

Greater Cambridge Shared Planning Service

By email: localplan@greatercambridgeplanning.org

28 January 2026

Dear Sir/Madam,

GREATER CAMBRIDGE LOCAL PLAN (REGULATION 18) REPRESENTATION DRAFT POLICY S/C/HGH: HENRY GILES HOUSE, 73-79 CHESTERTON ROAD

This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Telereal Investment Properties Limited Trillium Ltd (TT Group), with respect to the Greater Cambridge Regulation 18 Local Plan Consultation that is open until 30th January 2026.

Specifically, this Representation has been prepared to express support for the principle of draft Policy S/C/HGH, and to recommend changes to the draft policy to optimise the redevelopment of a prime brownfield site in central Cambridge.

Planning Background

The residential-led redevelopment of Henry Giles House (HGH), currently in office use, is a long-term local planning policy objective.

The allocation of HGH and the adjacent, Carlyle House within the 2006 City of Cambridge Local Plan (Policy 5.15) was carried forward into the adopted 2018 Local Plan (Policy R4). This policy allocates land comprising HGH and Carlyle House for the delivery of c.48 dwellings.

The redevelopment of HGH and Carlyle House is further supported in the Mitcham's Corner Development Framework SPD, with Section 4.3 of the document providing specific guidance to inform Policy R4.

In its existing form, HGH is identified as a building that is 'harmful' to the Conservation Area within the adopted Conservation Area appraisal. As such its replacement should be supported with a beneficial form of development.

Planning permission was granted in April 2021 for the creation of an additional floor of office accommodation and a rear extension at Carlyle House (ref: 20/03843/FUL). This planning permission has not been delivered.

Proposed Allocation

Policy S/C/HGH seeks to allocate land comprising HGH for the delivery of 50 dwellings. This follows representations made by TT Group to the GCLP Call for Sites consultation, to promote HGH for allocation in isolation (ref: 40103).

Our client maintains support for the allocation S/C/HGH supporting redevelopment of HGH. This will enable HGH to come forward for redevelopment irrespective of whether the adjacent Carlyle House (in separate ownership) is brought forward for redevelopment.

Scale of Development

The emerging Local Plan acknowledges that the site can accommodate a higher density of residential development than set out within Policy R4. Draft Policy S/C/HGH seeks to allocate 50 dwellings (79 dwellings per hectare) within the HGH site alone, while Policy R4 envisages delivery of 48 dwellings (62 dph) across HGH and Carlyle House.

While the uplift in density within draft Policy S/C/HGH is welcomed, we consider that the density of the site can be elevated further to maximise the delivery of sustainable homes, and affordable homes on this key brownfield site, in accordance with the aspirations the December 2024 NPPF. The December 2025 Draft NPPF further emphasises the importance of supporting redevelopment of brownfield previously developed sites in highly accessible City Centre locations.

TT Group instructed Formation Architects to undertake a scale and massing study, which would broadly follow the principles set out in the Mitchams Corner SPD. The massing study ascertains that a development of up to 95 dwellings (a density of 151 Dwellings Per Hectare) could be achieved. This allows for circa 50% of units to have a car parking space. This level of car parking provision is considered generous, demonstrating that Formation has assessed an appropriate level of development, as it is recognised that car free development would be supported in this location.

Whilst the east part of the site lends itself to houses around a courtyard, clearly a location such as this should be principally redeveloped for apartments. Broadly following the massing of the Mitcham's Corner SPD, and noting the precedent set by the approved 3rd floor extension (2+1) extension to Carlyle House, 50 units clearly underestimates the site's capacity. Underestimating site capacity undermines investor confidence in its future delivery. Local Plans, and Site Allocations should be positively planned in accordance with the NPPF, and we believe that Draft Policy S/C/HGH should be more ambitious and support a far greater number of dwellings, consistent with the study undertaken by Formation Architects, which accounts for Local Space Standards, Cycle Parking standards, and demonstrates each unit would have its own private amenity space.

It is important to stress that this development testing used the broad guidance on height and massing set out within Figure 52 of the Mitcham's Corner Development Framework SPD, with a maximum 5-storey height in the centre of the development, grading down to 2-storey forms to the north and east of the site, and stepped 3- and 4-storey forms to the west and north.

Further, it follows the massing which is now established through the grant of Planning Application 20/03843/FUL for 3-storey + 1 development at Carlyle House. This permission evidenced how it is possible to deviate beyond the 2-storey + 1 approach recommended in Figure 52.

Accordingly, 50 dwellings is considered to be far too conservative for Site Allocation S/C/HGH. As drafted the allocation is not positively prepared and will serve to stifle confidence in its future delivery. Evidence exists to support massing beyond the SPD, and by following this precedent, Formation have clearly shown that some appropriate movement from this guidance can be supported in principle, subject to further detailed design, without detracting from the wider Conservation Area.

The proposed development is anticipated to deliver positive benefits for the setting of the Conservation Area, by replacing an incongruous building (HGH) with a high-quality residential development, thereby achieving a long-term Conservation Area objective, as set out within the adopted Conservation Area appraisal. The scale and massing study demonstrates how the Conservation Area could be considered within a design response, by broadly aligning with the design and layout approach suggested at Figure 52.

Section 11 of the NPPF requires planning policies and development proposals to make efficient and effective use of land. Paragraph 125 requires planning policies and decisions to support the delivery of underutilised brownfield sites, while Paragraph 130 directs development proposals to adopt densities suited to their location, to optimise the use of land. The emerging NPPF (2025) reaffirms support for urban densification proposals in sustainable locations.

In accordance with this approach, the delivery of similar allocations within Cambridge has achieved greater residential densities than set out within the adopted Local Plan. For example, Policy R9 (Devonshire Gardens) allocated the delivery of 43 homes on a 1.23ha site (35 dph), while the planning-approved proposals secured a residential density of 184dph (ref: 22/01982/FUL).

As HGH benefits from a highly sustainable, central location, the proposed density of Policy S/C/HGH should be revisited, in line with national guidance and local precedents.

Greater Cambridge Context

The emerging Local Plan has committed to a high-growth scenario, that will require delivery of 48,195 new homes by 2045. This is reliant upon the delivery of a number of major strategic allocations, which are envisioned to supply over 37,000 new homes by 2045. Several of these allocations are likely to be heavily scrutinised given housing delivery rates at existing strategic locations, such as Cambourne, Northstowe and Waterbeach. Similarly, many strategic sites, such as Northeast Cambridge, rely on the delivery of significant infrastructure to unlock them.

This context heightens the importance of facilitating and maximising the delivery of smaller, deliverable brownfield sites like HGH, to provide a robust supply of high-quality homes in sustainable locations, should delivery of any of the major strategic allocations stall. Indeed, the spatial strategy that underpins the draft Greater Cambridge Local Plan is predicated, in part, on maximising opportunities to utilise brownfield land in sustainable, central locations (Paragraph

2.55). To align with this strategy, Policy S/C/HGH must be amended and densified in accordance with NPPF Paragraph 125 and accompanying PPG (004 Reference ID: 66-004-20190722).

Furthermore, Paragraph 256 of the Draft Plan notes that previously-developed sites, particularly within and on the edge of Cambridge, were identified for allocation ahead of greenfield sites. While this approach is encouraged, the development of brownfield sites like HGH must be optimised to minimise reliance upon largely greenfield strategic sites, to align with Paragraph 124 of the NPPF.

Additionally, Greater Cambridge's marginal five-year housing land supply position places even greater emphasis on accelerating and encouraging the delivery of sustainable sites like HGH, while the densification of brownfield sites must be supported in the emerging Local Plan, in accordance with the NPPF (Paragraph 125).

Summary and Recommendations

TT Group supports the proposed allocation of HGH, as detailed within draft Policy S/C/HGH, though the allocation must be revisited and amended to facilitate the delivery of a development that will realise the long-term planning policy and placemaking goals of the site and the wider area.

Specifically, the proposed density of the allocation should be revisited and uplifted to account for the sustainable location of the site, in line with the NPPF and recent local precedents, to maximise the quantum of development that can be achieved on this site, which can be delivered early in the emerging Plan period. We advise that the draft allocation is revised upwards to support in excess of 95 units on the site.

We look forward to progressing these amendments with the Greater Cambridge Local Plan team. If you have any questions, or wish to discuss these matters in more detail, then please do not hesitate to get in touch.

Yours sincerely,

Lyndon Gill
Senior Director
Twenty5 Planning Ltd

Cc.