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SPEC/Denny Road/AM/NR



Greater Cambridge Shared Planning Policy Team

Andy Moffat

E: [REDACTED]
DL: [REDACTED]

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

Dear Sirs,

Draft Greater Cambridge Local Plan for consultation

Representations on behalf of the landowner.

LAND AT DENNY END ROAD, WATERBEACH. HELAA SITE REFERENCE: 56211

Savills (UK) Ltd Planning Team are instructed by the landowner to make further representations as part of the Draft Greater Cambridge Local Plan for consultation in respect of development at Land at Denny Road, Waterbeach.

These representations relate to Policy S/JH: New Jobs and Homes and Policy S/DS: Development Strategy & Key Diagram, and includes an assessment of Land at Denny End Road, Waterbeach as it is important that they are read holistically together.

Policy S/JH: New Jobs and Homes

It is the landowner's position that the Draft Local Plan does not currently provide sufficient land to meet the housing requirement.

The Regulation 18 Draft Plan proposes to meet the objectively assessed needs between 2024-2045 for 73,300 jobs and a minimum of 48,195 new homes. They support the increase in jobs being planned for in the Draft Local Plan to around 73,300 additional jobs, up from the 66,600 jobs referenced in the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023 and the 58,500 included in the Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021).

The Draft Plan proposes around 25% more jobs across the plan period than the First Proposals. When compared to the First Proposals Draft, Greater Cambridge are proposing 8.5% more homes annually, meaning that there has not been a corresponding increase in the proposed housing requirement. This is also against the background of a significantly increased Standard Methodology figure for Greater Cambridge meaning there is an increasing disparity between the jobs target and the housing target. Greater Cambridge needs to plan for a corresponding increase in housing delivery, because anything else jeopardises the continued economic success of Cambridge and the delivery of the required housing in the right locations. The current Government is clear that they

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intend to capitalise upon the previous success of the region, and the delivery of sufficient housing in the right locations is a critical part of this.

It is evident that the housing land identified in the Draft Local Plan is insufficient to meet the real-world need in and around Cambridge for two further key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites. The latter point is expanded upon under the S/DS: Development Strategy & Key Diagram heading below.

In terms of in-commuting:

The Councils' Development Strategy Topic Paper recognises that "a critical assumption informing the relationship between the number of jobs and homes - is imperfect." It is understood why the 2021 census information is not considered robust, as it was influenced by the COVID-19 pandemic, but it is not robust to use "Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this" as the basis for justifying the housing requirement. Previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. Using previous commuting assumptions will result in increased numbers of workers commuting into the area. Some will use public transport, but this will inevitably result in an increased number of workers using Greater Cambridge's constrained road network. The proper planning of the area would see a greater housing requirement identified, and that requirement being met by sites that can readily access existing and 'currently being delivered' public transport and cycle links. The proposed (inadequate) identified housing requirement risks increasing strain on key infrastructure whilst also driving up property values due to a shortage of supply relative to demand. As evidenced within the Case for Cambridge report, it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country. ONS data confirms that the median house price reached £425,025 in 2024, equating to 9.5x median earnings, compared to a median house price of £290,000 (7.7x median earnings) across England as a whole.

Policy S/DS: Development strategy

A strategy that includes a focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. It does though lead to the conclusion that Greater Cambridge needs to adopt a more substantial housing supply buffer than the 6.5% (excluding any potential delivery at the former Waste Water Treatment Works site which the Councils acknowledge cannot be relied upon) currently proposed. A higher housing supply buffer would provide the required flexibility of delivery, and ensure a robustness of supply. The current buffer of 6.5% is insufficient and fails to recognise the delivery challenges which have historically held back early delivery on the large-scale strategic sites within Greater Cambridge. As a result, Greater Cambridge should employ a housing land supply buffer certainly over 10% and we would suggest circa 15-20% above the identified requirement which, for the reasons set out under the Policy S/JH: New Jobs and Homes heading above, also needs to be higher than the Standard Methodology figure.

An analysis of housing supply in Greater Cambridge in recent years all bears out the need to plan for a greater supply. The Plan's proposed supply of 51,328 dwellings (excluding North East Cambridge), which equates to 2,444 dwellings a year, has not been achieved in any year of the past 23 years. The Councils' supply over the 6 years 2018/19 – 2023/24 since the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018 were adopted equates to 1,790 dwellings a year, and with

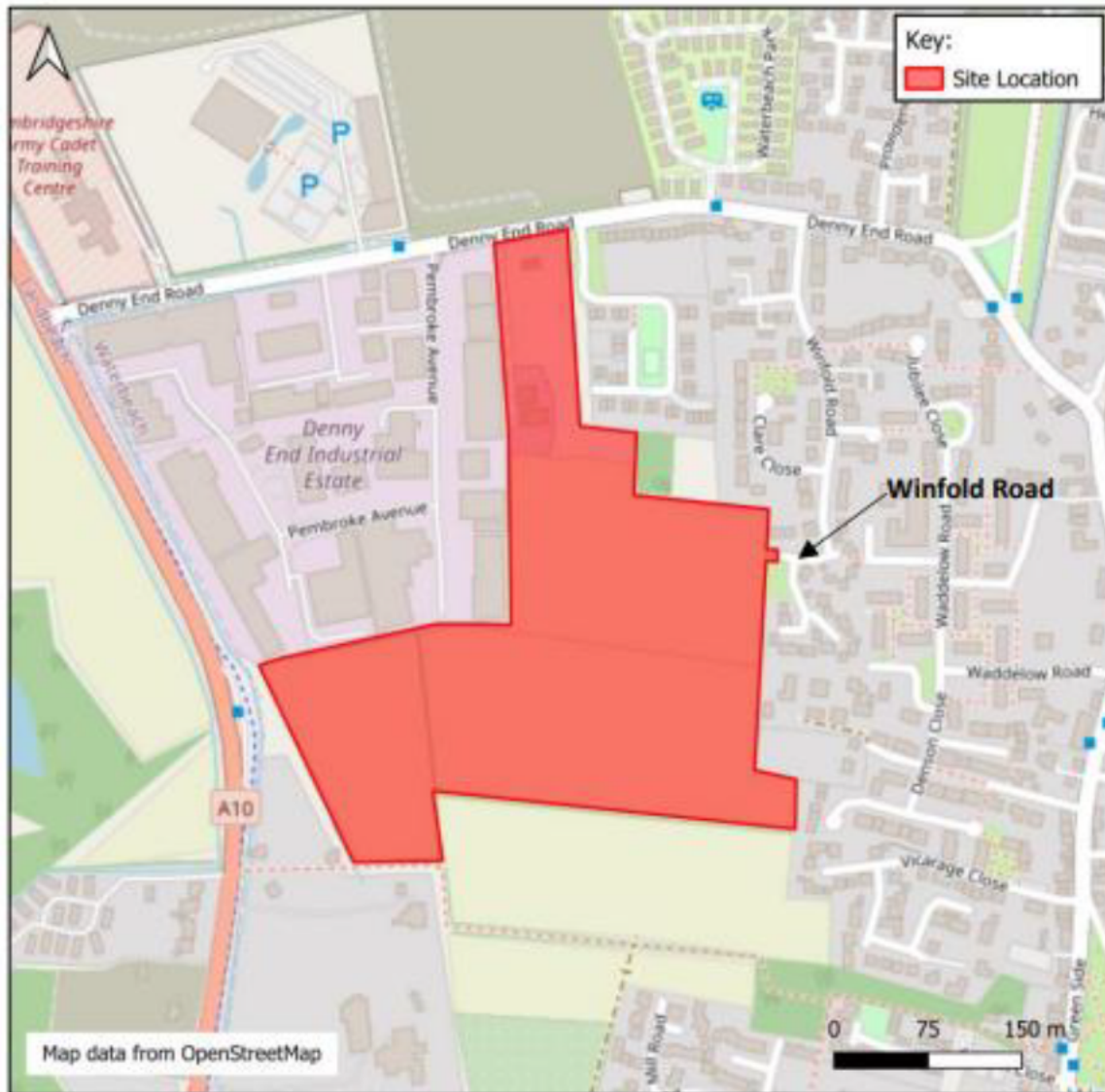
supply in 2023/24 actually falling to 1372. The Greater Cambridge Housing Delivery Study Addendum October 2025 includes a Trajectory for the draft Local Plan as its Appendix E. This assumes the Local Plan is adopted in the 2028/29 monitoring year, and the five-year housing land supply calculations period is therefore 1st April 2028 to 30th April 2033. Even by the Councils' own calculations, the land supply would be only 5.34 years at that stage, and completions are predicted to fall in 2030/31 and fall further in 2031/32. If the Local Plan was to be adopted in the 2027/29 monitoring year, which is quite possible, the land supply would be only 5.15 years. Any delay to the delivery of the newly allocated sites, or the pace of delivery on the previous allocations, could mean the Council falling below the required 5 years. Additional identified supply through small and medium sized sites coming forward in the first five years post adoption would provide the necessary contingency to ensure the Councils maintain a five year supply and the plan remains up to date.

The 'Supporting information' to Policy S/DS states that "We made sure to consider the sustainability impacts of focusing growth outside the green belt in comparison with alternatives of releasing green belt land, as we are required to do by national planning policy". It is not evident though that the Councils have given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which would justify a more flexible and permissive approach to grey belt release in particular. We understand that the Councils are undertaking a Grey Belt review which is due to be published after the Draft Local Plan consultation. It will be important to ensure that this review is published and the opportunity provided for it to be reviewed and commented upon in advance of the consultation on the Proposed Submission Consultation (Regulation 19) scheduled for Summer / Autumn 2026.

Growth within villages, including villages within the Green Belt, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. Such sites are necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

As part of a robust sustainable housing supply to meet the needs of all of Greater Cambridge, it is clear that medium sized sites, including sustainable Grey Belt sites, are needed as part of a blended development strategy (reducing the reliance / dependency on strategic sites) to ensure that dwellings are delivered throughout the Plan period to meet all needs.

Land at Denny End Road, Waterbeach ID 115065; HELAA Site ID 56211)



We can confirm that the Site area available includes a connection to Winfold Road i.e. it is the land assessed in the HELAA plus this link.

Grey Belt Assessment

The National Planning Policy Framework (NPPF) now defines Grey Belt for the purposes of plan-making and decision-making 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, namely (a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; or d) to preserve the setting and special character of historic towns.

Paragraph 148 of the NPPF states that “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.

It is understood that the Councils are undertaking a Grey Belt assessment that will not be available until after the Greater Cambridge Draft Local Plan consultation.

The LUC Greater Cambridge Green Belt Assessment 2021 Final Report prepared for South Cambridgeshire District Council and Cambridge City Council assesses the Site as having a:

- Limited / No contribution to Purpose 1 Cambridge Purpose 1 - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- Relatively Limited to Purpose 2 - to maintain and enhance the quality of Cambridge’s setting; and
- Relatively significant to Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city.

These ‘Cambridge Purpose’ are different to the NPPF Purposes against which an assessment as to whether a site is Grey Belt needs to be made. Having regard to the NPPF tests to determine whether a site is Grey Belt, the Site does not strongly contribute (a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; or d) to preserve the setting and special character of historic towns. The Site should therefore be categorised as Grey Belt.

Councils’ Housing and Employment Land Availability Assessment 2025 (HELAA)

Having regard to the Councils’ HELAA the table below sets out the Councils assessment against the landowners position. Further commentary on certain aspects is detailed below the table:

HELAA Aspect	HELAA Position	Landowner Comment and position
Adopted Development Plan	The Site is categorised as Amber : The HELAA states that the development of the site has some potential policy constraints, but these could be overcome through the planning application process.	The landowner agrees that the potential policy constraints can be overcome through the planning application process and therefore should be scored as Green .
Flood Risk	The Site is categorised as Amber : The HELAA states that the Site is wholly in Flood Zone 1 and, in relation to surface water flooding, 1% lies in a 1 in 30 year event 2% lies in a 1 in 100 year event 12% lies in a 1 in 1000 year event.	The Site can thereby be developed without being at risk of flooding or exacerbated flooding elsewhere and should therefore be scored as Green .

Landscape	The Site is categorised as Amber : The HELAA recognises that development upon this site would have only a limited impact to the landscape character and views subject to landscape mitigation measures.	The landscape mitigation measures would be included as part of a scheme on the Site and therefore should be scored as Green .
Biodiversity	The Site is categorised as Green : The HELAA states that development of the site would not have a detrimental impact on any designated site, or those with a regional or local protection.	No comment.
Policy	The Site is categorised as Green : The HELAA states that the Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	No comment.
Historic Environment	The Site is categorised as Amber : The HELAA states that the site lies outside the conservation area. The Environment western edge is adjacent to the line of Car Dyke, but there is no other heritage impact; any impact could be reasonably mitigated.	The Council considers that any impact could be reasonably mitigated and therefore should be scored as Green .
Archaeology	The Site is categorised as Amber : The HELAA states that extensive evidence for Roman settlement and associated activities is recorded in the vicinity, and the western border follows the line of the Car Dyke Roman canal.	An archaeological investigation and mitigation could form part of development proposals.
Accessibility	The Site is categorised as Green : The HELAA states that good accessibility to key local services, transport, and employment opportunities, and the proposed development would not require delivery of accompanying key services.	The Transport Strategy note that has now been prepared and is submitted as part of these representations further demonstrates convenient access to local facilities. The delivery of the Waterbeach Greenway, terminating at Cambridge Road in Waterbeach, provides a strategic walking and cycling link. The relocation and construction of the new Waterbeach Rail Station, now formally commenced and delivered alongside a wider travel-hub, busway extension and active-travel network, significantly strengthens the site's sustainable transport credentials. With the new facility offering high-capacity, accessible, multimodal facilities, future residents will have direct, high-quality alternatives to private-car travel. These

		<p>cumulative upgrades mean the site's access to the highway network will be less constrained by other origins and destinations within Waterbeach and the private-car travel generated.</p> <p>The new Waterbeach town will include employment space, schools, community facilities, and local services, meaning future residents of this site will make fewer long-distance trips and have significantly reduced reliance on private-car travel for daily needs, consistent with the Combined Authority's Local Transport and Connectivity Plan's (LTCP's) "avoid" and "shift" objectives. These committed and emerging measures demonstrate that a safe, multimodal access strategy is deliverable.</p>
<p>Site Access</p>	<p>The Site is categorised as RED: The HELAA states that the access link to the public highway is unsuitable to serve the number of units that are being proposed, and there is no possibility of creating a safe access.</p>	<p>The HELAA states that the access link to the public highway is unsuitable to serve the number of units that are being proposed, and there is no possibility of creating a safe access. A Transport Strategy note has now been prepared and is submitted as part of these representations. It states that:</p> <ul style="list-style-type: none"> • Vehicular access would be achieved via Denny End Road, which has a footway on its southern side only; • Denny End Road is subject to a 40mph speed limit in the vicinity of the Site but circa 80m east of the Site access the speed limit reduces to 30mph; • An appropriate access from Denny End Road could be achieved to serve the proposed development Access with visibility in accordance with the 40mph posted speed limit. However, it is considered that the 30mph speed restriction could be extended to the west of the site access if required;

		<ul style="list-style-type: none"> The capacity of the access would be assessed as part of the future planning application and informed by traffic surveys. <p>The landowners position is that the access could be scored as Green when that capacity work is complete, and should be scored Amber now.</p>
Transport and Roads	The Site is categorised as Amber : The HELAA states that development would require walking and cycling links into Waterbeach, there may be some localised junction improvements required, and any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	Links would be provided into Waterbeach and, as stated above, access to the Waterbeach Greenway, Waterbeach Rail Station and Waterbeach new town ensure that residents would have ready, convenient access to alternatives to the car for employment, services and facilities. The landowner considers Transport and Roads should be scored as Green .
Noise, Odour and Light	The Site is categorised as Amber : The HELAA states that the proposed site will be affected by road traffic noise from nearby main roads and noise from nearby industrial/commercial activities but is acceptable in principle, subject to appropriate detailed design considerations and mitigation, and potential amenity impacts can be mitigated by appropriate layout and buffer design.	Any planning application will include appropriate detailed design consideration and mitigation. Therefore, the landowner considers this aspect should be scored as Green .
AQMA	The Site is categorised as Green : The HELAA states that the site lies outside any AQMA and presents no air-quality restraint.	No further comment. Green score agreed.
Contaminated Land	The Site is categorised as Amber : The HELAA states that previous agricultural land use means potential for historic contamination, and conditions required.	Any contamination associated with agricultural use can be addressed through investigation and planning conditions and therefore this aspect should be scored as Green .
Overall Suitability	The Site is categorised as Red	This rating is driven entirely by Site Access concerns, and Rovia has confirmed in its Transport Strategy note can be achieved to serve the proposed development with visibility in accordance with the 40mph posted speed limit. Therefore, the Site should have an overall suitability score of Green .

Overall Suitability - The Site is categorised as Red: This rating is driven entirely by Site Access concerns, and Rovia has confirmed in its Transport Strategy note can be achieved to serve the proposed development with visibility in accordance with the 40mph posted speed limit. Therefore the Site should be have an overall suitability score of **Green**.

Conclusion

In summary:

- The Local Plan needs to make provision for more housing land than currently proposed in the Draft Local Plan to meet the needs arising from the proposed additional jobs, to avoid an exacerbation of in-commuting into the area and to provide an adequate buffer;
- To ensure they continue to be vibrant, inclusive communities, growth within villages is essential as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and this should include sustainable Grey Belt sites within villages in the Green Belt;
- Land at Denny End Road is Grey Belt land and is in a sustainable location;
- There are exceptional circumstances to justify the alteration of the Green Belt to include the release of sites such as Land at Denny End Road;
- All planning matters, including landscape / visual effects and site access, can be satisfactorily addressed;
- The Site is suitable, available and deliverable within the next 5 years; and
- As part of a robust, sustainable housing supply to meet the needs of all of Greater Cambridge, sustainable Grey Belt village sites such as Land at Denny End Road need to be allocated as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs.

We would welcome the opportunity to provide any further information in relation to the site that may be helpful to enable the Councils to include the site as an allocation in the next version of the emerging Local Plan.

If there is any further information and/or clarification that we can usefully provide to assist your consideration of these proposals, please do not hesitate to contact the undersigned in the first instance.

Yours faithfully



Andy Moffat BA(Hons) MPhil MRTPI
Planning Director and Head of Department