British Land response to S/DS (HELAA Assessment)

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.

HELAA 2026 Response

Introduction

These representations set out the evolution of the Site in terms of the Councils' HELAA Assessment.

HELAA Assessment 2021

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.

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

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

HELAA Assessment 2025

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**.

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

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

HELAA Assessment 2026

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

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

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

Achievable	**Green**

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'.

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

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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

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.

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.

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.

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.

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.

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.

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**

Suitability Summary

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		
	Historic Environment		
	Archaeology		

	Issue	HELAA 2026 Assessment	Reg 19 2026 Outcome
	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		

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.

Availability

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

Achievability

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.

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

HELAA Assessment Summary

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**