British Land response to S/GB

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.

Introduction

These Representations 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.

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.

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.

Updated assessment of parcel TR6

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.

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.

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.

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.

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.

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.

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.

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.

Grey belt and national Green Belt Purpose (d)

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.

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.

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.

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.

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.

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.

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).

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.

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.

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.

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.

Implications for the Development Strategy

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.

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.

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.

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.

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.

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.

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.