions, especially where applications are outline or for mixed E(g) components — introducing uncertainty over the type and timing of space that ultimately comes forward.
- 2.2.13 High construction costs, infrastructure requirements, and broader economic conditions could further affect whether developers build out all the space they have permission for, and when. A nominal surplus of permitted floorspace does not guarantee that occupiers will have suitable, available space when needed if developers phase construction, defer starts, or shelve projects. Indeed, some local planning reports commissioned by the Councils specifically highlight the importance of monitoring anticipated availability and delivery phasing as part of updating the trajectory and Local Plan evidence base.
- 2.2.14 The 2025 EHEU's acknowledgement that additional space will likely still be required in the 2030s despite the current pipeline further underlines that the pipeline must not only exist on paper but be deliverable in a timely manner to truly meet demand.



- 2.2.15 A wide number of sectors support the function of the Greater Cambridge economic ecosystem. One key component being mid-tech which supports R&D by bridging the gap between research and production, providing facilities for prototyping, testing, storing and scaling innovations, and enabling the translation of discoveries into commercial products.
- 2.2.16 Icení's latest work has identified a critical shortfall of industrial space in the pipeline, with only 28,595 sqm of net supply identified to meet a need of 317,000 from 2024-45. Future development at South Trumpington has potential to provide mid-tech space to allow companies spun out of Cambridge's research centres to build things in Cambridge (rather than relocating production elsewhere). Mid-tech space also creates more diverse job opportunities (mid-skilled technicians etc), aligning with inclusive growth goals.
- 2.2.17 In the context of this broader growth agenda, Icení's analysis provides a useful foundation for understanding employment and housing need in Greater Cambridge. However, it predates the forthcoming work being led by the Cambridge Growth Company, which is explicitly focused on enabling a more ambitious scale of growth. The Growth Company is developing a new evidence base, with the intention of going beyond the current local plan approach in both scale and ambition.
- 2.2.18 Given Cambridge's position at the forefront of the UK's innovation economy, the next stage of evidence will need to test whether Icení's identified level of need is sufficient to support that ambition. This next phase of plan-making will be critical in assessing whether planning policy and land allocations can genuinely deliver against the Government's objectives, maintaining Greater Cambridge's global competitiveness and fully capturing emerging opportunities in life sciences, AI and other innovation-led sectors.

2.3 Homes and Affordable Housing

- 2.3.1 British Land suggest that in terms of identifying need for jobs and housing GCSP and the GCLP ought to plan for a higher growth scenario as outlined within Employment and Housing Needs Case (Volterra 2026). In turn it is proposed that the requirement to plan for higher growth will create the derived demand for additional allocations for jobs and homes, including affordable homes, within Greater Cambridge. Considering this, it is proposed that Land at South Trumpington can contribute to meeting the needs of Greater Cambridge over the plan period.
- 2.3.2 Policy S/JH sets out the requirements within the proposed 21-year plan period of 2024-2045. Regarding housing need, it sets out the need for a 'minimum of 48,195 new homes' within this plan period. Paragraph 62 of the National Planning Policy Framework (NPPF) seeks strategic policies to be informed by a local housing assessment conducted using the standard method in national planning practice guidance.
- 2.3.3 The latest Standard Method figures following the update in June 2025 seeks an annual requirement of 1,103 dwellings per annum within Cambridge City and 1,193 dwellings per annum within South Cambridgeshire District. Combined, this results in 2,296 dwellings per annum for the Greater Cambridge authority. Based on a 21-year plan period, the minimum housing need total should therefore be a minimum of 48,216 dwellings. The Local Plan should therefore be updated to reflect this figure.
- 2.3.4 The acknowledgement that the housing need figure is a minimum figure is supported. The Greater Cambridge authority should seek opportunities to support further development within sustainable locations.
- 2.3.5 There are concerns regarding the Local Plan's ability to deliver appropriate levels of affordable housing within the plan period. Table 7.16 of the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire August 2025 sets out the net need for affordable housing as per the figures below:
- Cambridge City – 928 affordable dwellings per annum.



- South Cambridgeshire District – 708 affordable dwellings per annum.

2.3.6 This creates a total need of 1,636 affordable dwellings per annum. This represents 71% of the total housing need of 2,296 dwellings per annum. Recent levels of affordable housing delivery are set out in the table below:

Year	South Cambridgeshire District Affordable Housing Delivery	Cambridge City Affordable Housing Delivery	Total Affordable Housing Delivery
2023/24	503	20	523
2022/23	468	316	784
2021/22	357	147	504
2020/21	303	65	368
2019/20	344	199	543
2018/19	341	345	686
Total	2,316	1,092	3,408

Table 3.1: Affordable Housing Delivery

- 2.3.7 Current affordable housing delivery rates for the Greater Cambridge authority as a whole therefore have an average delivery rate of 568 affordable dwellings per annum over the period 2018/19-2023/24, which represents the most up to date information published by the Councils. These delivery rates are significantly below the identified affordable housing need required for the proposed plan period.
- 2.3.8 The spatial strategy within the emerging Local Plan is based on delivery of large-scale new settlements/ urban extension sites. If any of these are subject to a delay, then affordable housing delivery will suffer. For example, Bourn Airfield has yet to delivery any affordable housing. Affordable housing therefore provides strong justification for utilising a higher housing need number, thus stimulating more affordable housing delivery. This is supported by Paragraph 024 (Ref:ID:2a-024-20190220) of the ‘Housing and Economic Needs Assessment’ section of the Planning Practice Guidance, which states the following:
- “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*
- 2.3.9 Within Appendix A of the Greater Cambridge Authority Monitoring report 2023 to 2024, it is noted that between 2011 and 2024, affordable housing constituted 34% of all housing completions within Cambridge City. If such levels were to continue in the upcoming proposed plan period, then Cambridge City could be expected to deliver 375 affordable dwellings per annum (34% of the standard method figure of 1,103 dwellings per annum). For South Cambridgeshire District, it confirms that or schemes eligible to provide affordable housing, 36% were affordable. Whilst this does not provide a true representation given the number of small-scale schemes that are not eligible, it would lead to an optimistic figure of 429 affordable dwellings per annum (36% of the standard method figure of 1,193 dwellings per annum).
- 2.3.10 Therefore, at current rates, only 804 affordable dwellings per annum would be delivered, a figure which in itself is a big increase on current delivery rates. The figure is significantly below the identified need within the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire August 2025 report.
- 2.3.11 It is considered there is clear justification to increase housing need in order to meet more of the identified affordable housing need across Greater Cambridge. Failure to increase overall housing numbers would result in increasing affordable housing demands within the authority area.



2.4 Summary

- 2.4.1 A shortage of housing and employment space in this part of Greater Cambridge means we are missing key opportunities to cluster development at the most accessible locations, particularly those that can enhance and support existing key sectors, including a thriving technology ecosystem (AI, data science, software development), robotics, healthcare, and biomedicine near the CBC and other major employers. Delivering the right employment space and homes in the right location is critical. The government emphasises the importance of contiguous urban extensions to maximise the benefits of agglomeration, making growth in this location essential to support strategic clustering and meet future needs.
- 2.4.2 The site at South Trumpington can support this: it is a strategically accessible site, with no barriers to delivery, and is uniquely positioned to help Cambridge cement and strengthen its role as a European centre for technology development, innovation and life sciences, whilst offering the potential to deliver much needed homes close to high density employment clusters such as CBC, minimising need to travel.
- 2.4.3 A consideration of the above and acknowledgement of mandated national growth ambitions would ensure the emerging Local Plan is consistent with national policy as required by paragraph 36(d) of the NPPF.



3 Policy S/DS: Development Strategy

3.1 Introduction

3.1.1 Overall British Land welcome an approach to direct development to where active and public transport is a 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. Furthermore, British Land welcome the Seven Strategic priorities for the plan which are as follows:

- Climate change.
- Biodiversity and green spaces.
- Wellbeing and social inclusion.
- Great places.
- Jobs.
- Homes.
- Connectivity and infrastructure.

3.1.2 However, British Land have concerns over the process that the Councils have taken to arrange at the overall Development Strategy and with the approach towards the allocation of sites at sustainable locations at the edge of Cambridge. Policies S/JH and S/DS together effectively represent the Development Strategy for the draft Plan.

3.2 Policy S/DS Response

3.2.1 British Land broadly supports the overarching principle of Policy S/DS which sets out that the need for jobs and homes will be met as far as possible under the following order of preference (having regard to the purposes of the Green Belt):

- a) Within the Cambridge Urban Area.
- b) On the 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.

3.2.2 British Land welcomes the confirmation of Green Belt release to meet the needs of strategic sites, such as the Cambridge Biomedical Campus.

3.2.3 British Land understands that an updated Green Belt assessment will be published following the Regulation 18 Local Plan consultation. However, the apparent early determination, in advance of the published review that there are no strategic exceptional circumstances to justify release of Green Belt land, and by extension grey belt release for strategic planning purposes, remains a concern.

3.2.4 We strongly encourage the Councils to approach the assessment with an open mind, to reassess existing assumptions in light of the newly defined concept of the 'grey belt' in the



revised NPPF (2024), and to explore the potential of such sites positively and strategically. Careful consideration of opportunities in grey belt areas has the potential to enable denser and more sustainable development, supporting wider social and environmental objectives of the draft Plan, such as climate resilience, high-quality placemaking, biodiversity gains, and reduced need for commuting, while also creating opportunities for sustainable infrastructure provision, including renewable energy. This approach could strengthen deliverability of the Local Plan by reducing dependence on future transport infrastructure delivery. Given the exceptional and unprecedented nature of Greater Cambridge's growth in recent years and expected continued trajectory, this will be an important consideration going forward.

- 3.2.5 The continued support for existing allocations, urban expansion and new settlements with extant planning permissions are acknowledged. The proposed new allocations of North East Cambridge, Cambridge East, Grange Farm and Cambourne North are also acknowledged. However, there are significant concerns and risks associated the delivery of some of these sites, especially in the short-term.

3.3 North East Cambridge (NEC)

- 3.3.1 It is noted that due to the withdrawal of government funding for the relation of the Waste Water Treatment Works (WwTW) in August 2025 the GCLP does not include the dwellings proposed at NEC within the overall figure of deliverable dwellings in the plan period. Notwithstanding Greater Cambridge are proceeding with allocating NEC, including the WwTW site for development should the site become available. Should the WwTW site become available for development the GCLP accounts for 3,950 dwellings coming forward within the plan period (2024 – 2045) allowing for a 14.7% headroom provided to total supply should the site come forward for development.
- 3.3.2 This approach potentially misrepresents the quantum of deliverable development proposed to be accommodated on the edge of Cambridge. It is recommended that whilst the majority of the NEC should remain allocated, the Councils must acknowledge that, at present, there is no evidence to indicate that the WwTW site (where the majority of the 3,950 homes within the NEC are proposed) is available or deliverable. As such, alternative sites that can absorb development proposed at NEC should be considered in the event the WwTW site is determined to be unavailable or unsuitable for development within the plan period.

3.4 Cambridge East

- 3.4.1 Cambridge East is proposed for allocation for a mixed-use settlement comprising of an additional 3,950 homes on the airfield site. For Cambridge East to come forward Marshall's (occupants and owners of Cambridge City Airport) must relocate from the airport to alternative premises.
- 3.4.2 In September 2025 the planned relocation of Marshall's to Cranfield Airport was cancelled and as such whilst it is noted Marshall's remain committed to relocation by 2030 there remains uncertainty around the timing of their move and hence when Cambridge East will become available for redevelopment. The long-term availability and deliverability of Cambridge East is not questioned however the GCLP accounts at present for 3,950 homes being delivered at the site within the plan period. Whilst these homes may ultimately be delivered at Cambridge East, it is proposed that GCSP should consider alternative sites on the edge of Cambridge that are suitable, available and deliverable should delivery at other edge of Cambridge sites be delayed further which may challenge delivery over the plan period.

3.5 Alternative Edge of Cambridge Sites

- 3.5.1 Considering the context of the above, it is considered that alternative sites on the edge of Cambridge, within the Green Belt/ grey belt, which the Councils identify as sustainable locations for homes and jobs in the topic papers that underpin the draft Local Plan, should be explored in accordance with the hierarchy set out in draft policy S/DS. A consideration and inclusion of alternative sites on the edge of Cambridge would ensure the plan is positively



prepared, justified and effective in accordance with paragraph 36(a, b and c) in accordance with the NPPF and would support early delivery in the Local Plan.

- 3.5.2 It is noted the draft Plan relies heavily on the delivery of large-scale new settlements to come forward in order to meet the identified housing need and there is a distinct absence of smaller sites that are still capable of making significant contributions housing numbers. Notably these settlements include:
- Grange Farm – 6,000 homes.
 - Northstowe – 6,229 homes.
 - Cambourne North – 2,550 homes.
 - Bourn Airfield – 3,500 homes.
 - Waterbeach New Town – 5,727 homes.
- 3.5.3 Grange Farm, for example, does not presently benefit from any infrastructure to serve the site and will rely on the development and unplanned expansion of Cambridge South East Transport (CSET) as outlined within the *Development Strategy Topic Paper (2025)* in order to be well connected to the Southern Cluster and Cambridge.
- 3.5.4 The Public Inquiry for CSET was due to commence in December 2026; however, this has been delayed to March 2026 due to the discovery of a gas pipeline. Subject to CSET being granted permission there will then be significant lead in times to deliver infrastructure (including the proposed travel hub at Fourwentways Services). Furthermore, the current CSET plans due to proceed to inquiry do not at present account for a connection to Grange Farm.
- 3.5.5 Edge of Cambridge sites such as South Trumpington, already benefit from existing infrastructure or capacity to connect to neighbouring infrastructure often enabling for quicker delivery than new settlement sites which are reliant on the delivery of new infrastructure.
- 3.5.6 Such delays to the delivery of homes at large settlements is evidenced elsewhere in the authority such as at Northstowe and Waterbeach which is noted within the emerging Evidence Base. Notably the HDHS Addendum states that the focus on new settlements (Cambourne North, Northstowe, Waterbeach, Grange Farm etc) may present challenges in later years and beyond the plan period – especially in the context of the continued growth of Cambridge.
- 3.5.7 Further, government concern on the delivery rates of large settlements, specifically Northstowe is well documented. Matthew Penncook on the 18 October 2024 noted in Parliament that as a result of issues relating to the planning process and delivery partners, delivery at Northstowe has been slower than anticipated leading to the introduction of the New Homes Accelerator programme to unlock delivery at large, stalled sites.
- 3.5.8 Within this context British Land comment that an over reliance on such new settlements poses a risk to the delivery of housing in Greater Cambridge. In response it is suggested that additional smaller sites on the edge of Cambridge in sustainable locations should be considered by Greater Cambridge to support the delivery of housing in the authority and ensure anticipated delivery are maintained throughout the plan period.

3.6 Draft NPPF Considerations

- 3.6.1 The consultation draft NPPF (2025) signals a significant recalibration of how development opportunities in and around the Green Belt—particularly those close to well-connected railway stations—should be assessed. This shift has important implications for both plan-making and decision-taking, even where a Local Plan is formally prepared under the NPPF 2024 framework, which is the case for the GCLP.



- 3.6.2 At the heart of the emerging approach in the Framework is a clear distinction between locations that warrant protection and those where development should be positively enabled. Draft Policy S5 establishes that mixed-use development in areas outside settlements may be supported where sites are physically well related and located within a walkable catchment of a highly connected railway station, defined as services operating at least four trains per hour across the day. This is the case for land at South Trumpington given its relationship to Cambridge South railway station. In parallel, the draft NPPF clarifies through Policy GB7 that such development should not automatically be treated as inappropriate within the Green Belt, provided relevant safeguards, such as the Golden Rules in the case of major development, are met. At present there are no reasons to consider that the Golden Rules – and other policies in the draft NPPF – could not be met by development at South Trumpington, were a planning application to come forward.
- 3.6.3 The implication of these decision-making policies is reinforced by the plan-making provisions of Draft Policy GB3, which indicate that Green Belt boundaries should be reviewed and adjusted through Local Plan preparation where this would facilitate development in sustainable, transit-accessible locations. This confirms a clear policy expectation that land around stations should either be released through the Local Plan process or be capable of development through the planning application route, subject to compliance with the wider NPPF framework. The Councils must take this into account when considering the merits of land at South Trumpington.
- 3.6.4 Against this backdrop, the Site represents precisely the type of location that national policy is now seeking to unlock. Its close proximity to Cambridge South railway station, its strong functional and spatial relationship with Trumpington Meadows and the Southern Fringe, and its capacity to support high-quality, sustainable development together point to a compelling case that development in this location would not constitute inappropriate Green Belt development. Importantly, this conclusion would remain robust even if the site were not formally allocated, given the direction of the emerging NPPF decision-making policies.
- 3.6.5 Although the plan-making provisions of the draft NPPF 2025 do not formally apply to the Plan, their relevance cannot reasonably be dismissed. The decision-taking framework they establish will shape how proposals are assessed over the lifetime of the Plan and is closely aligned with the Government's stated growth objectives. In this context, a development strategy that fails to acknowledge sites which are likely to be acceptable in Green Belt terms (and which are clearly supported by up-to-date national policy) risks becoming quickly outdated. To ensure the Plan is both robust and responsive to national policy, such opportunities should be explicitly reflected within its overarching development strategy.

3.7 Overarching Comments on the Development Strategy and Approach to Allocating Sites

- 3.7.1 It is noted Paragraph 148 of the NPPF states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate. Further the paragraph elaborates that '*strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*'
- 3.7.2 In line with Paragraph 148, and in the absence of a revised Green Belt Assessment to support the GCLP, it is advised that GCSP should reconsider the opportunities presented by sustainable Green Belt sites on the edge of Cambridge that represent sustainable options to located housing and employment development on the urban edge of Cambridge.
- 3.7.3 In the same vein it is disappointing that Greater Cambridge have not published any assessment of grey belt within Cambridge or identified the Cambridge Grey Belt to support the GCLP. Planning Practice Guidance (PPG) Paragraph 003 Reference ID: 64-003-20250225 is clear that in assessing the Green Belt authorities need to identify grey belt land. As such as the GCLP emerges British Land consider in order for the emerging Local Plan to be



considered in accordance with national policy (NPPF, Paragraph 36d) Greater Cambridge must conduct an assessment of the Green Belt which includes an identification of the Cambridge Grey Belt. This in turn should inform proposed allocations within the GCLP.

- 3.7.4 In summary, British Land support the emerging Development Strategy and support the sequential approach to locating development as per draft policy SD/S. However, concern remains over the short-term deliverability development on the edge of Cambridge and a perceived reliance on large scale new settlements. Whilst these allocations are not challenged or recommended to be withdrawn British Land note significant lead in times and effort to deliver such sites must be considered. It is argued this may challenge the short-term delivery of the emerging Local Plan's growth ambitions. As a solution it is recommended GCSP should consider potential alternative sites within the edge of Cambridge that can serve to meet the identified needs for development on the edge of Cambridge urban area which can absorb the risk of larger sites not delivering as anticipated, especially given the direction of travel sought by the emerging NPPF for land outside of settlements. It is demonstrated in the supporting documents with this Regulation 18 response, how Land at South Trumpington can contribute to achieving these objectives.



4 Policy BG/BG: Biodiversity and Geodiversity

4.1 Policy BG/BG Response

- 4.1.1 British Land support the aspiration of the GCLP to ensure development delivers biodiversity net gains to ensure habitats for wildlife are enhanced and left in a measurably better state than they were before development.
- 4.1.2 It is noted and that the policy requires all development to deliver the minimum 10% BNG unless exempt and mandated by the Environment Act 2021. However, the requirement for 'major' development to deliver 20% BNG is considered inconsistent with national policy and the PPG which states, at Paragraph: 006 Reference ID: 74-006-20240214, that, "plan-makers should seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified."
- 4.1.3 Furthermore, it is worth noting that the consultation draft NPPF (2025) states, at Chapter 19, Paragraph N1(2), that 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. Achieving 10% BNG is extremely challenging on greenfield sites and imposing a requirement to meet anything above 10% will prove major challenges for development viability on such sites.
- 4.1.4 It should be noted should the draft NPPF (2025) be adopted in its current form with the above requirement in terms of BNG ahead of the GCLP Regulation 19 Consultation then the GCLP will need to be consistent with national policy in the Framework, to ensure it meets the tests set out in paragraph 36 (d) of the NPPF. Suggested revised wording for the policy BG/BG is provided below:

"1. All development must deliver statutory biodiversity net gain (BNG), providing a minimum of 10% BNG against the baseline, unless exempt under the Environment Act 2021, to be provided on-site in line with guidance."



5 Policy BG/TC: Improving tree canopy cover and tree population

5.1 Policy BG/TC Response

- 5.1.1 Draft Policy BG/TC introduces a minimum future canopy cover of 30% on site, unless “there are significant ecological, historical, landscape or operational reasons to justify a lesser figure”.
- 5.1.2 We suggest that the delivery of 30% tree canopy cover will be extremely challenging on certain sites where green infrastructure coverage is already high and where there are competing statutory requirements, most notable of which is BNG and which is guided by the Defra metric which can, in some cases, prioritise open grassland (without tree shading) and penalise the delivery of woodland.
- 5.1.3 The draft policy refers to ‘significant’ reason, which carries no definition. We would question what constitutes a ‘significant’ reason? Is BNG or the delivery of UK BAP Priority Habitats ‘significant’? When considered together, these may well provide a conflicting requirement and impact the delivery of sites.



6 Policy BG/EO: Providing and enhancing open spaces

6.1 Policy BG/EO Response

- 6.1.1 We note that the Councils are continuing to explore the number of hectares per employee to apply within the requirement for “Accessible Greenspace” (paragraph 3). These standards are important for promoters and developers of employment sites and mixed-use sites to understand as soon as possible, and we welcome the ability to review those standards as early as possible.
- 6.1.2 However, we would comment that the quantum of Accessible Greenspace that a proposal can deliver will very much be dictated by site context, constraints and opportunities. This will need to be recognised in the further draft of BG/EO.
- 6.1.3 Furthermore, it should be acknowledged that the best-in-class schemes, which adopt a design-led approach to place-making will naturally cater for accessible public realm and greenspace for future occupiers of the proposed development. In some instances, it will not be appropriate to prescribe a minimum quantum of greenspace to be delivered, if the scheme provides high-quality space as part of its response to the specifics of the site.
- 6.1.4 We would also suggest that for major mixed-use sites, a mandatory target of Accessible Greenspace, when considered in the round with statutory BNG, the proposed draft tree canopy policy, and the proposed public open space requirements for housing, may make viability and deliverability challenging.
- 6.1.5 On a matter of formatting and presentation, the lettering and numbering of the draft policy in paragraph 2, is confusing because at the sub-section labelling is inconsistent and it is unclear whether this reflects hierarchy or is an error.



7 Policy CP/ST: Skyline and tall buildings

7.1 Policy CP/ST Response

- 7.1.1 The GCLP's ambition to optimise density and support higher-density development in locations where existing services and transport infrastructure can sustain it is welcome. Clear recognition of the benefits associated with higher density is an important and positive step.
- 7.1.2 British Land firmly supports the use of appropriate and high-quality density as a mechanism for delivering additional housing and commercial space in sustainable locations, while strengthening the viability of public transport and public services like healthcare.
- 7.1.3 The continued commitment to high-quality, well-designed places and buildings is welcome. The GCLP's emphasis on high-quality development provides important assurance; well-designed and well-built places help attract and retain talent, support thriving communities, and this ultimately underpins sustainable economic growth.
- 7.1.4 Well-executed densification in suitable places is essential for a growing city such as Cambridge. Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Concentrating densification around existing infrastructure also provides significant environmental benefits by improving mobility and reducing reliance on private car travel.
- 7.1.5 However, there are significant concerns about some of the limits and constraints specified in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types (as per Appendix H: Skyline and tall buildings guidance) risks unduly constraining well-justified higher density developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.
- 7.1.6 The requirement to protect views of historic tall elements by preventing any obstruction or detraction from distant, strategic, or local views of key landmarks has the potential to unnecessarily restrict opportunities for sustainable and strategic growth, and to limit the wider benefits associated with increased density. Although we do note that Land at South Trumpington does not fall within any of the strategic views or the foreground or immediate background of any sensitive view cones identified at Figures 35 and 36.
- 7.1.7 Greater flexibility on density is needed, including through reframing GP/ST. We would welcome the policy being revised to allow for taller buildings in a wider range of locations than currently specified or greater clarity on the application of Appendix H in the determination of planning applications.



8 Evidence Base

8.1 Introduction

8.1.1 In terms of the published evidence base which supports the GCLP the following comments are raised

8.2 Employment and Housing Needs Evidence Update

- 8.2.1 Volterra have produced an Employment and Housing Needs Case report on behalf of British Land which is submitted in support of these Representations.
- 8.2.2 The Icen report provides an analysis of Greater Cambridge's commercial space requirements based on job forecasts, historical completions, and market signals. It is estimated that there is a need for 1.22 million square metres of commercial floorspace between 2024 and 2045, with R&D space accounting for almost half of this need.
- 8.2.3 Icen's approach to calculating these requirements combines three evidence sources: employment growth forecasts, recent development trends (completions), and market signals such as vacancy rates and take-up.
- 8.2.4 The final figures blend these inputs, applying buffers for market flexibility (10%) and vacancy (7.5%). For office space, Icen adopt the central employment scenario directly. For R&D, they set a target slightly above the employment-based projections but below recent gross completions. For industrial space, they rely primarily on the 10-year market absorption rate rather than employment forecasts, recognising the limitations of modelling this sector through labour demand alone.
- 8.2.5 While this approach provides a structured framework, several aspects warrant scrutiny. The choice of employment scenario, the treatment of historical suppressed demand, the absence of a replacement factor for ageing stock, and the reliance on pipeline supply that may not materialise all affect the reliability of the final figures.
- 8.2.6 This required need reflects a central scenario of 73,200 jobs planned for over the period of 2024-2045. Icen themselves, and other bodies, identify higher employment growth potential reflecting more ambitious growth, which would see a much greater spatial requirement. The most ambitious scenario published to date sees job projections of over twice (229,000) as high as Icen's central scenario (this is done over the period of 2023-2050 to allow for comparison).
- 8.2.7 The Icen central scenario estimates further do not fully account for suppressed demand, where a persistent lack of available supply has constrained potential growth over the past decade. The following chart illustrates that R&D vacancy rates in Greater Cambridge have consistently remained below the equilibrium or frictional vacancy level necessary for a healthy market, highlighting this unmet demand.
- 8.2.8 Additionally, the estimates focus on net additional floorspace but overlook the need for gross completions to replace ageing or converted stock. Between 2011/12 and 2023/24, data from the Icen report shows gross completions for R&D space exceeded net completions by 15%, indicating that a dynamic market requires a higher level of gross supply to meet net demand.
- 8.2.9 While the Icen reports provides a valuable foundation, we believe it underestimates the scale of future demand and overestimates the certainty of delivery. Suppressed demand, the need to replace ageing stock, and challenges in delivery all suggest that Greater Cambridge faces a greater shortfall in employment floorspace than currently anticipated, particularly for sites required to retain and enhance Cambridge's global competitiveness in this area. Deliverable sites like this one at South Trumpington will therefore be vital for supplying the flexible, high-quality spaces needed to support the region's strategic growth sectors – particularly as local



policy evolves to reflect the Government's intensified focus on Cambridge's role as a driver of national economic growth.

- 8.2.10 Although the pipeline quantum looks substantial on paper for offices and labs, planning permission is not the same as delivery.
- 8.2.11 The pipeline identified is reliant on a small number of very large schemes: the ten largest commitments account for over half of all outstanding floorspace, and the top twenty account for around three quarters. If even a handful of these stall or are scaled down, the headline supply picture changes materially. Many of these are large, complex projects where phasing, viability and delivery risk are heightened.
- 8.2.12 The Council's Office and Laboratory Employment Trajectory (2024) underscores these delivery risks. It shows that a significant share of commitments are at outline stage or have flexible use class permissions, meaning the eventual mix of office versus lab space can shift prior to delivery. As the Council's own evidence notes, proposed developments can change through reserved matters and in response to market conditions, especially where applications are outline or for mixed E(g) components — introducing uncertainty over the type and timing of space that ultimately comes forward.
- 8.2.13 High construction costs, infrastructure requirements, and broader economic conditions could further affect whether developers build out all the space they have permission for, and when. A nominal surplus of permitted floorspace does not guarantee that occupiers will have suitable, available space when needed if developers phase construction, defer starts, or shelve projects. Indeed, some local planning reports commissioned by the Councils specifically highlight the importance of monitoring anticipated availability and delivery phasing as part of updating the trajectory and Local Plan evidence base.
- 8.2.14 The 2025 EHEU's acknowledgement that additional space will likely still be required in the 2030s despite the current pipeline further underlines that the pipeline must not only exist on paper but be deliverable in a timely manner to truly meet demand.
- 8.2.15 A wide number of sectors support the function of the Greater Cambridge economic ecosystem. One key component being mid-tech which supports R&D by bridging the gap between research and production, providing facilities for prototyping, testing, storing and scaling innovations, and enabling the translation of discoveries into commercial products.
- 8.2.16 Icen's latest work has identified a critical shortfall of industrial space in the pipeline, with only 28,595 sqm of net supply identified to meet a need of 317,000 from 2024-45. Future development at South Trumpington has potential to provide mid-tech space to allow companies spun out of Cambridge's research centres to build things in Cambridge (rather than relocating production elsewhere). Mid-tech space also creates more diverse job opportunities (mid-skilled technicians etc), aligning with inclusive growth goals.
- 8.2.17 Given its location, and accessibility, future development at South Trumpington also has the potential to provide facilities which directly support the operations of strategic organisations in the City such as CBC or Cambridge University Hospitals (CUH).

8.3 Green Belt and grey belt Assessment

- 8.3.1 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.
- 8.3.2 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.



- 8.3.3 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).
- 8.3.4 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.
- 8.3.5 However, as outlined in Volterra's Employment and Housing Needs Case, 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.
- 8.3.6 NPPF Paragraph 148 requires that once Green Belt release has been deemed necessary the following hierarchy should be adopted when releasing land:
1. Previously Developed Land.
 2. Grey Belt which is not PDL.
 3. Other Green Belt locations
- 8.3.7 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.
- 8.3.8 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.
- 8.3.9 The identification and recommendation set out in these representations that the Councils should plan for a greater level of growth in turn indicates that GCSP 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.

8.4 Cambridge Biomedical Campus (CBC)

- 8.4.1 British Land welcome and support the continued commitment to growth at CBC through proposed allocation Policy S/CBC which proposes Green Belt for further expansion and continued allocation of the existing campus for an additional 1,000 homes on site and approximately 687,000 sqm (GIA) of R&D floorspace specially related to the biomedical and biotechnology uses and clinical healthcare and hospital facilities.
- 8.4.2 It is noted within the evidence base that CBC have prepared a Local Plan Housing Paper to outline how some of the additional housing to support the forthcoming allocation for the expansion of CBC can be accommodated on site. The paper identifies approximately 1,100 homes can be accommodated on site, which is reflected in the Policy S/CBC.
- 8.4.3 However, it is noted that within the Paper that by completion of the build out of Phase 4 (2050) it is anticipated there will be an additional offsite need for 14,900 additional affordable homes.



Notably the Paper also identifies that demand for affordable housing will be at its greatest in the early days of the Masterplan given the majority of the identified need already exists. Within this context it is noted that it is likely additional immediately available affordable housing will be required to support the continued and expanding function of CBC. Land at South Trumpington offers a suitable and deliverable site, within close proximity to the CBC, that could deliver affordable housing for essential workers within the short-term. We encourage GCSP to consider its potential in the context of the additional needs required at CBC.



9 Draft Local Plan Response Summary

- 9.1.1 In considering the comments made on the GCLP response this section of the Representations sets out how Land at South Trumpington can contribute to adding additionality to the housing and employment stock in Greater Cambridge and concludes with suggested policy wording for the site.
- 9.1.2 As set out within these representations the key considerations identified with the GCLP published for the Regulation 18 Consultation are:
- Greater Cambridge should plan for higher levels of growth in line with mandated national growth targets with a focus on Cambridge being of national importance.
 - Concerns around the immediate deliverability of 'Edge of Cambridge' fringe sites.
 - Lack of medium sizes sites and an over reliance on large scale new settlements.
 - Lack of consideration of sustainable Green Belt sites or identification of the Cambridge Grey Belt suitable for release for development.
 - An identified need for additional housing to support CBC in its planned expansion.
- 9.1.3 As outlined within Section 5 of this Report, Land at South Trumpington is located in a highly sustainable location on the urban edge of Cambridge and strategically located in terms of transport connections and connectivity to CBC.
- 9.1.4 A suite of technical evidence has been prepared and submitted in support of the Regulation 18 Consultation – pursuant to the submission made to the 'Sites Submission' in March 2025. Collectively these documents demonstrate Land at South Trumpington as suitable, deliverable and available for development. The documents also offer a response to the site assessment within the HELAA Addendum (2025) demonstrating the site should be assessed as suitable, achievable and available and hence considered for allocation.
- 9.1.5 These Representations have sought to provide constructive feedback to the Councils on the Regulation 18 Greater Cambridge Local Plan. Primarily it is noted within the representations and notably the supporting Employment and Housing Needs Case (2026) that the Councils should be more ambitious in their growth targets should national growth targets and ambitions for Cambridge mandated by government be realised. Further in addition to this it has been commented on that noting the delivery may be slower than expected on draft allocated sites on the edge of Cambridge. Noting the *Development Strategy Topic Paper (2025)* identifies the edge of Cambridge (Green Belt) as having the potential to provide a sustainable location for homes and jobs.
- 9.1.6 Further demonstrating a need to plan for additional growth, these representations have highlighted planned expansion at CBC demonstrates both a commitment to growth of the southern fringe and need, as evidenced with the CBC evidence base, for supporting development in the form of affordable housing. Land at South Trumpington represents a prime opportunity to locate some of the additional housing demand generated by expansion at CBC noting in line with the Golden Rules 50% of residential development would be affordable.
- 9.1.7 In considering the above and these representations it argued Land at South Trumpington represents the opportunity to release identified grey belt land from the Cambridge Green Belt in a highly sustainable location that can contribute to the continued commitment to growth of the southern fringe to provide a mixed use development of circa 200,000 sqm of employment floorspace and between 400 – 1,000 homes (50% affordable). In the event the Councils require further sites to accommodate more ambitious growth targets the suggested policy wording for Land at South Trumpington is set out below.



Land at South Trumpington – Suggested Policy Wording

Policy S/LST: Land at South Trumpington

What this policy does

This policy identifies suitable grey belt land to be released from the Green Belt for future development of a sustainable mixed use urban extension which will be masterplan led securing a coordinated approach to infrastructure, services and facilities.

Policy Text

An extension of Cambridge for mixed-use development of approximately up to 1,000 dwellings of a range of sizes, types and tenures to meet the identified diverse housing needs, and c. 200,000 square metres of commercial use (Use Class E(g)) including offices, research and development and mid-tech uses.



10 HELAA Appraisal of Land at South Trumpington

10.1 HELAA Assessment 2021

10.1.1 The Site was previously promoted by Grosvenor as part of the Call for Sites exercise in 2021. It was subsequently assessed as part of the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (2021). The Site was described as: “Land north of M11 and west of Hauxton Road, Trumpington, CB2 9NR” and given the HELAA Reference 40048.

10.1.2 The HELAA 2021 Site Assessment summarised the Site (Ref: 40048) as follows:

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

10.1.3 As set out within British Land’s Sites Submissions Update March 2025 response, the context of the Site has significantly changed. Therefore, when assessing the Site, the Councils must take into account the up-to-date evidence and information submitted by the landowner/ promoter.

10.2 HELAA Assessment 2025

10.2.1 Following the Sites Submission Update exercise, which concluded in March 2025, a revised HEELA (HEELA 2025) was prepared by the Councils in support of the Regulation 18 Draft Local Plan. The Site is described as: “Land north of M11 and west of Hauxton Road, Trumpington, CB2 9NR” and given the HELAA Reference **40048**.

10.2.2 The HEELA 2025 Site Assessment summarised the Site (Ref: 40048) as follows:

Criteria	Outcome
Suitable	Red
Available	Amber
Achievable	Green

10.2.3 The section below considers the material environmental and technical topics which informed the HELAA conclusions made up of ‘Suitability’, ‘Availability’ and ‘Achievability’. These are assessed in turn.

10.3 Suitability

10.3.1 This section considers the criteria which makes up ‘Suitability’ in more detail. It considers the HELAA 2025 score, summarises the latest evidence and suggests a revised score.

Adopted Development Plan Policies

10.3.2 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: In December 2024, the Government introduced changes to the NPPF which were considered vital to deliver the commitments to achieving economic growth and building 1.5 million new homes. This included defining ‘grey belt’ land within the Green Belt. Plan-making and decision-taking will need to reflect the revised NPPF and associated guidance. The Site represents a natural choice for sustainable development. It is expected



that future development at South Trumpington will generally comply with, and adhere to, adopted and proposed Development Plan Policies.

Revised Assessment (Reg 18 2025): **Green**

Flood Risk

10.3.3 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: The Environment Agency have recently published revised surface water flood risk mapping. Any changes to the Site following the HELAA 2021 are considered negligible, and the Site is considered to have a low probability of surface water flooding. As set out in the Water Resources and Flood Risk chapter of the submitted Environmental Report, it confirms the Site remains entirely within flood zone 1, indicating a low probability of flooding from rivers or the sea.

Revised Assessment (Reg 18 2025): **Amber**

Landscape and Townscape

10.3.4 Previous Assessment (HELAA 2025): **Red**

British Land Comments: The context of South Trumpington has changed substantially following the HELAA 2021 which the HELAA 2025 seemingly does not account for. The South West Travel Hub has been approved to the south of the Site, across the M11. Furthermore, the Trumpington Meadows development is completed and adjacent to the Site's northern boundary. The submitted Landscape and Visual Assessment prepared by FPCR, confirms the Illustrative Development Option can be successfully incorporated without notable long-term effects on landscape and visual receptors identified in the immediate and wider area. Further as set out in the Environmental Report the Illustrative Development Option would directly contribute to and extend Trumpington Meadows for the benefit of all.

Revised Assessment (Reg 18): **Green**

Biodiversity and Geodiversity

10.3.5 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: Biodiversity Net Gain is now a mandatory requirement in England under the Environmental Act 2021. The legislation requires a measurable 10% improvement in biodiversity compared to the pre-development state. This came into effect on 12 February 2024. The Illustrative Development Option would result in a measurable improvement for biodiversity with a target of 20% BNG considered achievable.

Revised Assessment (Reg 18 2025): **Green**

Policy

10.3.6 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: Development of the Site presents an opportunity to contribute to the preservation and enhancement of nearby policy designations to the Site including Public Open Space, Country Parks and Country Parks and Gardens.

Revised Assessment (Reg 18 2025): **Green**



Open Space / Green Infrastructure

10.3.7 Previous Assessment (HELAA 2025): **Green**

British Land Comments: The Site has no open space designation but does have to opportunity to enhance and extend the existing Country Park to the west. Furthermore, the Illustrative Development Option would improve accessibility to open space and green infrastructure across the Site.

Revised Assessment (Reg 18 2025): **Green**

Historic Environment

10.3.8 Previous Assessment (HELAA 2021): **Green**

British Land Comments: There have been no changes to the historic environment since the HELAA 2021. This Regulation 18 Consultation response is accompanied by a standalone Heritage Statement and as a chapter within the Environmental Report. The Illustrative Development Option is not expected to impact on the Historic Environment.

Revised Assessment (Reg 18 2025): **Green**

Archaeology

10.3.9 Previous Assessment (HELAA 2021): **Amber**

British Land Comments: There have been no changes to archaeology since the HELAA 2021. Or HELAA 2025 The submitted Desk Based Archaeology Assessment confirms the Illustrative Development Option is expected to be acceptable from an archaeology perspective.

Revised Assessment (Reg 18 2025): Remains as **Amber**

Accessibility to Services and Facilities

10.3.10 Previous Assessment (HELAA 2021): **Green**

British Land Comments: Access to local services and facilities have improved since the HELAA 2021 through the completion of the Trumpington Meadows development.

Revised Assessment (Reg 18 2025): **Green**

Site Access

10.3.11 Previous Assessment (HELAA 2025): **Red**

British Land Comments: The site benefits from an access to the public highway via Osprey Drive and this could be improved for all means as part of any future development. It should be noted that works to maintain operational site access from Osprey Drive were granted planning permission under ref. 25/04043/FUL. The HELAA 2025 suggests that the Site does not link to an adopted public highway and is hence inaccessible to highway users. However, Osprey Drive, adjacent to the Site, is under British Land's ownership and will provide access to the Site to Hauxton Road. Osprey Drive is currently being presented through the process which will enable its adoption as highway maintainable at the public's expense. Once Osprey Drive forms part of the highway network, the proposed access to the Site will ensure a connection to the highway network. As set out in the submitted Transport and Access Chapter of the



Environmental Report, further technical assessments would be carried out demonstrating the suitability of the Site.

Revised Assessment (Reg 18 2025): **Green**

Transport and Roads

10.3.12 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: Local trunk roads have not changed since the HELAA 2025 and any future development would be accompanied by a robust technical assessment, as set out in the submitted Transport and Access Chapter of the Environmental Report.

Revised Assessment (Reg 18 2025): **Amber**

Noise, Vibration, Odour and Light Pollution

10.3.13 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: The submitted Environmental Report includes reference to noise surveys which have informed the Illustrative Development Option. The Report demonstrates the Site can be developed with an appropriate layout, design and mitigation.

Revised Assessment (Reg 18 2025): **Amber**

Air Quality

10.3.14 Previous Assessment (HELAA 2025): **Green**

British Land Comments: The submitted Environmental Report includes an Air Quality chapter which confirms the Site is at low risk in regard to air quality.

Revised Assessment (Reg 18 2025): **Green**

Contamination and Ground Stability

10.3.15 Previous Assessment (HELAA 2025): **Amber**

British Land Comments: No changes to contamination and ground stability following the HELAA 2021.

Revised Assessment (Reg 18 2025): **Amber**

10.3.16 In order to understand how the suggested scoring compares with the HELAA 2021 scoring, we have provided a summary table below:

	Issue	HELAA 2025 Outcome	Reg 18 2025 Outcome
Suitability	Adopted Development Plan policies		



	Issue	HELAA 2025 Outcome	Reg 18 2025 Outcome
	Flood Risk	Yellow	Yellow
	Landscape and Townscape	Red	Green
	Biodiversity and Geodiversity	Yellow	Green
	Open Space / Green Infrastructure	Green	Green
	Policy Officer	Yellow	Green
	Historic Environment	Green	Green
	Archaeology	Yellow	Yellow
	Accessibility to Services and Features	Green	Green
	Site Access	Red	Green
	Transport and Roads	Yellow	Yellow
	Noise, Vibration, Odour and Light Pollution	Yellow	Yellow
	Air Quality	Green	Green
	Contamination and Ground Stability	Yellow	Yellow
	Overall 'Suitable' Score	Red	Green

6.1.1 The table above demonstrates that several of the HELAA scores have changed following a review of up-to-date evidence and information. As such, the Site is now considered to be suitable for release and development.

10.4 Availability

6.1.2 When considering 'Availability', the Council considered the below questions in the HELAA 2025, which British Land has responded to:

Question	British Land Response (Reg 18 2025)
Is the site controlled by a developer or landowner who has expressed an intention to develop?	Yes
Are there know legal or ownership impediments to development?	No
Is there planning permission to develop the site?	No



When will the site be available for development?	Immediately
--	-------------

6.1.3 The Site is considered to be available for development with immediate effect.

10.5 Achievability

6.1.4 When considering ‘Achievability’, the Council considered the below question in the HELAA 2025 which we have responded to.

Question	British Land Response (Reg 18 2025)
Is there a reasonable prospect that the site could be developed?	Yes

6.1.5 The land has been promoted by the landowner and is known to be available for development. The landowner has no reasons why the Site could not be developed.

6.1.6 Development of the Site is considered the be achievable now.

10.6 Summary

6.1.7 Having reviewed the most up to date evidence and information, the previous HELAA 2021 outcome scores for the Site can be updated. The proposed changes to the overall outcome are set out in the table below:

Criteria	HELAA 2025 Outcome	Potential Reg 18 2025 Outcome
Suitable	Red	Green
Available	Amber	Green
Achievable	Green	Green

