



Planning Report

Land at South Trumington

March 2025

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British Land PLC

Prepared by:
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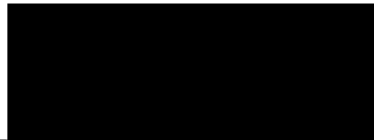
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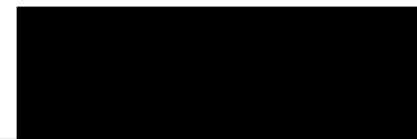
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Executive Summary

British Land owns the Land at South Trumpington, Cambridge (the 'Site'), 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 "Sites Submission 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)). This report 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. 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.
- 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.



1 Introduction and Purpose

1.1 Introduction

- 1.1.1 This report has been prepared by Stantec on behalf of British Land to support a submission to the Greater Cambridge Local Plan 'Sites Submission Consultation' exercise.
- 1.1.2 The promoter, British Land, are the sole owner of the Site, Land at South Trumpington, Cambridge and are committed to promoting the Site through the emerging Greater Cambridge Local Plan.
- 1.1.3 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.
- 1.1.4 The 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)).
- 1.1.5 This submission replaces all technical information provided to Greater Cambridge by the previous landowner (Grosvenor) (**HELAA ref. 40048**).

1.2 Purpose

- 1.2.1 The purpose of this report is to support British Land's response to the Sites Submission Consultation as part of the emerging Local Plan process. Pursuant to the National Planning Policy Framework (NPPF) published by the government on 12 December 2024, this report sets out:
 - The context for growth and housing and employment need;
 - The sustainability benefits of Land at South Trumpington as a location for growth;
 - The case for Land at South Trumpington to be designated as grey belt;
 - The subsequent case for Land at South Trumpington to be released from the Green Belt and allocated for development, pursuant to its grey belt status;
 - How future development on the Site could easily satisfy the NPPF's 'Golden Rules';
 - The conclusions for the Site's suitability for allocation and development; and,
 - The benefits of future development of Land at South Trumpington.
- 1.2.2 This list is not exhaustive but establishes a robust and evidenced baseline to support the future promotion and vision for the Site. This Planning Report should be read in conjunction with other documents that form part of the submission, including the Green Belt Assessment prepared by FPCR.
- 1.2.3 This report 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.



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1.2.4 The remainder of this report is structured as follows:

- Section 2: The Context for Growth.
- Section 3: Meeting Unmet Needs.
- Section 4: A Sustainable Location.
- Section 5: The Performance of the Site against Green Belt Purposes.
- Section 6: The Case for Green Belt Release.
- Section 7: Contribution to the Golden Rules.
- Section 8: HELAA Appraisal of Land at South Trumpington.
- Section 9: Summary of the Benefits.



2 The Context for Growth

2.1 National Priorities

- 2.1.1 The Government has highlighted economic growth and housing delivery as two key ambitions of its administration. One way the Government hopes to achieve this is through planning reform, including updates to the NPPF, which was adopted on 12 December 2024. These updates seek to make planning conditions easier for authorities to meet and deliver upon their housing and employment needs, as necessary through targeted development in the Green Belt for residential and commercial purposes and in the case of commercial development, with a particular focus on delivering need pursuant to growth sectors that are important to the national economy, especially laboratories.
- 2.1.2 Furthermore, the Government's commitment to sustained economic growth has been transferred into "Invest 2035: the UK's Modern Industrial Strategy" (2024) ("Invest 2035") which states, "growth is the number one mission of this government". Invest 2035 sets out a 10-year plan to deliver certainty and stability to businesses to encourage investment in high growth sectors. The ambition of the Invest 2035 is to drive growth at both national and regional level ensuring economic security and resilience. Maintaining and delivering a high-quality stock of business premises, including science and technology floorspace that could accommodate life science floorspace (which is specifically identified as a 'priority sector'), is crucial in ensuring that the targets set out in Invest 2035 are met.

2.2 Cambridge Growth Company

- 2.2.1 The Cambridge Growth Company (CGC), chaired by Peter Freeman, has commissioned work and evidence to underpin the Government's growth ambitions for Greater Cambridge. It is expected that updates for this work will be published in Spring 2025 (yet to be confirmed) and may set homes and jobs targets for Greater Cambridge.

2.3 Oxford-Cambridge Region

- 2.3.1 The Oxford-Cambridge Supercluster Board published analysis in January 2025 which suggests that the 'Ox-Cam' region has the potential to make a major contribution to the Government's Industrial Strategy and deliver substantial economic growth for the country over the next ten years. The analysis suggests that, "with the right investment and the necessary policy reforms, the region could double its growth trajectory – adding £25bn in GVA every year to the economy by 2035 compared with today." To achieve the high growth scenario, the Supercluster Board mandate for 371,000 more houses and 26.5 million square feet (c. 2,460,000 sqm) of new laboratory space is required to fulfil growth in high knowledge-intensive sectors.

2.4 Cambridgeshire and Peterborough Combined Authority

- 2.4.1 The Cambridgeshire and Peterborough Combined Authority (CPCA), led by Mayor Nik Johnson, published its Economic Growth Strategy in 2022. The Strategy identifies Cambridge as an internationally renowned centre of excellence and that high value sectors are core to the UK's global success. The Independent Economic Review that underpins the Strategy confirms that Life Sciences, and Digital & IT, are priority sectors for the combined authority region's economic growth.

2.5 Greater Cambridge

- 2.5.1 At a local level, the Local Planning Authorities (LPA) (Cambridge City Council and South Cambridgeshire District Council) ("the Councils" / "the Authorities") base their spatial development strategy for Greater Cambridge (as found in its draft Local Plan 'First Proposals' of 2021) on four key tenets:



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- Direct development to where it has the least climate impact.
- Where active and public transportation is the natural choice.
- Where green infrastructure can be delivered alongside development.
- Where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.

2.5.2 The Councils' spatial development strategy also seeks to be realistic around the locational limits of new jobs floorspace that is centred upon national and global economic clusters. Where proposals come forward for development in locations where jobs, services, and facilities are located closest to where people live, these proposals should be supported in order to the meet the Councils' needs in full.



3 Meeting Unmet Needs

3.1 Calculating Need for Housing and Jobs

- 3.1.1 Housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations. (Planning Practice Guidance (PPG)).
- 3.1.2 The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for. The standard method set out below identifies a minimum annual housing need figure, and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure.
- 3.1.3 The PPG, in relation to preparing and maintaining an evidence base for business needs, explains that, in gathering evidence to plan for business uses, strategic policy making authorities will need to liaise closely with the business community, taking account of the Local Industrial Strategy, to understand their current and potential future requirements. They will need to assess:
- the best fit functional economic market area;
 - the existing stock of land for employment uses within the area;
 - the recent pattern of employment land supply and loss – for example based on extant planning permissions and planning applications (or losses to permitted development);
 - evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data and market intelligence, such as recent surveys of business needs, discussions with developers and property agents and engagement with business and economic forums;
 - wider market signals relating to economic growth, diversification and innovation; and
 - any evidence of market failure – such as physical or ownership constraints that prevent the employment site being used effectively.
- 3.1.4 It is expected that the government will publish updates to the PPG in Spring 2025 and, as such, there may be updates to guidance on how to calculate and maintain need, that will need to be kept under review.

3.2 The Local Need for Offices and Laboratory/ R&D Floorspace

- 3.2.1 In September 2024, Greater Cambridge published evidence on the locational and accommodation needs of key sectors of life science and ICT, the “Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs” (September 2024), aka “the Iceni Report”.
- 3.2.2 In headline terms, the Iceni Report identifies the need for 600,000 sqm of R&D, 289,700 sqm of office, and 200,000 sqm of industrial and warehousing space, which is based on job forecasts, completions, and market signals. In the context of the Ox-Cam Supercluster’s identified need for 2,461,000 sqm of laboratory space, this means that Iceni’s forecast of



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600,000 sqm equates to, conservatively, 25% of the Oxford-Cambridge region's need, highlighting the importance of delivering this R&D floorspace in Greater Cambridge.

3.2.3 The Land at South Trumpington site performs well on many of the key criteria identified in the Iceni Report, including:

- **Accessibility and location** – the site is strategically located with excellent accessibility, including proximity to Trumpington Park & Ride, Cambridge South Railway Station, and proposed busway and mobility hubs, with links to the Cambridge South East Transport corridor. Active travel will be prioritised throughout the site and to nearby key locations.
- **Proximity to clusters and growth areas** – the Iceni report notes that proximity to research centres such as CBC is a key locational priority for some businesses. The site is located near CBC and well located to maximise the benefits of agglomeration, a key focus of the government.
- **Importance of place-based business destinations** – the Site will be a vibrant, high-quality development, offering a rich mix of cafes, restaurants, leisure facilities, and expansive public open spaces. This amenity-driven environment will create a dynamic and attractive destination for residents, businesses and employees.
- **Space for start-ups and scale-ups** – exploring space for scale ups and to support them through the future planning process. Partnerships established with key institutions and British Land's innovation advisory council.

3.2.4 As mentioned above, the Iceni Report identifies the need for 600,000 sqm of R&D, 289,700 sqm of office, and 200,000 sqm of industrial and warehousing space, based on job forecasts, completions, and market signals.

3.2.5 However, as concluded in the supporting Employment and Housing Needs Case by Volterra, these estimates do not fully reflect suppressed demand, where potential growth has been constrained by a lack of available supply over the past decade. Additionally, the estimates focus on net additional floorspace but overlook the need for gross completions to replace ageing or converted stock. Between 2011 and 2021, data from the Iceni report shows gross completions for R&D space exceeded net completions by 15%, indicating that a dynamic market requires a higher level of gross supply to meet net demand.

3.2.6 The key sector report's suggestion of a balanced demand and supply trajectory for office space appears optimistic, given significant uncertainties in delivery. Historical trends indicate that delivery rates have often fallen short of consents, and current headwinds such as rising construction costs and economic challenges further compound these risks. A large portion of Greater Cambridge's lab stock is also occupied by public institutions or owner-occupiers, bypassing the commercial market.

3.2.7 While the Iceni reports provide a valuable foundation, it may underestimate the scale of future demand and overestimate the certainty of delivery. Suppressed demand, the need to replace ageing stock, and challenges in delivery all suggest that Greater Cambridge faces a greater shortfall in employment floorspace than currently anticipated. This underscores the importance of sites like Land at South Trumpington in providing the flexible, high-quality spaces needed to support the region's strategic growth sectors. Land at South Trumpington can play an important and sustainable role in supporting important sites such as the Cambridge Biomedical Campus, given the proximity and accessibility between the two locations.

3.3 The Need for Mid-Tech and Logistics Floorspace

3.3.1 Mid-tech supports R&D by bridging the gap between research and production, providing facilities for prototyping, testing, and scaling innovations, and enabling the translation of discoveries into commercial products. While we understand Iceni is currently reviewing warehouse and industrial location requirements in Greater Cambridge, their latest work (Greater Cambridge Employment and Housing Evidence Update 2023) has identified a



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significant shortfall in such space; 149,163 sqm – which is likely to underestimate real demand.

- 3.3.2 The Land at South Trumpington proposals will also explore the integration of a ‘consolidation centre’ (Use Class B8) which could, where possible, foster links with local organisations such as the CBC and/or the wider Cambridge ecosystem, again supporting the development of a key strategic growth location. The Iceni Report highlights a need for 200,000 sqm of industrial and warehousing space, although it is not clear how this need would be met in terms of land supply, and, based on past under-supply, it is considered that this figure should be much higher.

3.4 The Need for Housing

- 3.4.1 The Standard Method for Greater Cambridge, and therefore the joint housing target for Cambridge City and South Cambridgeshire was increased by around a third, from 1,726 to 2,309 homes per year based on the new NPPF methodology. A buffer has also been introduced which, combined with the increase, means the Greater Cambridge Shared Planning Service (GCSPS) needs to be able to demonstrate a supply of just over 12,100 homes in Greater Cambridge over five years. GCSP reported in April 2024 that the housing trajectory for the five-year period from 1 April 2024 to 31 March 2029 was 11,190 homes, equating to a demonstrated supply of 6.5 years prior to the changes in December 2024. However, with the new target set by Government increasing to 12,100, effective immediately, the supply has fallen to just under 5 years.
- 3.4.2 British Land is engaging with important local employers including Cambridge Biomedical Campus and Cambridge University Hospital to discuss their specific specialist housing need. The CBC Housing Study is clear that many of the 22,000 employees struggle to find housing and the limited affordable housing options affects the ability of CBC employers to recruit and retain staff. British Land is committed to working with CBC and other organisations to explore options to deliver housing that can meet needs of current and future workers at this strategically important site, at levels of up to 50% affordable housing.
- 3.4.3 Future development of Land at South Trumpington could provide a range of housing types to meet local demand. British Land will continue to review local evidence and engage with stakeholders to meet local need.

3.5 Summary

- 3.5.1 Evidence suggests that the Council cannot currently demonstrate a 5 Year Housing Land Supply, and there is not a Local Plan adopted, or currently in draft that can show how the housing need established via the Standard Method can be delivered upon over the next 15-20 years. Further, whilst there are clear gaps within the Employment pipeline to meet need identified by Iceni on behalf of the joined authorities, we are of the view that the needs are far higher than stated in the current evidence base, particularly when accounting for previous under-supply and considering the wider national growth perspective and plans for the Ox-Cam region. Further there are uncertainties to delivery of the stated employment pipeline in this part of Greater Cambridge, which misses opportunities to cluster development near CBC. The government emphasises the importance of contiguous urban extensions to maximise the benefits of agglomeration, making growth in this location essential to support strategic clustering and meet future needs.
- 3.5.2 This strategically accessible site, with no barriers to delivery, is uniquely positioned to strengthen Cambridge’s role as a European centre for innovation and life sciences. It addresses critical unmet housing needs, linked to essential CBC/CUH workers, while supporting national and regional growth through clustering and sustainable development.



4 A Sustainable Location

4.1 The Accessibility of the Site

- 4.1.1 The Site is located in the southwest of the city, between Trumpington Meadows, the A1309 Hauxton Road and the M11.
- 4.1.2 The Figure 1 below, which is also provided in the Transport and Movement Strategy prepared by KMC and submitted in support of this Sites Submission Consultation Response, illustrates the key current transport infrastructure for the Site (shown in purple) relating to active travel, public transport and highway access. Here, it can be seen that Land at South Trumpington is well positioned to be plugged into existing high-quality infrastructure between Cambridge City Centre, the Cambridge Biomedical Campus and into Cambridgeshire and the wider region.

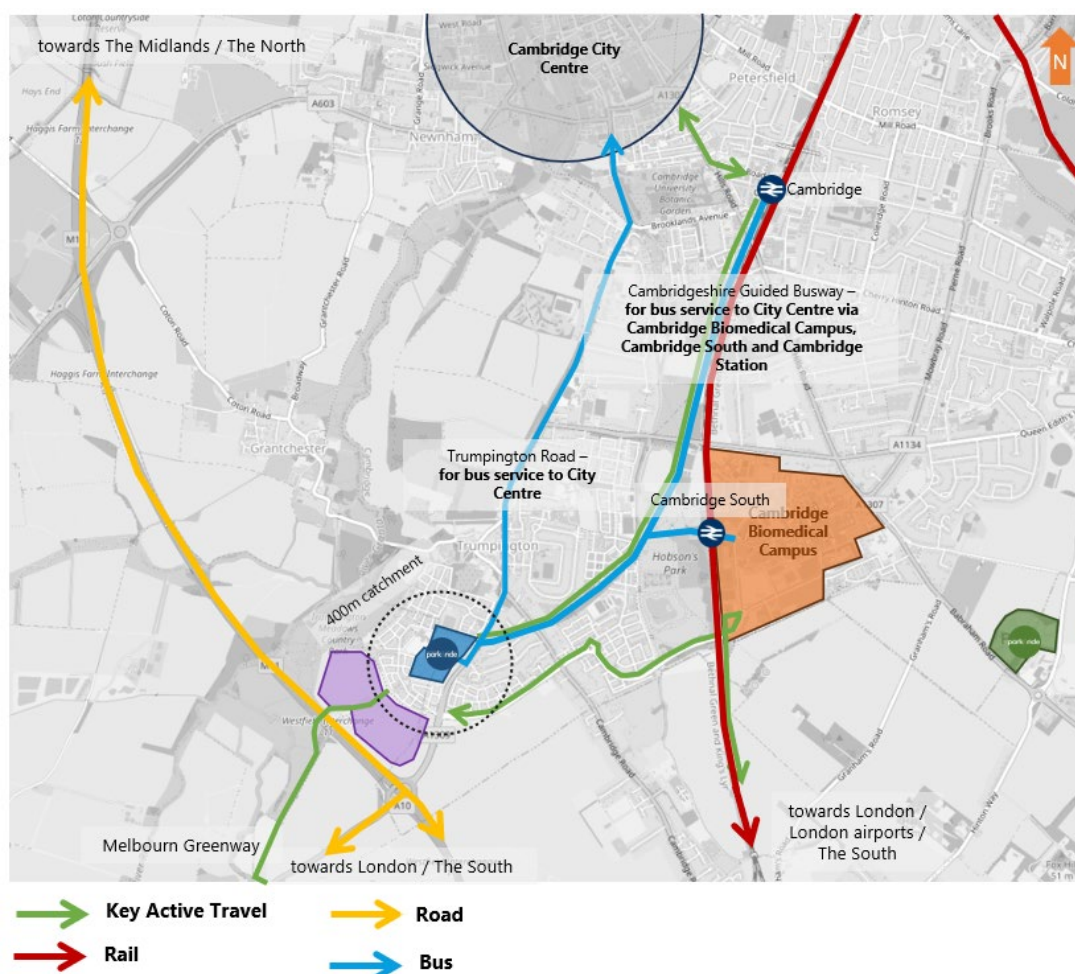


Figure 4.1: Baseline Transport Headlines

- 4.1.3 In addition to the transport links presented in 1, alongside Cambridge South Railway Station which is currently under construction (anticipated to open in 2026), there are several proposed transport schemes for this part of Cambridge which will positively impact the baseline transport infrastructure relevant for Land at South Trumpington.
- 4.1.4 The schemes include the South West Travel Hub and Cambridge South East Transport projects, both of which are included on Figure 2. The South West Travel Hub will provide a strategic 'park and ride' facility and connect that site to the rest of Cambridge by an increased number of bus services. The South West Travel Hub is immediately south of Land at South Trumpington, across the M11. The Cambridge South East Transport project is a proposed

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new busway and active travel corridor connecting the CBC with Babraham. These schemes will widen the catchment of people who can easily access Land at South Trumpington by public transport.

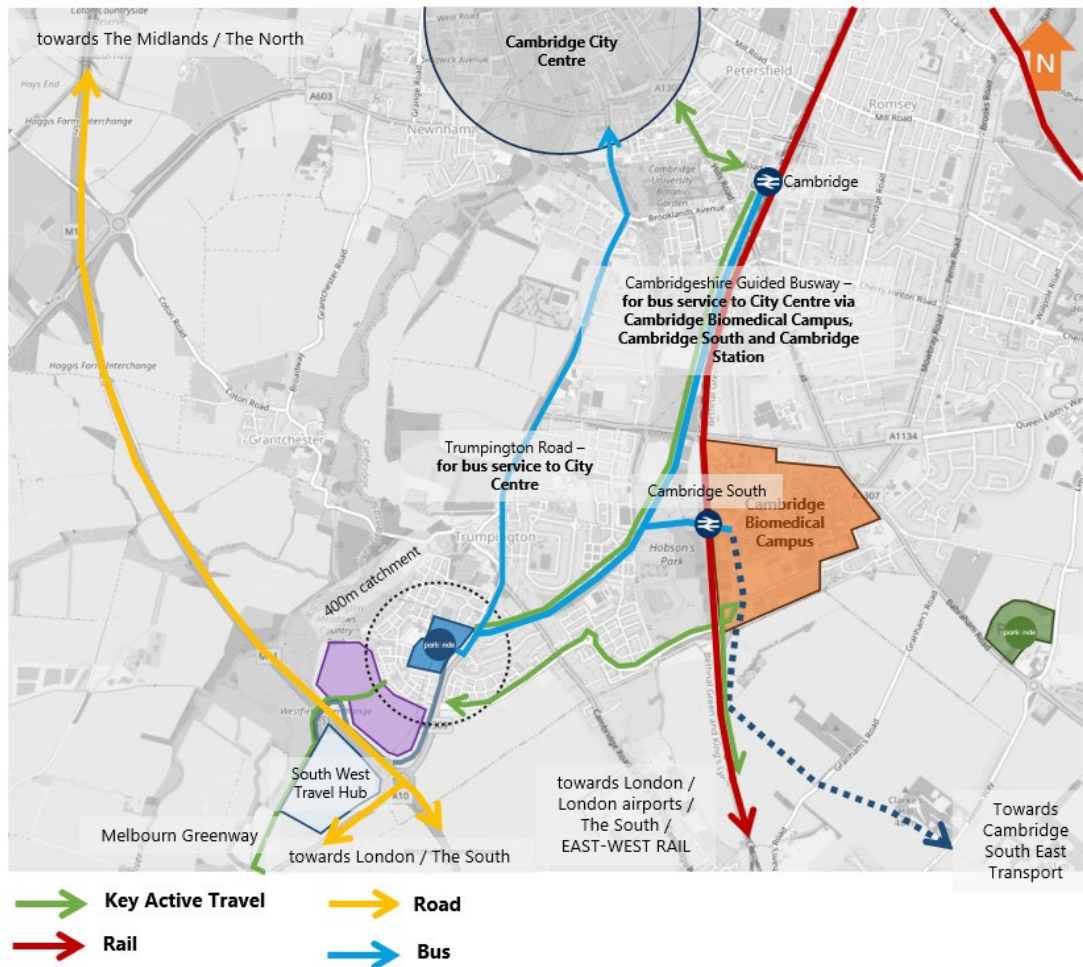


Figure 4.2: Existing and Emerging Transport Schemes Adjacent to Land at South Trumpington

4.2 Active Travel

- 4.2.1 Land at South Trumpington benefits from access to several existing high-quality and well-connected Active Travel routes in and around Trumpington, connecting to the Cambridge Biomedical Campus and towards the City Centre.

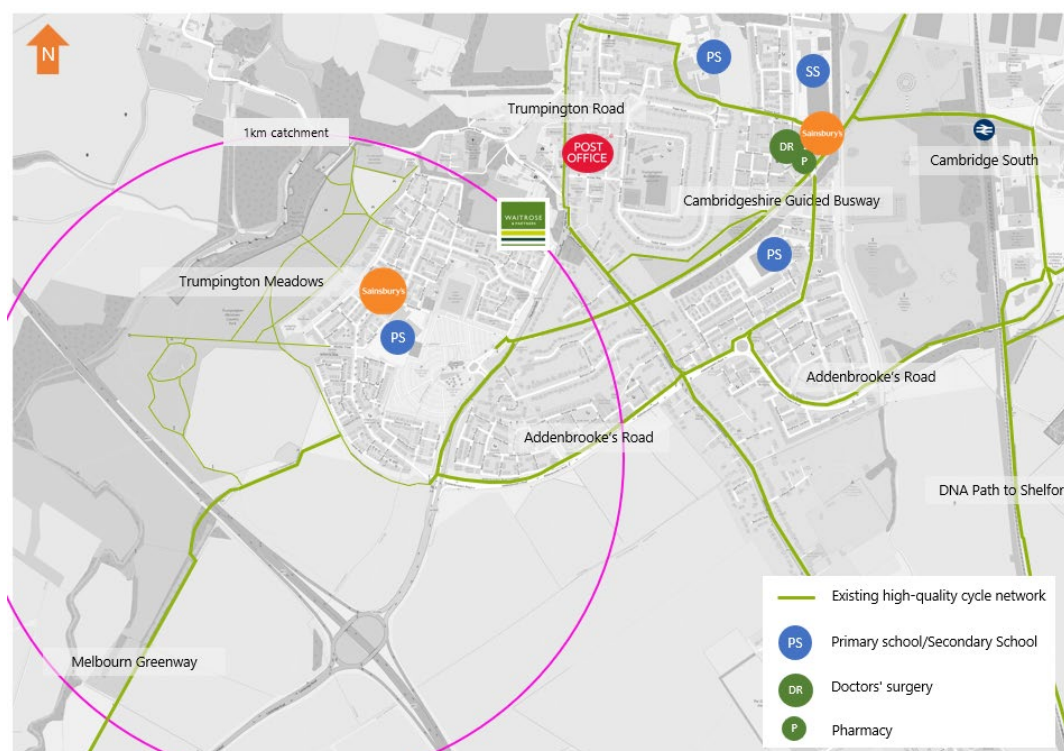


Figure 4.3: Existing Active Travel Infrastructure and Access to Key Local Amenities

4.2.2 The key routes near to Land at South Trumpington include:

- A choice of northbound routes towards Cambridge city centre, either via the shared pedestrian/cycle path on the Cambridgeshire Guided Busway (CGB) or the shared pedestrian/cycleway on Trumpington Road.
- Access to Cambridge Biomedical Campus (and Cambridge South station) via either the CGB or segregated cycling infrastructure along Addenbrooke's Road.
- Routes into rural South Cambridgeshire via the Melbourn Greenway towards Hauxton/Foxton and the DNA path to the Shelfords.
- Leisure routes into the country park to the west of the Site.

4.3 Amenities

- 4.3.1 With regard to existing amenities such as local shops, Land at South Trumpington is within walking distance ($\leq 1.6\text{km}$) of a Sainsburys Local, Waitrose supermarket and Trumpington Post Office.
- 4.3.2 There are three primary schools and a secondary school within 3km, all located within easy access of a high-quality active travel route. Of these, Trumpington Meadows Primary School is within walking distance ($< 800\text{m}$) of Land at South Trumpington.
- 4.3.3 Trumpington Medical Centre and Welfare Pharmacy are co-located at the Clay Farm Centre, close to the Cambridgeshire Guided Busway, approximately 2.5km from Land at South Trumpington.
- 4.3.4 Land at South Trumpington is also well placed for access to leisure and recreational activities, as shown in Figure 4.

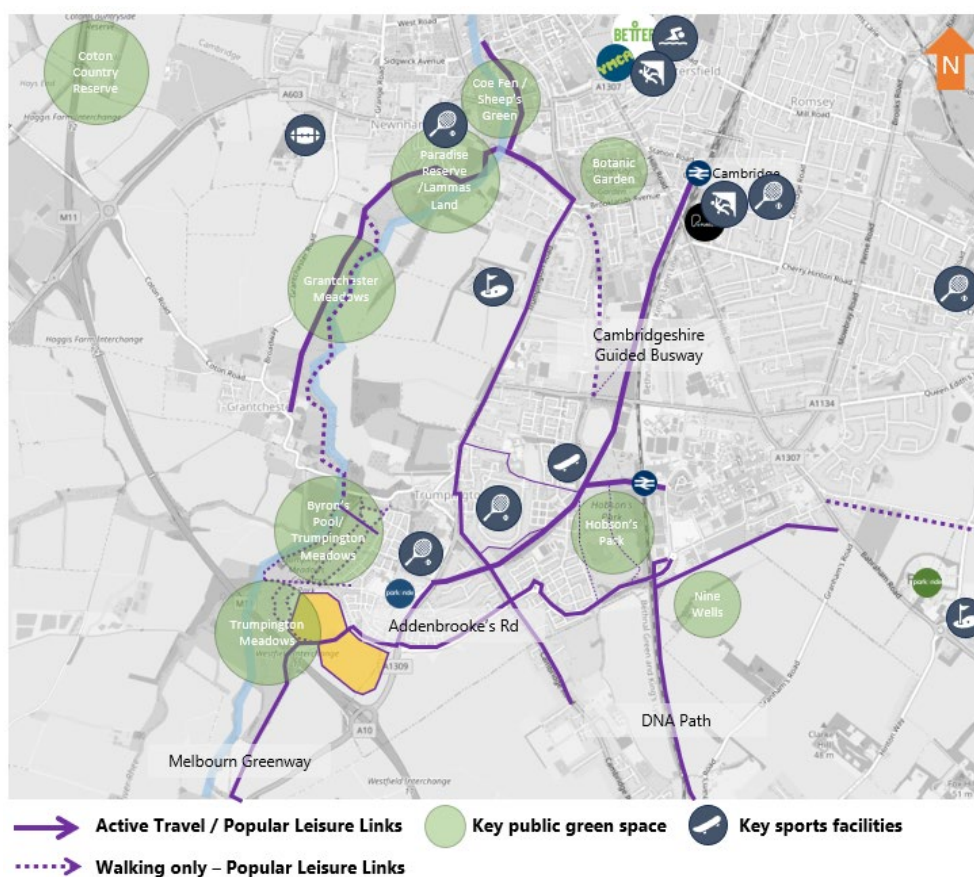


Figure 4.4: Leisure and Recreation Opportunities Proximate to Land at South Trumpington

- 4.3.5 Land at South Trumpington is located adjacent to Trumpington Meadows Country Park, which spans both sides of the M11. For onward connections, there are high-quality and pleasant leisure walking routes towards Grantchester Meadows through Byron's Pool.
- 4.3.6 With regard to leisure and sports facilities, key active travel routes link Land at South Trumpington to a number of popular venues including sports pitches, gyms and tennis courts. Access to the country park is also immediately proximate to the Site.

4.4 Public Transport

- 4.4.1 The location of Land at South Trumpington provides a great basis for facilitating access to existing and proposed public transport. Figure 5 demonstrates the existing strategic public transport connections.

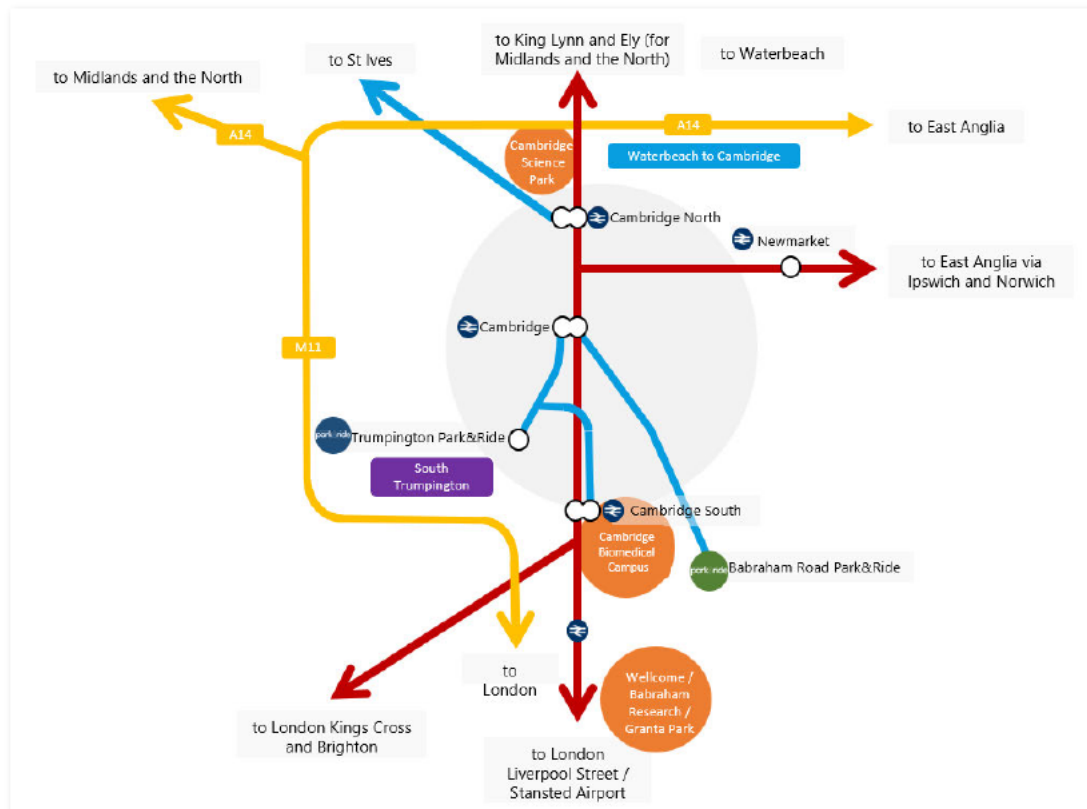


Figure 4.5: Strategic Overview Diagram of Public Transport Connections

- 4.4.2 The Site is located approximately 400m to the south of Trumpington Park&Ride with provides two high-quality, frequent bus services; the Busway A and Trumpington Park&Ride services. Thus, Land at South Trumpington will be well connected for services to the city centre and to the Cambridge Biomedical Campus via this existing hub.
- 4.4.3 Other bus services from Trumpington Park&Ride include those towards Harston on the A10 corridor south, plus, National Express/Flix Bus regional and national coach services.
- 4.4.4 In terms of access to the rail network, Land at South Trumpington is located within 2.5km of Cambridge South station, which is due to open in 2025. Although the timetable is unknown at present, it is anticipated that it will plug into both the core services towards London, plus into East Anglia. Locally, it will also provide a multi-modal option to travel to Cambridge North for access to the Cambridge Science Park.
- 4.4.5 In addition to this existing infrastructure, there are a number of public transport proposals in the vicinity of Land at South Trumpington, these are shown in Figure 6:

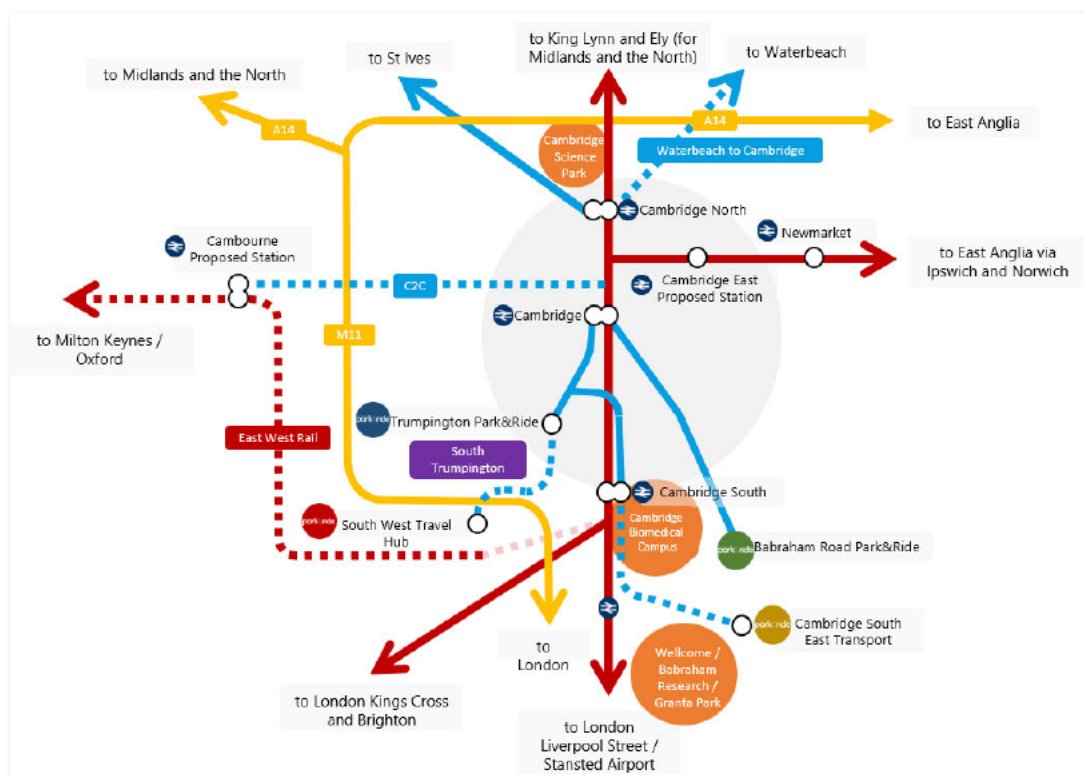


Figure 4.6: Proposed Public Transport Network – Strategic Overview Diagram

4.4.6 Key Public Transport measures which contribute towards the accessibility of the area are:

- Cambridge South East Transport – a new high-quality public transport route connecting the Cambridge Biomedical Campus to communities and research parks around The Abingtons.
- South West Travel Hub – providing new Park & Ride capacity on the southwestern corridor into Cambridge, increasing capacity at Trumpington Park & Ride.
- East-West Rail – connecting Cambridge to Oxford via existing and proposed (e.g. Cambourne) stations by a direct rail route.
- C2C (Cambourne to Cambridge) – a new high-quality transport route between a key growth area and Cambridge.

4.4.7 The Site can capitalise on access to the above infrastructure, improving connectivity for people to access the jobs and facilities proposed at Land at South Trumpington. Based on indicative timescales, it is anticipated that a number of these schemes will either be constructed or in an advanced stage of development prior to the occupation of Land at South Trumpington.

4.5 Assessment against the NPPF

4.5.1 Paragraph 11 of the NPPF places a presumption in favour of sustainable development, stating that, for plan-making, this means that, “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.” In the case of Land at South Trumpington, this Site benefits from existing and planned infrastructure that present an obvious location for growth whose allocation would promote a sustainable pattern of development.

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- 4.5.2 Paragraph 148 requires policy-makers to promote sustainable patterns of development, having particular regard to paragraphs 110 and 115. How Land at South Trumpington meets these policies is discussed in the supporting Transport and Movement Strategy prepared by KMC.
- 4.5.3 Paragraph 110 highlights that the planning system should manage patterns of growth ensuring that 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'.
- 4.5.4 The Site will meet this policy by being able to capitalise on sustainable transport measures such as the Busway and a network of cycle links and facilities to promote local living are already in place. Emerging schemes such as the South West Travel Hub and Cambridge South Railway Station will enhance sustainable travel opportunities. The vision and design of Land at South Trumpington will maximise those opportunities and add further transport choice within the area.
- 4.5.5 Paragraph 115 sets out the key criteria for assessing sites for allocation within plans. The criteria include:
- Ensuring sustainable transport modes are prioritised.
 - Providing safe and suitable access.
 - Designing streets, parking and transport elements in line with guidance.
 - Ensuring impacts on the transport network are mitigated with reference to a vision-led approach.
- 4.5.6 The Site addresses these sections of the NPPF by:
- Providing low car parking provision that is located in consolidated hubs ensuring streets are prioritised for people.
 - Maximising access opportunities with multiple active travel routes, public transport via the Busway extension and a new vehicle access through a modified Osprey Drive.
 - Designing streets that are centered around people rather than vehicles with car parking placed at the periphery.
 - Setting a clear vision of an exemplar development which prioritises active travel and utilises sustainable transport opportunities.



5 The Performance of the Site against Green Belt Purposes

5.1.1 This section of the report summarises the Site's performance against both national, and local Green Belt Purposes, which is important context when understanding the Site's contribution to the Green Belt and how to apply this when considering whether the site would meet the 'Grey Belt' definition contained in the NPPF, and whether it is appropriate for release from the Green Belt for development. This section should be read in conjunction with the Green Belt Report prepared by FPCR on behalf of the landowner and submitted with the Sites Submission Consultation response.

5.2 National Green Belt Purposes

5.2.1 NPPF paragraph 143 sets out the five purposes of the Green Belt. Green Belt sites are therefore assessed against how they score against these purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.3 Cambridge Green Belt Purposes

5.3.1 The Cambridge Green Belt has three purposes, rather than the five national ones, but they broadly align with the national purposes relevant to Grey Belt. The Greater Cambridge Green Belt Assessment (South Cambridgeshire District Council and Cambridge City Council) was prepared by LUC in August 2021. The LUC Assessment evaluates the Site as part of "parcel TR6".

5.3.2 We have set out below the three Cambridge Green Belt Purposes, with specific reference to the Green Belt Parcel that contains the Site, with LUC's conclusion and FPCR's (appointed by British Land) independent conclusion alongside.

| Cambridge Green Belt Purpose (LUC 2021) | LUC Assessment of Contribution | FPCR Conclusion of Contribution |
|---|--------------------------------|---------------------------------|
| To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre. | Relatively Significant | Moderate |
| To maintain and enhance the quality of Cambridge's setting. | Moderate | Relatively Limited |
| To prevent communities in the environs of Cambridge from merging into one another and with the city. | Moderate | Relatively Limited |

Table 5.1: Cambridge Green Belt Purposes Contribution



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- 5.3.3 The FPCR Green Belt Report examines the most recent Green Belt Assessment, the “Greater Cambridge Green Belt Assessment - South Cambridgeshire District Council and Cambridge City Council, LUC August 2021” completed for the Councils, and suggests that the Site performs a more limited role against Green Belt purposes than suggested in the LUC 2021 Greater Cambridge Green Belt study. This LUC study draws on the earlier (2015) Cambridge Inner Green Belt Boundary Study, completed by LDA Design.
- 5.3.4 Circumstances have changed since the 2021 Study was produced, with the completion of Trumpington Meadows and now the consent for the South West Travel Hub. These inevitably provided more containment and urban influence. FPCR consider that the Site could be judged to have a “limited” role in the setting of Cambridge and in preventing the merging of settlements. In terms of Cambridge Green Belt purpose 1, preserving “the unique character of Cambridge as a compact, dynamic city with a thriving historic centre”, FPCR consider the site makes a “Moderate” contribution.
- 5.3.5 The table below sets out FPCR’s assessment of the Site’s contribution to the five national purposes as set out in the NPPF.

| NPPF Green Belt Purpose (paragraph 143) | FPCR Conclusion of Contribution |
|---|---------------------------------|
| A – to check the unrestricted sprawl of large built-up areas. | Moderate |
| B - To prevent neighbouring towns merging into one another. | Relatively Limited |
| C - To assist in safeguarding the countryside from encroachment. | Moderate |
| D - To preserve the setting and special character of historic towns. | Moderate |
| E - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. | Not applicable |

Table 5.2: National Green Belt Purposes Contribution

- 5.3.6 Overall, FPCR conclude that the Site/ land parcel TR6 does “**not strongly contribute**” to the relevant national Green Belt Purposes.

5.4 The Designation of the Site as ‘Grey Belt’

- 5.4.1 The definition of grey belt in the NPPF Glossary is as follows and is relevant to this Site:

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

- 5.4.2 Part of the site contains Previously Developed Land that may fall under the definition of Previously Developed Land in the NPPF.
- 5.4.3 The designations listed in NPPF footnote 7 do not apply to the Site.
- 5.4.4 The FPCR assessment (summarised above) concludes that the Site does not perform strongly against National Purposes a), b), or d). As such, the Site falls within the NPPF definition of ‘grey belt’.



6 The Case for Green Belt Release

6.1.1 The Site has been shown to not strongly contribute to the three tests of NPPF Paragraph 143. Enabling a release as 'Grey Belt' pursuant to NPPF Paragraph 148 and the NPPF Glossary, this section of the report now turns to appraising the circumstances in which the Site should be released from the Green Belt.

6.1.2 NPPF paragraph 145 states that:

"Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans."

6.1.3 NPPF paragraph 146 continues:

"Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan."

6.1.4 The Council's own 5YHLS and supporting report on unmet need, summarised above and included in the Employment and Housing Needs Case by Volterra, concludes that the Councils cannot meet their identified need for homes and commercial or other development being proposed by British Land at Land South of Trumpington, through other means.

6.1.5 It is therefore necessary to review the Cambridge Green Belt boundary in accordance with NPPF paragraph 146 and release land for development.

6.1.6 As the Site is grey belt, then NPPF paragraph 148 is relevant, which states (our emphasis):

"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

6.1.7 It has been established that Greater Cambridge cannot meet its housing and employment needs in full based on the development strategy of the Cambridge City Council and South Cambridgeshire District Council Local Plans (2018). Further, it has been identified in Section 4 of this report above that Land at South Trumpington would meet the definition of a grey belt site, and as such this Site must be prioritised ahead of other Green Belt locations by the Councils in the preparation of the Local Plan.

6.1.8 Paragraph 148 requires policy-makers to promote sustainable patterns of development, having particularly regard to paragraphs 110 and 115. How Land at South Trumpington meets these policies is discussed in the supporting Transport and Movement Strategy prepared by KMC and in Section 3 of this Report.



7 Contribution to the Golden Rules

7.1 NPPF Paragraph 156

- 7.1.1 Given the Site is grey belt, NPPF paragraph 156 would be engaged when assessing the appropriateness of future proposed development on the Site. Paragraph 156 states:

“Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*

- 7.1.2 Even if the Site is released from the Green Belt, the Golden Rules will still need to be satisfied in relation to any future proposed development on the Site.

- 7.1.3 This section confirms that the

156a: Affordable Housing

- 7.1.4 Future proposed development at the Site could provide a minimum of 400 homes, with the potential for up to 1,000 homes, that would need to provide affordable housing to meet the provisions of Paragraph 156a.

156b: necessary improvements to local or national infrastructure

- 7.1.5 Future proposed development at the Site will provide new and enhanced local infrastructure, outdoor play and sports provision (on and offsite), and neighbourhood retail services. It will also seek to foster links with strategic organisations in the City and South Cambridgeshire and where possible seek to provide supplementary infrastructure.

156c: provision of new, or improvements to existing, green space

- 7.1.6 Future proposed development at the Site has the potential to provide significant areas of green space and woodland, along with enhanced links to existing open space at the Country Park and beyond, all within walking and cycling distance of residents' homes.

7.2 Conclusion

- 7.2.1 The NPPF 'Golden Rules' will therefore be satisfied when any future proposed development is progressed and as such, should be given significant weight in favour of the grant of permission (in accordance with paragraph 158 of the NPPF).



8 HELAA Appraisal of Land at South Trumpington

8.1 HELAA Assessment 2021

8.1.1 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.

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

| Criteria | Outcome |
|------------|---------|
| Suitable | Red |
| Available | Green |
| Achievable | Green |

Table 8.1: HELAA 2021 Outcome

8.1.3 As set out within this Planning Report and the suite of documents accompanying British Land's 2025 response to the Sites Submission Consultation, the context of the Site has significantly changed. Therefore, when assessing the Site, the Councils must take into account the up-to-date evidence and information submitted as part of the Sites Submission Consultation 2025 process.

8.1.4 The following section below considers the key environmental and technical topics which informed the HELAA conclusions made up of ‘Suitability’, ‘Availability’ and ‘Achievability’. These are assessed in turn.

8.2 Suitability

8.2.1 This section considers the criteria which makes up ‘Suitability’ in more detail. It considers the HELAA 2021 score, summarises the latest evidence and suggests a revised score.

Adopted Development Plan Policies

8.2.2 Previous Assessment (HELAA 2021): **Amber**

8.2.3 LPA Comments: The Site is outside the Development Framework, within or partially within an Area of Major Change/ Opportunity Area, and partially within the Cambridge Green Belt (99%).

8.2.4 Current commentary: In December 2024, the Government introduced changes to the NPPF which were considered vital to deliver the commitments to achieving economic growth and building 1.5 million new homes. This included defining grey belt land within the Green Belt. Plan making and decision taking must therefore reflect the revised NPPF and associated guidance, including the promotion of development in parts of the Green Belt that are grey belt for homes and jobs. The Site represents a natural choice for sustainable development on grey belt land at the edge of the Development Framework. The Site is adjacent to the Southern Fringe Areas of Major Change (Trumpington Meadows and Clay Farm) but the Opportunity is entirely compatible with the residential development that has been delivered on those sites. It is expected that future proposed development at Land at South Trumpington will fully comply with adopted and proposed Development Plan Policies.

8.2.5 Revised Assessment (CfS 2025): **Green**



Flood Risk

- 8.2.6 Previous Assessment (HELAA 2021): **Amber**
- 8.2.7 LPA Comments: Wholly in Flood Zone 1.
- 8.2.8 Current commentary: The Site remains in Flood Zone 1. The Environment Agency have recently published revised surface water flood risk mapping. Any changes to the Site following the HELAA 2021 are considered negligible and the Site is considered to have a low probability of fluvial and surface water flooding.
- 8.2.9 Revised Assessment (CfS 2025): **Amber**

Landscape and Townscape

- 8.2.10 Previous Assessment (HELAA 2021): **Red**
- 8.2.11 LPA Comments: Significant adverse impact on wide and local landscape character, views, and the setting of Cambridge.
- 8.2.12 Current commentary: The context of the Site has changed substantially following the HELAA 2021 resulting in the urbanisation of the immediate locality. The South West Travel Hub has been approved to the south of the Site, across the M11. Furthermore, the Trumpington Meadows development is completed and adjacent to the Site's northern boundary. The submitted Landscape and Visual Assessment confirms the Illustrative Development Option can be successfully incorporated without notable long-term effects on landscape and visual receptors identified in the immediate and wider area.
- 8.2.13 Revised Assessment (CfS 2025): **Green**

Biodiversity and Geodiversity

- 8.2.14 Previous Assessment (HELAA 2021): **Amber**
- 8.2.15 LPA Comments: Development of the site may have a detrimental impact on a designated site (Trumpington Meadows Country Park), or those with a regional or local protection but the impact could be reasonably mitigated or compensated.
- 8.2.16 Current commentary: Biodiversity Net Gain is now a mandatory requirement in England under the Environmental Act 2021. The legislation requires a measurable 10% improvement in biodiversity compared to the pre-development state. This came into effect on 12 February 2024. The Illustrative Development Option ensures that the existing hedgerows on the Site will be retained and, overall, would result in a measurable improvement for biodiversity. Any impact could be reasonably mitigated or compensated through future proposed development of the Site.
- 8.2.17 Revised Assessment (CfS 2025): **Green**

Open Space / Green Infrastructure

- 8.2.18 Previous Assessment (HELAA 2021): **Green**
- 8.2.19 LPA Comments: Site is not on a protected open space designation, however there are some protected open space designations on periphery of the site. Development of the site may have a detrimental impact on the peripheral open space designation, but the impact could be reasonably mitigated or compensated.
- 8.2.20 Current commentary: The Site has no open space designation but does present a positive opportunity to enhance and extend into the existing Country Park to the west. Furthermore,



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the Illustrative Development Option would improve accessibility to open space and green infrastructure across the Site, for both new residents and employees and those of Trumpington.

8.2.21 Revised Assessment (CfS 2025): **Green**

Historic Environment

8.2.22 Previous Assessment (HELAA 2021): **Green**

8.2.23 LPA Comments: Development of the site would not have a detrimental impact on any designated or non-designated heritage assets.

8.2.24 Current commentary: There have been no changes to the historic environment since the HELAA 2021. This Sites Submission Consultation response is accompanied by a standalone Heritage Statement and as a chapter within the Environmental Report. The Illustrative Development Option isn't expected to impact on the Historic Environment.

8.2.25 Revised Assessment (CfS 2025): **Green**

Archaeology

8.2.26 Previous Assessment (HELAA 2021): **Amber**

8.2.27 LPA Comments: Located in an extensive prehistoric, Roman and Saxon landscape, including the Scheduled Roman settlement to the north. The site is also the location of a WWII prisoner of war camp.

8.2.28 Current commentary: There have been no changes to archaeology since the HELAA 2021. The submitted Desk Based Archaeology Assessment confirms the Illustrative Development Option is expected to be acceptable from an archaeology perspective.

8.2.29 Revised Assessment (CfS 2025): **Amber**

Accessibility to Services and Facilities

8.2.30 Previous Assessment (HELAA 2021): **Green**

8.2.31 LPA Comments: Good accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.

8.2.32 Current commentary: Access to local services and facilities have improved since the HELAA 2021 through the completion of the Trumpington Meadows development. The scale of Opportunity is such that services would be provided on Site to serve the new neighbourhood and beyond.

8.2.33 Revised Assessment (CfS 2025): **Green**

Site Access

8.2.34 Previous Assessment (HELAA 2021): **Amber**

8.2.35 LPA Comments: The proposed site is acceptable in principle subject to detailed design. The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site.



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8.2.36 Current commentary: The Site benefits from an access but this would be improved for all means as part of any future proposed development. Further consultation with National Highways will be carried out as part of the ongoing planning process.

8.2.37 Revised Assessment (CfS 2025): **Amber**

Transport and Roads

8.2.38 Previous Assessment (HELAA 2021): **Amber**

8.2.39 LPA Comments: Capacity issues on adjacent links and junction. Need for new Passenger Transport, walking and cycling provision and also consider route through for New Trumpington P&R. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.

8.2.40 Current commentary: Local trunk roads have not changed since the HELAA 2021. The South West Travel Hub and busway benefit from planning permission and are entering the design stage and will be delivered. The Melbourn Greenway will run through the Site. Any future proposed development would be accompanied by a robust Transport Assessment, as set out in the submitted Transport and Access Chapter of the Environmental Report.

8.2.41 Revised Assessment (CfS 2025): **Amber**

Noise, Vibration, Odour and Light Pollution

8.2.42 Previous Assessment (HELAA 2021): **Amber**

8.2.43 LPA Comments: The proposed site will be affected by road traffic noise from nearby main roads but is acceptable in principle subject to appropriate detailed design considerations and mitigation. This site is cross boundary but is mainly located within SCDC Road traffic noise levels, arising from the use of the M11, are very / relatively high along the western edge of the development site such that residential development immediately adjacent to the M11 and Hauxton Road would be challenging.

8.2.44 Current commentary: The submitted Environmental Report includes reference to noise surveys which have informed the Illustrative Development Option. The Report demonstrates the Site can be developed with an appropriate layout, design and mitigation. The Illustrative Development Option has carefully considered the location of commercial development along the boundaries with the M11 and Hauxton Road, screening the proposed residential uses from these issues, traffic noise in particular.

8.2.45 Revised Assessment (CfS 2025): **Amber**

Air Quality

8.2.46 Previous Assessment (HELAA 2021): **Green**

8.2.47 LPA Comments: Site does not lie within an AQMA. Minimal traffic impact on AQMA.

8.2.48 Current commentary: No changes. The submitted Environmental Report includes an Air Quality chapter which confirms the Site is at low risk in regard to air quality.

8.2.49 Revised Assessment (CfS 2025): **Green**

Contamination and Ground Stability

8.2.50 Previous Assessment (HELAA 2021): **Amber**



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8.2.51 LPA Comments: Previous agricultural land use. Potential for historic contamination, conditions required.

8.2.52 Current commentary: No changes to contamination and ground stability following the HELAA 2021.

8.2.53 Revised Assessment (CfS 2025): **Amber**

8.2.54 In order to understand how the suggested scoring compares with the HELAA 2021 scoring, we have provided a summary table below:

| | Matter | HELAA 2021 Outcome | British Land CfS 2025 Outcome |
|--------------------|---|--------------------|-------------------------------|
| Suitability | Adopted Development Plan policies | Yellow | Green |
| | Flood Risk | Yellow | Green |
| | Landscape and Townscape | Red | Green |
| | Biodiversity and Geodiversity | Yellow | Green |
| | Open Space / Green Infrastructure | Green | Green |
| | Historic Environment | Green | Green |
| | Archaeology | Yellow | Yellow |
| | Accessibility to Services and Features | Green | Green |
| | Site Access | Yellow | Yellow |
| | Transport and Roads | Yellow | Yellow |
| | Noise, Vibration, Odour and Light Pollution | Yellow | Yellow |
| | Air Quality | Green | Green |
| | Contamination and Ground Stability | Yellow | Yellow |
| | Overall 'Suitability' Score | Red | Green |

Table 8.2: HELAA Outcomes Comparison

8.2.55 The assessment summarised in the table above demonstrates that a number of the HELAA scores have changed following a review of up-to-date evidence and information. As such, the Site is now considered to be suitable for allocation and development.



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8.3 Availability

- 8.3.1 When considering 'Availability', the Council considered the below questions in the HELAA 2021, which we have responded to:

| Question | British Land Response (CfS 2025) |
|---|----------------------------------|
| Is the site controlled by a developer or landowner who has expressed an intention to develop? | Yes |
| Are there know legal or ownership impediments to development? | No |
| Is there planning permission to develop the site? | No |
| When will the site be available for development? | Immediately |

Table 8.3: Availability

- 8.3.2 The Site is available for development with immediate effect.

8.4 Achievability

- 8.4.1 When assessing 'Achievability', the Council considered the below question in the HELAA 2021 which we have responded to;

| Question | British Land Response (CfS 2025) |
|--|----------------------------------|
| Is there a reasonable prospect that the site could be developed? | Yes |

Table 8.4: Achievability

- 8.4.2 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.

- 8.4.3 Development of the Site is considered to be achievable now.

8.5 Summary

- 8.5.1 Having reviewed the most up to date evidence and information, the previous HELAA 2021 outcome scores for the Site can be updated. The proposed changes to the overall outcome are set out in the table below:

| Criteria | HELAA 2021 Outcome | British Land CfS 2025 Outcome |
|------------|--------------------|-------------------------------|
| Suitable | Red | Green |
| Available | Green | Green |
| Achievable | Green | Green |

Table 8.5: HELAA Outcomes Summary



9 Summary of Benefits

9.1.1 The benefits of allocating Land at South Trumpington for Green Belt release and development are compelling and summarised below:

- 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.
- 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.

