LICHFIELDS

Briefing Note

Date 25 September 2026

Subject Site Allocation: Edge of Cambridge HELAA

1.1 These representations to the regulation 19 draft Greater Cambridge Local Plan (dGCLP) have been prepared by Lichfields for CEG Land Promotions Limited (CEG LP) on behalf of the landowners Peterhouse College and Guys & St. Thomas' Foundation in the context of their interests in Southeast Cambridge, namely the foreseen:

- Southern extension to Peterhouse College (A southern expansion to previously released Green Belt sites GB3/GB4);
- Southern extension to Employment site E/3; and
- Easterly expansion to the previously released Green Belt site GB1.

Representation

1.2 As set out in CEG LP's Regulation 18 representations, the site was previously assessed under the Housing and Employment Land Availability Assessment (HELAA) published by Greater Cambridge Shared Planning Service in 2021 (HELAA Site ref 40058). The site was originally submitted as one singular red line, with confirmation from CEG LP that the site was available immediately for development.

1.3 As part of an updated call for sites submission in March 2025 three individual sub-parcels within the site were submitted. Careful consideration was given to each and their extent reflected advice on parcels within the wider land holding which could be suitable for development in landscape terms and meet the definition of Grey Belt, thereby addressing the alleged harms to the purposes of the Green Belt. The parcels are:

- Southern extension to Peterhouse College (A southern expansion to previously released Green Belt sites GB3/GB4) (HELAA Site ID 200790);
- Southern extension to Employment site E/3 (HELAA Site ID 200795, which incorrectly merges it with Site ID 200790 above); and
- An easterly expansion to the previously released Green Belt site GB1 (HELAA Site ID 40058b).

1.4 As per the 2025 HELAA, Southern extension to Peterhouse College and Southern extension to Employment site E/3 are both still incorrectly merged as one site, (HELAA Site ID 200790). These parcels were submitted as new sites to the HELAA process as CEG LP considered they should be assessed on their own merits.

1.5 Furthermore, the easterly expansion to the previously released Green Belt site GB1 (HELAA Site ID 40058b) does not appear in the 2026 HELAA at all. Land south of Fulbourn Road and north of Worts Causeway (HELAA Site ref 40058a) states as part of the Landscape

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Comment that *"Additional Information submitted is a response to the original assessments. The document suggests several options for development including a smaller option at 7.5ha up to the scale of an urban extension encompassing the whole site. The original assessment is not altered by this level of detail because it is considered that any development would cause harm."* However, CEG LP strongly considers the smaller parcel HELAA Site ID 40058b should have been assessed on its own merits, especially with regards to Landscape which is the only suitability criteria for which the site scored Red.

Land to the south of Peterhouse Technology Park (HELAA Site ID 200790)

1.6 The HELAA assessment concludes that the Site has an Overall Suitability RAG Score of Red, Available RAG of Green and Achievability RAG of Green. The suitability of the site being Red is entirely related to 'Site Access' which states that *"Based on the additional information, the site assessment has remained red as the site boundary has not been amended to connect to the adopted highway*." This is after the 2025 HELAA stated "*the site does not link to the adopted public highway and is therefore inaccessible to highway users"*.

1.7 CEG LP set out in Regulation 18 representations that they strongly disagreed with this conclusion, noting that access would be provided via the roundabout within the consented scheme on Site allocation E/3. This was also set out within the covering letter submitted with the submission to the call for sites process, which explicitly stated that access would be provided via the roundabout within the consented scheme on Site allocation E/3 and there are legal rights to enable this access to be delivered across Employment Site E/3. The 'Red' score is, therefore, unjustified and unsupported by the evidence already presented to the Councils twice. The score should be 'green' where the methodology states *"Access by all means is possible."*

1.8 The parcel is not subject to any constraints whilst providing a natural extension to an existing employment hub which is globally recognised, enabling additional future growth and increased levels of inward investment to Greater Cambridge. Developing this parcel of South East Cambridge would enable a natural extension southwards of the GB3 and GB4, two sites that were previously released from the Green Belt through the Cambridge City Local Plan 2018. The continued expansion of both the Fulbourn Road Business Park and Peterhouse Technology Park would represent a natural extension to an existing business cluster in a highly accessible, sustainable location.

Land south of Fulbourn Road and north of Worts Causeway (HELAA Site ID 40058a)

1.9 CEG LP note that the Council has retained the Red RAG assessment for landscape.

1.10 The criteria for the RAG assessment are presented in Annex 1 of the HELAA. In relation to landscape and townscape, the criteria are defined as:

Score: Red

Assessment criteria: Development of the site would have a significant negative impact which cannot be mitigated.

Score: Amber

Assessment criteria: Development of the site would have a detrimental impact which could be satisfactorily mitigated.

1.11 The previous HELAA assessment of this site considered the site to be unsuitable due to landscape considerations, with comments relating to openness of the site and impact to the surrounding countryside's landscape character being primarily related to the contouring of the site. These comments were taken onboard and resulted in the submission of HELAA Site ID 40058b, which, as set out above, has not been considered in this HELAA because "*The original assessment is not altered by this level of detail because it is considered that any development would cause harm.*" CEG LP strongly disagree with this conclusion. HELAA Site ID 40058b is a smaller parcel within HELAA Site ID 40058a, is situated to the west of the high ground and located outside of those views directed through the centre of Cambridge. It is not plausible that the same conclusions can be reached on this smaller parcel which avoids high ground and the setting of views of the City.

1.12 In CEG LP's view, this parcel of land would form an appropriate extension to the previous GB1 allocation, providing two key benefits. Firstly, additional development in this location would enable the delivery of local services and facilities to cater to the needs of both current and future residents of GB1 and GB2 such as a local shop or GP surgery. Secondly, the parcel is in close proximity to the Biomedical Campus and Cambridge South rail station which has been identified as requiring c.20,000 homes of various tenure types to support the workforce and enable continued growth. It therefore provides an opportunity to allocate a residential site which can help meet identified housing needs and delivery housing in a highly sustainable location within walking and cycling distance of a prominent employer within Greater Cambridge.

Conclusion with regards to soundness

1.13 The HELAA is crude and heavy handed in its assessment and is not in all cases correctly applying its own methodology, it cannot be considered accurate nor robust. CEG LP consider that policies informed by this evidence-based document cannot be justified as per NPPF paragraph 36(b) as the strategy of the dGCLP (Reg 19) is not based on accurate, and therefore not proportionate, evidence. Furthermore, it means the HELAA is not in accordance with NPPF paragraph 32 which states local plan preparation should be underpinned by relevant and up to-date evidence. This cannot be the case when the evidence base itself is inaccurate.