

## **British Land response to S/DS**

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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.

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.

### **Policy S/DS Response**

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.

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

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.

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.

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.

### **North East Cambridge (NEC)**

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.

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.

### **Cambridge East**

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.

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.

### **Alternative Edge of Cambridge Sites**

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.

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.

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.

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.

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.

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.

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.

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.

### **Draft NPPF Considerations**

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.

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.

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.

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.

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.

### **Overarching Comments on the Development Strategy and Approach to Allocating Sites**

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.'*

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.

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.

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.