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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/GB: The Cambridge Green Belt

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 draft Policy S/DS 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.

In accordance with paragraphs 145-147 of the NPPF 2024 (Policy GB2 and GB3 of the NPPF 2026) and following the updated Planning Practice Guidance issued in February 2025, the Councils are required to review Green Belt boundaries to support the emerging Local Plan. To this end, on 27th February 2025, it was announced that Greater Cambridge Planning had received £140,000 to facilitate a comprehensive review of the Green Belt to support the emerging Local Plan. It is not clear how this has been spent, other than a light-touch update to the previous Assessment.

Endurance Estates are concerned that the further evidence provided within the Greater Cambridge Green Belt Assessment – Review Following Changes to National Policy and Guidance (July 2026) prepared by LUC represents only a minor update to the 2021 Green Belt Assessment, and accordingly, the Plan is still largely based on evidence which is now over 5 years old. LUC's July 2026 Update makes only minor updates and concludes that there is very little Grey Belt land or other land suitable for release from the Green Belt. The document, having prepared late in the preparation of the Local Plan effectively seeks to retrospectively justify a Development Strategy that has already been determined by suggesting that the changes in Green Belt policy in the NNPF and PPG make no material difference to the previous conclusions despite these representing the biggest change in Green Belt policy since its inception in the 1950s.

Notwithstanding the above, the Draft Policy S/GB maintains the additional 'Cambridge Green Belt Purposes', which effectively grant greater protection to Green Belt within Greater Cambridge than National Policy affords.

Indeed, Cambridge Green Belt Purpose C prevents "communities in the environs of Cambridge from merging into one another and with the city". This is not consistent with National Policy, and Endurance Estates contend that it is a much higher bar than afforded by the NPPF, which references "neighbouring towns" only and confirms that this protection is not intended to cover villages. The NPPF therefore deliberately limits the Green Belt purpose to the prevention of coalescence between towns and cities, rather than all Green Belt settlements.

Not only is Cambridge Purpose C a duplication of NPPF Green Belt Purpose B, it goes significantly further. The justification for this is not clear form the evidence base. The 2026 NPPF instead outlines, in Policy S2(c), that designations should be made to safeguard gaps between settlements where necessary to maintain and separate identities of the settlements. Clearly, the intent is for this to be a site and settlement specific measure, rather than a blanket application.

A less restrictive approach would help to accommodate growth in the most sustainable locations of Greater Cambridge, helping to accommodate a portion of the Government's aspiration for the growth of the City.

As with previous representations, Endurance Estates remain concerned that the draft Green Belt policy will be fundamentally flawed and risk being unsound, ineffective and inconsistent with national policy.

Endurance Estates propose the following revisions to the S/GB Policy:

1. *A Green Belt will be maintained around Cambridge in accordance with national Green Belt policy.*
2. *The detailed boundaries of the Green Belt are defined on the Policies Map.*
3. *In considering the future role and function of Green Belt land around Cambridge, regard will be had to:*
    a. *The nationally defined Green Belt purposes set out in Policy GB2 of the National Planning Policy Framework;*
    b. *The contribution of Green Belt land to the setting and special character of the historic city of Cambridge; and*
    c. *The need to support a sustainable pattern of development consistent with the spatial strategy of the Local Plan.*

4. Development proposals within the Green Belt will be determined in accordance with the Green Belt policies of the National Planning Policy Framework.

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 to support additional housing growth beyond the minimum currently identified and achieve a more balanced and sustainable housing land supply which locates growth in the second most sustainable location, helps to address unmet market and affordable housing needs in Cambridge and mitigates the risk of delayed delivery from the New Settlements. 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.

Notwithstanding the conclusions in the LUC Green Belt Study, Endurance Estates consider their land at East of Gazelle Way, Cherry Hinton (Site ID 115222, HELAA ID 40250) to be Grey Belt land having regard to the definition in the Annex B of the NPPF 2026, in that it does not contribute strongly to Green Belt Purposes (a), (b) or (d). 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, the site makes a **moderate contribution** to Purpose A and does not therefore contribute strongly to Purpose A.

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 Paragraph 156 of the NPPF (Policy GB8 of the NPPF 2026).

Initial technical investigations on the indicative design confirm that 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.

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. As stated in Policies GB6 and GB7 of the NPPF, development which is Grey Belt and which complies with the Golden Rules should be given significant weight in favour of granting permission.

It is considered that the housing and employment needs of the nationally significant Greater Cambridge economy represent exceptional circumstances that justify the release of land from the Green Belt.

Endurance Estates object to the draft Policy S/GB as it is considered that the Policy is **unsound** on the basis that it is not positively prepared, justified, effective or consistent with national policy 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 Assessment

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

The Green Belt should be further reviewed to identify suitable Grey Belt and other suitable sustainable Green Belt sites on the Edge of Cambridge which can be allocated for new housing to meet the areas housing needs as the next most sustainable location for growth after the Cambridge Uran Area. This should include the allocation of Land East of Gazelle Way, Cherry Hinton (Site ID 115222; HELAA ID 40250) for a residential-led development of circa 1,500 new homes.

In any event, The Policy should be amended to reflect the requirements of the Green Belt policies in the NPPF in order to ensure consistency with National Policy.

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.