Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name		Lyndon Gill
Organisation (where relevant)	Telereal Investment Properties Limited Trillium Ltd (TT Group)	Twenty5 Planning Ltd
Job Title (where relevant)		Senior Director
Address, including Post Code		50-60 Station Road Cambridge CB1 2JH
Telephone		[redacted]
Email address		[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/C/HGH: Henry Giles House, 73-79 Chesterton Road
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Introduction

This representation is made by Twenty5 Planning Ltd on behalf of Telereal Investment Properties Limited Trillium Ltd (TT Group), owner and promoter of Henry Giles House (HGH), 73-79 Chesterton Road. It should be read alongside our full representation letter dated 18 September 2026 and its appendices (see Section 4).

TT Group made representations on draft Policy S/C/HGH at the Regulation 18 stage (December 2025 – January 2026). These supported the principle of allocating the site for residential development, but recommended changes to ensure that the policy optimises the redevelopment of a prime brownfield site in a highly sustainable location, in accordance with Paragraph 124 of the NPPF (December 2024). TT Group continues to support the allocation, but considers that Policy S/C/HGH, and in particular criterion (g), is unsound when assessed against the tests at Paragraph 36 of the NPPF.

Changes to Policy S/C/HGH at Regulation 19

The Proposed Submission Plan amends criterion (a) to require building heights reflective of local context and contextual materials, and adds criteria (f) (archaeological assessment, as requested by Historic England) and (g). We have no comment on the amendments to criterion (a) or on criterion (f). Criterion (g) states:

"There is potential for a minimal increase in capacity where it can be demonstrated that amenity, outlook, daylight and sunlight and heritage impacts can be assessed and mitigated effectively. Any increase in scale along the Chesterton Road frontage would need to be fully tested from sensitive heritage views including the views down Carlyle Road and the impacts on nearby Grade II listed structures and their setting."

The policy as a whole is negatively worded. It sets out everything development must not do and all the mitigation it must consider, but does not acknowledge the positive basis for redevelopment: a previously developed site in a highly sustainable location within walking distance of the City Centre, with good public transport and active travel accessibility. HGH is identified in the adopted Conservation Area Appraisal as a building that has a negative impact on the Conservation Area, so the emphasis should be on positive redevelopment and on making the most effective use of the land to meet the very significant need for homes in Greater Cambridge.

Cambridge is one of the least affordable places to live in the UK, and the Housing Trajectory & Housing Land Supply Addendum (September 2026) identifies that Cambridge City has only a 2.72-year supply of homes. Against this backdrop the Plan should be maximising the potential of sustainable sites such as HGH.

The Site Allocations Topic Paper (2026) states that "there is potential for a higher capacity to be accommodated where further evidence can be developed" to ensure impacts on neighbouring buildings and heritage assets are managed. While we accept that further detailed assessment would be required to support a denser scheme, limiting the site to "a minimal increase in capacity" in criterion (g) conflicts with the Council's own evidence and is unsound for the reasons set out below.

Positively Prepared

NPPF Paragraph 124 requires strategic policies to accommodate objectively assessed needs in a way that makes as much use as possible of previously developed land. With only a 2.72-year supply in Cambridge City, the Plan clearly cannot currently accommodate its needs. The high-growth scenario requires c.48,069 new homes over the Plan period to 2045 and relies on major strategic allocations to deliver over 37,000 of these, several of which depend on significant infrastructure (e.g. North East Cambridge) or are subject to scrutiny given delivery rates at Cambourne, Northstowe and Waterbeach. This heightens the importance of maximising smaller, deliverable brownfield sites such as HGH.

Paragraph 2.56 of the Proposed Submission Plan confirms that the urban area of Cambridge "provides the most significant opportunities for reusing previously developed land and optimising densities in these well connected locations". Criterion (g) contradicts this strategic driver by failing to optimise the density of a brownfield site in a highly sustainable and well-connected location.

Criterion (g) also conflicts with Policy DP/HD (Housing Density), which requires efficient use of land through a design-led approach and supports high-density development exceeding prevailing densities where sites are within 800m walking/cycling distance of Cambridge City Centre and/or high-quality active travel provision. HGH meets these locational criteria. It also conflicts with NPPF Paragraph 130(a), which requires plans to optimise the use of land and seek a significant uplift in density in city and town centres unless there are strong reasons why this would be inappropriate. Policy S/C/HGH instead presumes against a significant uplift. The policy, and criterion (g) in particular, has not been positively prepared.

Justified

TT Group's Regulation 18 representations were accompanied by a scale and massing study by Formation Architects, based on Figure 52 of the Mitcham's Corner Development Framework SPD (a maximum of 5 storeys in the centre of the site, grading down to 2 storeys to the north and east, with stepped 3- and 4-storey forms to the west and north). It demonstrates that up to 95 dwellings (c.151 dph) can be achieved, meeting space standards and cycle parking standards, with private amenity space for each unit and parking for around 50% of units (44 spaces), which is generous in a location where car-free development would be supported. The approved 3-storey + 1 scheme at Carlyle House (20/03843/FUL) demonstrates that deviation from the SPD's 2-storey + 1 approach can be acceptable.

This evidence, and the heritage benefit of replacing a building identified as harmful to the Conservation Area, do not appear to have been considered in limiting the site to a "minimal increase". The Topic Paper provides no justification for this limitation. The other Regulation 18 respondents on this policy (Historic England, a local resident and the Green Party) sought for development to reflect local historic context, heights and materiality – matters now addressed in criteria (a) and (f). None suggested that density or the quantum of development should be curtailed. Criterion (g) is therefore not justified.

Effective

Allocations must be deliverable over the Plan period. HGH is available and deliverable, but underestimating and capping site capacity undermines investor confidence. Formation Architects' work indicates that conversion of the existing building could accommodate a similar number of homes to the 50-dwelling allocation. Given the costs of demolition, construction, affordable housing and biodiversity net gain on brownfield sites, the policy as drafted provides no incentive to pursue comprehensive redevelopment, and effectively encourages retention of the existing building. A policy that deters the redevelopment it seeks to secure is not effective.

We accept that careful consideration of the immediate context, including the Chesterton Road frontage, will be required at application stage, supported by a Heritage Impact Assessment and Landscape and Visual Impact Assessment. That design-led, collaborative process with the LPA is the appropriate means of establishing the optimal capacity; an arbitrary cap in the policy places a barrier on it. Criterion (g) is not effective.

Consistent with National Policy

NPPF Chapter 11 requires efficient and effective use of land. Paragraph 125 requires policies to support the development of under-utilised brownfield land, and Paragraph 130 requires densities that optimise the use of land. Comparable Cambridge allocations have exceeded their allocated densities significantly: Policy R9 (Devonshire Gardens) allocated 43 homes on 1.23ha (35 dph), while the approved scheme (22/01982/FUL) achieves 184 dph. Restricting HGH to a "minimal increase" above 50 dwellings unduly limits a prime brownfield site and is inconsistent with national policy.

Conclusion

TT Group supports the allocation of HGH, but Policy S/C/HGH must be amended to be sound. The indicative capacity should be increased to at least 95 dwellings, and criterion (g) should be deleted or modified to remove any limitation on capacity, with the policy recognising the positive opportunity the site presents. Proposed modifications are set out in Section 5.

Please provide a 100 word summary of your representation.

TT Group supports the allocation of Henry Giles House but considers Policy S/C/HGH unsound. The policy is negatively worded and new criterion (g) caps the site at "a minimal increase in capacity" above 50 dwellings, contrary to the Council's own Topic Paper, Plan paragraph 2.56, Policy DP/HD and NPPF paragraphs 124, 125 and 130. Formation Architects' massing study, following the Mitcham's Corner SPD, demonstrates capacity for around 95 dwellings. With Cambridge City at a 2.72-year supply, the cap is not positively prepared, justified or effective. The capacity should be increased to at least 95 dwellings and criterion (g) deleted or modified.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please Refer to Full Representations Document prepare by Twenty5 Planning:
Greater Cambridge Local Plan (Regulation 19) Representation – Draft Policy S/C/HGH: Henry Giles House, 73-79 Chesterton Road (18 September 2026)

- Appendix 1 – Twenty5 Planning, Greater Cambridge Local Plan (Regulation 18) Representations on draft Policy S/C/HGH (28 January 2026)
- Appendix 2 – Formation Architects, 7071 Henry Giles House Initial Feasibility Study, Rev 02 (November 2025)

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Modification 1 – Site capacity
Amend the indicative capacity for Policy S/C/HGH (and corresponding figures in the supporting text, housing trajectory and site schedules) from 50 dwellings to "at least 95 dwellings".
Reason: it reflects the only site-specific capacity evidence before the examination (Formation Architects study), aligns with the Topic Paper's conclusion that higher capacity is possible, and is consistent with Policy DP/HD and NPPF paragraphs 124, 125 and 130 (positively prepared, justified, consistent with national policy).

Modification 2 – Criterion (g)
Delete criterion (g). Alternatively, replace it with:
"(g) The site is capable of accommodating a significant uplift in density above the indicative capacity. Proposals should follow a design-led approach demonstrating that amenity, outlook, daylight and sunlight and heritage impacts, including along the Chesterton Road frontage, in views down Carlyle Road and on the setting of nearby Grade II listed structures, are assessed and mitigated effectively."

Reason: it retains the heritage and amenity safeguards sought by Historic England and other respondents, but removes the unjustified cap on capacity, so that the appropriate quantum is determined through detailed design and assessment at application stage (justified, effective).

Modification 3 – Positive framing of the policy
Add the following opening text to Policy S/C/HGH (or its supporting text):
"The redevelopment of Henry Giles House is supported as a highly sustainable, previously developed site within walking distance of Cambridge City Centre, with excellent public transport and active travel accessibility. The existing building is identified in the Conservation Area Appraisal as having a negative impact on the Conservation Area. Its replacement with a high-quality residential scheme that makes efficient use of land and optimises density, in accordance with Policy DP/HD, is encouraged."

Reason: it sets out the positive basis for the allocation, consistent with Plan paragraph 2.56 and NPPF paragraph 125, and provides the certainty needed to incentivise comprehensive redevelopment rather than retention of the existing building (positively prepared, effective).

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

TT Group is the owner and promoter of the site and has prepared site-specific capacity evidence (Formation Architects Initial Feasibility Study) that is directly relevant to the modifications sought. The appropriate capacity of the site, and the balance between optimising density and protecting heritage assets, are matters of technical and planning judgement that are best explored through discussion at the hearing sessions. Participation will enable TT Group to assist the Inspector in understanding the evidence and in testing whether the capacity limitation in criterion (g) is justified.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes