Representations to the Greater Cambridge Local Plan Regulation 19 Draft

Land at South Trumpington
Site ID: 115169
HELAA Site ID: 40048

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Executive Summary

British Land owns the Land at South Trumpington, Cambridge (the 'Site') (Site ID: 115169; HELAA Site ID: 40048), and are committed to promoting it through the emerging Greater Cambridge Local Plan. British Land have a strong reputation of delivering state-of-the-art developments, in the best strategic locations, built and managed to British Land's industry-leading standards. They do this by bringing together their unique expertise in the delivery of complex developments, as well as their award-winning sustainability practices.

British Land's previous local plan submissions demonstrate that the Site is suitable, achievable and deliverable for allocation and, ultimately, development (subject to future planning permission(s)). Those submissions conclude that the Site should be designated as grey belt and as such, should be prioritised for release from the Green Belt for development in order for Greater Cambridge to meet its unmet housing and employment needs. Land at South Trumpington is a sustainable, achievable and deliverable site that can make a powerful contribution to Greater Cambridge's needs in the short-term, with strong alignment with emerging local and national visions. The Site:

- Has beneficial links with existing sites and businesses across the city including important clusters e.g., the Cambridge Biomedical Campus, CB1, University of Cambridge's West Cambridge Campus, Peterhouse Technology Park, Cambridge Science Park, Babraham Research Campus, Granta Park, and the Wellcome Genome Campus. The Site has potential to support these important local businesses (complementary workspace, consolidation centre, research and development, travel hub).

- Presents a range in opportunity including up to approximately 260,000 sqm of flexible space for jobs, including in those sectors which are crucial to a modern economy and contributing to Cambridge's world-class ecosystem.

- Can deliver approximately 400-1,000 homes across a mix of tenures, up to 50% of which will be affordable including homes for essential workers, meeting an urgent and unmet local need quickly, and satisfying one of the NPPF's "Golden Rules".

- Is uniquely strategically accessible by multi-modes, supporting a vision led approach to transport and movement. The Site would provide excellent access by non-car modes to the City Centre, CBC, and the southern cluster, as it is located adjacent to the South-West Travel Hub (under construction), the Trumpington Park & Ride, and is extremely well-related to Cambridge South station by walking and cycling.

- Is adjacent to existing open space (Trumpington Meadows Country Park), allowing for enhancements and connections to open space for future residents and workers, satisfying another of the "Golden Rules".

- Benefits from existing infrastructure capacity to deliver a rich mix of uses, consisting of a range of housing types, community facilities, research and development, and complementary workspace such as start-up and scale-up.

- Benefits from all required utility connections to serve future development.

- Will deliver new and enhanced local infrastructure, with potential for community and health facilities, and retail, satisfying one of the Golden Rules.

- Will implement a best-in-class, sustainable water consumption strategy for residential use, commercial use, and landscape.

- Can deliver Biodiversity Net Gain in line with legislation.

- Benefits from one ownership, is justifiable and deliverable at pace and as such, can easily provide a significant first phase in delivering the Cambridge growth strategy.

This Report offers a response to the Regulation 19 draft of the Greater Cambridge Local Plan ('GCLP') of which consultation extends to 25 September 2026.

These Representations consider the GCLP against the criteria for soundless of a Local Plan as set out in Paragraph 36 of the NPPF (2024) and offers comment on how Land at South Trumpington can contribute to the emerging aims and growth ambitions of the GCLP.

British Land considers that the emerging Plan is not fully justified and is not fully effective insofar as it excludes Land at South Trumpington from the Development Strategy. The allocation of the Site would improve flexibility, resilience and delivery capability whilst remaining wholly consistent with the Plan's overarching spatial strategy and objectives.

The Site is available, achievable and suitable for development and represents a sustainable edge-of-Cambridge opportunity capable of contributing towards the Plan's housing and employment objectives.

British Land therefore requests that the Councils reconsider the role of Land at South Trumpington within the development strategy and modify the Plan to allocate the Site for development.

1 Introduction

1.1 Preamble

1.1 This report ('the Representations') has been prepared by Stantec (Planning Consultant) on behalf of British Land PLC ('the Representor') and sets out the Representor's responses to the draft Greater Cambridge Local Plan (GCLP) which is currently out for consultation until 25 September 2026. These Representations follow the Sites Submission Update in March 2025 and Regulation 18 Response in January 2026.

1.2 The Representor

1.2.1 British Land owns and operates several sites in Cambridge and South Cambridgeshire, namely Land at South Trumpington, Newmarket Road, and Peterhouse Technology Park. In respect of Land at South Trumpington, British Land are committed to promoting the Site through the emerging Greater Cambridge Local Plan. British Land have a strong reputation of delivering state-of-the-art developments, in the best strategic locations, built and managed to British Land's industry-leading standards. They do this by bringing together their unique expertise in the delivery of complex developments, as well as their award-winning sustainability practices.

1.2.2 British Land are the sole owner of Land at South Trumpington, Cambridge (the Site) and are committed to promoting the Site through the emerging Greater Cambridge Local Plan. The Site ID is 115169 and HELAA Site ID is 40048.

1.2.3 British Land's "Regulation 19 Consultation" submission, which this document forms part of, demonstrates that the Site is **suitable, achievable and deliverable** for allocation and, ultimately, development (subject to future planning permission(s)).

1.2.4 Ultimately, the evidence submitted by British Land as part of the Greater Cambridge Local Plan process concludes that the Site should be designated as grey belt and as such, should be prioritised for release from the Green Belt for development in order for Greater Cambridge to meet its unmet housing and employment needs. Land at South Trumpington is a sustainable, achievable and deliverable site that can make a powerful contribution to Greater Cambridge's needs in the short-term, with strong alignment with emerging local and national visions.

1.2.5 The Representations consider whether the Plan is sound and assess the Plan specifically against Paragraph 36 of the NPPF (2024) which identifies that Plans are 'sound' if they are:

*'a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'*

1.2.6 Specifically, this submission responds to three matters relating to:

- The Councils' assessment of the Site in the Development Strategy Topic Paper.
- The newly available Green Belt evidence provided by the Councils.
- The Councils' overall 'suitability' score in their HEELA Response (2026) especially regarding i) Landscape and ii) Site Access.

1.2.7 These Representations have also been submitted online via the Council's consultation portal.

2 Housing and Employment Need, Supply and Plan Resilience

2.1 Introduction

2.1.1 British Land supports the Councils' ambition to deliver a Local Plan capable of supporting Greater Cambridge's continued economic success whilst meeting identified housing needs.

2.1.2 Greater Cambridge occupies a unique role within the national economy. It remains one of the United Kingdom's most significant centres for research, innovation, life sciences and technology-based employment. Government policy continues to recognise the strategic importance of Cambridge as a driver of national economic growth and productivity. The emerging Local Plan therefore performs a function beyond simply meeting minimum housing requirements; it must also provide an appropriate framework capable of supporting future economic growth and associated housing demand.

2.1.3 The question for the Examination is therefore not solely whether the Plan identifies sufficient land to meet current minimum requirements, but whether the proposed strategy is sufficiently flexible, resilient and deliverable to respond to future growth opportunities and potential changes in housing and employment demand over the Plan period.

2.2 Housing Need and Economic Growth

2.2.1 The Councils' evidence identifies a relationship between future employment growth and housing provision. However, there remains uncertainty regarding the scale of future economic growth that Greater Cambridge may experience over the Plan period.

2.2.2 In previous responses to the emerging Plan, British Land have raised concerns that the Plan is informed primarily by a central growth scenario and may not adequately account for the potential for higher levels of economic growth. These concerns are particularly relevant given the continued Government focus on Cambridge as a location of national economic importance and the significant public and private sector investment being directed towards the area.

2.2.3 It is not necessary for the Examination to conclude that the Councils' housing requirement is incorrect in order to recognise that uncertainty exists. Rather, such uncertainty reinforces the importance of ensuring that the development strategy contains an appropriate degree of flexibility and includes a sufficient range of deliverable growth opportunities.

2.2.4 In British Land's view, the Local Plan should seek to avoid circumstances where housing provision becomes a constraint on economic growth. The provision of additional sustainable and deliverable development opportunities close to major employment locations represents an appropriate response to such uncertainty.

2.3 Delivery Risk and Supply Resilience

2.3.1 The draft Local Plan places substantial reliance on a relatively limited number of strategic allocations and large-scale development opportunities.

2.3.2 British Land recognises the important role these allocations will play in delivering homes and jobs throughout the Plan period. However, large strategic sites are inherently complex and frequently dependent upon substantial infrastructure investment, multiple landownerships, significant upfront costs and long delivery programmes. As a result, there can often be a considerable gap between allocation and delivery.

2.3.3 The preparation of a sound Local Plan should therefore recognise that delivery trajectories are forecasts rather than certainties. A robust strategy should contain sufficient flexibility to accommodate delays, market changes and unforeseen delivery constraints.

2.3.4 In this context, additional deliverable sites such as South Trumpington, which are capable of contributing alongside the strategic allocations can play an important role in strengthening the resilience of the overall development strategy. The purpose of additional sites is not to replace existing allocations but to diversify the supply portfolio and provide contingency should delivery rates differ from those currently forecast. Such flexibility is an important component of a positively prepared and effective Local Plan.

2.4 The Role of Land at South Trumpington

2.4.1 Land at South Trumpington represents precisely this type of opportunity.

2.4.2 The Site is controlled by a single landowner and is available for development. Previous assessments have also confirmed that the Site is achievable. British Land has submitted a substantial body of technical evidence demonstrating that the Site is suitable, available and achievable and capable of making a meaningful contribution to Greater Cambridge's housing and employment needs.

2.4.3 The Site occupies a highly sustainable edge-of-Cambridge location adjacent to existing development and close to key employment destinations including the Cambridge Biomedical Campus. It benefits from existing and emerging sustainable transport infrastructure, including proximity to Cambridge South Station, the Guided Busway, Trumpington Park and Ride and strategic active travel routes.

2.4.4 Future development at South Trumpington would provide the opportunity to deliver housing and employment in close proximity to one another, reducing reliance on longer-distance commuting and supporting more sustainable patterns of growth.

2.4.5 Importantly, allocation of the Site would not require any change to the fundamental structure of the Development Strategy or undermine existing allocations. Rather, it would reinforce the Plan's preferred approach of directing growth to sustainable locations on the edge of Cambridge whilst increasing flexibility and reducing reliance upon a relatively limited number of major sites.

2.5 Conclusion

2.5.1 British Land considers that the emerging Local Plan should be assessed not only against minimum housing requirements but also against its ability to respond positively to uncertainty in future housing and employment demand.

2.5.2 Given the scale of proposed economic growth within Greater Cambridge, the reliance on a relatively small number of large strategic sites and the Government's continued emphasis on supporting growth in Cambridge, it is appropriate that the Plan incorporates additional sustainable and deliverable opportunities capable of strengthening housing and employment delivery.

2.5.3 Land at South Trumpington represents such an opportunity. Allocation of the Site would improve the resilience, flexibility and effectiveness of the Development Strategy whilst remaining consistent with the Plan's stated preference for sustainable growth on the edge of Cambridge.

3 Policy S/DS: Development Strategy

3.1 Introduction

3.1.1 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.

3.1.2 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.

3.2 Policy S/DS Response

3.2.1 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.

3.2.2 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.

3.2.3 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 which were set out in British Land's Regulation 18 response and therefore are not repeated here.

3.3 Overarching Comments on the Development Strategy and Approach to Allocating Sites

3.3.1 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. It further requires strategic policy-making authorities to consider the consequences for sustainable development of directing development towards urban areas within the Green Belt, towns and villages inset within the Green Belt, or locations beyond its outer boundary.

3.3.2 Consistent with paragraph 148, the Councils should have fully assessed the opportunities presented by sustainable Green Belt sites on the edge of Cambridge. Such sites may provide more sustainable locations for housing and employment growth than alternatives located beyond the Green Belt, particularly where they benefit from proximity to existing development, employment, services and sustainable transport infrastructure.

3.3.3 British Land supports the broad sequential approach established by Policy S/DS, including its identification of the edge of Cambridge as a preferred location for growth after the Cambridge urban area. However, the evidence does not demonstrate that this preference has been applied consistently when selecting sites for allocation. In particular, the Councils have reached conclusions about the Site that are not justified by the evidence, particularly given the changed circumstances at South Trumpington and the strategic objectives of the Plan.

3.3.4 As set out in Chapter 2, British Land is also concerned that the development strategy relies on a relatively limited number of large strategic allocations with extended delivery programmes. British Land does not seek the removal of those allocations. However, the Plan should include sufficient flexibility to accommodate delays, market changes or infrastructure constraints that may affect their delivery.

3.3.5 British Land considers that the evidence relied upon to justify the exclusion of Land at South Trumpington does not adequately reflect the Site's current circumstances, the substantial body of technical evidence submitted on behalf of British Land, or the strategic benefits that the Site could deliver.

3.3.6 Allocation of Land at South Trumpington would complement, rather than alter fundamentally, the proposed development strategy. The Site would provide an additional sustainable and deliverable edge-of-Cambridge growth opportunity, diversify the sources of housing and employment supply and improve the resilience of the Plan.

3.3.7 The Site should not be treated merely as a contingency or reserve option. It is under single ownership, is available for development and has been the subject of substantial technical assessment. Its allocation would give effect to the spatial priorities established by Policy S/DS while supporting a sustainable pattern of development in accordance with paragraph 148 of the NPPF.

4 Green Belt

4.1 Introduction

4.1.1 This chapter responds to the updated Green Belt evidence published by the Councils in support of the Regulation 19 draft Greater Cambridge Local Plan. In particular, it considers the:

- Greater Cambridge Green Belt Assessment: Response to Comments from Site Submissions Update and Draft Local Plan Consultation, prepared by LUC in June 2026;
- Greater Cambridge Green Belt Assessment: Review Following Changes to National Policy and Guidance, prepared by LUC in July 2026; and
- updated assessment of parcel TR6, within which Land at South Trumpington is located.

4.1.2 These representations should be read alongside the Landscape and Green Belt Technical Note prepared by FPCR, which forms part of British Land's Regulation 19 submission. The Technical Note reviews the updated evidence and considers the contribution made by the Site to the Green Belt purposes, the treatment of the Cambridge South West Travel Hub (SWTH) and the Councils' approach to identifying grey belt.

4.1.3 British Land welcomes the Councils' publication of updated Green Belt evidence and the recognition within that evidence that the circumstances affecting parcel TR6 have changed. However, British Land remains concerned that the methodology applied does not provide a sufficiently robust basis for concluding that TR6 makes a "Strong" contribution to national Green Belt Purpose (d), or for excluding the Site from consideration as grey belt.

4.2 Updated assessment of parcel TR6

4.2.1 Land at South Trumpington forms the principal part of the eastern area of Green Belt parcel TR6. The updated Greater Cambridge Green Belt Assessment acknowledges a number of changes relevant to the parcel, including the completed development at Trumpington Meadows and the consented SWTH.

4.2.2 The updated assessment reduces the contribution of TR6 to Cambridge Purpose 1 from "Relatively Significant" to "Moderate". This reflects the additional urbanising containment associated with the Travel Hub and the resulting reduction in the parcel's distinction from the urban area. The "Moderate" assessment is consistent with FPCR's assessment of the parcel against Cambridge Purpose 1.

4.2.3 The Councils' assessment continues to identify a "Moderate" contribution to Cambridge Purpose 2. FPCR considers that the parcel makes a "Relatively Limited" contribution to this purpose. Nevertheless, neither assessment identifies a strong contribution.

4.2.4 The principal area of disagreement concerns Cambridge Purpose 3. The updated assessment increases the contribution of TR6 from "Moderate" to "Relatively Significant". It does so principally on the basis that development of the Travel Hub and Cambridge Discovery Campus would weaken the separation between Cambridge and Hauxton, increasing the importance of the remaining undeveloped land.

4.2.5 FPCR does not agree with that conclusion. The Site is a relatively narrow area of land between the established settlement edge at Trumpington Meadows and the M11 and Travel Hub. Those features exert a substantial urban influence and provide defining and enduring edges. The wider separation between Cambridge and Hauxton is principally provided by land to the south of the Travel Hub and to the south-east of the A10, extending between the A10 and M11.

4.2.6 In this context, development of the Site would make a negligible difference to the perception of the wider settlement gap. The substantive separation between Cambridge and Hauxton would remain, while the M11, the Travel Hub infrastructure, the public transport route and associated landscape works would continue to provide significant physical and perceptual separation.

4.2.7 The Travel Hub should not therefore be treated only as increasing the sensitivity or importance of the remaining gap. Its urbanising and containing effects must also be reflected fully in the assessment of:

- the existing distinction between TR6 and the settlement edge;
- the Site's relationship with Cambridge rather than the wider countryside;
- the continuing role of the M11 and associated landscape infrastructure as enduring boundaries; and
- whether development of TR6 would materially diminish the wider separation between Cambridge and Hauxton.

4.2.8 In British Land's view, the Councils' assessment does not strike an appropriate balance between these considerations. It places undue weight on a perceived reduction in the settlement gap without giving equivalent weight to the Travel Hub's role in urbanising and containing TR6 or to the extent of the wider gap that would remain.

4.3 Grey belt and national Green Belt Purpose (d)

4.3.1 The December 2024 NPPF defines grey belt by reference to whether land makes a strong contribution to Green Belt purposes (a), (b) or (d). The assessment should therefore establish clearly whether the land itself makes a strong contribution to one or more of those national purposes.

4.3.2 The Greater Cambridge Green Belt Assessment continues to assess land by reference to three locally defined Cambridge Green Belt purposes. The Councils then seek to translate those local purposes into the national grey belt assessment. In particular, the Councils consider that all three Cambridge purposes form elements of national Purpose (d), which concerns preserving the setting and special character of historic towns.

4.3.3 This approach has a decisive effect on the assessment of TR6. The Councils' assessment identifies:

- a "Moderate" contribution to Cambridge Purpose 1;
- a "Moderate" contribution to Cambridge Purpose 2; and
- a "Relatively Significant" contribution to Cambridge Purpose 3.

4.3.4 Those findings are combined through the Councils' bespoke methodology to produce an overall "High" Green Belt harm rating. That overall harm rating is then translated into a finding that TR6 makes a "Strong" contribution to national Purpose (d), with the result that the parcel is not identified as provisional grey belt.

4.3.5 British Land is concerned that this process conflates different Green Belt considerations. Cambridge Purpose 3 concerns the separation of communities and therefore relates most directly to the function performed by national Purpose (b), which is to prevent neighbouring towns merging into one another. National Purpose (d), by contrast, is specifically concerned with preserving the setting and special character of historic towns.

4.3.6 The Councils' assessment of TR6 relies extensively on matters concerning the gap between Cambridge and Hauxton and the perceived separation of those settlements. Those

considerations should not, without clear justification, be used to elevate the Site's contribution to the distinct national purpose of preserving the setting and special character of a historic town.

4.3.7 This is particularly important because the Councils' individual assessment of Cambridge Purpose 2, which addresses the quality of Cambridge's setting and appears to relate most closely to national Purpose (d), concludes that TR6 makes only a "Moderate" contribution. FPCR assesses its contribution as "Relatively Limited". Neither conclusion indicates that the Site makes a strong contribution to national Purpose (d).

4.3.8 The Site is separated from the historic extent and core of Cambridge by extensive modern development at Trumpington Meadows. It is influenced and contained by that development, the M11, the A10 and the consented Travel Hub. The Site does not have an important direct visual, physical or experiential relationship with the historic core of Cambridge. These characteristics are inconsistent with the conclusion that the Site makes a strong contribution to preserving the setting and special character of the historic town.

4.3.9 The Councils' evidence does not provide a sufficiently clear justification for treating all three Cambridge purposes as components of national Purpose (d), or for converting the combined assessment into a finding that TR6 makes a "Strong" contribution to that purpose. The methodology effectively allows findings relating to settlement separation to determine the parcel's performance against historic setting and character, despite those being distinct national Green Belt purposes.

4.3.10 Although the emerging Local Plan falls to be assessed against the December 2024 NPPF, the August 2026 NPPF provides a relevant indication of the Government's current policy approach. Annex E reinforces the importance of assessing the contribution of land to each relevant national Green Belt purpose directly. It does not support deriving a Purpose (d) conclusion through the aggregation of separate locally defined purposes.

4.3.11 British Land therefore considers that the Councils' methodology does not provide a reliable basis for concluding that TR6 makes a strong contribution to national Purpose (d), or for excluding the Site from consideration as grey belt.

4.4 Implications for the Development Strategy

4.4.1 FPCR's assessment concludes that TR6 does not make a strong contribution to national Green Belt purposes (a), (b) or (d). The Site should therefore be treated as grey belt for the purposes of considering potential changes to the Green Belt through the plan-making process.

4.4.2 This conclusion does not mean that landscape, heritage or other environmental considerations cease to be relevant. Those matters remain relevant under their respective policy and technical tests when considering whether the Site should be allocated and how development should be planned. However, they should not be conflated with the separate question of whether the Site makes a strong contribution to the relevant Green Belt purposes.

4.4.3 The Site-specific Landscape and Visual Appraisal submitted at Regulation 18 stage, demonstrates that development can be successfully incorporated without notable long-term effects on the landscape and visual receptors identified in the immediate and wider area. Its allocation would also provide the opportunity for a landscape-led development framework responding to the Site's particular context and sensitivities.

4.4.4 The Site is located on the edge of Cambridge, adjacent to existing development and close to major employment, public transport and active travel infrastructure. Its allocation would support the spatial priorities established by Policy S/DS and provide a sustainable and deliverable addition to the Plan's supply of housing and employment land.

4.4.5 The updated Green Belt evidence does not provide a sufficiently robust basis for excluding the Site from further consideration. In particular:

- the assessment acknowledges that the parcel's distinction from Cambridge has been reduced;
- the individual assessment of the Cambridge purpose most closely related to national Purpose (d) remains "Moderate";
- the claimed strong contribution to Purpose (d) results from a bespoke aggregation of separate Cambridge purposes;
- the assessment places disproportionate reliance on settlement separation when reaching a conclusion concerning historic setting and character; and
- the urbanising and containing influence of the Travel Hub and existing development has not been reflected consistently in the overall conclusion.

4.4.6 British Land considers that the exclusion of Land at South Trumpington from the Development Strategy is not justified by proportionate Green Belt evidence. The Plan has not demonstrated that the chosen strategy represents the most appropriate strategy when reasonable alternatives, including sustainable and deliverable grey belt opportunities on the edge of Cambridge, are properly considered.

4.4.7 The omission of the Site therefore contributes to British Land's conclusion that the Plan is not justified and is not effective. The Plan should be modified to allocate Land at South Trumpington for development.

5 HELAA Assessment of Land at South Trumpington

5.1 Introduction

5.1.1 This section sets out the evolution of the Site in terms of the Councils' HELAA Assessment.

5.2 HELAA Assessment 2021

5.2.1 The Site was previously promoted by Grosvenor as part of the Call for Sites exercise in 2021. It was subsequently assessed as part of the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (2021). The Site was described as: "Land north of M11 and west of Hauxton Road, Trumpington, CB2 9NR" and given the HELAA Reference 40048.

5.2.2 The HELAA 2021 Site Assessment summarised the Site (Ref: 40048) as follows:

Criteria	Outcome
Suitable	**Red**
Available	**Green**
Achievable	**Green**

5.3 HELAA Assessment 2025

5.3.1 Following the Sites Submission Update exercise, which concluded in March 2025, a revised HELAA (HELAA 2025) was prepared by the Councils in support of the Regulation 18 Draft Local Plan. The Site is described as: "Land north of M11 and west of Hauxton Road, Trumpington, CB2 9NR" and given the HELAA Reference **40048**.

5.3.2 The HELAA 2025 Site Assessment summarised the Site (Ref: 40048) as follows:

Criteria	Outcome
Suitable	**Red**
Available	**Amber**
Achievable	**Green**

5.4 HELAA Assessment 2026

5.4.1 Following the Regulation 18 consultation, a HELAA (2026) response was published by the Councils.

5.4.2 The HELAA (2026) summarised the Site (Reg. 40048) as follows:

Criteria	Outcome
Suitable	**Red**
Available	**Green**
Achievable	**Green**

5.4.3 Pursuant to the Suitability score, the section below considers the topics of landscape and site access only as these are the only two issues that the Councils' have scored 'red'.

5.5 Suitability

Landscape

HELAA (2026) Assessment: Red

Councils' Landscape Comment 2026

Having considered the updated site submission details, the assessment score remains red. The site is a large plot of agricultural land between Trumpington Meadows, which forms part of the southern edge of Cambridge and the M11. Cumulatively with the development of the travel hub, development here could begin to see development creep southwards, diminishing the landscape gaps between Cambridge and Hauxton and enveloping part of the M11 into the environs of Cambridge. Development of the site would cause irreversible harm to the setting of Cambridge and degrade the separation between Hauxton and Cambridge.

British Land Response September 2026

5.5.1 The HELAA 2026 retains a "Red" landscape assessment for the Site. The Councils conclude that development could result in southward development creep, diminish the landscape gap between Cambridge and Hauxton, envelop part of the M11 within the environs of Cambridge, cause irreversible harm to the setting of Cambridge and degrade the separation between Cambridge and Hauxton.

5.5.2 British Land does not agree with this assessment. The Councils' commentary relies principally on matters of settlement separation, Green Belt function and the perceived effect of development on the Cambridge–Hauxton gap. Although these matters have a landscape dimension, they do not amount to a clear assessment of the likely effects of development on identified landscape and visual receptors. The HELAA's reasoning has therefore moved away from a conventional landscape assessment and increasingly duplicates the Green Belt assessment considered in Chapter 4.

5.5.3 A detailed Landscape and Visual Appraisal was prepared by FPCR and submitted with British Land's Regulation 18 representations. This considered the sensitivity and value of the Site and its surroundings, together with the potential landscape and visual effects of development. FPCR has reviewed its previous conclusions against the updated Regulation 19 evidence and confirms that they remain unchanged.

5.5.4 The Greater Cambridge Landscape Sensitivity Assessment divides the Site between parcels CSF07 and CSF08. While the wider CSF08 parcel is assessed as having High sensitivity, the assessment itself recognises that sensitivity varies across the parcel and that the M11 and the edge of new development at Trumpington are strong features that are less susceptible to the development scenario. Parcel CSF07, which covers the central and eastern parts of the Site, is assessed as having medium to low sensitivity.

5.5.5 The Site-specific appraisal is therefore important. FPCR concludes that the Site and its immediate landscape have "Medium" landscape value overall. The Site is not a landscape of uniformly high sensitivity and its immediate context is strongly influenced by the established settlement edge at Trumpington Meadows, the M11, the A10 and the consented SWTH.

5.5.6 The context of the Site has changed materially since the original HELAA assessment. Development at Trumpington Meadows is complete and forms a clear and substantial urban edge immediately to the north. The SWTH will introduce further transport infrastructure, lighting, movement, public transport infrastructure, bunding and landscape works to the south and south-east. These features reduce the Site's distinction from the urban area and increase its physical and visual containment.

5.5.7 The Councils rely on the SWTH as a reason for increasing the perceived importance of the remaining gap. That analysis does not give adequate weight to the Travel Hub's parallel effect in urbanising and containing the Site. Nor does it recognise that the wider separation between Cambridge and Hauxton is principally provided by land to the south of the Travel Hub and to the south-east of the A10.

5.5.8 The M11 would remain a substantial and readily perceptible boundary. Together with the Travel Hub, the new public transport route and associated landscape infrastructure, it would continue to provide an enduring edge and a clear element of separation. Development of the Site would therefore make a negligible difference to the perception of the wider gap between Cambridge and Hauxton.

5.5.9 FPCR's detailed work identifies limited effects on landscape and visual receptors and concludes that development can be successfully incorporated without notable long-term effects in the immediate or wider area. The opportunity would exist through the preparation of a development framework and future planning application to respond to identified sensitivities through the disposition and scale of development, structural landscaping, appropriate treatment of the M11 edge and connections with the wider green infrastructure network.

5.5.10 The Councils' continued "Red" assessment does not engage adequately with that Site-specific evidence. It relies instead upon generalised concerns regarding development creep, settlement separation and Green Belt function. Those concerns do not demonstrate that the Site is unsuitable in landscape terms, particularly when considered against its changed context and the submitted Landscape and Visual Appraisal.

5.5.11 British Land therefore considers that landscape impact does not provide a robust basis for finding the Site unsuitable or excluding it from the Development Strategy. The HELAA landscape assessment should be revised from Red to Green.

Revised Assessment (Reg 19): **Green**

Site Access

HELAA (2026) Assessment: **Red**

Site Access Officer Comment 2026

Having considered the updated site submission details, the assessment score remains red. The access arrangements proposed would not be suitable for the development, with due regard to the existing development to the north. A minimum of two points of vehicular access would be required for a development of this scale.

British Land Response

5.5.12 The HELAA 2026 identifies Site Access as a "Red" constraint and concludes that the proposed access arrangements would not be suitable for development, stating that a minimum of two points of vehicular access would be required for a development of this scale. However, the evidence presented by the Council does not adequately justify this conclusion.

5.5.13 Previous iterations of the HELAA assessed access arrangements to the Site more positively. The 2021 HELAA concluded that the Site was "acceptable in principle subject to detailed design" and assigned an "Amber" rating, a conclusion which was retained in the 2023 HELAA. The subsequent change to a "Red" rating in 2025 arose from a point-in-time issue regarding the adoption status of Osprey Drive rather than any fundamental inability to provide suitable access to the Site. The Site promoter controls the land necessary to secure a connection to the highway network and there is no technical impediment to delivering an access from Osprey Drive to serve future development.

5.5.14 The Regulation 19 HELAA maintains the "Red" rating on different grounds, namely that a second point of vehicular access would be required. However, this position appears

inconsistent with both the HELAA methodology and the relevant highway authority guidance. The HELAA states that sites promoting more than 100 dwellings must provide a suitable secondary access, but expressly acknowledges that such access may comprise a pedestrian and cycle connection where it complies with highway requirements.

5.5.15 Similarly, the Cambridgeshire Highways Development Management General Principles for Development (2023) state that, for developments exceeding 100 dwellings, a second access point comprising an emergency link will normally be sought, whilst two full vehicular access points are generally required only for developments exceeding 200 dwellings.

5.5.16 Evidence prepared by KMC Transport Planning demonstrates that the Site is capable of being served by a principal vehicular access from Osprey Drive together with multiple secondary connections through adjoining streets and active travel routes to the north. These connections provide opportunities for pedestrian, cycle and emergency access and are capable of satisfying the requirements set out within both the HELAA methodology and highway authority guidance.

5.5.17 Importantly, the purpose of the HELAA is to determine whether a site is capable of accommodating development and whether any constraints can reasonably be overcome. It is not intended to require a fully engineered access solution equivalent to that expected at planning application stage. The evidence submitted on behalf of British Land demonstrates that suitable access can be achieved and that any detailed design considerations can be addressed through the normal development management process.

5.5.18 Accordingly, the Site Access assessment does not justify a “Red” constraint score. At a minimum, the evidence supports an “Amber” rating, reflecting that any access-related matters are capable of being satisfactorily addressed through the design and delivery of development. The HELAA assessment therefore materially understates the suitability of the Site for allocation and should be revisited.

Revised Assessment (Reg 19): **Amber**

5.6 Suitability Summary

5.6.1 As such, to understand how the suggested British Land scoring compares with the HELAA 2026 scoring, we have provided a summary table below:

	Issue	HELAA 2026 Assessment	Reg 19 2026 Outcome
Suitability	Adopted Development Plan policies		
	Flood Risk		
	Landscape and Townscape		
	Biodiversity and Geodiversity		
	Open Space / Green Infrastructure		
	Policy Officer		

	Issue	HELAA 2026 Assessment	Reg 19 2026 Outcome
	Historic Environment		
	Archaeology		
	Accessibility to Services and Features		
	Site Access		
	Transport and Roads		
	Noise, Vibration, Odour and Light Pollution		
	Air Quality		
	Contamination and Ground Stability		
	Overall 'Suitable' Score		

5.6.2 In conclusion, as set out within British Land's Sites Submissions Update (March 2025) response, and their Regulation 18 response (January 2026), and the table above, the context of the Site has significantly changed and additional technical evidence has been provided to underpin British Land's conclusion that the proposed HELAA scores should be changed following a review of up-to-date evidence and information. As such, the Site is now considered to be suitable for release and development.

5.7 Availability

5.7.1 The Councils agree with British Land that the Site is available for development with immediate effect.

5.8 Achievability

5.8.1 The land has been promoted by the landowner and is known to be available for development. The landowner has no reasons why the Site could not be developed.

5.8.2 The Councils agree with British Land that development of the Site is considered to now be achievable.

5.9 HELAA Assessment Summary

5.9.1 Having reviewed the most up to date evidence and information, we suggest that the previous HELAA 2026 outcome scores for the Site should be updated. The proposed changes to the overall outcome are set out in the table below:

Criteria	HELAA 2026 Outcome	Potential Reg 19 2026 Outcome
Suitable	**Red**	**Green**

Available	**Amber**	**Green**
Achievable	**Green**	**Green**

6 Conclusion

6.1 Modification Sought

6.1.1 British Land therefore considers that, for the reasons set out in Chapters 2 to 5, the emerging Plan is not fully justified and is not fully effective insofar as it excludes Land at South Trumpington from the development strategy. The allocation of the Site would improve flexibility, resilience and delivery capability whilst remaining wholly consistent with the Plan's overarching spatial strategy and objectives.

6.1.2 The Site is available, achievable and suitable for development and represents a sustainable edge-of-Cambridge opportunity capable of contributing towards the Plan's housing and employment objectives.

6.1.3 British Land therefore requests that the Councils reconsider the role of Land at South Trumpington within the development strategy and modify the Plan to allocate the Site for development.