



For and on behalf of
Endurance Estates

Draft Greater Cambridgeshire Local Plan (Regulation 18) Consultation Representations

Land off Branch Road, Comberton

**Prepared by
DLP Planning Ltd
Bedford**

January 2026

Established in 1991

Employee Owned Trust



Prepared by:	[REDACTED] [REDACTED]
Approved by:	[REDACTED] [REDACTED]
Date:	January 2025

**DLP Planning Ltd
4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH**

[REDACTED]

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.



CONTENTS	PAGE
1.0 Introduction	4
2.0 The Site.....	5
3.0 Policy S/JH: New Jobs and Homes.....	6
Policy Outline.....	6
Commentary	6
4.0 Policy S/DS: Development Strategy.....	6
Policy Outline.....	6
Commentary	7
Delivery of Dwellings.....	7
Conclusion on Delivery Rates	9
Vitality of Villages.....	10
Water Supply	11
Variety of Site Size.....	11
5.0 Policy S/SH: Settlement Hierarchy.....	12
Policy Outline.....	12
Commentary	14
6.0 Policy S/GB The Cambridge Green Belt	19
Policy	19
Commentary	19
7.0 Appendix E Housing Trajectory and Five Year Housing Land Supply Calculation and Appendix F Monitoring.....	22
Policy	22
Commentary	22
8.0 HELAA 2021	23
9.0 Sustainability Assessment	25
10.0 Conclusions	27



1.0 INTRODUCTION

- 1.1 These representations are made to the Draft Greater Cambridgeshire Local Plan (Regulation 18) (“the Draft Plan”) Consultation on behalf of Endurance Estates in relation to the site known as Land off Branch Road, Comberton, Cambridgeshire, (“the Site”).
- 1.2 This representation responds specifically to the Draft Greater Cambridgeshire Local Plan Regulation 18 Consultation document, providing our comments on specific draft policies and allocations, and the supporting evidence base, as has been provided at this point.
- 1.3 These representations conclude that too much reliance is placed on new settlements and strategic level developments to provide new dwellings which are slow to deliver and risk not delivering within the plan period due to constraints. More sub strategic level sites should be allocated to ensure delivery of homes, including to address the acute need for affordable homes in a way which is viable and deliverable over the plan period, and to ensure a rolling five year land supply on adoption of a Plan.
- 1.4 The vitality of villages needs to be better considered and there is a requirement for a Green Belt review given the exceptional circumstances of the very acute need for affordable housing and as such Grey Belt sites should be allocated.
- 1.5 There should be an amendment to the settlement hierarchy to allow larger windfall sites outside settlement boundaries where they relate to the settlement and deliver much needed housing. This should also include allocation of the Branch Road Comberton site.

2.0 THE SITE

Our client's land interest ("The Site") is located south of Branch Road, Comberton, as outlined in Figure 1 below.



Figure 1: Red Line plan of the Site (Land off Branch Road, Comberton)

- 2.1 This site was previously submitted to the Call for Sites and as part of a larger parcel of land was given the Housing and Employment Land Availability Assessment (HELAA) HELAA Site ID 40316.
- 2.2 These representations are accompanied by an updated Call for Sites submission. This new submission reflects the landowner's current aspirations for the site as a residential-led mixed use development. This has been submitted via the portal.
- 2.3 The proposals for the Site are that it can accommodate approximately 200 new dwellings, associated public open space, play areas, significant landscaping, potential community and health uses such as land for a GP surgery, community orchard and community allotments with associated car parking. The Site is accessible from existing highways and there are also

opportunities to connect into public rights of way for pedestrians ensuring that the Site is well integrated into the existing village and the services and facilities already present in Comberton, as well as offering existing residents from the village access to the new community facilities proposed on the Site.

3.0 POLICY S/JH: NEW JOBS AND HOMES

Policy Outline

- 3.1 The Policy states that a minimum of 48,195 new homes meeting the needs of the population including affordable housing and specialist accommodation is required based on the Standard Method in the PPG and that this has been based on the needs of Cambridge and South Cambridgeshire jointly.

Commentary

- 3.2 This is a considerable increase in new homes need under the Standard Method compared to the previous requirements in the adopted Local Plans. Before the introduction of the new Standard Method for calculating housing need introduced in 2024, the Councils' position was that they could demonstrate a six-year housing land supply. This was then reduced to below 5 years using the Standard Method. This uplift provides a significant pressure for the Councils to deliver new housing not only during the Plan Period but also to allocate sites that can enable early delivery to ensure a five year land supply can be demonstrated on adoption. There is a question of soundness if the plan is not effective in delivering housing (NPPF 2024 paragraph 36) and this must be addressed.

4.0 POLICY S/DS: DEVELOPMENT STRATEGY

Policy Outline

- 4.1 The Policy sets out a preference order for where jobs and homes will be met:
- (a) *Within the Cambridge urban area;*
 - (b) *On the edge of Cambridge;*
 - (c) *At an expanded Cambourne;*
 - (d) *At other new settlements; and*
 - (e) *In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.*
- 4.2 The Policy then proposes that the majority of the needs up to 2045 will be met on strategic scale allocations in Cambridge, around Cambridge, at new settlements, in the Rural Southern Cluster, and at allocated sites in the Rest of the Rural Area. The remainder of the

development needs will be met at smaller sites in the Cambridge urban area and the rural area. Development in the rural area will be limited with allocations for jobs and housing focused on Rural Centres and Minor Rural centres.

- 4.3 Table 1 sets out that the housing need for homes 2024-2045 is 48,195 homes of which 37,865 are considered to be in the current supply as adopted allocations, sites with planning permission or a resolution to grant planning permission or windfall allowance. Therefore, there is a need to meet 10,330 homes in the Plan period. Table 2 sets out 19 sites which are new allocations to deliver 13,463 homes in the Plan period. A further 3,950 homes in North East Cambridge are identified as a potential supply during the Plan Period. The Council therefore states that there is a 6.5% headroom (excluding North East Cambridge) against the required need in the Plan Period.

Commentary

- 4.4 There are several considerations which we believe must be taken into account with the growth strategy.

Delivery of Dwellings

- 4.5 Of the new allocations 9,950 dwellings are to be delivered on sites of 1,000 or more dwellings of which 6,450 of those dwellings are part of larger sites which are due to continue delivering after 2045. Therefore only 3,513 dwellings are on sites of less than 1,000 units, and in fact those sites are all 150 dwellings or below. There is therefore a heavy over-reliance on large scale sites in the new allocations. This poses a significant delivery risk as any delay on any of the larger sites would have a significant impact on the overall delivery of dwellings in the Plan Period.
- 4.6 This should be addressed through the allocation of more medium scale sites capable of delivering in the region of 150-250 dwellings which allow for the delivery of housing and local infrastructure as part of existing settlements/communities on a quicker basis, as the infrastructure and set up requirements for delivery of housing are lesser allowing earlier delivery and occupation of new dwellings.
- 4.7 This is also in accordance with the Government's stated aim of 1.5 million new homes in this

Parliament¹ (which ends mid 2029 at the latest). Therefore, serious consideration should be given to ensuring that the draft Local Plan delivers more homes earlier in the plan period and is not so heavily reliant on large strategic scale allocations. Examples such as Northstowe, Waterbeach and Bourn Airfield and now North East Cambridge (Water Treatment works) development show how slippage of large sites have serious impacts on the timely delivery of houses and the Council's ability to maintain a five year supply as required by national policy. Allocation of more sub-strategic level sites adjacent to existing settlements would counteract that risk. The impact on housing delivery of one such site not coming forward would be significantly less than the overall impact on housing delivery of a larger scale site being delayed or not coming forward.

- 4.8 It is noted in the Housing Delivery Topic Paper December 2025 (“*HDTP*”) that on larger sites there is a lead in time and then a “ramping up” of delivery overtime. SUEs have the highest delivery rate assumptions, and New Settlements are considered to have a slower build up to the peak which reflects the higher infrastructure requirements, site preparation and access points and the need to establish a new housing submarket in the area (Paragraph 2.4). More modest sites within existing housing submarkets and utilising and upgrading of existing infrastructure at villages such as Comberton have the benefits of the SUE delivery but further accelerated due to their relative simplicity.
- 4.9 The *HDTP* analyses the windfall allowance and concludes an allowance of 425dpa is justified and realistic with 240-255dpa for South Cambridgeshire (paragraph 2.9). This is a higher windfall allowance for the Plan than would normally be expected. Greater certainty in the efficacy of the plan would be if further sub-strategic level allocations are made rather than an allowance on windfall sites. This would be best achieved through increasing the amount of housing supported in Minor Rural centres on sites which are “well-connected” on a “policy off” basis.
- 4.10 The *HDTP* notes the downward trajectory in the national housing pipeline and in delivery. It also highlights that there is a disconnect between the number of homes being approved and sites being built out. Again, over reliance on larger sites with high costs could further exacerbate that position. The report notes at 2.19 and 2.20 that there has been a drop off in the number of dwellings completed in 2023-2024 following national trends and following

¹ WMS by SoS for Housing, Communities and Local Government 18th November 2025 (HCWS1062)
<https://commonsbusiness.parliament.uk/Document/99195/Pdf?subType=Standard>

negative economic headwinds. The report states that within Greater Cambridgeshire the fluctuations are “*also a reflection of the development strategy, and the area being in a transition period as delivery from strategic sites on the edge of Cambridge tails off as sites are completed before the new settlement reach their peak delivery*” (para 2.20). Again, medium sized sites such as our client’s land at Branch Road, Comberton will help plug that gap and the pitfalls of overreliance on larger sites in the existing development strategy should be learnt from in this new draft Local Plan. Whilst it is recognised that there has been some allocation of smaller and medium sites, it does not go far enough.

- 4.11 As is referenced in the HDTP the LPDF sponsored report by Savills in 2025 (Land Matters 3: Increasing Outlets to Boost Housing Delivery) suggests that increasing housing delivery in England required not just more land “*but more sales outlets, especially on small and medium-sized sites*” (Para 2.18). This should be heeded in this Plan and Branch Lane, Comberton allocated accordingly. The long lead in time of new settlements and strategic sites is noted in paragraph 2.75 of the plan. The lack of landownership issues on the Branch Lane, Comberton site will also assist with early delivery of homes.

Conclusion on Delivery Rates

- 4.12 There is an over reliance on large sites of 1000+ dwellings in both the adopted Plans and the draft Plan. The Council’s own Housing Delivery Topic Paper itself highlights that planning permissions for larger sites are taking more time to be obtained, and that the market and delivery of these sites is not currently strong. It states that it does not expect that this will be the case for the 20 year life time of the Plan, however failure to consider more modest sites around 200 dwellings on the edge of existing, sustainable settlements such as Comberton means that there is a risk of not having a five year land supply upon adoption, or early into the Plan Period as required by national policy.
- 4.13 There is a need to consider a development strategy that does not rely on development being delivered at the end of the Plan Period. This Site offers a good opportunity for earlier delivery of homes and therefore should be allocated to assist with early delivery.
- 4.14 Additionally, a windfall policy should be created which allows for sites which are well connected, but adjacent to settlement envelopes to come forward to help with delivery in the short term to smooth out the “lumpy” delivery rates identified in the Topic Paper. This would be in accordance with NPPF Paragraph 75 with regards to windfall which needs to be

realistic. This will be discussed further in the following section.

Vitality of Villages

- 4.15 The current and future vitality of the villages and rural areas has not been properly considered. There is a need to allocate more housing to villages to ensure their vitality as per the NPPF paragraph 83 which clearly states that: *“Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*
- 4.16 The Development Strategy as set out fails to accurately provide for rural and village growth to ensure sustainability and vitality of settlements, particularly a sustainable large village such as Comberton. Growth in villages should be better prioritised in the Development Strategy to ensure that those who wish to live in the rural areas are able to do so and that there is a variety of choice for the rural community. It is important that villages have adequate incremental growth to sustain the services they currently offer as well as offering appropriate additionality of services to avoid them becoming “sleeper villages” only without services as there is insufficient population to sustain the services which exist.
- 4.17 The vitality of villages must also be considered as part of the plan and the benefits of expanding villages incrementally. There is a double benefit to the sustainability of the village itself and to the delivery of adding to infrastructure instead of starting from scratch as is required with a new settlement. Therefore, a greater quantum of development should be allocated to minor rural centres, and they should be higher up the development strategy.
- 4.18 The Plan states at paragraph 2.75 that the rural area will have a lower share of development in the new plan, *“reflecting other more sustainable sources of supply, but will still provide some development to support out rural communities”* but the proposals do not go far enough to allow villages to remain sustainable by being enhanced through a level of growth which they could support and which could provide new much needed infrastructure.
- 4.19 Comberton’s status as a sustainable settlement with good sustainable transport links into Cambridge has not been correctly considered. As set out in Figure 13 there is a committed walking/cycle route from Comberton into Maddingley Road Park and Ride and also into Cambridge City Centre.

Water Supply

- 4.20 The risk to delivery of dwellings is also increased by the ongoing water supply issues in the region (paragraph 2.80-2.84). The medium term strategy as set out by the Government in 2024 is to increase supply through major infrastructure to bring water in via the Fens Water and Grafham Water reservoirs however these are not expected to be in supply before 2035². In the short term the proposals are to increase water efficiency, reuse and offsetting. These solutions are more suitable to sub strategic level developments, such as the Site at Branch Road, Comberton as there is a limit to the impact that those measures will have. SUEs and new settlements will require the delivery of the major infrastructure. Reliance on those sites in the Plan therefore creates a real risk of failure to deliver the number of homes required in the early years of the Plan Period and to achieve a five year supply. Should there be delay with the necessary water infrastructure there may be a failure to deliver adequately in the Plan Period overall.
- 4.21 Therefore, smaller sub strategic edge of rural settlement sites should be allocated, including Branch Road, Comberton.

Variety of Site Size

- 4.22 Based on the requirement of 48,195 new homes over the Plan Period, 4,820 houses should be on small sites of 1ha or less under the requirements of the NPPF paragraph 73(a). This has not been achieved. The reasons given in justification of this are not “strong” as to why the target cannot be achieved. They set out the desire in the draft Local Plan to pursue a strategy but not a strong reason as to why this 10% requirement cannot be met as a matter of fact (paragraphs 2.43-2.25 of the justifying text to the Policy). The draft Local Plan should reconsider paragraph 73 and note the clear direction from Government to deliver small and medium sites, and note the benefits for small and medium enterprise housebuilders and the benefits in terms of build out rates.
- 4.23 The future ‘direction of travel’ in the draft NPPF 2025 should be noted as there is a new emerging requirement for medium sized sites (10-49 dwellings) to be allocated Policy L1, This is over and above the recognition in the NPPF 2024 at paragraph 73a that “*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new*

² <https://www.gov.uk/government/publications/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures>

homes, and are often built-out relatively quickly”.

4.24 In addition to the extant requirement for 10% of housing need to be allocated on smaller sites of 1ha or less (paragraph 73 NPPF 2024), the consultation draft of the NPPF 2025 contains a requirement for allocation of medium size sites. Whilst the emerging ‘medium sites’ category has not yet come into force, it is good practice to consider this potential requirement now, and it has strong merits in strategic planning terms whether it is made a formal national requirement or not.

4.25 For the above reasons we therefore **object** to Policy S/DS as currently drafted.

5.0 POLICY S/SH: SETTLEMENT HIERARCHY

The settlement hierarchy policy should provide for windfall development for different categories of village consistent with the level of local service provision and quality of public transport to Cambridge or a market town.

Policy Outline

5.1 The policy sets out the grouping of settlements into categories which reflects their scale, characteristics and sustainability; this is then used to direct development. The policy also set out the scale of development proposals coming forward as windfall sites that would be potentially suitable in each category of settlement.

5.2 Comberton is designated as a minor rural centre where residential development and redevelopment up to an indicative maximum scheme size of 30 dwellings will be permitted within the defined development extent (as set out on the Policy Map).

5.3 Minor rural centres are fourth in the hierarchy after Cambridge, towns and rural centres. The rural centres are Great Shelford and Stapleford, Histon and Impington, and Sawston. Within these settlements there is no limit on an individual scheme size within the defined development extent provided that adequate services, facilities and infrastructure are available or are made available as a result of the development.

5.4 The Development Strategy topic paper 2021³ awards Comberton 11 points:

³ https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/TPStrategyAug21v3Nov21_0.pdf

Existing Minor Rural Centres

Village	Parish Population (as at 2018)	Primary School and GP surgery	Shops and services points	Secondary School points	Job density	Transport points	Total points
Bar Hill	3,870	2	8	0	1	3	14
Bassingbourn	1,670*	2	3	4	0	0	9
Comberton	2,360	2	5	4	1	0	11
Fulbourn	3,710**	2	6	0	2	3	13
Gamlingay	3,810	2	5	0	0	0	7
Girton	4,710	2	2	0	0	3	7
Linton	4,650	2	7	4	1	2	16
Melbourn	4,750	2	6	4	1	1	14
Milton	4,880	2	6	0	2	3	13
Papworth Everard	3,840	2	4	0	0	0	6

Swavesey	2,570	2	4	4	2	2	14
Waterbeach	4,840	2	5	0	2	4	13
Willingham	4,070	2	7	0	0	0	9

Table 7 Points awarded to existing Minor Rural Centres under each assessment category and total

5.5 The Development Strategy Topic Paper goes on to state that:

5.6 *“Comberton continues to provide a good range of services. It has a primary school and a secondary school. Like Bassingbourn, it does not receive any points for jobs. Although it is on a proposed Greater Cambridge Partnership greenway route, no points are awarded for*

transport as it is over 8km from Cambridge. It continues to offer a greater range of services than a group village and should remain as a Minor Rural Centre.”

5.7 The methodology used is:

- Population (contextual)
- Transport (7 points)
 - Up to 4 points for whether the settlement has train station, busway access, public transport on GCP transport route, active travel possible within 8km of Cambridge or market town
 - Up to 3 points for frequency of bus services
- Services
 - Primary school (1 point)
 - Secondary school (1 points)
 - GP Surgery (1 point)
 - Shops and services
- Jobs density (based on 2021 data)
 - Job Density ratio 0.5-1 (1 point)
 - Job density ratio 1+ (2 points)

Commentary

5.8 Comberton is in a sustainable location where further transport schemes are making a significant impact on transport options, connecting Comberton to other villages including Cambourne, and the services and opportunities on the edge of Cambridge. Currently the Greenway is being constructed and the A428 is being dualled. There are also proposals around East West Rail and the Cambourne to Cambridge Guided Busway which will open up further sustainable transport opportunities.

5.9 The Site itself is well connected to the Comberton Greenway⁴ as can be seen below (in red):

⁴ <https://www.greatercambridge.org.uk/sustainable-transport-programme/active-travel-projects/greater-cambridge-greenways>

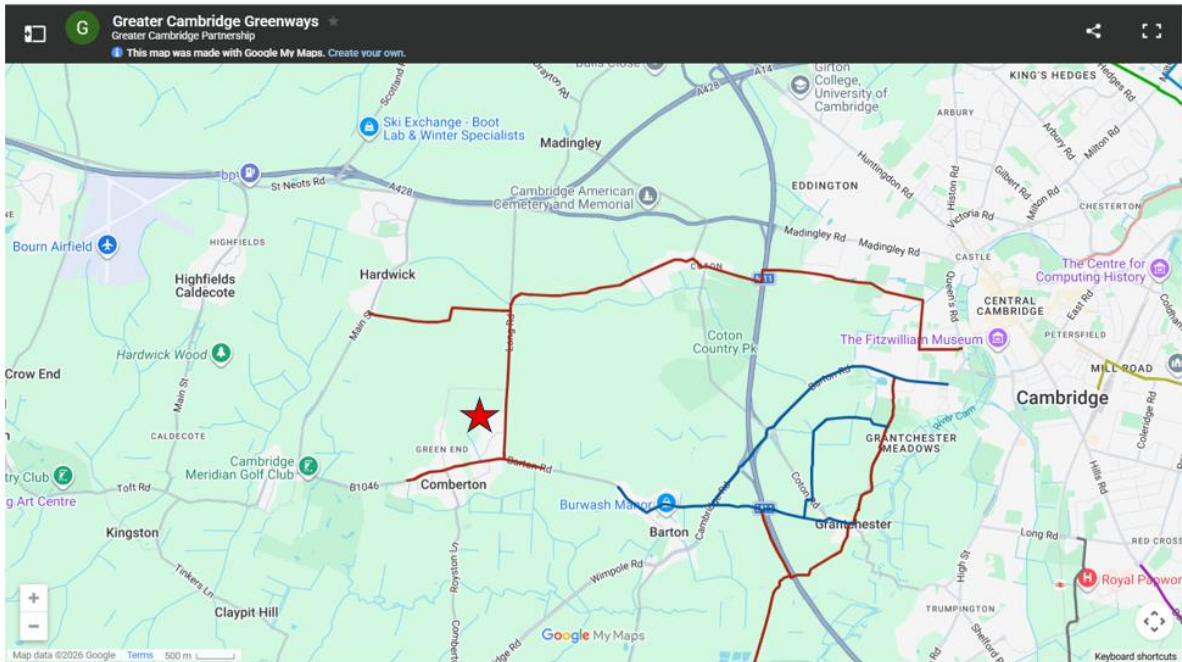


Figure 2: The Site in relation to the Comberton Greenway

5.10 Within the Settlement Hierarchy, Comberton was awarded no points for transport despite the Greenway as it is over 8km from Central Cambridge. This is illogical. The focus of the study was proximity to Central Cambridge or a market town. No consideration was given to services which are in neighbouring villages including Cambourne which is less than 8km away (contrary to paragraph 83 of the NPPF). As can be seen from the Comberton Greenway Cycling Times⁵ a variety of services are available within reasonable cycling distance of Comberton via the Greenway:

⁵ <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Active-Travel-Projects/Greater-Cambridge-Greenways/Comberton-Greenway/Greenway-cycling-times-Comberton.pdf>

Greenway	Location A	Location B	Time if cycling at 10mph
Comberton	Comberton Village College	Comberton Village Green	3 mins
	Comberton Village Green	Long Road (South)	3 mins
	Long Road (South)	Long Road (North)	8 mins
	Long Road (North)	Hardwick	8 mins
	Long Road (North)	Coton	8 mins
	Coton	Coton Countryside Reserve	3 mins
	Coton Countryside Reserve	M11 bridge	1 min
	M11 bridge	Cambridge Uni West Campus	4 mins
	Cambridge Uni West Campus	Grange Road	3 mins
	Grange Road	Sidgwick Avenue	3 mins
	Sidgwick Avenue	Silver Street	3 mins
	Barton Greenway link	Grange Road	5 mins

5.11 The Council's approach also fails to recognise that there are services and job opportunities outside of Central Cambridge and the Market Towns, particularly along the Comberton Greenway, such as Cambridge West Campus and access to Maddingly Road Park and Ride, that mean that there are job opportunities and services within, or near to, the village which are available via sustainable modes of transport. There should also be consideration to provision of more employment opportunities within the village of an appropriate nature and scale to assist the wider vitality of Comberton and these should not be restricted to the "Employment Use Classes" as set out in the Use Classes Order, but consider employment more widely, for example in health and education.

5.12 In the Development Strategy Topic Paper at page 251 it is stated that there was no consensus on how far is too far to cycle and that as such 8km (equating to approx. 30mins) was picked. This is, as the Topic Paper notes, arbitrary. A more considered approach should be taken, and points should be awarded to settlements which benefit from the Greenways. The Greenways programme has been developed over the last 10 years and their purpose is to allow non-motorised commuting to services and employment including in Central Cambridge. It should also be noted that there are significant employment opportunities on Cambridge West Campus and on the edge of the city as the new science parks are created and expand.

- 5.13 The purpose of the Greenways is set out in consultation documents prepared for the Greater Cambridgeshire Partnership which is tasked with implementing the City Deal and implementing new job creation, new homes and supporting growth with integrated transport including viable alternatives to driving⁶. The specific purpose of the Greenways as part of this remit is that they connect villages to Cambridge City for commuting purposes. The Autumn 2018 consultation document on Comberton Greenway sets it out as follows:

“What is a Greenway

A high-quality, direct, continuous and legible route connecting local villages with the city.

• In this project the Greenways are particularly aimed at providing facilities likely to increase cycle commuting and thereby encourage modal shift out of the motor vehicle for journeys in their respective corridors, but should also provide good facilities for pedestrians, wheelchair and mobility scooter users and, where appropriate, horse riders – and cater for both leisure and utility users.⁷”

- 5.14 The Greater Cambridgeshire Partnership partners are the Cambridge City Council, Cambridge County Council, South Cambridgeshire District Council, the University of Cambridge and the Cambridgeshire and Peterborough Combined Authority Business Board. Given that the Cambridge City and South Cambridgeshire District Councils, who are preparing this draft joint Local Plan, are members of the Partnership leading on the Greenways, it is somewhat perverse to not include the Greenways positively in the new Local Plan.
- 5.15 The Comberton Greenway is already under construction and works have started at Adams Road in Cambridge City and at Coton village. The initial phase of works within Comberton have already been completed. The route is therefore well on its way to being delivered and should be taken into account when considering the sustainability of Comberton as a location for growth. The scheme is included in the Local Transport Plan and is being brought forward by the Greater Cambridge Partnership (Infrastructure Topic Paper). Therefore, Comberton should be awarded a point for transport for the cycling infrastructure.

⁶ <https://www.greatercambridge.org.uk/about-us>

⁷ [Comberton-Greenway-Pre-Consultation-Overview-Autumn-2018](#)



- 5.16 Comberton also benefits from an at least hourly bus service (18/18A) (St Neots-Cambourne-Comberton – Cambridge) at times which allow those travelling into central Cambridge to arrive for work before 9am weekdays and to return home. Therefore Comberton should be awarded at least 1 point for bus transport.
- 5.17 The Settlement Hierarchy should take the broader picture into account and when considering the quantum of development which a settlement can support using the wider proximity to services should be considered not just services in Central Cambridge and Market Towns. Due to the services within the village and its location near other villages and services on the western edge of Cambridge, Comberton is able to support much higher levels of housing growth sustainably over and above 30 dwellings. Allocations and windfall policies should include land adjacent to the existing settlement due to the existing services, proximity to other services by sustainable transport (Comberton Greenway) and services on the edge of Cambridge.
- 5.18 Comberton is a sustainable location for growth and development and development which is part of an existing settlement is more achievable in the five year and plan periods than new settlements and strategic urban extensions. It should be considered as a Rural Centre capable of sustaining a larger quantity of growth.
- 5.19 However in any case even as a Minor Rural Centre, a greater quantum of development should be programmed for Comberton as more than 30 new dwellings can be sustained. The quantum of development allowed in all villages is arbitrary and therefore a broader approach should be taken to development in all villages. Additionally in order to accommodate that development, development adjacent to settlement boundaries should be allocated for and allowed in development management policy terms using grey belt as set out in the NPPF 2024. On this basis the site at Branch Road, Comberton should be allocated.
- 5.20 For the above reasons we therefore **object** to Policy S/SH as currently drafted.

6.0 POLICY S/DE DEFINED DEVELOPMENT EXTENTS

Policy

- 6.1 The policy sets out a defined development extent (“DDE”) inside of which development will be permitted on the following basis:

“1. Development and redevelopment of unallocated land and buildings within defined

development extents (as shown on the Policies Map) will be permitted provided that:

- (a) Development is of a scale, density and character appropriate to the location, and is consistent with other policies in the Local Plan; and*
- (b) Retention of the site in its present state does not form an essential part of the local character, and development would protect and enhance local features of green space, landscape, ecological or historic importance; and*
- (c) There is the necessary infrastructure capacity to support the development.*

6.2 Outside the DDEs development is generally not permitted unless it is for:

- (a) "allocations within Made Neighbourhood Plans;*
- (b) Rural Exception sites meeting local need for affordable housing;*
- (c) development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside; or*
- (d) where development is supported by other policies in this plan."*

Commentary

6.3 Endurance Estates **objects** to this policy on the basis that it is arbitrary and it fails to allow for well-connected windfall growth in villages on the basis set out above in relation to policy S/SH.

6.4 The DDEs constrain growth of sustainable settlements and there is a lack of capacity testing to demonstrate that growth shall only be delivered within DDE. As set out above there is a need for windfall sites to come forward based on the current housing supply trajectory and there is also a need to ensure that villages remain vital and vibrant. The artificial DDE limit fails to adhere to these principles.

7.0 POLICY S/GB THE CAMBRIDGE GREEN BELT

Policy

7.1 The detailed boundaries of the Green Belt in Greater Cambridge are defined on the Policies Map. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework, and having regard to the Cambridge Green Belt purposes set out above.

Commentary

7.2 It is noted that no Green Belt study has been undertaken at this stage to inform the Draft Local Plan. This is a fundamental gap in the evidence base that needs to be addressed prior to Regulation 19.

- 7.3 The Development Strategy and this policy are not in accordance with the NPPF as they fail to take into account Grey Belt which was introduced in the NPPF December 2024. Under the NPPF December 2024 the development of Grey Belt sites is not inappropriate *per se*.
- 7.4 The NPPF 2024 states at paragraph 45 that “*once established, Green Belt should only be altered where exceptional circumstances are fully evidence and justified through the preparation or updating of plans*”. Paragraph 146 provides further clarity on what might be an exceptional circumstance, and this includes but is not limited to 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 their Green Belt boundaries in accordance with the NPPF policies. Where it is necessary to release Green Belt land for development the priority should be for development of previously developed (brownfield land) and then consider grey belt land.
- 7.5 When considering applications paragraph 155 states that development which uses “grey belt” should not be considered as inappropriate where it would not fundamentally undermine the purposes of the Green Belt across the area of the plan, there is a demonstrable need for the type of development, the development would be in a sustainable location and the Golden Rules are met.
- 7.6 There is case law which assists with clarifying the definition of “exceptional circumstances”. *Calverton Parish Council v Greater Nottingham Councils (2015)* sets out the “tests”. A need for homes, and specifically a need for affordable housing, is considered to be an exceptional circumstance in law. The Icenci Projects paper “The Greater Cambridge Housing Needs of Specific Groups” (2025) concluded that there is a need for 928 affordable homes in Cambridge City per annum and 708 in South Cambridgeshire per annum. The analysis identifies different rationales for the figures and states that the two assessments should not be arithmetically linked. This is problematic in a joint local plan with joint allocations. The need for affordable housing is **very acute** (paragraphs 2.5-2.7 Development Strategy Topic Paper 2025).
- 7.7 The “very acute” need for affordable housing is therefore an exceptional circumstance, and a Green Belt review is triggered under the NPPF paragraphs 147 and 148.
- 7.8 The Iceni report is clear that it does not provide a target figure, but it does set out the acute need for affordable housing currently. It notes that there is likely to be a fluctuation in needs

over time as households' needs change. It is therefore reasonable to conclude that the data position on need is most accurate during this early phase of the plan period, and certainly there is a recognition of existing need of households from South Cambridgeshire being placed in temporary accommodation including bed and breakfast accommodation which is not suitable for long term accommodation. Therefore, it is an exceptional circumstance with regard to the very acute need for households for affordable housing and the need to address the existing backlog of need.

- 7.9 To address the existing crisis of need, the draft Local Plan should be including a greater number and variety of sites, including Green Belt sites, to front load delivery of affordable housing rather than relying on larger new settlements and strategic urban settlements which will deliver later on the Plan period and which are more likely to have viability issues due to the amount of infrastructure required to be delivered to facilitate new dwellings.
- 7.10 Furthermore, as noted in the Iceni report, viability is a critical factor in delivery of affordable homes and therefore there needs to be a balance between affordable homes and private homes rather than reliance on rural exception schemes where values can be an issue
- 7.11 A Green Belt study of sufficient granular nature to satisfy the new requirements in the NPPF and the Planning Practice Guidance should be undertaken, and sites should be established as grey belt as part of this study. Grey Belt is land which while in the Green Belt does not perform strongly against purposes a, b or d:
- Purpose A – to check the unrestricted sprawl of large built up areas
 - Purpose B – to prevent neighbouring towns merging into one another
 - Purpose D – to preserve the setting and special character of historic towns
- 7.12 Turning to our client's site at Branch Road, Comberton - this does not perform strongly against Green Belt purposes a or b as it is a village and not part of a large built up area, and does not perform strongly against purpose d, as although Cambridge is a historic town, the site does not have a strong relationship to its setting and is not sufficiently proximate nor does it have a strong visual relationship with Cambridge.
- 7.13 The site would need to comply with the Golden Rules which includes additionality in terms of affordable housing which would contribute to the very acute need for affordable housing in South Cambridgeshire. Allocation of this site would therefore be appropriate and necessary.

7.14 Therefore, we submit that land south of Branch Road, Comberton should be allocated for C3 dwellings and an appropriate percentage of affordable housing to address the existing acute need for affordable homes. The site can deliver much earlier than the large allocations and therefore would be a strong addition to the local plan to deliver against this exceptional need.

7.15 For the above reasons we therefore **object** to Policy S/GB as currently drafted.

8.0 APPENDIX E HOUSING TRAJECTORY AND FIVE YEAR HOUSING LAND SUPPLY CALCULATION AND APPENDIX F MONITORING

Policy

8.1 In calculating the five-year land supply calculation for 2028-2033, the Sedgefield approach is used (taking the previous under delivery and spreading it across the 5 year period, rather than spreading it across the lifetime of the plan period).

8.2 On this basis the five-year land supply is calculated as 5.23 years with a 5% buffer. The annual requirement prior to adding the shortfall is 2,295 and with the shortfall is annualised to 2,582.

8.3 The 2024-2025 annual delivery figure is well below the annualised requirement using the standard method (approx. 50%).

8.4 Appendix F Monitoring indicators states that should there be a less than five-year housing land supply the steps may include:

- Review Development Management processes.
- Action to bring forward housing sites consistent with the Local Plan, wherever possible in partnership with landowners and developers.
- Action to secure the timely provision of infrastructure.
- Review relevant parts of the Local Plan, including housing target and housing allocations.
- Consider undertaking cooperation with other local authorities, including through duty to co-operate

Commentary

8.5 There is currently a lack of five-year land supply, and this should be addressed as soon as possible. There is a general weakness in the draft Plan as the five-year land position is not particularly strong upon adoption of the plan and relies on making up previous shortfall within the five year period despite a continuing reliance on new settlements and strategic level sites which have been slow to deliver to date.

- 8.6 Given that the previous shortfall has been attributed to this slow delivery of new settlements and strategic level sites, continuing to pursue this approach without greater allocation of below strategic level sites such as Branch Road, Comberton is not justified and leaves the Plan at risk of non-delivery of sites in the early years and risks not being able to demonstrate a five year land supply. The delivery rates of the Councils remains good to date due to the consented schemes of smaller scale sites from 2015-2019. In order to retain the delivery rates and a five year land supply this approach should be adopted to allocations, all the more so with the increased housing need under the standard method. Therefore, more sites which are well related to existing settlements should be allocated, including this Site.
- 8.7 Furthermore, the actions set out are not quick delivery options, unlike allocating more sites which fall under the SUE threshold including Branch Lane Comberton as a modest development to an existing settlement where there is existing infrastructure as a base position which can be added to.
- 8.8 While the monitoring monitors specialist housing uses, the monitoring also fails to monitor the delivery of affordable housing which should be rectified. Again, there should be levers in the local plan which can be pulled to create a timely difference in housing delivery. Sites which are in the Green Belt which come forward as Grey Belt sites have to have a higher percentage of affordable housing and therefore allocating sites at a more modest scale including Branch Road, Comberton would enable there to be clear and specific delivery of new affordable housing.
- 8.9 As currently drafted the local plan has extremely limited opportunities to increase affordable housing delivery to meet the acute needs identified.

9.0 HELAA 2021

- 9.1 The site forms part of Site ID40316/HELAA ID40316 and has been updated via the call for sites portal.
- 9.2 While a 2025 addendum to the HELAA has been produced, this only analyses new sites. Our client's land at Comberton was analysed in 2021 under the HELAA report at that time.
- 9.3 The site was proposed for the following types of development:
- Residential

- Market and affordable housing
- Key worker housing
- Older persons housing
- Residential care home
- Custom or self-build housing
- Specialist/other forms of housing
- Public Open Space
- Community Facilities
- Recreation and Leisure

9.4 The maximum number of homes proposed was 250 units which is a density of 12 dwellings per hectare which is a low density suitable for an edge of settlement location. The primary focus for development is now C3 residential uses. It is noted that there is a shortfall of self-build housing plots being granted planning permission in Greater Cambridgeshire and this site could potentially significantly assist in addressing that shortfall⁸.

9.5 Analysis of site ID 40316 in the HELAA Report (2021) states that the site is viewed as follows:

Site Assessment Summary

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

9.6 The good ranking of the “availability and achievability” of the Site are not disputed. The site is available and achievable and can deliver early in the Plan Period helping to deal with the “lumpy” housing trajectory and is of size where the water shortage issues can be dealt with using the short term solutions which have been identified.

9.7 However, the estimated start date for delivery on site is set out at 6-10 years in the HELAA at page 872, however these representations and the updated call for sites form state that the estimated start should be noted as within 5 years. The Site (which is part of the HELAA Site ID41603) is in a single ownership, is free from significant constraints and has access to services.

⁸ <https://www.greatercambridgeplanning.org/the-planning-application-process-and-advice/self-build-and-custom-build-property-register>

- 9.8 With regard to the suitability of the site the analysis is disputed and should be Green.
- 9.9 In particular with regards to the “Landscape and Townscape” consideration, while this is red in the HELAA, it should be considered as Amber as the impacts are limited and can be mitigated =. It is not clear whether the site has been analysed with a “policy on” approach with regards to the settlement envelope but it appears that it has been. It should be considered with a policy off approach to consider whether spatially the site could be appropriate within the context of the village. While the site may be outside of the current village envelope it does have a good relationship with existing residential development and is enclosed by Branch Road as noted in the HELAA analysis.
- 9.10 The site is therefore well contained and would not necessarily impact on the wider landscape character. The site is already well screened and there are limited views of the site from public rights of way. A sympathetically designed scheme could therefore be well contained on the site and not impact the wider landscape character area.
- 9.11 With regards to the Strategic Highways Impact, it is understood that a red rating was not considered as an automatic presumption against development (set out in paragraph 1.21 of the HELAA Addendum 2025). It is also noted that sites which were previously assessed in 2021 were not re-assessed (paragraph 1.24 HELAA Addendum 2025), however they should be given the amount of time that has passed and the changing factors influencing planning in the Greater Cambridgeshire area and nationally.
- 9.12 Highways England is reviewing its Strategic Road Network Investment Plan as the previous plan ran from 2020-2025 and now is using an interim 2025/26 plan. National Highways is now increasing the capacity of the A428 which is near to the site, and which will increase capacity on the strategic road network. The Government is investing in local transport infrastructure and the new greenway is being built. Therefore, development on the west of Cambridgeshire should not automatically be considered red from a strategic road network capacity point of view.

10.0 SUSTAINABILITY ASSESSMENT

- 10.1 A draft Sustainability Assessment (“SA1”) has been prepared to accompany the Draft Plan. This concludes that there is a *“strong focus on providing an appropriate amount of development and in particular a variety of housing types and tenures, to meet the needs of*



a broad range of people” and that, “the spatial strategy and policies set out a strong emphasis on minimising carbon emissions, particularly through minimising the need to travel, using land efficiently and making the most of existing and planned sustainable transport links.”

- 10.2 The inclusion of Branch Road, Comberton would be entirely in accordance with making the most of existing and planned sustainable transport links, and as currently drafted the Local Plan fails to make the most of the sustainable transport in and around Comberton, existing and planned, including the Greenway, East West Rail and the Cambourne Cambridge Busway.
- 10.3 The SA also does not adequately address the options for growth in relation to affordable housing as it does not reflect the “very acute” need identified in the Icen Paper. The viability issues of larger sites which could result in lower affordable housing levels being provided are stated to be offset by smaller developments, however there are very limited smaller, sub-strategic level, sites being allocated. This needs to be addressed with some more dispersed allocations in sustainable Minor Rural Centres with good sustainable transport options. Branch Road, Comberton fulfils this need.

11.0 CONCLUSIONS

11.1 In summary, we object to the plan as drafted for the following reasons:

- The Draft Local Plan places a strong reliance on the allocation and delivery of housing in new settlements and strategic level allocations. This approach risks failing to secure a five year land supply in the early years of the plan and more sub-strategic level sites are needed to ensure that housing delivery takes place in a more timely manner during the beginning of the Plan period. This should include sites on the edge of existing sustainable settlements which can use and supplement existing infrastructure and contribute to the sustainability of services in the village.
- The vitality of settlements should be considered, including the need for new housing to continue to support existing services within villages, and the opportunity to appropriately supplement existing services. Sustainable transport options should not be discounted because of the distance to Central Cambridge or a Market Town alone, but a more nuanced approach should be taken to consider not only the services within a village but also those in nearby villages and on the edge of Cambridge which can be highly accessible. The quantum of development in villages should not be artificially constrained by such limited housing numbers as set out in the Plan, but wider options for growth in villages embraced, including beyond Defined Development Envelopes where sites relate well to the existing settlement.
- Smaller sites should also be allocated as they can deliver dwellings through water use mitigation measures, unlike larger strategic sites which rely on new infrastructure to delivery water to the region and which are programmed to take at least 5 years to complete.
- The very acute need for affordable housing has not been sufficiently addressed in the draft Local Plan and further work must be done to ensure that the existing needs are addressed early in the Plan. Release of Green Belt should be considered as this is an “exceptional circumstance”. Moreover, as sites released from the Green Belt are required to deliver an uplift of affordable homes as per the Golden Rules in the NPPF this will ensure that more affordable housing is brought forward even where viability is likely to be an issue on larger strategic sites (as identified in the evidence base for the plan).



- A Green Belt review has not been produced as part of the evidence base for the draft Local Plan, that must be prepared before draft allocations are published as this is fundamental evidence to identify grey belt sites under the NPPF and PPG which do not strongly contribute to Green Belt purposes a, b and d.
- We would encourage the Council to consider allocation of more medium sites in sustainable locations in order to aid plan flexibility and address affordable housing needs. Our client's land south of Branch Road, Comberton should be allocated for residential development and associated uses on this basis.

Bedford

Planning | Research & Analysis | Transport & Infrastructure
bedford@dlpconsultants.co.uk

Bristol

Planning | Transport & Infrastructure
bristol@dlpconsultants.co.uk

Liverpool

Planning
liverpool@dlpconsultants.co.uk

London

Planning
london@dlpconsultants.co.uk

Nottingham

Planning | Transport & Infrastructure
nottingham@dlpconsultants.co.uk

Rugby

Planning
rugby@dlpconsultants.co.uk

Sheffield

Planning | Research & Analysis | Transport & Infrastructure
sheffield@dlpconsultants.co.uk



Established in 1991

Employee Owned Trust