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Greater Cambridge Community Infrastructure Levy Examination

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Dear Sir/Mada,

Greater Cambridge Local Plan

Policy S/DS – Unsound

The general development strategy is recognised as being effective and efficient however the reference to having regard to the purpose of the Cambridge Green Belt in developing the overall strategy is unsound and does not comply with national policy.

The principal reason for this is the identification of grey belt land within the Cambridge Green Belt study and the fact that grey belt sites have not been considered as part of the overall strategy.

Development Strategy Topic Paper - Appendix 4: Revised Greater Cambridge Local Plan Green Belt Considerations Review (2026) confirms that, in the Council's view, no 'exceptional circumstances' have been identified to require a review of the Green Belt boundaries.

This approach is unsound for various reasons. The first is that the Local Plan does allocate sites that are within the Green Belt and therefore such boundaries will change in any case. Therefore, exceptional circumstances do exist.

We have commented elsewhere as to the overall requirement in the Plan and whether sufficient allocations exist to demonstrate a policy-compliant housing land supply position at the adoption of the Plan. Our view is that no such certainty can be assumed and it is highly likely that there would be challenges to housing delivery. Indeed, whilst the Housing Delivery Test results for South Cambs are positive, the figure for Cambridge itself is currently 82% requiring the imposition of a 20% buffer. There continue to be challenges to delivery of the larger sites across the Greater Cambridge area and reliance on only these (or extension to some which either have poorer delivery rates and / or have not even commenced delivery) does not provide the flexibility required by national policy.

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This is particularly the case as the proposal is to utilise the Liverpool method in calculating housing land supply, notwithstanding the Planning Practice Guidance confirming that the preferred methodology "The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal".

The justification for this can be found in paragraph 2.40 of the Local Plan which provides reasons for utilising the Liverpool method. The Plan states that delivery rates under the standard method are 37% higher than the current joint adopted housing requirement and that higher growth is only anticipated in the second half of the plan due to constraints. However, at the same time, the Plan states that the vast majority of the sites already have consent and are delivering. Indeed, the Plan only seeks to allocate 9,690 homes over a 21-year period against a requirement of over 48,000. Therefore, the notion that housing cannot meet the identified requirement in the early part of the plan does not stand up to scrutiny.

As to the overall requirement, the figure is 2,289 dwellings per annum. However, data from the Housing Delivery Test demonstrates that in 2024/25 that within the joint authorities 2,269 dwellings were delivered demonstrating that delivery can and does meet the standard method figure. As such, there is no basis for utilising the Liverpool method and the Sedgefield method should be preferred. We have also set out that currently in Cambridge a 20% buffer should be utilised, accepting that this does put additional pressure on housing delivery.

The challenge here is that the Council has not identified small sites at sustainable settlements such as Waterbeach (and with Waterbeach new town coming forward, this enhances the sustainability of the wider area) and has also sought to restrict the development strategy by not allocating suitable grey belt sites. This approach is unsound as it does not reflect the strategy undertaken by the Council elsewhere and also does not reflect the approach advocated by the NPPF. As an example, the site at Denny End Road, Waterbeach is identified by the Councils as being wholly grey belt and is also identified in the HELAA as being suitable, available and achievable and unconstrained.

As such, and in order to make the Policy sound, an amendment is required to recognise that suitable grey belt land at sustainable locations should form part of the overall development strategy. As an example, the site at Denny End Road, Waterbeach is such a suitable site. A Vision Document setting out the positive attributes of developing and delivering this site is included with these representations.

Policy S/SH – Unsound

We support the principle of developing a settlement hierarchy and that, in general terms, development should be concentrated at the more sustainable locations. We do not consider that there is a need to review the category of settlement, albeit, we do not that with the advent of Waterbeach New Town, the existing settlement of Waterbeach will have a significantly increased access to wider services.

However, the limitation on development both within settlement boundaries and also limited in number is unsound and non-compliant with both the 2024 NPPF and, more importantly for development management purpose, the 2026 NPPF.

This is further in light of the housing land supply position and the availability of sites immediately adjacent to settlement boundaries that could form suitable sustainable extensions. It is also recognised that larger sites are able to accommodate greater percentages of affordable housing and deliver wider community benefits, something that smaller sites are not able to do.

As such, and in order to make the policy sound the reference to development only within settlement boundaries should be removed as well as the reference to maximum quantum of development. The policy should amended to allow suitable sustainable developments to come forwards so long as the do not lead to significant adverse effect and non-compliance with the national development management policies.

Policy S/DE – Unsound

The Policy seeks to define developments extents to settlements and sets out criteria for allowing development within settlement boundaries, with extremely limited development allowed outside defined development extents. This Policy in unsound and not consistent with national policy. It is also ineffective and leads to the plan to not be positively prepared.

The NPPF and national development management policies advocate a more flexible approach to delivering new growth, especially recognising that locations immediately adjacent to existing settlement could provide higher sustainable growth opportunities than perhaps sites within settlement boundaries that are located further away from services and especially train stations. As an example, in Waterbeach, the train station plus a transport interchange is being developed which could offer wider opportunities for further growth. This approach is supported by national policy and the crude approach of setting out strict development boundaries does not support sustainable development.

As such, the Policy should be amended to create specific criteria for development adjacent to sustainable settlements that could support enhanced sustainability.

Policy S/GB – Unsound

"The government attaches great importance to Green Belts, the essential features of which are their openness and permanence" (NPPF 2026, chapter 13). It is recognised that this plan is being prepared under the auspices of the 2024 version of the NPPF rather than the 2026 version. We also recognise that the Councils' Green Belt Review following changes to National Policy and Guidance identifies grey belt land within the authorities' boundaries including the land bring promoted by Wates at Denny End Road, Waterbeach which is wholly identified as grey belt.

The Councils state that there is no need for any amendments to Green Belt boundaries for 'general development needs' (paragraph 2.62) however 'exceptional circumstances' do exist to release other Green Belt for development across the plan area.

We contend that this approach is contrary to the NPPF (both the 2024 and 2026 versions) as the requirement in NPPF terms is not to identify site specific exceptional circumstances but rather consider them on plan-wide basis. If such circumstances do exist, it is then that sites are considered both in terms of effects on the Green Belt, but also other effects such as sustainability. Therefore, the approach of the Council to Green Belt and considering such land is unsound.

In terms of changes to the Policy, we recognise that they key reasons for including land in the Green Belt are set out and that it is appropriate to use these as a proxy to the purposes identified in the NPPF. However, and as set out, numerous parcels are identified as grey belt, including the land that Wates is promoting. The acceptance by the Council that exceptional circumstances do exist should have led to the sequential approach set out in the NPPF having been undertaken, something that has not been carried out.

Whilst we cannot pre-empt the results of such an assessment, and indeed it may not change the location where development is being proposed, the process should have been undertaken in accordance with national policy. The failure to do so undermines the soundness of the plan.

Policy S/JH – Unsound

This policy sets out the overall housing requirement and also refers to the neighbourhood plan allocations set out in Appendix C. For Waterbeach, the figure is set at a minimum of 113 new homes. Whilst we are not challenging the figure set out in the Plan, there is no mechanism set out in the Plan to oblige a neighbourhood forum to make a new neighbourhood plan or make housing allocations in such a plan. Failing to include such a requirement (which is prevalent in many recently made local plans) means that there is no confidence that the overall housing requirement will be met. This would also have a significant adverse effect on locations that need and require new housing.

Therefore, a policy needs to be included within the plan that if sites do not come forward through neighbourhood plans in a timely manner, then either a supplementary plan would be developed or a criteria-based policy would allow such sites to come forward as windfall sites.

Yours faithfully,

For and on behalf of Savills (UK) Ltd



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Director and Head of Office