Land at Hinxton Grange

Smithson Hill representations to the Greater Cambridge Regulation 19 Local Plan

Smithson Hill

25 September 2026

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk

© 2026 Nathaniel Lichfield & Partners Limited (trading as "Lichfields"), All Rights Reserved, is registered in England, no. 2778116.
Registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.
Formatted for double sided printing.
Plans based upon Ordnance Survey mapping with the permission of His Majesty's Stationery Office.
© Crown Copyright reserved. Licence number 10007707
70133/01/MS/RC
41635049v1

8.0 The HELAA

8.1 The councils HELAA assessment concludes that the Site (HELAA Site ID 200765) has an Overall Suitability Score of Red, Available RAG of Green and Achievability RAG of Green. Despite the provision as part of the Regulation 18 Local Plan consultation of significant supporting material to evidence that the Red Overall Suitability Score for the Site is not supported by evidence (including a revised concept masterplan and technical work on archaeology, heritage and landscape) the score is unchanged. All other suitability criteria are scored as Amber or Green and are also not changed.

8.2 The below sets out why SmithsonHill does not consider the Suitability conclusions are robust, nor align with the HELAA's stated methodology.

Archaeology

8.3 We note that the Council has retained the Red RAG assessment for archaeology.

8.4 The criteria for the RAG assessment is presented in Annex 1 of the HELAA. In relation to archaeology, the criteria are defined as:

Score: Red

Assessment criteria: Known archaeology of significance which could not be mitigated through design or conditions.

Score: Amber

Assessment criteria: Development of the site could have a detrimental impact to archaeology. Further information regarding the extent and significance of archaeology would be required. Archaeological works could be secured by condition of planning permission.

8.5 The Archaeology Officer Comment does not describe why the harm to archaeological assets could not be mitigated through design or conditions. It is acknowledged that there is likely to be archaeology of importance within the Site. However, as discussed in the Archaeology Appraisal prepared for the site, the previous refusal at the site (ref. S/4099/17/OL) did not list archaeology as a reason for refusal. A scheme of archaeological mitigation was agreed by condition between the LPA and the applicant at the time.

8.6 Part of the definition of an Amber RAG rating states that *"Further information regarding the extent and significance of archaeology would be required. Archaeological works could be secured by condition of planning permission."* Given it was agreed that the archaeological impact of a previous scheme at the site could be mitigated by condition, it follows that Amber would be a more appropriate RAG rating for the site for archaeology. This would allow for further investigation of areas that have not yet been subject to evaluation, as well full excavation of any sensitive areas. It should also be noted that, at the application stage, the landscape masterplan could be developed to avoid the most sensitive areas as part of an appropriate mitigation scheme.

8.7 The comparison of the Site's assessment to Grange Farm as it relates to archaeology is included in the below section on historic environment.

Historic environment

8.8 We note that the Council has retained the Red RAG assessment for the historic environment.

8.9 The criteria for the RAG assessment is presented in Annex 1 of the HELAA. In relation to historic environment, the criteria are defined as:

Score: Red

Assessment criteria: Development of the site would cause substantial harm, or severe or significant "Less than substantial harm" to a designated heritage asset or the setting of a designated heritage asset which cannot be reasonably mitigated (see paragraphs 212-214 of the NPPF 2024).

Score: Amber

Assessment criteria: Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated

8.10 The Historic Environment Comments 2026 state *that "…it is still considered that development of the site to the extent proposed would cause a high degree of harm to heritage assets which could not be reasonably mitigated."*

8.11 The overall effects of development, including potential mitigation and heritage benefits, can only be determined at application stage when full details of a proposed development are available. It is therefore premature to draw conclusions on the degree of harm and effects of mitigation. Furthermore, national policy does not require heritage harm to be reasonably mitigated to be acceptable; it needs to be avoided where possible or minimised, and where there is harm this needs to be weighed against public benefits/benefits where required by policy, as part of the wider planning balance. National policy is also focused on conserving the significance of a heritage asset and not its setting; setting is not a heritage asset and needs to be considered with regards to its contribution to the significance of a heritage asset and the effect that change to setting would have on significance.

8.12 The Heritage Appraisal prepared by Lichfields and the emerging concept masterplan which accompanied the Regulation 18 representation, demonstrate that development at the site can directly respond to the heritage context and sensitivities through mitigation. This includes avoiding development in the most sensitive locations, retaining designed and historic landscape features, retaining the listed buildings and the non-designated pillbox, among a number of other key heritage principles identified for development. The Heritage Appraisal also identified that there is potential for heritage benefits to be incorporated into development.

8.13 The emerging concept masterplan is one approach to development of the site and it is fully recognised that responding to the heritage context would be a key consideration in terms of acceptability of development of the site at application stage. As set out in the Heritage Appraisal, it is considered that the heritage considerations should not preclude the site's allocation or the principle of development on the site. We disagree with the Council's conclusion that harm to the significance of designated heritage assets (the Grade II listed Hinxton Grange and Stable and Coach House to North East of Hinxton Grange) could not

be reasonably mitigated and the reason for this conclusion is not explained, particularly considering the key heritage principles for development identified in the Heritage Appraisal and the context of relevant national policies regarding assessing the effects of development on heritage assets. We therefore request that the RAG rating is revised to Amber.

8.14 In addition, we note that the land at Grange Farm site (HELAA Site ID 59401) has been identified as Amber for the historic environment and archaeology, despite the conclusion on the residual risk of harm in the 'Grange Farm Heritage Impact Assessment Update (2026)', which we assume has been prepared by the Council, stating that *"Due to the proposed scale and density of development, following the application of suitable mitigation strategies, the risk of significant residual harm remains high."* This does not appear to be reflected in the updated HELAA and it is not clear why if the Grange Farm site has been allocated an Amber rating for the historic environment/archaeology despite potential for significant residual harm following mitigation, that the Hinxton site is also not considered Amber. It is also noted that this report states *"Retention of the existing Grange Farm and part of its rural context would avoid impact on this non-designated heritage asset, and be a positive place making opportunity."* The Site is also proposing to retain Hinxton Grange and a substantial area of land forming part of its designed and rural setting and yet was not afforded the same conclusion about a positive place making opportunity.

Landscape

8.15 We note that the Council has retained the Red RAG assessment for landscape.

8.16 The criteria for the RAG assessment is 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.

The Council's conclusion does not fully reflect the Site's context or mitigation measures proposed. The Site is not an isolated area of open countryside but is closely related to the approved and under construction Wellcome Genome Campus expansion immediately to the south, with Ricketts Field also well related to Whittlesford Parkway Station, the National Highways depot, and existing commercial development to the south. The Site comprises predominantly commonplace large-scale arable fields. Importantly, the Site's more sensitive features, including the designed parkland landscape, can be retained and integrated within a landscape-led masterplan. Detailed appraisal work has demonstrated that, through a thorough understanding of landscape character, constraints and opportunities, development can be carefully located and designed to substantially reduce landscape effects. New planting, green infrastructure, public open space and undeveloped areas along the western boundary would help maintain a sense of the rural setting while limiting wider visual impacts. Consequently, contrary to the HELAA conclusions, it is considered that development of the Site could be accommodated in a manner that

substantially limits the landscape harm identified by the Council, i.e. it would not have a significant negative impact which cannot be mitigated.

8.17 In addition, we note that the land at Grange Farm site has been identified as Red for Landscape also, the assessment for the site states *"Long views across the site from the south exist. Views from the A14 are buffered with gappy vegetation and the density of the buffer is variable. The emerging masterplan will alter the existing landscape character irreversibly and may result irreversible harm to the setting of Little Abington if constraint planning and green corridors are not considered during the planning of the site"*. As acknowledged in the assessment, the Grange Farm site is very prominent in views from the A1307 due to its topography; arguably more so than the Hinxton Grange Site is from corresponding routes. Despite this conclusion, the site is still progressed to an emerging allocation.

Conclusion with regards to soundness

8.18 It is noted that the HELAA assessment for the emerging allocation at Grange Farm (HELAA Site ID 59401) also has an Overall Suitability RAG Score of Red, Available RAG of Green and Achievability RAG of Green. This shows that if the Site were to be pursued as an emerging allocation, it would do so with the same concluding assessment as Grange Farm, which is an emerging allocation. As set out extensively elsewhere in our representations, more housing allocations are needed to make this plan sound, and on the basis of the analysis here, the Site should be one of them.

8.19 Notwithstanding, the HELAA is overly heavy handed in its assessment and is not in all cases correctly applying its own methodology, it cannot be considered accurate nor robust. SmithsonHill consider that policies informed by this evidence-based document cannot be justified as per NPPF paragraph 36(b) as the strategy of the draft GCLP 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.

Birmingham
0121 713 1530
birmingham@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk