Representations on behalf of Hill Group and Homes England

Draft Greater Cambridge Local Plan Regulation 19 Consultation

25 September 2026

Q260286

Report

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1 Introduction and Overview

1.1 This document has been prepared by Quod on behalf of the Hill Group and Homes England (hereafter referred to as “Hill / HE") in relation to land at Barnwell Drive, Cambridge (“the Site”).

1.2 Hill / HE recently acquired the Site from Marshall.

1.3 This document responds to the Greater Cambridge Shared Planning’s (“GCSP”) consultation on the Greater Cambridge Local Plan (“GCLP”): Proposed Submission Regulation 19 Consultation.

1.4 The Site comprises approximately 0.6 hectares of land immediately west of the Peverel Road allotments in the eastern part of Cambridge. The Site comprises undeveloped scrub land.

1.5 The draft GCLP proposes to retain the Site as Protected Open Space (“POS”) under designation POS_0309 “Allotments at Peverel Road” within emerging Policy BG/PO.

1.6 Hill / HE object to the designation of the Site as POS. Hill / HE support the continued protection of the active Peverel Road allotments, however the designation does not accurately reflect the separate characteristics, use and function of the Site. The evidence base inappropriately assesses the Site together with the adjoining allotments and does not provide sufficient site-specific justification for treating the Site as a food-growing space or as open space of environmental or recreational importance.

1.7 In light of the above, these representations explain:

- The characteristics of the Site and its relationship with the adjoining Peverel Road allotments;
- The relevant planning history and evidence supporting the proposed designation;
- Why the Site does not perform the function protected by Policy BG/PO; and
- Why removing the Site from POS_0309 would not prejudice the continued protection or operation of the active allotments.

1.8 Overall, whilst small in scale, this is exactly the type of urban area site which must be identified and developed in Cambridge if GCSP is going to meet its housing requirement, respond to the Government’s growth agenda and limit the release of land from the countryside. The Local Plan cannot be sound until it can demonstrate it has optimised urban capacity, including on Site’s such as this.

1.9 In this context, these representations are structured as follows:

- **Section 2**: Site and Designation Context;
- **Section 3**: Objection to Policy BG/PO and Designation POS_0309 “Allotments at Peverel Road”; and

- **Section 4**: Summary and Proposed Modification.

2 Site and Designation Context

Site Characteristics

2.1 The Site extends to approximately 0.6 hectares of land off Barnwell Drive in eastern Cambridge. It is irregular in shape and comprises undeveloped scrubland (see Figure 2.1).

2.2 The Site adjoins the Peverel Road allotments to the east and is situated within an established urban context, with residential properties to the north, and employment uses to the south and west, beyond a mature treeline.

2.3 The Site is not in active allotment or food-growing use. The adjoining Peverel Road allotments to the east are separated from the Site by a path and an established hedge. There is no access between the Site and the allotments. The Site is not publicly accessible and does not contain any Public Rights of Way or permissible footpaths.

Figure 2.1 The Site



Relationship Between the Site & the Peverel Road Allotments

2.4 The Peverel Road allotments are physically and functionally distinct from the Site.

2.5 The Site does not contain any cultivated allotment plots and does not provide access, servicing, circulation, storage or any other operational function that supports the use of the adjoining allotments.

2.6 The adjoining allotments operate entirely independently from the Site. Instead, the Site comprises an area of fallow and undeveloped land.

2.7 In summary, there is no current or historical use or association of the Site with allotment activity.

Existing and Proposed Protected Open Space Designation

2.8 Despite the absence of historical allotment activity, the Site is designated within the adopted Cambridge Local Plan 2018 as POS under Policy 67. The designation forms part of a wider area which also includes the adjoining Peverel Road allotments, as shown in Figure 2.2.

2.9 Policy 67 resists development which would harm the character of, or lead to the loss of, open space of environmental and/or recreational importance, unless the open space can be satisfactorily replaced in terms of quality, quantity and access and the replacement is located within a short walk of the original site.

Figure 2.2 Extract from the adopted Local Plan Policy Map showing a wider Protected Open Space designation covering the Site



2.10 The Proposed Submission GCLP carries forward the POS designation under emerging Policy BG/PO. As shown on Figure 2.3, the Site continues to be included within a wider designation incorporating the Peverel Road allotments. The supporting evidence identifies this combined area as POS_0309 “Allotments at Peverel Road”.

2.11 Policy BG/PO protects open space of ‘*environmental and/or recreational importance’* where development would harm its character, function and/or quality, or lead to its loss.

Development will only be permitted where the existing open space can be satisfactorily replaced to an equivalent or better standard in terms of quality, quantity and accessibility.

2.12 The proposed designation therefore continues the approach taken in the adopted Local Plan by treating the Site as part of the adjoining allotments as a single protected area.

Figure 2.3 Extract from the Proposed Submission GCLP Policies Map showing the wider Protected Open Space designation across the Site

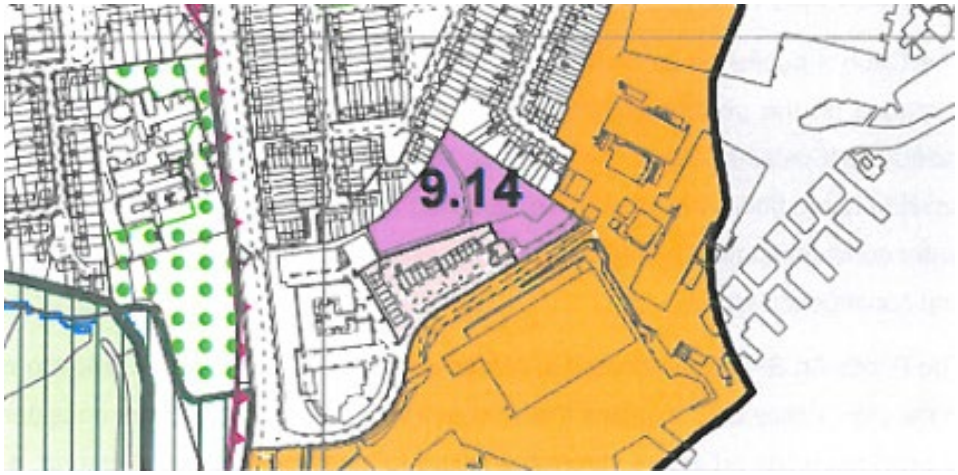


Relevant Planning History

2.13 A review of Cambridge City Council's planning register for the Site has been carried out, and a summary of planning history activity is available at **Appendix 1**.

2.14 The planning history demonstrates that the Site has previously been identified as suitable for development. The Site formed part of housing allocation 9.14 in the Cambridge Local Plan 2006 (see Figure 2.4).

Figure 2.4 Extract from the Cambridge Local Plan 2006 identifying the Site and allotments as part of a residential allocation



2.15 More recently, planning permission Ref No: 16/1566/FUL was granted in June 2018 on the Site for the '*Erection of B1 Use Class building for use of Marshall Aerospace and Defence Group, car and cycle parking, access road, level changes, new boundary treatments and landscaping'.* This permission related to the Site only, and excluded the adjacent allotments.

2.16 In considering the principle of development on the Site, the officer report states:

"The principle of development on this site dates back to 2002, when outline planning consent for an office development was granted on this site (reference C/00/0907/OP), followed by detailed reserved matters approval (reference 04/0983/RM) in 2004. The planning consent was never implemented and subsequently expired in 2008."

2.17 The officer report accompanying that permission provides important context regarding the basis for the POS designation. It records that the Site and adjoining allotments were assessed together through the 2011 Open Space and Recreation Strategy. It was recognised that the Site did not function as allotments and instead is 'fallow' land. However, the officer report explains that the Council noted the high waiting list for allotments, and as a result allocated the Site in the draft Local Plan as part of the wider allotments to encourage further allotment provision. The officer report notes that as no objections were received to the proposed allocation, the 2018 Local Plan was adopted on that basis with the allocation across the Site and the existing adjacent allotments.

2.18 However, in considering the planning application, the officer report concedes that the provision of allotments on the Site was not feasible stating that it is "…*recognised that this [ie allotment provision] is not practical under current land ownership and bearing in mind the applicant's aspirations for the land*" (para 8.13).

2.19 The same conclusion is repeated at paragraph 8.16 of the officer report and the Council granted planning permission for the substantial employment development on the Site.

2.20 In summary, the Site's designation as POS arose from the Council's aspiration to deliver additional allotments and the absence of an objection to the designation when it was first proposed as part of the then emerging draft Local Plan. However, the Council accepts that the Site does not currently contain allotments and is unlikely to do so in the future given the ownership of the Site. This continues to be the case today, especially as a result of the Site's acquisition by Hill / HE. The Council has previously granted planning permission for an employment development on the Site, and given the context did not require any compensation space/facilities to be provided elsewhere.

3 Objection to Policy BG/PO and Designation POS_0309 "Allotments at Peverel Road"

The designation is not supported by site-specific evidence

3.1 Emerging Policy BG/PO addresses protected open space and states:

> ***1. Development proposals will not be permitted where they would harm the character, function and/or quality of, or lead to the loss of, protected open space of environmental and/or recreational importance as identified on the policies map, or undesignated areas that fulfil the criteria used to assess protected open space, unless the existing open space can be satisfactorily replaced to an equivalent or better standard in terms of quality, quantity and accessibility.***
>
> ***2. Where replacement open space is to be provided in an alternative location, the replacement site must be;***
>
> > ***a. Located within a suitable distance of the original site having regard to the Natural England Accessible Greenspace size and proximity criteria; and***
> >
> > ***b. Fully available for use before the area of open space to be lost can be redeveloped.***

3.2 The designation of land as POS should be supported by evidence demonstrating the function and importance of the land proposed for protection.

3.3 However, the evidence supporting the designation of the Site does not assess it as a separate parcel. The Open Space and Recreation Strategy 2011 assessed the Site together with the adjoining Peverel Road allotments as Site A26, "Peverel Road Allotments". The combined area was found to have environmental and recreational importance and was assigned a quality score of 58.33%. However, the assessment did not distinguish between the characteristics and functions of the active allotments and those of the Site.

3.4 This approach is repeated in the Protected Open Spaces Review 2026. The Review identifies the combined area as POS_0309 "Allotments at Peverel Road" and classifies the whole designation as a "Food Growing Space". It does not separately assess whether the Site itself performs a food-growing, environmental or recreational function.

3.5 The 2026 Review explains that protected open space typologies, other than informal open space, contain clearly identifiable features which allow them to be identified as falling within a particular typology without further justification. This approach assumes that the entirety of POS_0309 displays the defining characteristics of a food-growing space. That assumption is not appropriate in relation to the Site, which is not in allotment or food-growing use and is physically and functionally separate from the active allotments. This was accepted by the Council in the officer report associated with application Ref No: 16/1566/FUL.

3.6 By assessing the two parcels together, the evidence base attributes the established food-growing and recreational functions of the Peverel Road allotments to the Site. It does not

identify which, if any, of the characteristics recorded for the wider designation are attributable to the Site itself.

3.7 Hill / HE do not dispute that the active allotments perform an established food-growing and recreational function or that their continued protection is appropriate. However, the combined assessment does not provide proportionate, site-specific justification for extending POS_0309 across separate land that does not perform the same function. The inclusion of the Site within the designation is therefore not justified.

The Site does not perform the function protected by Policy BG/PO

3.8 The relevant question is whether the Site, considered on its own merits, performs an environmental or recreational function of sufficient importance to warrant protection under Policy BG/PO. The assessment below demonstrates that it does not.

3.9 The assessment applies the Council's criteria for determining whether open space is of environmental and/or recreational importance. These criteria are set out in Appendix I of the adopted Cambridge Local Plan, deriving from the Open Space and Recreation Strategy 2011, and are carried forward in a similar form in the Protected Open Spaces Review 2026 supporting Policy BG/PO.

Environmental Function

3.10 The Site contains areas of scrub and grassland. However, the existence of vegetation or undeveloped land is not, by itself, sufficient to demonstrate that land is of the environmental importance required to justify its designation as POS.

3.11 The Site is a small and enclosed parcel within an established urban and edge-of-city context. It is not publicly accessible and does not make a major contribution to the setting, character, structure or environmental quality of Cambridge. Its limited size, enclosed character and relationship with surrounding residential, employment and airport-related development mean that it does not provide a distinctive sense of place or perform a strategic role within the wider city.

3.12 The Site also does not function as an important green break. It does not separate distinct settlements or built-up areas and does not provide strategic relief within the urban framework. While it provides some physical separation between neighbouring uses, that limited and localised role is not sufficient to establish the Site as an important green break for the purposes of the POS assessment criteria.

3.13 The Site also does not form part of a publicly accessible network of open spaces. It provides no public route or connection and has a materially different function from accessible open spaces in the surrounding area.

3.14 There is no identified historical, cultural or archaeological interest associated with the Site and it is not subject to any known statutory or non-statutory nature conservation designation. The Site is separated from Coldham's Common by intervening development and Barnwell Road, and has not been identified as an important ecological link.

3.15 The available evidence does not identify habitats or species of sufficient importance to justify protection of the Site in its own right and it does not demonstrate that the land performs an environmental function sufficient to warrant its designation under Policy BG/PO.

Recreational Function

3.16 The Site has no established recreational function. It is not publicly accessible, is not in active allotment or food-growing use, and does not contain any formal or informal recreational facilities.

3.17 The Site also provides no recreational route or linkage and does not form part of the network or hierarchy of accessible recreational open spaces. Its size, quality and accessibility are not such that it attracts, or could reasonably be expected to attract, recreational use from either the local area or the city more widely.

3.18 The recreational importance attributed to POS_0309 is derived from the adjoining Peverel Road allotments. Those allotments perform an established food-growing and recreational function, but that function does not extend to the Site. The Site is physically and functionally separate from the cultivated allotments and provides no land or infrastructure required for their operation.

3.19 When assessed on its own merits, the Site has no established recreational function or environmental value. The environmental and recreational importance attributed to POS_0309 principally derives from the active Peverel Road allotments. Hill / HE therefore consider that the Site does not perform the function protected by Policy BG/PO and that its removal would not diminish the value or protection of the adjoining allotments.

De-designation would not prejudice the allotments

3.20 Removing the Site from POS_0309 would not prejudice the protection or operation of the Peverel Road allotments. The proposed modification would affect only the Site; the active allotments would remain designated under Policy BG/PO. As established in Section 2, the allotments do not rely on the Site for access, servicing, circulation, storage or any other operational purpose.

3.21 The removal of the designation would also not determine the form or acceptability of future development of the Site. Any development proposal would remain subject to the planning application process and would need to demonstrate an appropriate relationship with the adjoining allotments. These are development management considerations and do not provide a justification for retaining a POS designation over land which does not itself perform the function protected by Policy BG/PO.

3.22 Amending the POS boundary would therefore create a justified and accurate designation, focusing the protection afforded by Policy BG/PO on the active allotments that perform the identified food-growing function. The Site can be removed without diminishing the extent, function or continued operation of those allotments and provides an opportunity to deliver a scheme that aligns with the Local Plan's own growth ambitions and wider government objectives for Cambridge.

4 Summary and Proposed Modification

4.1 For the reasons set out in these representations, Hill / HE consider that the inclusion of the Site within POS_0309 “Allotments at Peverel Road” is not justified and would not provide an effective basis for the application of Policy BG/PO.

4.2 The evidence base does not assess the Site separately from the adjoining Peverel Road allotments. Instead, the two parcels have been assessed as a single area and the established food-growing and recreational functions of the active allotments have consequently been attributed to the Site. The evidence does not demonstrate that the Site itself performs an environmental or recreational function sufficient to justify its designation as Protected Open Space.

4.3 The designation is therefore not justified by proportionate, site-specific evidence. In particular, the identification of the wider area as a “Food Growing Space” does not accurately reflect the use or function of the Site, which is a) not publicly accessible; b) not in active allotment or food-growing use; and c) is physically and functionally separate from the adjoining allotments.

4.4 The position is reinforced by the planning history of the Site where the Council previously consented its redevelopment for employment purposes, recognising that the Site did not contain any allotments and any aspiration for the creation of new allotments on the Site were unrealistic.

4.5 Overall, retaining the Site within POS_0309 undermines Policy BG/PO, rendering the policy unsound, as it is not ‘justified’ or ‘effective’.

4.6 Removing the Site from POS_0309 would not prejudice the continued protection or operation of the Peverel Road allotments. The active allotments would remain designated as Protected Open Space and would continue to perform their established food-growing and recreational function. No active allotment plots or operational land would be removed from the designation.

4.7 Hill / HE therefore request the following modification to the GCLP:

Amend the Policies Map and the boundary of POS_0309 “Allotments at Peverel Road” to exclude the Site. The Protected Open Space designation should be retained over the active Peverel Road allotments.

4.8 Hill / HE consider the Site capable of delivering a high-quality residential development and are actively exploring the potential for a 100% affordable housing scheme. In the context of acute affordable housing need across Greater Cambridge, the retention of an unjustified POS designation would prevent the delivery of significant public benefits.

Appendix 1

Table A.1 Cambridge City Council Online Planning History Records

Ref	Description	Decision	Decision Date
C/02/0656	Residential development (outline planning permission)	Refused	09 October 2002
C/00/0907	Erection of buildings (3000 sqm) for Class B1 business use (outline application)	Approved with conditions	24 November 2003
C/04/0011	Erection of Class B1 building for use by Marshalls Aerospace	Withdrawn	25 February 2004
C/04/0983	Erection of B1(c) building for use by Marshall Aerospace Ltd, including level changes, car parking, boundary treatment and landscaping	Granted Permission	15 December 2004
09/0211/FUL	Use of land for 36 extra car parking spaces and erection of a cycle shelter for 24 bicycles	Refused Permission	20 May 2009
13/1594/FUL	Erection of B1 building for use by Marshall Aerospace and Defence Group, car and cycle parking, access road, level changes, new boundary treatments and landscaping	Granted Permission	13 August 2014
16/1566/FUL	Erection of B1 Use Class building for use of Marshall Aerospace and Defence Group, car and cycle parking, access road, level changes, new boundary treatments and landscaping	Granted Permission	05 June 2018

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