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Greater Cambridge Shared Planning
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VIA EMAIL ONLY TO: localplan@greatercambridgeplanning.org

Dear Sir/Madam,

Proposed Submission – Greater Cambridge Proposed Submission Local Plan (Regulation 19) Consultation

Representations on behalf of Endurance Estates and the Landowners

Savills (UK) Ltd are instructed by our clients, Endurance Estates, to make representations as part of the Proposed Submission Greater Cambridge Local plan (Regulation 19) Consultation on behalf of Endurance Estates (Land Promotion) Ltd and the Landowners.

Endurance Estates have a number of land interests across Greater Cambridge including:

- Land East of Gazelle Way, Cherry Hinton (Site ID 115222; HELAA ID 40250).
- Land South of Horseheath Road, Linton (Site ID 115248, HELAA ID 40554)
- Land at The Causeway, Bassingbourn (Site ID 116001, HELAA ID 40228)
- Land at Elbourne Way, Bassingbourn (Site ID 116006, HELAA ID 40227)
- Land to the rear of Old House Road, Balsham (Site ID 115953, HELAA ID 40438)
- Land at Hillside, Orwell (Site ID 115802, HELAA ID 40496)

Endurance Estates previously made representations at the early stages of the Plan-making process, most recently at the Regulation 18.3 Consultation which was held between December 2025 and January 2026. Since then, Endurance Estates have continued progressing technical and masterplanning work to inform the continued promotion of the various sites.

These further representations build on those earlier representations and raise a number of issues of soundness with various policies within the Proposed Submission Local Plan including:

Strategic Policies and Supporting Aspects – Responses Applicable to All EE Sites

- Policy S/JH - New Jobs and Homes.
- Policy S/DS - Development Strategy & Key Diagram (Figure 4) and Figure 5.
- Policy S/SH - Settlement Hierarchy.
- Policy S/DE - Defined Settlement Extents.
- Policy S/MO - Monitoring.
- Appendix D – 5YHLS and Housing Trajectory.

- Sustainability Appraisal.
- **Strategic Policies – Responses Applicable to Cherry Hinton Only**
- Policy S/GB - The Cambridge Green Belt.
- Policy S/EOC - Other site allocations on the edge of Cambridge.
- Inset Map for Cambridge.

Strategic Policies – Responses Applicable to EE Village Sites Only (Bassingbourn, Balsham, Linton & Orwell)

- Policy S/RRA - Site Allocations in the Rest of the Rural Area.
- Appendix C – Housing Requirements for Neighbourhood Areas.
- Inset Maps for Linton, Balsham, Bassingbourn, and Orwell.

Development Management policies:

- Policy CC/WE - Water efficiency in New Developments.
- Policy BG/BG – Biodiversity and Geodiversity.
- Policy GP/LC - Protection and enhancement of Landscape Character.
- Policy J/AW: Affordable workspace and creative industries
- Policy H/AH - Affordable Housing.
- Policy H/ES: Exception sites for affordable housing
- Policy H/HM - Housing Mix.

We attach Endurance Estates individual comments in relation to the various policies of concern, firstly with comments on the Strategic Policies that are relevant to all of Endurance Estates' sites, then with regard to more site specific policies and then finally with regard to a number of the 'Development Management' Policies of relevance. In addition, comments have also been submitted online through the Council's Consultation Portal.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which required that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent** with national policy.

These representations therefore relate to these tests.

Conclusions

We hope that Endurance Estates representations are in order and will be given due consideration by

the Inspector(s) as part of the forthcoming Local Plan Examination.

Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours faithfully,

[redacted]

Neil Waterson
BA (Hons) DipTP MRTPI
Director, Planning

cc. Tim Homes, Endurance Estates; Joe Murphy, Persimmon Homes

Policy S/EOC - Other Site Allocations on the Edge of Cambridge.

Do you consider the Greater Cambridge Local Plan is legally compliant?

Yes

Do you consider the Greater Cambridge Local Plan is plan sound?

No

Please set out and explain your comments

Endurance Estates object to the draft Policy S/EOC as it is considered that **the Policy is unsound on the basis that it is not positively prepared, justified or effective** when considered against the reasonable alternatives and evidence available.

Draft Policy S/DS states that, as far as possible, housing and jobs needs will be met in order of preference as follows: (a) within the Cambridge Urban Area, **(b) on the edge of Cambridge**, (c) at an expanded Cambourne, (d) at other new settlements; and finally (e) in the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres. The order of preference has been determined in recognition of the sustainability of these locations and is considered to be broadly logical and justified.

However, despite the Edge of Cambridge being identified in the Settlement Hierarchy / Development Strategy as being the second most sustainable location for directing new housing and employment growth, the Councils have not identified any further sites on the edge of Cambridge in order help meet the areas needs.

As highlighted in our representations to Policies S/DS and S/GB, it is considered that the Development Strategy should be supplemented by the provision of additional allocations on the Edge of Cambridge, with land removed from the Green Belt, to create a more balanced housing land supply which mitigates the risk of delayed delivery from the New Settlements and enables a more balanced and sustainable pattern of growth which better supports the needs of the Greater Cambridge economy, as evidenced in the Greater Cambridge Economic Needs Assessment which supports these representations. This would meet a wider range of housing needs (including affordable housing needs) across the whole area whilst also addressing the inadequate housing supply buffer previously referred to.

The concentration of further growth on the edge of Cambridge would result in development being located in the next most sustainable location after the urban area (as acknowledged in the Plan) where development for new housing can come forward quickly, benefiting from the existing infrastructure and proximity to jobs, services and facilities. This is recognised by the Sustainability Appraisal as some of the most sustainable locations for growth in terms of access to services, facilities and healthcare, equal to options of densification of the city and new settlements.

By allocating new housing development on the edge of the City and close to existing and planned employment growth, the Development Strategy would both better meet and address Cambridge's unmet need for market and affordable housing and would better support the growth of the economy given the ability for new residents to access jobs at the various business parks on the fringes of the City and within the City Centre by active travel and other sustainable modes.

In terms of Green Belt, the Council's Development Strategy Topic Paper Appendix 4 (Cambridge Local Plan Green Belt Considerations) 2026, identifies that Land East of Gazelle Way (40250) partially comprises Grey Belt, by virtue of overlapping with Grey Belt Parcel TE9, which is a 2.29 hectare parcel on the edge of Teversham.

It is acknowledged that the 'Review following changes to National Policy and Guidance' document, prepared by LUC in July 2026, does not identify any of the other parcels comprising the promotion site (CHI1, CHI2, CHI3, CHI4, TE7 and TE8 and FU1) are identified as provisional green belt, and each is identified as having a 'very high' harm rating, with the exception of CHI3 which is given a 'high' harm rating. The Assessment concludes that the site has a 'strong' contribution to NPPF Purpose D. None of these assessments have changed since the LUC August 2021 Greater Cambridge Green Belt Assessment and Endurance disputes their findings and considers that the evidence has been prepared retrospectively to justify a strategy already determined rather than providing a fully objective assessment.

The constraint of the Green Belt is understood and acknowledged. However, the Green Belt evidence relied upon by the Council makes no attempt to identify Green Belt land which would represent some of the most highly sustainable locations for growth anywhere in the Greater Cambridge region. Paragraph 2.51 of the Proposed Submission which follows 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". Paragraph 2.50 then states that the Councils "also identified six development strategy choices which form geographically focused hybrids of the previously identified sources of supply" which included "A hybrid involving release of land from the Green Belt." The Councils have not 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 the release of green belt and grey belt land.

The updates made to the Assessment are light-touch, and essentially boil down to corrections and updates, such as the amendments made in the Assessment for sites which have seen recent development, including for example Land South of Trumpington. Regrettably, the Council have not applied the same update to Land East of Gazelle Way, Cherry Hinton, which is now similarly influenced by recent developments at the Land North of Cherry Hinton site, which continues to be built out at pace. The site is now effectively surrounded on all sides by built form: Cherry Hinton to the west; Capital Park to the south; Teversham to the north-east and Fulbourn to the south-east. Planned development, including supporting facilities for East West Rail to the south-east of the site will also continue to evolve the surroundings over the next Plan period.

Endurance Estates have undertaken significant technical work in support of their promotion of Land East of Gazelle Way, Cherry Hinton in order to demonstrate that the proposed scheme can come forward in accordance with the revised Green Belt policies set out in the 2026 NPPF.

Despite the significant housing needs identified within Greater Cambridge and the lack of available brownfield sites within Cambridge to meet their own needs, the Plan makes only a single new allocation within the Green Belt at Cambridge Biomedical Campus. It is therefore considered that the Council should urgently undertake a full Green Belt Review in accordance with the NPPF and PPG to identify potential Grey Belt of other suitable sites on the edge of Cambridge which can sustainably contribute Greater Cambridge's demonstrable housing and employment needs.

East of Gazelle Way, Cherry Hinton (Site ID 115222, HELAA ID 40250)

Endurance Estates strongly objects to the omission of the proposed allocation site at Land East of Gazelle Way.

Endurance Estates has consistently promoted Land East of Gazelle Way for a mixed-use, landscape-led development of approximately 1,250 dwellings, employment space and extensive public open space. The site comprises 120 acres on the edge of Cambridge which is currently in agricultural use.

Land East of Gazelle Way is an unparalleled location for growth and can readily connect to the existing and committed infrastructure of Cambridge without the need for substantial additional costly infrastructure.

Land East of Gazelle Way is well located for access to key existing employment sites, including Capital Park (Cam Life) and Fulbourn Hospital, which sit immediately south of the railway line, and Peterhouse

Technology Park, which lies to the southwest and can be reached within a six-minute cycle. These employment sites represent a growing cluster, which benefit from significant investments, including from occupiers such as ARM, which has its global HQ on the Peterhouse Technology Park and is expanding significantly.

In recognition of its highly accessible location, the east of Cambridge area is expected to become a focus of employment and infrastructure growth over the coming decade. As part of this, projects including the Cherry Hinton Innovation District development at Coldham's Lane (circa 1.5km west of the site) and the Cambridge East development at Cambridge Airport (circa 1.6km north-west), will both come forward and transform this part of the City.

Significant infrastructure is already committed to accommodate this growth, including the Fulbourn Greenway, EWR's proposed Cambridge East Station and the relocation of the Newmarket Road Travel Hub to Teversham, complementing the existing high quality public transport and cycle connectivity within this area.

To compliment this further, the proposed East of Gazelle Way scheme, would deliver new high-quality off-road cycle route connecting with the Fulbourn Greenway to the south and up to the Cambridge East to the north.

Attached to these representations is an extract from the 2025 HELAA site assessments, accompanied by comments from the Endurance Estates' project team. This demonstrates that, based on the updated technical information available, the Site would score green against most criteria with amber in relation to the remaining criteria and no red scores.

In addition to the HELAA assessment, it is important to consider whether the site qualifies as Grey Belt land. According to the latest PPG, land which does not contribute strongly to Green Belt Purposes (a), (b) or (d), can be considered to comprise Grey Belt. Below is a brief assessment of Land East of Gazelle Way which demonstrates that the Site can be considered Grey Belt.

In terms of **Purpose A** (to check the unrestricted sprawl), while it is accepted that the proposed site would encroach into the countryside, it is our view that the site performs weakly against Purpose A. The site is largely enclosed by Cherry Hinton to the west, Springstead Village to the north, the former Ida Darwin Hospital development to the south-east and Capital Park/CamLife Campus which sits the south. The southern boundary is comprised of the Cambridge to Newmarket railway line. There are also other existing urban influences to the south in the form of the National Grid/UKPN Grid Substation, and a mobile home park with the Yarrow Road Tesco beyond. The site is therefore considered to be well contained and would be a logical extension to Cambridge. Once developed, the site would represent a logical limit to Cambridge, whilst preserving a landscaped buffer between the scheme, Teversham and Fulbourn providing separation and protecting their individual identity. This buffer would be similar in scale to that provided between Darwin Green and Girton.

In conclusion, it is considered that the site makes a **moderate contribution** to Purpose A and does not therefore contribute strongly to this purpose.

In terms of **Purpose B** (Prevent neighbouring towns merging into one another) the revised PPG confirms that this relates solely to the merging of towns, and not villages. Given the nearest town to the east of the site is Newmarket, approximately 10km away it is considered that the site makes no meaningful contribution to fulfilling this purpose.

Nevertheless, the proposals submitted include a substantial open landscape buffer which would preserve the setting of both Teversham and Fulbourn maintaining separation and preserving their individual identity. Once provided, the landscaped buffer would retain a visual separation between the proposals and both villages, which could be incorporated into open space, biodiversity enhancement areas or a country park – subject to further technical work and discussions with Greater Cambridge. This would effectively secure this buffer in perpetuity, rounding off development to the East of Cambridge.

In conclusion, the Site makes only a **weak/no contribution to Green Belt Purpose B** and does not therefore contribute strongly to Purpose B.

For **Purpose D** (to preserve the setting and special character of historic towns), again, the revised PPG confirms that this relates solely to towns (and not villages). Accordingly, the only historic town relevant to the site is Cambridge. The last Green Belt Assessment (LDA, August 2021) published by the Council confirmed the promotion site contributed only moderately to purpose 2 (maintaining and enhancing the quality of Cambridge's setting), reflecting the presence of relatively modern developments in and around Cherry Hinton, which do not contribute to the historic character or setting of the City.

In conclusion, the Site only makes a **weak to moderate contribution** to this purpose and does not therefore contribute strongly to Purpose D.
Further, in terms of the Golden Rules for Green Belt Release, the site is fully capable of meeting the requirements as outlined in Policy GB8 of the NPPF 2026.

Initial technical investigations on the indicative design confirm that Land East of Gazelle Way can viably deliver 50% affordable housing, which would significantly help meet the pressing need for affordable housing in the City.

Alongside this, the proposed scheme is capable of contributing towards necessary infrastructure, including provision of a new primary school and contributions to required sustainable transport infrastructure. The site design is capable of incorporating safe active travel routes throughout, and the Site will be easily accessible and will provide enhanced linkages to the Fulbourn Greenway, relocated Teversham Travel Hub and the potential future Cambridge East Station at Coldham's Lane. Endurance Estates would welcome discussions with Greater Cambridge relating to required infrastructure contributions.

The proposed scheme will also include substantial public open space, providing enhanced public access to the countryside, linking with existing Public Rights of Way for existing and future residents. This will build-on the Cambridge Nature Network and the proposals at the nearby Springstead Village and Cambridge East Sites. The site is therefore capable of meeting the NPPF's Golden Rules for Green Belt release. The Scheme is capable of providing connectivity through to the planned green infrastructure at the Cambridge East development, helping provide additional connectivity in line with the ambitions of the Cambridge Nature Network Local Nature Recovery Strategy, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.

As such, it is concluded that the site is likely to constitute Grey Belt and is capable of complying with the Golden Rules of Green Belt release outlined in Policy GB8 of the NPPF 2026. As stated in Policy GB8(2) of the NPPF 2026), development which complies with the Golden Rules should be given significant weight in favour of granting permission.

Endurance Estates contends that, subject to ongoing technical investigations, Land East of Gazelle Way is capable of contributing to the identified housing needs of Greater Cambridge. The site is Available for development within the first 5 years of the Local Plan Period and remains Achievable and Suitable for the development proposed.

Endurance Estates requests that Greater Cambridge urgently publish the updated Green Belt Assessment and remove Land East of Gazelle Way from the Green Belt, with a corresponding allocation for residential-led mixed-use development of the site.

Conclusion

Accordingly, the lack of any new housing allocations on the Edge of Cambridge identified within the Proposed Submission Local Plan despite the high levels of unmet market and affordable housing within the City and it representing the next most sustainable location in the Settlement Hierarchy for new development is considered to be unjustified and unsound. In particular, Endurance Estates objects to the omission of Land East of Gazelle Way, Cherry Hinton (Site ID 115222, HELAA ID 40250) as a new residential-led allocation and considers this to be unsound.

Endurance Estates object to the draft Policy S/EOC as it is considered that **the Policy is unsound** on the basis that it is **not positively prepared, justified or effective** when considered against the reasonable alternatives and evidence available.

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

Greater Cambridge Economic Need Study

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

The Policy Map should be amended to include the allocation of the Site at Land East of Gazelle Way, Cherry Hinton (Site ID 115222, HELAA ID 40250) for a residential-led development to include the provision of approximately 1,500 new homes, employment development, neighbourhood centre and supporting uses along with a new country park.

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

Yes

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

To fully represent our client's interests in this important matter which is fundamental to the promotion of their various sites across Greater Cambridge and to provide the opportunity to explain our rationale fully, responding to comments from the Council as appropriate.