British Land response to S/DS

Site ID 115169 / HELAA Site ID: 40048

These Representations (submitted on behalf of British Land) offer 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.

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.

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.

Policy S/DS Response

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.

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.

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.

Overarching Comments on the Development Strategy and Approach to Allocating Sites

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.

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.

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.

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.

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.

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.

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.