

Endurance | Cambridge Local Plan 2024-2045

Greater Cambridge Local Plan Regulation 18 Consultation

Date of report: JANUARY 2026

PREPARED FOR



savills

Sensitive

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Document History

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1. General Comments

1.1 Policy S/JH: New Jobs and Homes

- 1.1.1 Endurance Estates **object** to Draft Policy S/JH on the basis that the proposed requirement for both jobs and homes is insufficient to meet the real-world need in and around Cambridge. In the case of the extent of housing provision, the proposed housing supply is also considered to be insufficient to ensure full delivery of the identified needs with the proposed buffer of 6.5% insufficient to provide flexibility and ensure a robustness of delivery. As a result, the draft Plan is not considered to be positively prepared and is unlikely to meet the needs in terms of housing and infrastructure delivery.
- 1.1.2 The Regulation 18 Draft Plan aims to meet the objectively assessed needs between 2024-2045 for 73,300 jobs and a minimum of 48,195 new homes.
- 1.1.3 The need for significant growth across Greater Cambridge is clear. The UK Government has repeatedly expressed its ambition to substantially increase the delivery of homes across the country, with a particular focus on Cambridge in recognition of Cambridge's role as a leading European hub for science and technology innovation which is an engine for economic growth that, if managed correctly, can continue to thrive.
- 1.1.4 The relative strength of Cambridge is well documented and evidenced. The 2014 City Deal sought to "enable a new wave of innovation-led growth by investing in infrastructure, housing and skills that will facilitate the continued growth of the Cambridge Phenomenon".
- 1.1.5 More recently, the Government has continued to further strengthen its support for growth around Cambridge. The Case for Cambridge (March 2024) report states that the Life Sciences sector alone employs 23,000 people in over 600 companies in the Cambridge region, with a combined turnover of £9bn, making Cambridge Europe's largest cluster. The current Government is equally clear that they intend to capitalise upon the previous success of the region with Matthew Pennycook confirming in August 2024. the following (emphasis our own):
- "We believe that the recent focus on Cambridge and its untapped economic potential are entirely warranted. The city's strengths in knowledge-intensive businesses and its unique innovation ecosystem are well documented, with strong connections between investors, researchers, businesses and local government. The economic growth of Cambridge has been a phenomenal success and **we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy**".*
- 1.1.6 While recognising the need for Growth, Matthew Pennycook went on to recognise some of the difficulties which have emerged as a failure to account for sufficient levels of growth:
- "Success has clearly come with costs; **expensive housing, traffic jams and air pollution are daily concerns for many residents and risk deterring those who want to live, work and study in the city**", before identifying that "I recognise that in recent years much has been delivered, **there remain significant barriers to realising the area's full potential. The Deputy Prime Minister and I are determined to help remove them and overcome the issues that have held up planned development for essential housing and laboratory space.**"*
- 1.1.7 As shown in the table below, when compared to the First Proposals Draft, Greater Cambridge is now proposing 8.7% more homes on an annual basis. This is in the context of a Standard Method which has increased by almost 30% as outlined in the Consultation Strategy Topic Paper. At the same time, the latest Draft Plan proposes around 25% more jobs across the plan period, meaning

there is an increasing disparity between the relatively ambitious jobs target and a less ambitious housing target.

Table 1: Comparison of First Proposals and December 2025 Consultation Draft:

	Homes Proposed	Annual Requirement	Versus Standard Method of...	Jobs
First Proposals (2021)	44,400 (or 48,840 incorporating the 10% buffer proposed)	2,111/annum	1,769 (+19% on the SM figure excl. buffer)	58,500 jobs
Regulation 18 December 2025	48,195 (or 51,328 incorporating the 6.5% buffer proposed)	2,295/annum	2,295 (+0% on the SM figure excl. buffer)	73,300 jobs
Difference in 2025 versus First Proposals	+8.5% (or 5% when incorporating the buffers proposed)	+8.7%	-	+25%

- 1.1.8 Endurance Estates are supportive of the acknowledgement that the proposed employment figures outlined in the First Proposals were insufficient, to fully capitalise upon the Government’s ambition for the region. However, Endurance Estates consider that the true need is likely greater still than the 73,300 jobs that is being planned for as part of the Regulation 18 Draft Local Plan.
- 1.1.9 In terms of Housing, it is disappointing that Greater Cambridge are not pursuing an increase in the planned housing figures to correspond to the comparatively ambitious jobs target. Endurance Estates contend that failing to plan for an ambitious housing figure to deliver against the deficiencies outlined in the August 2024 letter from Matthew Pennycook, potentially jeopardises the continued economic success of Cambridge.
- 1.1.10 Paragraph 3.43 of the Strategy Topic Paper¹ explains this change by highlighting that Cambridge’s current commuting ratio is below 1, meaning there is a greater number of employees who are in-commuting to the region. Whilst this is acknowledged, this fact is arguably a demonstration of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. In light of this, it is therefore disappointing that Greater Cambridge are content to pursue only the minimum housing requirements, effectively shifting residual housing demands into neighbouring authorities, which risks embedding unsustainable commuting patterns and increasing pressure on existing infrastructure in and around the City.
- 1.1.11 It is considered that it is not sufficient or sustainable to plan for higher jobs growth without fully addressing corresponding housing needs, and to rely upon in-commuting. Such a strategy risks increasing strain on key infrastructure whilst also driving up property values due to a shortage of supply relative to demand. As evidenced within the Case for Cambridge report, it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country. ONS data confirms that the median house price reached £425,025 in 2024, equating to 9.5x median earnings, compared to a median house price of £290,000 (7.7x median earnings) across England as a whole.

¹ [Topic cover - Development Strategy Topic](#)

- 1.1.12 In addition to aiming beyond the mandatory housing target, it is the view of Endurance Estates that Greater Cambridge should adopt a more substantial housing supply buffer than the 6.5% currently proposed. The First Proposals draft had included a 10% buffer over the 2,111 dwellings annual requirement which was identified at the time.
- 1.1.13 At very least, a higher housing supply buffer to provide flexibility of delivery, and to ensure a robustness of supply should be introduced. Endurance Estates consider that the current buffer of 6.5% (excluding any potential delivery at the former Wastewater Treatment Works site) is insufficient and fails to recognise the delivery challenges which have historically held back early delivery on the large-scale strategic sites within Greater Cambridge.
- 1.1.14 When considering the default 5% buffer applied to 5-Year Housing Land Supply Assessments, the 6.5% buffer on the identified need for the whole 18 year Plan period will offer little comfort in the event that any of the new settlements are delayed.
- 1.1.15 Endurance Estates' view of the Trajectory and Five-Year Housing Land Supply included at Appendix E of the Regulation 18 Plan will be outlined in separate representations, however it is worth noting that with such a slight buffer, any small deviation in terms of delivery could result in the Council being unable to demonstrate a 5-year housing land supply upon, or shortly after, adoption of the plan. At present, Savills estimate Greater Cambridge can demonstrate only around 4-years' supply, primarily as a result of overly optimistic assumptions around delivery at the new settlements which have been delayed by late delivery of essential infrastructure – including Waterbeach Railway Station and the C2C busway which have resulted in delays to the Waterbeach New Town East and Bourn Airfield developments respectively.
- 1.1.16 The continued dependency upon strategic scale new settlements for the majority of the planned housing delivery, presents significant risk to Greater Cambridge's ability to maintain a 5 year housing land supply. As a consequence of the inadequate buffer proposed, even a relatively minor delay on one or more of the new settlements could jeopardise the plan-led system and could leave the district open to speculative development to plug the shortfall.
- 1.1.17 In light of the significant infrastructure challenges across the Cambridge region, and the mixed track record of delivery in recent years, a more substantial buffer would be prudent.
- 1.1.18 As a result, it is Endurance Estates' view that Greater Cambridge should employ a housing land supply buffer of over 10% and preferably circa 15-20% above the Standard Method figure. Such a buffer would provide the authority with flexibility in light of any delays with the delivery of the large number of strategic sites / new settlements resulting under-delivery versus the housing trajectory, and therefore reduce the risk of being unable to demonstrate and maintain a sufficient 5YHLS or failing to meet the identified housing requirement for the Plan period in full with the danger that this could further hold back the local economy.

1.2 Policy S/DS: Development Strategy & Key Diagram

- 1.2.1 Endurance Estates **object** to draft Policy S/DS on the grounds that it is not positively prepared or justified when considered against the reasonable alternatives and evidence available.
- 1.2.2 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 are broadly supported by Endurance Estates.
- 1.2.3 However, the strategy proposed in the Regulation 18 plan relies primarily and increasingly on strategic developments in new settlements for new housing delivery. The draft Plan makes reference to North East Cambridge (including the Waste Water Treatment Works) being the “last remaining significant brownfield site” within the City, which has resulted in the provision of housing within the Urban Area, the most sustainable location within the District, falling from 19% to 11% of the proposed provision. The Draft Policy also confirms that the ‘Edge of Cambridge’ is the second most sustainable location, and so it would be expected that there would be a corresponding increase in the proportion of housing to be delivered on the edge of the City, however the share of housing proposed for ‘Edge of Cambridge’ sites is proposed to fall from 35% in the 2018 Plans to 29% in the Draft. There has also been a decrease in the proportion of dwellings proposed to be delivered through the Rural Area (including through windfalls) – falling from 23% in the 2018 Plans, to just 16% in the proposed draft.
- 1.2.4 A total of 44% of the identified need is proposed to be delivered through new settlements, up from 23% in the 2018 Plans. The Plan therefore concentrates development on the New Settlements at the expense of every other location across Greater Cambridge. This position is summarised in Table 2 below.

Table 2: Table Summarising the Proposed Approach to Allocations

	Adopted Local Plans	First Proposals	December 2025 Regulation 18 Draft	Percentage Point Difference versus Adopted Plans (and First Proposals)
Cambridge Urban Area (incl. Windfalls)	19%	20%	11%	-8 (-9)
Edge of Cambridge	35%	24%	29%	-6 (+5)
New Settlements	23%	38%	44%	+21 (+6)
Rural Area (incl. Windfalls)	23%	18%	16%	-7 (-2)

- 1.2.5 Endurance Estates endorses the proposed New Settlement Allocations, including Cambourne North, as these locations represent excellent opportunities to capitalise on recent growth in a way which materially enhances the existing settlements. The new settlements should continue to have a significant role in the delivery of the overall housing need, however, Endurance Estates are of the view that these new settlements should be supplemented additional development on the edge of Cambridge and within the sustainable villages of the district.

- 1.2.6 However, a near-exclusive focus upon new and emerging New Settlements places additional risks upon Greater Cambridge's continued supply of housing land. As a result of delayed housing starts within the new settlements (including late delivery of essential infrastructure), Savills estimate that Greater Cambridge can presently demonstrate only circa 4 years of Housing Land. The continued focus upon the New Settlements, at the expense of sites to the edge of Cambridge and in the villages, pushes housing delivery towards the later part of the Plan. From a delivery perspective, the New Settlements should therefore be supported by additional allocations on the Edge of Cambridge and within sustainable village locations to create a more balanced housing land supply which mitigates the risk of delayed delivery from the New Settlements and 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.
- 1.2.7 Endurance consider that the New Settlements, including Cambourne North, should continue to have a significant role in the delivery of the overall housing need, however, Endurance Estates are of the view that these new settlements should be supplemented additional development on the edge of Cambridge and within the sustainable villages of the district. The concentration of further growth on the edge of Cambridge in particular 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.
- 1.2.8 Whilst the current Green Belt constraint is acknowledged, it is also noted that the Council have not undertaken a comprehensive Green Belt assessment to support the Plan. The LUC report to support the Plan was updated for 2025, however, this was a piecemeal response to individual representations, rather than a comprehensive strategic-level update. The report therefore makes no attempt to identify Grey Belt land which could represent some of the most highly sustainable locations outside the City.
- 1.2.9 The Draft Plan states that the Councils are aiming to publish an update to the Green Belt Assessment in 2026. However, in devising a strategy in advance of having the latest evidence, the 2026 Green Belt Assessment risks retrofitting evidence to support the already-chosen strategy, rather than informing and shaping the strategy from the outset.
- 1.2.10 As a result of this lack of evidence, the Plan makes only a single new allocation within the Green Belt at Cambridge Biomedical Campus. With this being an employment allocation, no new residential allocations are proposed on the edge of the City, the second most sustainable location.
- 1.2.11 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 five purposes of the Green Belt set out in the NPPF. Additional allocations to the edge of the City, including well-located sustainable locations such as Land East of Gazelle Way, would help to address the spatial imbalance in the Draft Plan.
- 1.2.12 In addition to the lack of new Green Belt edge of Cambridge allocations, the Plan also does not sufficiently acknowledge the sustainability of many of the Villages within the district and the need to provide further housing to meet local housing needs (including affordable housing needs) and support the viability of local services and facilities. As outlined in the Endurance Estate Representations, in comparison to the 2018 Plans, and First Proposals Plans, the Draft de-prioritises growth in the Villages, despite many of these being demonstrably sustainable locations with excellent accessibility to key employment centres.
- 1.2.13 Endurance Estates are promoting sites at Land South of Horseheath Road, Linton; Land at Elbourn Way, Bassingbourn; Land at the Causeway, Bassingbourn; Old House Road, Balsham; Land at Hillside, Orwell. Each of these sites represents an excellent opportunity for high-quality,

proportionate development which can contribute towards not only the identified housing needs of Greater Cambridge, but also towards ensuring the continued vitality of their host villages.

- 1.2.14 In failing to consider sites in many of the sustainable village locations across the District, the Plan risks, the following:
- Failure to adequately address local affordable and market housing needs in these villages.
 - Unsustainable commuting patterns.
 - Loss of vitality and associated loss of services and facilities in the villages.
 - A lack of small-medium sites in the trajectory to ensure robust delivery across the plan period.
 - Failure to capitalise upon already committed and funded transport enhancements.
- 1.2.15 Each of these issues is discussed in turn below.
- 1.2.16 First, whilst the Local Plan identifies some level of need within the villages of the District, the current development strategy makes no attempt to meet this need. From a review of the Evidence Base, it appears no assessment of the level of affordable housing need has been made for the Villages of the District. Therefore, the Councils have failed to assess the level of both market and affordable housing need.
- 1.2.17 Secondly, the supporting text to Policy S/DS acknowledges that *“locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion”*. Endurance Estates welcome this, having long argued that growth within the Villages, which include Linton, can help to reduce commutes and therefore have a positive impact on the associated pollution and congestion. However, Endurance Estates would like to also highlight the strategic transport enhancements which have been progressed under the stewardship of the GCP, including the Greenways and Busways. Each of these schemes significantly improves the potential for sustainable commuting and the proposed policies of the Greater Cambridge Local Plan should reflect this reality. By neglecting to allocate any significant development within the Villages, Greater Cambridge are not taking advantage of the transport schemes which, for the most part, are already committed and funded.
- 1.2.18 Third, to reiterate the point already made in relation to ensuring the Local Plan trajectory is robust across the Plan period.
- 1.2.19 Fourthly, not allocating housing growth in the villages fails to capitalise upon the already committed and funded transport enhancements which are being brought forward by the GCP.
- 1.2.20 Finally, Greater Cambridge have allocated very few small-to-medium-sized sites as a total proportion of the overall need. Paragraph 2.43 of the Draft Plan confirms the Councils have identified specific allocations for just 3.5% of the total housing need. The remaining 6.5% to make up the minimum 10% requirement outlined in Paragraph 73 of the NPPF are proposed to be met through windfall development.
- 1.2.21 The role of small-to-medium sized sites is increasingly recognised by the Government. In May 2025, the UK Government published a working paper entitled *Reforming Site Thresholds*. The working paper is presented as a key reform to significantly increase housebuilding. The Paper proposed a streamlined process for medium scale sites of between 10-49 units up to 1 hectare. The Paper states that the Government sees Medium size sites as *“vital to diversifying our housing market and delivering the homes our communities need”*.

- 1.2.22 Whilst the working paper is not necessarily a material consideration in the Plan making process, it gives an insight into the Government's thinking and direction of travel. Indeed, since the working paper, the Government has sought to double-down on this approach and the December 2025 NPPF consultation proposes to increase the size limit up to 2.5ha. The streamlined process signals the Government's clear intention to encourage more medium sized sites to come forward.
- 1.2.23 Lichfield's Start to Finish (2024) report confirms that sites of less than 100 dwellings take significantly less time than larger sites to deliver dwellings – at less than 4 years from validation for sites of less than 100, compared to over 6 years from the validation of the application for sites larger than 1000 units.
- 1.2.24 With consideration to the above, it would be prudent to diversify the housing trajectory to incorporate more small and medium allocations. In light of the clear steer from the Government to focus on small and medium sites, as well as the contribution these sites can make to ensuring a robust supply of housing across the plan period, it is considered that Greater Cambridge should urgently seek to make additional small and medium site allocations, particularly where there
- 1.2.25 In terms of employment delivery, Endurance Estates contend that Greater Cambridge should consider a more flexible approach which recognises the loss of Industrial and Mid-Tech floorspace in recent years. The Evidence Base outlines a clear need for additional Industrial and Mid-Tech floorspace and references requirements for B8 floorspace locations on the SRN. This is supported, however in light of the high-level of demand, it is considered that a flexible approach to locations would be most appropriate. This should include, as a minimum, support for locations along other radial routes, including the A10 south of Cambridge.
- 1.2.26 In addition, there is a need to consider additional employment provision at the New Settlements in the long term to ensure these are mixed and balanced and sustainable communities rather than dormitory settlements.

1.3 Policy S/SH: Settlement Hierarchy

- 1.3.1 Endurance Estates wishes to **object** to Policy S/SH, and in particular the arbitrary indicative limits on the scale of housing developments set out. The indicative housing limits do not ensure the continued vitality of the villages, nor recognise their sustainability for proportionate and controlled housing growth. As a result of the proposed hierarchy, the policy is not considered to be positively prepared or justified, as it will result in unmet need across the villages of the District.
- 1.3.2 The Settlement Hierarchy seeks to direct the majority of new housing to Cambridge first, then Edge of Cambridge followed by the New Settlements. It is acknowledged that Cambridge is constrained by a lack of available sites, however, as outlined in Endurance Estates' representations to Policy S/DS, the majority of development is proposed to be directed to the New Settlements (the third tier). This overlooks sustainable and available Edge of Cambridge locations, where there is capacity to provide additional housing and employment land in sequentially preferable locations in terms of sustainability.
- 1.3.3 The rural areas of South Cambridgeshire are ageing rapidly, Cambridgeshire Insight estimate that the greatest increase in population will be in the elderly population, with a 55% increase in the 80-84 age population and a 45% increase in the over 85s. This rapid aging is a challenge to villages which do not see any growth, and risks jeopardising the ongoing provision of key services including rural schools and local shops — jeopardising continued provision of one of the key features which make them sustainable locations to live.
- 1.3.4 A controlled and proportional level of growth is the best way to ensure the continued vitality of rural villages. In this context, Paragraph 82 of the NPPF confirms that in rural areas, “planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs”, whilst Paragraph 83 states that “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”. The current Draft Plan is not considered to sufficiently address local needs or circumstances and is therefore not in accordance with national policy.
- 1.3.5 Sites should preferably be brought forward through the plan-led process, however if not, policies such as Policy S/SH should be sufficiently flexible to ensure that moderate development can come forward.
- 1.3.6 It is considered that the apparently arbitrary ‘indicative’ limits upon developments of 30 dwellings in Minor Rural Centres and just 8 dwellings in Group Villages will result in small, piecemeal development which fails to ensure the continued vitality of key village services.
- 1.3.7 The 8 dwelling indicative limit imposed upon Group Villages is particularly harmful as it would jeopardise affordable delivery, which as per both the adopted Plans and proposed Policy H/AH, are typically secured only through schemes of 10 or more dwellings. Under the policy, Group Villages would effectively be reliant upon rural exceptions sites to deliver any affordable housing which is considered unlikely to be sufficient to meet the affordable housing needs in villages across the district.
- 1.3.8 There is an inconsistency between the draft Policy S/SH and Figure D1 of Appendix D which provide the housing requirements for the designated rural areas.
- 1.3.9 The arbitrary limits, which stymie sustainable growth should be deleted prior to the Regulation 19 Consultation Draft Plan. The limits as proposed are not justified and are not consistent with the NPPF.

1.4 Policy S/DE: Defined Settlement Extents

- 1.4.1 Endurance Estates **objects** to Draft Policy S/DE due to the lack of flexibility in the policy and on the grounds that as a result it is not positively prepared nor justified. Part 2 of the Policy as currently drafted, states that by default development outside the development extents will not be permitted except for allocations in Neighbourhood Plans, Rural Exceptions Sites, Agricultural Development and where supported by other policies of the plan. The impacts upon potential windfall sites of this policy are compounded by the lack of residential allocations across many the sustainable villages of the district. As a result, there is a substantial risk that over the next plan period, that many of the villages will see their populations stagnate or even decline, placing unnecessary strain on local services.
- 1.4.2 The wording of the proposed policy is effectively identical to that of South Cambridgeshire's Local Plan (2018) Policy S/7, however the policy has not been updated to acknowledge that suitable and available brownfield development sites within villages are in increasingly short supply. Accordingly, there are likely to be ever-fewer sites within settlement boundaries which can accommodate the needs of the villages.
- 1.4.3 It is considered that the inflexibility of this policy will make achieving the neighbourhood housing need outlined in Appendix D difficult to achieve in reality. Flexibility would also aid in ensuring Greater Cambridge's housing delivery can maintain a sufficient 5-year supply across the Local Plan period.
- 1.4.4 Endurance Estates contend that Greater Cambridge should update the proposed Policy wording to allow for flexibility in terms of development outside the defined boundaries where there is unmet local need for housing. It would be prudent to make allowances for development outside-but-adjacent-to settlement boundaries as a minimum.

1.5 Policy S/MO: Monitoring

- 1.5.1 Endurance Estates strongly objects to Draft Policy S/MO on the grounds that it lacks specific consequences and timeframes in the event that housing and employment policies are not being achieved.
- 1.5.2 Whilst Appendix F (Monitoring Framework) is acknowledged, it is considered that the wording of Policy S/MO is not sufficiently specific with regards to the triggers and consequences of policies “not being achieved”. The current wording of the supporting information is subjective and implies a judgement from the Council as to whether policies are coming forward in a “timely manner”. It should be clarified that, in addition to a judgement, a demonstrated lack of a five-year housing land supply or unfavourable HDT result would also trigger the steps outlined in Policy S/MO.

1.6 DM Policies

Policy CC/NZ – Net Zero Carbon New Buildings

- 1.6.1 Endurance objects to Policy CC/NZ since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.
- 1.6.2 Endurance has particular concerns regarding the requirement under part B of the draft Policy in relation to total energy use intensity. It is noted that these requirements go beyond Building Regulations requirements. The Government has provided guidance to local planning authorities that suggest that Local Planning Authorities should not go beyond the requirements of Building Regulations
- 1.6.3 The Government's Written Ministerial Statement (WMS) issued in December 2023, confirms that the government "does not expect" councils to set standards above current or planned Building Regulations and that inspectors should reject such policies unless the council can provide a "well-reasoned and robustly costed rationale" showing the policy was viable. Whilst the Courts have subsequently confirmed LPAs can set energy efficiency standards above national regulations, these need to be robustly justified by local circumstances and backed by evidence.
- 1.6.4 Moreover, we note that the consultation draft NPPF published in December 2025 reinforces this point by setting an "expectation" that local plans should not replicate or go further than nationally set building standards except for in relation to housing accessibility and water efficiency in "exceptional circumstances".
- 1.6.5 It is considered that the proposed policy requirements are unduly onerous and have not been sufficiently justified by local or exceptional circumstances or through robust evidence showing they are both necessary and viable.
- 1.6.6 In addition, more flexibility needs to be introduced into the application of other aspects of the policy through changes to the detailed wording, in particular, part C of the draft Policy where it should refer to "where possible".

Policy CC/WE: Water efficiency in new developments

- 1.6.7 Endurance objects to Policy CC/WE since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.
- 1.6.8 Whilst the water scarcity issues within the Cambridge Area and the need for greater water efficiency are widely acknowledged, the requirements to achieve 80l/p/d of water use has not been fully justified in terms of its viability and deliverability. Whilst there are grounds to go beyond national policy and Building Regulations, the viability and deliverability of the policy still need to be fully justified and a degree of flexibility should be incorporated within the detailed policy wording.

Policy BG/BG – Biodiversity and Geodiversity – 20% BNG requirement for major development

- 1.6.9 Endurance objects to Policy BG/BG since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.
- 1.6.10 The requirement to achieve Biodiversity Net Gain of 20%+ goes beyond National Policy and Legislative requirements. The schemes referenced in the Biodiversity Topic Paper as part of the

justification for the proposed policy requirement are very large scale or urban. Topic Paper acknowledges there are no examples of 20% BNG on small sites.

- 1.6.11 Mole Valley has 20% BNG requirement but the Inspectors Report to the examination of their Local Plan (2024) suggests this is an exception rather than the norm. Mole Valley outlined a case for urgency coupled with evidence of viability. This approach was compelling, but it is not clear that this is the case in Greater Cambridgeshire.
- 1.6.12 Similarly, the list of sites which have delivered / are delivering 20% BNG are considered to be limited and exceptional, relating to employment and NHS related developments and only a single housing scheme (Waterbeach) is referred to, which has itself suffered from poor delivery to-date.
- 1.6.13 Endurance are concerned that the proposed policy requirement goes beyond Government policy and legislative requirements, contrary to National Policy and has not been demonstrated to be justified or viable and deliverable. It is considered that the emphasis of the policy should be on achieving the National and Legislative requirements (adjusted to reflect recent changes) whilst encouraging an increase beyond this where possible to ensure that the proposed policy is sound.

Policy GP/LC: Protection and enhancement of landscape character

- 1.6.14 Endurance objects to Policy GP/LC since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.
- 1.6.15 It is considered that the proposed wording of the policy should explicitly recognise that both new settlements or extensions of settlements may not be deemed to “protect, conserve and enhance” the local landscape character, and features in full, since development provides an inherent and unavoidable change.

Policy H/AH: Affordable housing

- 1.6.16 Endurance objects to Policy H/AH since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.
- 1.6.17 Whilst Endurance support the continuation of the 40% affordable housing requirement it is considered that more flexibility should be provided in the proposed affordable housing tenure requirements (with the requirement currently stated as being 65% affordable rent homes, 10% social rent homes, and 25% shared ownership homes, or other affordable). It is considered that the Policy should expressly recognise that viability may justify a different percentage and / or tenure mix.
- 1.6.18 Moreover, the Policy needs more flexibility to provide a wide range of affordable tenures in accordance with Government policy. For example, there’s no reference to other forms of intermediate housing like discount to market provision. It is also unclear how the Policy should be applied in respect of housing with care and Keyworker provision and whether Key worker accommodation is considered as affordable.

Policy H/HM: Housing mix

- 1.6.19 Endurance objects to Policy H/HM since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.
- 1.6.20 This policy sets out the mix of housing to be provided by new development, to ensure that new homes are generally of a size and type that meet the housing needs of different groups in the community.

- 1.6.21 Endurance consider that the Policy should include more flexibility in relation to the required housing mix to reflect the circumstances of each site and its context as well as market demand and evidence of local needs in accordance with Government policy.

1.7 Appendix E – 5YHLS and Housing Trajectory

- 1.7.1 The Regulation 18 Plan outlines how the Council intends to deliver a minimum of 48,195 new homes between 2024 and 2045. After reviewing the delivery assumptions in Figure E1 ('Anticipated Completions 2024 - 2025') of the Consultation Plan, Endurance Estates considers the projected delivery rates to be unrealistic.
- 1.7.2 Savills' assessment of the current 5YHLS position in Greater Cambridge confirms that the Councils cannot demonstrate a five-year supply of housing land. The proposed trajectory in Appendix E of the consultation plan does not materially change this assessment. Accordingly, Savills' view is that, if adopted as currently proposed, the Council will be unable to demonstrate a sufficient supply of housing land upon adoption of the new Plan.
- 1.7.3 Savills estimate that the housing land supply upon adoption would likely be in the region of circa 4 years', leaving Greater Cambridge open to speculative development to address the shortfall.
- 1.7.4 The projected shortfall is primarily due to unrealistic delivery assumptions at several key strategic sites. These include Northstowe, Waterbeach, and Bourn Airfield, and extend to other large allocations that lack clear evidence of delivery commencing within the five-year period.
- 1.7.5 To ensure that Greater Cambridge's five-year housing land supply upon adoption is secure, the Councils should allocate further land for development, focusing on sites that do not require significant additional infrastructure before housing delivery can commence. In practice, this will mean allocating small-to-medium sized sites which can start to deliver early in the Plan period.
- 1.7.6 Endurance Estates has consistently promoted sites across Greater Cambridge for development, and several of these sites can deliver early in the Plan period to ensure a robust 5YHLS position.
- 1.7.7 Endurance Estates' view is that the 6.5% housing supply buffer currently proposed on the housing requirement for the Plan period, upon which the allocations and trajectory are based, will result in Greater Cambridge being unable to demonstrate a five-year supply of housing land either upon or shortly after adoption and a risk to the delivery of the Plan's overall housing requirement. With a the limited housing supply buffer being provided, housing delivery is vulnerable to even minor slowdowns, such that a delayed planning application at a single site could subject Greater Cambridge to the tilted balance in decision-making and affect the achievement of the Plan's housing requirement overall.

2. East of Cherry Hinton

2.1 Policy S/GB: The Cambridge Green Belt

- 2.1.1 Endurance Estates object to Draft Policy S/GB on the basis that to date, Greater Cambridge has failed to undertake a full Green Belt review in accordance with the latest national policies and guidance. As a result, the draft Plan is not considered to be positively prepared and is not consistent with National Policy.
- 2.1.2 In accordance with paragraph 15X of the NPPF 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.
- 2.1.3 As of the December 2025 Regulation 18 consultation, the most recent Green Belt Assessment remains the 2021 version, with only a high-level response to previous comments published during the last round of consultations. This stops well short of a comprehensive assessment as required by Government Policy. We are aware that Greater Cambridge have commissioned an update to the 2021 Green Belt Assessment, and it is understood that the Assessment will not be published until later in 2026, alongside Regulation 19 stage.
- 2.1.4 The Council's currently stated position within the draft Regulation 18 Local Plan is that the only new site on the edge of Cambridge where exceptional circumstances justify Green Belt release is the Cambridge Biomedical Campus expansion.
- 2.1.5 Endurance Estates is concerned that devising a draft strategy before obtaining the latest evidence is likely to result in a misguided policy direction that does not reflect current national policy and guidance. The 2026 Green Belt Assessment risks retrofitting evidence to support the already-chosen strategy, rather than informing and shaping the strategy from the outset.
- 2.1.6 As a result of the out-of-date Green Belt Assessment, no consideration has been given to whether there are potential Grey Belt sites, which was introduced in the December 2024 NPPF revision. Greater Cambridge's current position, as outlined at paragraph 2.64 of the Consultation Document is that, as (the minimum) housing needs can be met outside the Green Belt boundary, they are not required to assess sites for Grey Belt potential.
- 2.1.7 However, this fails to acknowledge the significant housing and employment needs arising from the National significant Cambridge Economy which justify a higher level of housing provision and jobs than currently being planned for to address the issues outline by the Government in the Case for Cambridge and other documents. Moreover, it also fails to reflect that, as acknowledged in the Council's own evidence base, locating development on the edge of Cambridge is the next most sustainable option after development within the Cambridge urban area. The failure to undertake a Green Belt Review in this context is a fundamental flaw of the emerging Plan, particularly as we would expect the updated Assessment to consider the implications of the Grey Belt.
- 2.1.8 As part of the committed 2026 Green Belt Review, the Councils must take account of the latest Planning Practice Guidance. A comprehensive review, in line with the latest national policies and guidance, which includes the identification of Grey Belt sites, would give the Council the opportunity to allocate housing on the edge of Cambridge, which, by the Council's own admission, are among the most sustainable sites in the District.
- 2.1.9 Endurance Estates maintains that, following the receipt of the 2026 Green Belt Review, Greater Cambridge should undertake a full and comprehensive review of the draft strategy before the

Regulation 19 consultation. This must be more substantial than a mere tweak of the current proposals, which were based on outdated assessments and national policies.

- 2.1.10 Such an approach would ensure that higher levels of growth could be accommodated around Cambridge in a sustainable manner in accordance with Government aspirations and objectives for Cambridge, with additional housing helping to address one of the key identified barriers to growth.
- 2.1.11 Without pursuing such an approach, Endurance Estates is concerned that the emerging Local Plan will be fundamentally flawed and risk being unsound, holding back planned growth within the area.

2.2 Policy S/EOC: Other site allocations on the edge of Cambridge

General

- 2.2.1 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 create a more balanced housing land supply which 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.
- 2.2.2 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..
- 2.2.3 The current Green Belt constraint is acknowledged, however it is also noted that the Council have not undertaken a comprehensive Green Belt assessment to support the Plan. The LUC report to support the Plan was updated for 2025, however, this was a piecemeal response to individual representations, rather than a comprehensive strategic-level update. The report therefore makes no attempt to identify Grey Belt land which could represent some of the most highly sustainable locations outside the City.
- 2.2.4 The Draft Plan states that the Councils are aiming to publish an update to the Green Belt Assessment in 2026. However, in devising a strategy in advance of having the latest evidence, the 2026 Green Belt Assessment risks retrofitting evidence to support the already-chosen strategy, rather than informing and shaping the strategy from the outset.

As a result of this lack of evidence, 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)

- 2.2.5 Endurance Estates strongly objects to the omission of the proposed allocation site at Land East of Gazelle Way.
- 2.2.6 Endurance Estates has consistently promoted Land East of Gazelle Way for a mixed-use, landscape-led development of in the region of 1,500 dwellings, employment space and extensive public open space. The site comprises 120 acres on the edge of Cambridge which is currently in agricultural use.
- 2.2.7 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.
- 2.2.8 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.

- 2.2.9 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.
- 2.2.10 Significant infrastructure is already committed to accommodate this growth, including the Fulbourn Greenway, EWR’s 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.
- 2.2.11 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.
- 2.2.12 Below is an extract from the 2025 HELAA site assessments, accompanied by comments from the promotion team.

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Comments
Adopted Development Plan Policies RAG (2025)	Amber	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.	The assessment acknowledges that any conflicts with the Adopted Development Plan policies can be overcome through the planning process. The Policies RAG should therefore be updated to Green.
Flooding RAG (2025)	Amber	Flood Zones: Site is wholly within Flood Zone 1. Surface Water Flooding: 1% lies in a 1 in 100 year event. 3% lies in a 1 in 1000 year event.	The site is within Flood Zone 1. There are minimal areas with elevated risk of Surface Water flooding, however these comprise no more than 4% of the total land area and can be incorporated into the scheme design. The Flooding RAG rating should therefore be updated to Green.
Landscape Comment (2025)	Red	The illustrative framework submitted as part of the revised information indicates a narrow continuation of the green belt corridor; however, it is considered that the space is	The scheme has been landscape-led from the outset. Extensive consideration has been given to the potential impacts upon the landscape character which have been incorporated to the illustrative

		<p>too constrained to function well for all the uses envisaged, including sports fields and recreational spaces. Development of the site as shown would continue to have an adverse impact on the landscape character and would amalgamate Cambridge, Chery Hinton, Teversham and Fulbourn. However, it is considered that with alterations to the quantum of development, layout and character, and design of the open spaces, some limited development could be considered.</p>	<p>design. At this stage, the design is purely illustrative, and the parameters are not yet fixed with details, including the approach to the landscape design, to be considered further as part of the ongoing assessment and masterplanning process as the scheme evolves.</p> <p>As is evident from the submitted Masterplan it is clear that the proposed design is capable of incorporating strong and sufficient landscape buffers such that the proposals would not amalgamate Cambridge, Cherry Hinton, Teversham and Fulbourn. On the contrary, the landscape buffers are envisaged to retain the separation of the villages in perpetuity, whilst providing new, high-quality public open space and recreational facilities.</p> <p>The Landscape assessment rating should therefore be updated to Green.</p>
<p>Biodiversity and Geodiversity (2023)</p>	<p>Amber</p>	<p>The supporting documents indicate that an ecological consultant has provided initial observations. This indicates that measures to safeguard Caulde Ditch will be a key aspect of the design to ensure that no adverse effects on the Wilbraham Fens SSSI. It is recommended that there is no change to the site assessment scoring and more detailed information is required to demonstrate that impacts will be avoided. Further surveys for protected and Priority species will also be required.</p>	<p>Initial technical investigations confirm that mitigations in excess of statutory and emerging local requirements can be met within the site boundary. Impacts upon the Wilbraham Fens SSSI will be fully considered in the detailed design and mitigations can be secured by condition.</p> <p>The Biodiversity and Geodiversity RAG should therefore be updated to Green.</p>

Policy Officer Comments (2021)	Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	The assessment and Green RAG rating are welcomed.
Historic Environment Comments (2023)	Amber	Additional information has been provided in relation to impacts on heritage assets, as described in the documentation, and proposes mitigation. While these appear reasonable, further details would be required and therefore no change in the score of the earlier assessment.	The additional information provided previously showing the incorporation of suitable buffers to designated heritage assets was considered to be reasonable, and any additional mitigations required can be incorporated fully into the scheme design. The Historic RAG should therefore be updated to Green.
Archaeology RAG (2025)	Red	The assessment remains unchanged. The site includes the nationally important, designated medieval moat and associated features. The Roman settlement is also likely to be of equivalent significance to designated assets. We advise against the allocation of this site for development.	The recommendation against development of the entirety of the site due to the presence of Scheduled Monuments on a small portion of the site area is completely disproportionate and unnecessary. The indicative design proposals have allowed for significant buffers to preserve the scheduled monuments and archaeological remains in-situ if required. Should any detailed investigations recommend further mitigations, these can be incorporated into the proposed site design. The Archaeology rating should be updated to Amber, pending further investigations.
Accessibility Comment (2025)	Green	Good accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.	The assessment and Green rating is welcomed.
Site Access RAG (2023)	Amber	Based on the new information provided, the	Endurance welcomes the recognition that the site access



		<p>site access assessment remains unchanged. The proposed site is acceptable in principle, subject to detailed design at a planning application stage.</p>	<p>is acceptable in principle. Any specific matters relating to design can be assessed at detailed application stage.</p> <p>The Site Access RAG should therefore be updated to Green.</p>
<p>Transport and Roads RAG Assessment (2023)</p>	<p>Amber</p>	<p>Based on the new information provided, the assessment scoring remains Amber as the site will need to provide high-quality passenger transport and non-motorised user links into existing and proposed non-motorised user and passenger transport facilities and Cambridge. Would impact on an existing severely congested part of the network and would therefore require a 'trip budget' approach. Would rely on delivery of the Eastern Access and Newmarket Road corridor proposals and will require a robust Travel Plan.</p>	<p>The highly sustainable location of the site offers the possibility of pursuing an ambitious modal shift, capitalising on proximity to existing and committed transport infrastructure in the area.</p> <p>The proposals now include a high-quality off-road cycle link to connect the site to the Fulbourn Greenway and cycle routes through the Springstead Village development towards the planned Cambridge East Station proposed as part of the East West Rail scheme. This will provide high-quality links for non-motorised users.</p> <p>The Transport and Roads RAG should therefore be updated to Green.</p>
<p>Noise, Vibration, Odour and Light Pollution Guideline Comments (2023)</p>	<p>Amber</p>	<p>New information provided has not changed the assessment. The proposed site will be affected by road traffic noise from nearby main roads and by railway noise (and possibly vibration) but is acceptable in principle subject to appropriate detailed design considerations and mitigation. Detailed site specific assessments will be required for any future planning applications at this location.</p>	<p>The site comprises approximately 120 acres of land, and there is sufficient space to accommodate buffers where required, including through high-quality landscaping and the placement of less-sensitive receptors such as employment land.</p> <p>The Noise, Vibration, Odour and Light Pollution RAG should therefore be updated to Green.</p>
<p>Air Quality (2025)</p>	<p>Amber</p>	<p>No change to the score given the potential impacts on air quality.</p>	<p>The site is located outside the AQMA. The site is well connected to the existing and proposed sustainable and</p>

			<p>active transport corridors. As a result, there is a potential to pursue an ambitious modal shift can be incorporated in the Travel Plan to mitigate against potential Air Quality impacts. Any other mitigations as may be required can be secured by condition at planning stage.</p> <p>The Air Quality RAG should therefore be updated to Green.</p>
Contaminated Land RAG (2023)	Amber	The revised site boundary has been reviewed but the assessment remains unchanged. This is a site previously in agricultural use with the potential for historic contamination and planning conditions will be required.	<p>Contaminated land assessments will be undertaken prior to the submission of any planning application. Subject to the outcome, planning conditions can be used to fully mitigate any historic contamination within the site.</p> <p>The Contaminated Land RAG should therefore be updated to Green.</p>
Overall Suitability Score	Red		<p>None of the issues raised are considered to be significant enough to preclude development of the site. Mitigations for all areas of concern can be incorporated through the detailed design phase.</p> <p>The Suitability RAG should therefore be updated to Green.</p>
Available RAG	Amber		<p>The Site remains available within the first 5 years of the Plan period. There are no reasons to conclude that the site will not be able to deliver in this timeframe.</p> <p>The Availability RAG should therefore be updated to Green.</p>
Achievable RAG	Green		<p>The assessment and Green rating is welcomed.</p>



- 2.2.13 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), and where Footnote 7 of the NPPF does not provide a strong reason for refusing development, 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.
- 2.2.14 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.
- 2.2.15 In conclusion, the site makes a **moderate contribution** to Purpose A and does not therefore contribute strongly to Purpose B.
- 2.2.16 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.
- 2.2.17 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.
- 2.2.18 In conclusion, the Site makes only a **weak/no contribution to Green Belt Purpose B** and does not therefore contribute strongly to Purpose B.
- 2.2.19 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.
- 2.2.20 In conclusion, the Site only makes a **weak to moderate contribution** to this purpose and does not therefore contribute strongly to Purpose D.
- 2.2.21 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.
- 2.2.22 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.

- 2.2.23 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.
- 2.2.24 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.
- 2.2.25 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 Paragraph 156 of the NPPF. As stated in Paragraph 158 of the NPPF, development which complies with the Golden Rules should be given significant weight in favour of granting permission.
- 2.2.26 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.
- 2.2.27 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.

2.3 Inset Maps (Policies Map)

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

- 2.3.1 Endurance Estates strongly objects to the proposed policy map for Cambridge on the basis that it fails to inset Land East of Gazelle Way, Cherry Hinton, from the Green Belt and does not propose allocation of the site for development. Endurance Estates contend that the Site should be allocated for a mixed-use, residential-led development capable of delivering approximately 1,500 new homes alongside extensive green space, employment land, a primary school and associated infrastructure.
- 2.3.2 The Policies Map should therefore be updated to remove Land East of Gazelle Way, Cherry Hinton from the Green Belt and allocate it for a residential-led mixed-use urban extension to the City to provide approximately 1,500 new homes, employment space, new Country Park and associated community and other infrastructure.

Linton (Land South of Horseheath Road, Site ID 115248, HELAA ID 40554)

- 2.3.3 Endurance Estates objects to the proposed inset map for Linton on the grounds that it does not allocate Land South of Horseheath Road for residential development. Indeed, no residential

allocations are proposed in Linton, despite the village being a demonstrably sustainable Minor Rural Centre.

- 2.3.4 The Policies Map should therefore be updated to allocate Land South of Horseheath Road, Linton for a residential development of approximately 100 new homes.

Balsham (Site ID 115953, HELAA ID 40438)

- 2.3.5 Endurance Estates strongly objects to the proposed inset map for Balsham on the grounds that it does not allocate Land to the Rear of Old House Road for residential development. Indeed, no residential allocations are proposed in Balsham, despite the village being a demonstrably sustainable location for development.
- 2.3.6 The Policies Map should therefore be updated to allocate Land to the Rear of Old House Road, Balsham for a residential development of approximately 25 new homes.

Bassingbourn (Land off the Causeway Site ID 116001, HELAA ID 40228; Land off Elbourn Way ID 116006, HELAA ID 40227).

- 2.3.7 Endurance Estates strongly objects to the proposed inset map for Bassingbourn on the grounds that it does not allocate either Land off the Causeway or Land off Elbourn Way for residential development through the development of approximately 80 new homes.
- 2.3.8 The Policies Map proposes no residential allocations within the village, despite it being a sustainable Minor Rural Centre.
- 2.3.9 The Policies Map should therefore be updated to allocate Land off the Causeway and/or Land off Elbourn Way, for residential developments of approximately 80 and 50 new homes respectively.

Orwell (Site ID 115802, HELAA ID 40496)

- 2.3.10 Endurance Estates strongly objects to the proposed inset map for Orwell on the basis of the omission of a site-specific policy allocating Land at Hillside, Orwell, for residential development. As a Group Village, Endurance Estates contend that a development such as Land at Hillside could contribute towards meeting the market and affordable housing needs of the Village through the development of approximately 25 new homes.
- 2.3.11 The Policies Map should therefore be updated to allocate Land at Hillside, Orwell, for a residential development of approximately 25 new homes.

3. Policy S/RRA: Site Allocations in the Rest of the Rural Area

- 3.1.1 Endurance Estates consider that the housing allocations across the rural area are insufficient to meet local housing needs in the villages of the District and reflect wider concerns set out in our response to the wider Policies that confirm the Plan is not providing for sufficient number of new homes.
- 3.1.2 In particular, Endurance Estates strongly objects to Draft Policy S/RRA on the basis that it omits the following proposed site allocations:
- Land South of Horseheath Road, Linton (Site ID 115248, HELAA ID 40554)
 - Land to the rear of Old House Road, Balsham (Site ID 115953, HELAA ID 40438)
 - Land off the Causeway, Bassingbourn (Site ID 116001, HELAA ID 40228)
 - Land off Elbourn Way, Bassingbourn (Site ID 116006, HELAA ID 40227)
 - Land at Hillside, Orwell (Site ID 115802, HELAA ID 40496)

Linton

- 3.1.3 Endurance Estates have consistently promoted Land South of Horseheath Road, and sought to provide updated technical information at every given opportunity. The 2025 HELAA relating to the landscape impact states that the “*Site is highly sensitive in landscape terms and development in this location would be highly visible, creating adverse impacts on landscape character and local views. These impacts are significant when considered cumulatively alongside other development on adjacent land*”. It is not clear on what basis this conclusion was reached, as detailed Landscape and Visual Impact Assessments have concluded that development of the site can be sufficiently mitigated through a considerate, landscape-led design and planting scheme.
- 3.1.4 As a Minor Rural Centre, Linton is demonstrably a sustainable settlement. Linton benefits from a Infant, Junior and Secondary Schools, a Library, several shops and cafes, public houses, a GP Surgery, dental practice, and an excellent range of sports and recreation facilities, including a skate park, swimming pool and sports pavilion. It is therefore considered that the site, and by extension the village of Linton, benefits from sufficient accessibility to essential shops and services, alongside the ability to travel sustainably further afield for a full array of services in both the surrounding villages and Cambridge.
- 3.1.5 Linton also now benefits from two committed schemes which are coming forward over the next few years and which remained subject to uncertainty at the Local Plan First Proposals stage. These significant transport infrastructure investments being brought forward by the GCP and include the Linton Greenway and CSET Busway. Both schemes will materially improve the sustainability of the settlement in a way which we consider has not been reflected in the assessment of the village’s potential to accommodate growth sustainably. The Linton Greenway is understood to be approaching completion, with the majority of the route between Linton and the Abingtons now in use. Linton therefore benefits from a high-quality, direct, safe and segregated pedestrian and cycle route to both Granta Park and the Babraham Research Campus - two of the largest employment sites in the District.

- 3.1.6 In addition, the proposed CSET scheme, which will reach examination in 2026, will provide fast and direct public transport connections into Cambridge and the Biomedical Campus from a new Travel Hub on the A11 Junction at Fourwentways. The CSET busway and Travel Hub are both easily accessible via the Greenway from Linton. It is expected that the CSET scheme will come forward as envisaged prior to or in a similar timeframe to the development of the site.
- 3.1.7 The supporting text to Policy S/DS: Development Strategy outlines that “We [Greater Cambridge] also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion”. This acknowledgement is endorsed by Endurance Estates as recognition of the sustainability of villages in the Southern Cluster, which includes Linton. Despite this sensible admission, it makes the lack of any residential allocations within Linton difficult to understand, particularly with the transport enhancement schemes being brought forward by GCP with the express purpose of improving the accessibility of the Village to employment sites.
- 3.1.8 Below is an extract from the 2025 HELAA site assessments, alongside comments from the promotion team.

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Comments
Adopted Development Plan Policies RAG (2025)	Amber	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.	The technical works undertaken by Endurance Estates in support of the promotion of the site demonstrate that the development can come forward in line with the adopted development plan policies and relevant national policy and guidance.
Flooding RAG (2025)	Green	Flood Zones: Site is wholly within Flood Zone 1. Surface Water Flooding: None.	Subject to a suitable planning conditions to secure drainage details at Reserved Matters stage based on the principles outlined in the FRA, the proposals are considered to comply with Local Plan policies CC/8 and CC/9 along with the NPPF.
Landscape Comment (2025)	Red	Updated information does not change the commentary from the previous review. The site is highly sensitive in landscape terms and development in this location would be highly visible, creating adverse impacts on landscape	A Landscape-led approach has been pursued from the outset of the promotion of the site. Subject to detailed design, the highest and

		character and local views. These impacts are significant when considered cumulatively alongside other development on adjacent land.	most sensitive areas of the site can be reserved for woodland enhancement and open space, to reduce the impact upon the landscape character of the development.
Biodiversity and Geodiversity (2021)	None provided	All new housing developments will require assessment of increased visitor pressure on nearby SSSI. There are no apparent priority habitats within the site; however, there are grasslands, hedges and wooded boundaries on site that are likely to have ecological value. Applications may find provision of 10% net gain in biodiversity difficult within their red lien boundaries and may need to find off-site compensation to comply with up-coming National legislation and developing local policies.	This assessment is significantly out of date. Endurance have conducted extensive technical investigations on the site, which confirm that the development can accommodate at-least a 10% biodiversity net-gain within the site. The assessment should be updated to Green .
Policy Officer Comments (2021)	Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	The assessment is welcomed.
Historic Environment Comments (2023)	Green	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.	The assessment is welcomed.
Archaeology RAG (2025)	Amber	There is evidence of archaeology in the area that will require further investigation.	Endurance Estates have commissioned a desk-based assessments of potential archaeology within the site. Any below-ground investigations can be secured by condition. The RAG assessment should be updated to Green .

Accessibility Comment (2025)	Amber	Adequate accessibility to local services, transport and employment opportunities. Proposed development would not require delivery of accompanying key services	The assessment summary is welcomed. The site is a highly sustainable location, readily accessible to a range of essential shops and services within Linton and beyond. The RAG assessment should be updated to Green .
Site Access RAG (2023)	Amber	The site is acceptable in principle, subject to further detail and consultation. Infrastructure will be required outside the site boundary to encourage more sustainable transport links. It is unclear whether these sustainable transport links can be achieved within the local available constraints.	Detailed highways assessments have been undertaken which demonstrate that safe and suitable vehicular and pedestrian access can be achieved onto Horseheath Road. The RAG assessment should be updated to Green .
Transport and Roads RAG Assessment (2023)	Amber	Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	The supporting text is welcomed. Highways assessments confirm that there are no significant impacts to the functioning of trunk roads as a result of the proposed development. The RAG assessment should be updated to Green .
Noise, Vibration, Odour and Light Pollution Guideline Comments (2023)	Amber	New information provided has not changed out assessment. The site is capable of being developed to provide healthy internal and external environments in regard to noise/ vibration/ odour/ light pollution after careful site layout, design and mitigation. The effects of the adjacent Horseheath Road will need to be taken into account at properties fronting this road.	Detailed site specific assessments have been undertaken which demonstrate that the site will provide a healthy internal and external environment for future residents. The RAG assessment should be updated to Green .

		Detailed site specific assessments will be required for any future planning applications at this location.	
Air Quality (2021)	Green	The site does not lie within an AQMA. Minimal traffic impact on AQMA.	The assessment is endorsed.
Contaminated Land RAG (2023)	Amber	The additional information provided does not significantly affect environmental health issues or mitigation. Therefore the assessment of the site remains unchanged since the original assessment as this is a site with the potential for historic contamination and planning conditions will be required.	Detailed site specific investigations have been undertaken which confirm the site is not subject to contamination. Any further investigations can be secured via condition. The RAG assessment should be updated to Green .
Overall Suitability Score	Red	-	Subject to the detailed landscape assessments which have been undertaken by LDA, there are no significant issues which cannot be sufficiently mitigated through the scheme's design. Accordingly, the site Suitability RAG rating should be updated to Green .
Available RAG	Amber	-	The site is available within the first 5 years' of the Plan period. The Availability RAG rating should be updated to Green .
Achievable RAG	Green	-	The assessment is endorsed.

3.1.9 Endurance Estates contend that the omission of Land South of Horseheath Road fails to recognise Linton's accessible location and the likelihood that this will shortly be enhanced through planned public transport improvements, along with the good level of existing service provision. The site and village as a whole is outside of the Green Belt and the identified landscape constraints are capable of being overcome through a landscape-led design approach.

- 3.1.10 Linton is therefore demonstrably a sustainable location capable for accommodating further housing growth to meet the identified local need and its allocation would be consistent with the strategy of focussing growth in the Rural Southern Cluster, close to existing employment sites. In this regard, Greater Cambridge should allocate Land South of Horseheath Road for a sustainable development of approximately 100 market and affordable homes within the village.
- 3.1.11 The Site remains Available, Achievable and Suitable for residential development.

Balsham

- 3.1.12 Endurance Estates objects strongly to the proposed Inset Map for Balsham on the grounds that it does not propose allocation of Land at Old House Road for residential development. The Policies Map proposes no residential allocations within the village, Endurance Estates are promoting Land to the Rear of Old House Road, Balsham which is considered capable of accommodating a scheme of approximately 25 new dwellings.
- 3.1.13 Crucially, draft Policy S/SH states that “limited development will help maintain remaining services and facilities and provide for affordable housing to meet local needs”. This acknowledgement is strongly supported by Endurance Estates, however the lack of any allocated development to ensure the long-term vitality of the village’s facilities is disappointing.
- 3.1.14 Balsham had a population of 1,623 as of the 2021 Census, which represents an approximate 1% decrease on the 1,641 residents recorded at the 2001 Census. This contrasts starkly with the wider South Cambridgeshire district, which grew by just under 25% in the same time period. This stagnation places the village’s existing services at risk of further decline. As correctly identified by the supporting text to Policy S/SH, additional growth in villages such as Balsham is key to maintaining their vitality. Simply, without growth, the range of shops and essential services is likely to continue to deteriorate.
- 3.1.15 Below is an extract from the 2025 HELAA site assessments, alongside comments from the promotion team.

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Comments
Adopted Development Plan Policies RAG (2025)	Amber	Development of the site has some potential policy constraints, but these could be overcome through the planning application process.	The supporting text is supported, however Endurance contend that, as any policy constraints could be overcome through the planning application process, the RAG assessment should be updated to Green .
Flooding RAG (2025)	Amber	Flood Zone: Wholly in FZ1. Surface Water Flooding: 1% lies in a 1 in 100 year event.	The site is entirely within Flood Zone 1. The 1% of the site is in an area of surface flood risk, however this can be mitigated through

			<p>the detailed design of the scheme.</p> <p>The RAG rating should be updated to Green.</p>
Landscape Comment (2025)	Amber	The principle of development is acceptable from a landscape perspective and the assessment score remains amber as some form of landscape mitigation is required.	<p>The landscape mitigations which the development would include will fully mitigate any landscape harm.</p> <p>The RAG rating should be updated to Green.</p>
Biodiversity and Geodiversity (2023)	Amber	The supporting information indicates that an Ecological Report has been prepared by Applied Ecology. This identified that there were no significant constraints to development upon designated sites. However, it is indicated that further detailed consideration is still required to fully rule out increased visitor pressure on Balsham Wood SSSI. Therefore there is no change to the site assessment scoring.	<p>The Applied Ecology note confirms that there are no significant constraints to developing the site. Whilst further investigations are necessary, there is no reason to conclude that there would be unacceptable impacts to the Balsham Wood SSSI which cannot be mitigated through the application.</p> <p>The RAG rating should be updated to Green.</p>
Policy Officer Comments (2021)	Green	-	The assessment is endorsed.
Historic Environment Comments (2023)	Green	-	The assessment is endorsed.
Archaeology RAG (2025)	Amber	Located on edge of the medieval settlement with evidence for prehistoric and Saxon activity known in the vicinity.	<p>Archaeological investigations can be secured through the planning application, either prior to determination or through condition.</p> <p>The RAG rating should be updated to Green.</p>
Accessibility Comment (2025)	Amber	Adequate accessibility to key local services, transport and	The site is readily accessible to the key

		employment opportunities. Proposed development would not require delivery of accompanying key services.	local shops and services of the village. Endurance Estates welcome the acknowledgement that the development would not require accompanying key services. The RAG rating should be updated to Green .
Site Access RAG (2021)	Amber	The proposed site is acceptable in principle subject to detailed design.	The site can achieve safe and suitable access for pedestrians and vehicles. A detailed design will be provided at application stage. The RAG rating should be updated to Green .
Transport and Roads RAG Assessment (2021)	Amber	Any potential impact of the functioning of trunk roads and/or local roads could be reasonably mitigated.	The site is not of a scale which is likely to have any significant impacts upon local or trunk roads. Any residual harms which are identified through detailed highways assessments will be mitigated through the application. The RAG rating should be updated to Green .
Noise, Vibration, Odour and Light Pollution Guideline Comments (2023)	Amber	The site is capable of being developed to provide healthy internal and external environments	Subject to technical assessments, there is no reason to conclude that the site would not be able to provide a healthy internal and external environment. The RAG rating should be updated to Green .
Air Quality (2025)	Green	-	The assessment is endorsed.
Contaminated Land RAG (2023)	Amber	Previous use of the site is for agricultural buildings. Potential	Further investigations can be secured by

		for historic contamination, conditions required.	conditions attached to any planning permission. The RAG rating should be updated to Green .
Overall Suitability Score	Amber	-	There are no insurmountable challenges which should preclude the development of the site. There is no reason to conclude that development cannot sufficiently mitigate any residual impacts. The RAG rating should be updated to Green .
Available RAG	Green	-	The assessment is welcomed. The site can be available for development within the first 5 years' of the Plan period.
Achievable RAG	Green	-	The assessment is welcomed.

- 3.1.16 In terms Land to the Rear of Old House Road, there were no significant issues which cannot be mitigated through the scheme design which were raised in the 2021, 2023 or 2025 HELAA documents.
- 3.1.17 Endurance Estates contend that the Inset Map for Balsham should be urgently updated to ensure that controlled growth can come forward, in support of essential services through the allocation of sites such as Land to the Rear of Old House Road.
- 3.1.18 The Site remains Available, Achievable and Suitable for residential development.

Land off the Causeway, Bassingbourn (Site ID 116001, HELAA ID 40228)
Land off Elbourn Way, Bassingbourn (Site ID 116006, HELAA ID 40227).

- 3.1.19 Endurance Estates objects strongly to the proposed Inset Map for Bassingbourn on the grounds that it does not propose allocation of either Land off the Causeway, or Land off Elbourn Way for residential development. The Policies Map proposes no residential allocations within the village, despite it being a sustainable Minor Rural Centre. Greater Cambridge recognises that the village plays a role in providing services and facilities for a rural hinterland; however, the lack of allocations to secure controlled growth moving forward puts existing services at risk of decline.
- 3.1.20 Bassingbourn had a population of 2,351 at the 2021 Census which represents a marked decrease on the 3,090 residents that lived in the village at the time of the 2001 Census. This decline is in stark contrast with South Cambridgeshire, which grew by just under 25% in the same time period. There is therefore an urgent need to protect the vitality of the village to secure the ongoing provision of shops, services and community facilities. The Village currently hosts a good range of shops and services including a Spar Convenience Store, Public Houses and a community centre. The Village also benefits from Bassingbourn Primary and Bassingbourn Village College. Without additional growth in villages such as Bassingbourn, which play key roles in the delivery of shops and services for rural areas of South Cambridgeshire, the breadth and quality of key shops and services is likely to deteriorate, ultimately harming the sustainability of the settlement in the long term.
- 3.1.21 Below is an extract from the 2025 HELAA site assessments, alongside comments from the promotion team.

Land off the Causeway

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Comments
Adopted Development Plan Policies RAG (2025)	Green	Development of the site has some potential policy constraints, but these can be overcome through the application process.	The assessment is welcomed.
Flooding RAG (2025)	Green	Flood Zoen: Wholly in Flood Zone 1. Surface Water Flooding: None.	The assessment is welcomed.
Landscape Comment (2025)	Red	A landscape and visual appraisal has been submitted which sets out the context and character of the site and shows the visibility of the site from 10 locations around the site. Development of the whole site would result in loss of the distinctive open fields and landscape character between Bassingbourn and Kneesworth. Development would only be acceptable with	A landscape-led scheme, informed by technical inputs, can be brought forward on the site. The scheme will be informed by these technical inputs, and it is anticipated the site will include extensive landscaping, hedgerow enhancement and open space to mitigate for any residual impact.

		a reduced number of homes, located on the western side of the site where they can be absorbed into the existing settlement, leaving the open landscape to the east unchanged.	
Biodiversity and Geodiversity (2023)	Green	-	The assessment is welcomed.
Policy Officer Comments (2021)	Green	-	The assessment is welcomed.
Historic Environment Comments (2023)	Amber	The additional information submitted agrees that the layout of the site would have to be carefully considered to mitigate the impact on the heritage assets. Until that layout has been seen the RAG rating should remain as amber.	A carefully considered indicative layout can be produced for any application. This would be produced alongside heritage assessments to ensure that there is no adverse significant impact upon the heritage assets nearby. Any residual impacts can be assessed at application stage. The RAG rating should be updated to Green.
Archaeology RAG (2025)	Amber	Based on the additional information provide, the assessment for the site remains unchanged as Amber as there is evidence of archaeology in the area that will require further investigation.	Detailed assessments can be secured by condition, or provided at application stage. The RAG rating should be updated to Green.
Accessibility Comment (2025)	Amber	Adequate accessibility to key local services, transport and employment opportunities. Proposed development would not require delivery of key accompanying services.	Acknowledgement that the development would not require the delivery of key accompanying services is welcomed. The RAG rating should be updated to Green.
Site Access RAG (2021)	Amber	The proposed site is acceptable in principle subject to detailed design.	Detailed design will be provided at application stage to demonstrate that safe and

			<p>appropriate access can be achieved for vehicles and pedestrians.</p> <p>The RAG rating should be updated to Green.</p>
Transport and Roads RAG Assessment (2023)	Green	-	The assessment is welcomed.
Noise, Vibration, Odour and Light Pollution Guideline Comments (2021)	Amber	The site is capable of being development to provide healthy internal and external environments in regard to noise/ vibration/ odour/ light pollution after a careful site layout, design and mitigation.	<p>The site is fully capable of providing healthy internal and external environments. Any additional mitigation required can be secured by permission.</p> <p>The RAG rating should be updated to Green.</p>
Air Quality (2021)	Amber	Site does not lie within an AQMA	It is not clear why the site has been rated as Amber. This approach is inconsistent with other sites and should be updated to Green.
Contaminated Land RAG (2021)	Amber	Potential for historic contamination, conditions required.	<p>Any contamination will be identified through detailed investigations at application stage, with mitigations secured by condition.</p> <p>The RAG rating should be updated to Green.</p>
Overall Suitability Score	Red	-	The primary matter relates to landscape impact. Initial technical works undertaken confirm that subject to mitigation measures, the site can be developed. This would include substantial landscaped buffers and planting throughout. The suitability score should be updated to Green.

Available RAG	Green	-	The site remains available in the first 5 years' of the Plan period.
Achievable RAG	Green	-	The site is achievable, and likely to be economically viable.

Land off Elbourn Way, Bassingbourn

Criteria (with latest assessment date in brackets)	RAG Rating	HELAA Comments	Promoter Comments
Adopted Development Plan Policies RAG (2025)	Amber	Development of the site has some potential policy constraints, but these could be overcome through the planning process.	The assessment text is welcomed. The RAG rating should be updated to Green.
Flooding RAG (2025)	Red	2% in Flood Zone 2. 6% in Flood Zone 3. Surface Water: 5% in a 1 in 1000 year event.	A small proportion of the site is subject to an elevated flood risk. The site is sufficiently large to avoid areas of higher risk and can accommodate suitable mitigation.
Landscape Comment (2023)	Red	A commentary on landscape and visual impacts has been submitted in support of the proposals. It is considered that some reasonable suggestions are made and assurances regarding screening for visual impact. However, it is also considered that the proposals along with the mitigations would ultimately be harmful to the character and setting of the village due to the location beyond the eastern edge of the development along North end. Elbourn Way does not impose on the countryside in the manner that the proposals would despite the poor level of screening and integration the Elbourn Way development has.	A landscape-led scheme, informed by technical inputs, can be brought forward on the site. The scheme will be informed by these technical inputs, and it is anticipated the site will include extensive landscaping, hedgerow enhancement and open space to mitigate for any residual impact.

Biodiversity and Geodiversity (2023)	Green	-	The assessment is welcomed.
Policy Officer Comments (2021)	Green	-	The assessment is welcomed.
Historic Environment Comments (2023)	Amber	The western section of the site is within the Conservation Area and development could potentially affect the setting of the Grade I listed church. Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated. .	A carefully considered indicative layout can be produced for any application. This would be produced alongside heritage assessments to ensure that there is no adverse significant impact upon the heritage assets nearby. Any residual impacts can be assessed at application stage. The RAG rating should be updated to Green.
Archaeology RAG (2025)	Amber	Based on the additional information provide, the assessment for the site remains unchanged as Amber as there is evidence of archaeology in the area that will require further investigation.	Detailed assessments can be secured by condition, or provided at application stage. The RAG rating should be updated to Green.
Accessibility Comment (2025)	Green	-	The assessment is welcomed.
Site Access RAG (2023)	Red	The proposed site access is unacceptable. The proposed site does not have a direct link to the adopted public highway.	The site seeks to achieve a route from the existing development from the south. Technical works on the access are ongoing and will be submitted to future consultations and/or applications. At this stage, feasibility studies have demonstrated that safe and appropriate access can be provided to the site.

			The RAG rating should be updated to Amber.
Transport and Roads RAG Assessment (2023)	Amber	Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	The site is not of a scale likely to significantly impact local or trunk roads, but could mitigate any residual impact through the application. The RAG rating should be updated to Green.
Noise, Vibration, Odour and Light Pollution Guideline Comments (2021)	Green	-	The assessment is welcomed.
Air Quality (2021)	Green	-	The assessment is welcomed.
Contaminated Land RAG (2021)	Amber	Potential for historic contamination, conditions required.	Any contamination will be identified through detailed investigations at application stage, with mitigations secured by condition. The RAG rating should be updated to Green.
Overall Suitability Score	Red	-	Endurance Estates contend that the Site is suitable for the development proposed. The suitability score should be updated to Green.
Available RAG	Green	-	The site remains available in the first 5 years' of the Plan period.
Achievable RAG	Green	-	The site is achievable, and likely to be economically viable.

3.1.22 The Inset Map for Bassingbourn should be updated to reflect the role of the village as a Minor Rural Centre. Proportional and sympathetic extensions to the village, such as those proposed at Land off the Causeway and Land off Elbourn Way, are the best and most effective way to securing the

continued viability of essential services and facilities and maintaining the vitality of the village in accordance with paragraph 83 of the NPPF.

3.1.23 The Site remains Available, Achievable and Suitable for residential development.

Land at Hillside, Orwell (Site ID 115802, HELAA ID 40496)

3.1.24 Endurance Estates objects strongly to the proposed Inset Map for Orwell on the basis of the omission of a site specific policy allocating Land at Hillside, Orwell for a residential development.

3.1.25 Orwell is categorised as a Group Village under draft Policy S/SH. The village has experienced moderate growth since the 2001 Census, increasing by approximately 6%. However, this is significantly below the growth rate of South Cambridgeshire, which saw population growth of just under 25% during the same period. As of the 2025 Regulation 18 Consultation, there are no residential allocations proposed within the village.

3.1.26 Orwell benefits from a Primary School, Public House, Post Office, Convenience Store and a Village Hall. The Village also has a good bus connection to Cambridge for a wider range of services.

3.1.27 Land at Hillside, Orwell, is promoted by Endurance Estates for a landscape-led development of approximately 26 dwellings. The 2025 HELAA did not assess the site as it was deemed to “not align with the wider Local Plan Strategy”. Endurance Estates consider that this fails to consider the contribution that the Site could make towards a controlled and proportionate growth of the Village in order to support essential services and facilities to maintain the vitality of the village in accordance with paragraph 85 of the NPPF. .

3.1.28 In the absence of a formal assessment in the HELAA, Savills have undertaken a review against the criteria in the 2025 HELAA below.

Criteria	Savills Rating	RAG	Savills Comments
Adopted Development Plan Policies RAG	Green		Development of the site has some potential policy constraints when assessed against the adopted policies of the plan, however these can be overcome through the planning application process.
Flooding RAG	Green		The site is entirely within Flood Zone 1. There are no areas of surface water flood risk of 1 in 30 likelihood. A very small portion of the site to the periphery is susceptible to a 1 in 100 annual likelihood of surface water flooding. These can be mitigated through the detailed design of the scheme.
Landscape Comment	Green		Previous HELAA assessments confirm that the site currently has enough screening to limit views, but could benefit from further screening north to limit views of the countryside looking into the site. This can be incorporated into the scheme design through any planning application.

Biodiversity and Geodiversity (2023)	Green	The site does not contain any priority habitats. The detailed scheme would be landscape-led, and would feature extensive landscaping features and habitat creation.
Policy Officer Comments	Green	The Site is not subject to any protected space designations. Any impact of the proposed development could be reasonably mitigated or compensated.
Historic Environment Comments	Green	Any application would be accompanied by a Heritage and Archaeological Assessment and could include follow up trenching if necessary, which can be secured by condition. The site is south-east of Wimpole Hall, and will include a detailed assessment of any potential impact upon the significance of the registered park and gardens.
Archaeology RAG	Green	
Accessibility Comment	Green	The scheme has adequate accessibility to local services and transport, including busses to Cambridge, a Primary School and Village Shop. The proposed scheme is not likely to require delivery of accompanying key services.
Site Access RAG	Green	The site access is feasible, and likely to be acceptable in principle subject to further technical assessments and consultation with County Highways.
Transport and Roads RAG Assessment	Green	As a scheme of circa 26 dwellings, there is not expected to be any significant impact upon the functioning of key roads or junctions.
Noise, Vibration, Odour and Light Pollution Guideline Comments	Green	The site is capable of incorporating sufficient landscape buffers to reduce the impact of noise, vibration, odour, light pollution and air quality. Detailed site specific assessments will be undertaken for application stage.
Air Quality	Green	
Contaminated Land RAG	Green	The site is previously agricultural, and so there is a potential for some contamination. A comprehensive assessment will be undertaken at planning application stage and mitigations can be secured thereafter.
Overall Suitability Score	Green	The site is suitable for a development of circa 26 dwellings and associated infrastructure.
Available RAG	Green	The site is available for development within the first 5 years' of the Plan period.
Achievable RAG	Green	There are no matters which suggest that the site would not be achievable in line with the promotion materials.

- 3.1.29 Since the development at Hurdleditch Road was approved in 2016 (**S/3190/15/OL**), no further major schemes have been approved in the village. Partly as a result of the lack of site allocations there within the Adopted Local Plan.
- 3.1.30 Department of Education records indicate that the Petersfield C of E Primary School has 134 pupils on roll and a capacity of 210, indicating that the school is currently operating at around 64% capacity.

This suggests there is capacity for growth within the village, which would help safeguard existing services for the benefit of current and future residents.

- 3.1.31 The Inset Map for Orwell should be updated to reflect the capacity of the village for a controlled and proportionate level of growth to support the Village's services. This should include, as a minimum, Land at Hillside, Orwell for a residential development of circa 26 dwellings.
- 3.1.32 The Site remains Available, Achievable and Suitable for residential development.

3.2 Appendix D – Housing Need in Neighbourhood Areas

- 3.2.1 Endurance Estates object strongly to the housing figures set out in Appendix D on the basis that the methodology is overly simplistic and not justified.
- 3.2.2 It is unclear what relationship, if any, the figures provided in Figure D1 bear to identified local market and affordable housing needs. At present, it appears that the apportionment is a simple proportional basis, based upon the current population.
- 3.2.3 A simple apportionment approach is considered too simplistic and should be updated to reflect local need. Local needs are influenced by local characteristics, demographics, affordability, and should consider any spare capacity in existing local services, alongside projected demographic trends.
- 3.2.4 Moreover, the current method does not appear to reflect the settlement hierarchy and takes no account of existing service provision. As a result, smaller villages which nonetheless have a good level of service provision are apportioned a smaller number of homes than larger villages which have a relatively poorer level of public services.
- 3.2.5 Endurance Estates contend that the Councils should seek to update the mechanism for distributing the residual housing needs at the first opportunity to ensure that it is robust and consistent across the Plan policies. Greater Cambridge should urgently seek to ensure that market and affordable housing needs in each of the neighbourhood areas are addressed in full.
- 3.2.6 The relationship between the Appendix D housing requirements and Neighbourhood Plans should also be clarified. At present, it is not clear whether the needs identified are to be delivered through forthcoming Neighbourhood Plans or whether these are in addition to any needs identified through the Neighbourhood Plan-making process. It is also not clear whether these figures should take precedence to any identified figures in Neighbourhood Plans. Endurance Estates contend that this position is unacceptably subjective and open to significant interpretation from decision makers and should be rectified in the next draft of the Plan.
- 3.2.7 Clarification should also confirm that these housing requirements are intended as minimum figures and not as a ceiling to village growth.

4. Sustainability Appraisal

- 4.1.1 The Sustainability Appraisal notes at Paragraph 4.35 that the ‘Southern Cluster’ which includes Linton, would ensure that “housing is well-located in relation to existing centres of employment”. Paragraph 4.35 continues “the scale of development in the Southern cluster should be sufficient to also provide some new services and facilities”. Paragraph 4.42, also states that development in the ‘Southern Cluster’ villages, may “help to boost the vitality and viability of village services and facilities, which is particularly likely to benefit older people and the less mobile”. These acknowledgements are strongly supported by Endurance Estates.
- 4.1.2 Endurance Estates assert that a balanced strategy, which includes a sustained but proportional level of growth within the villages of the district, is the simplest and most effective way of ensuring the continued provision of essential services which are relied upon by existing residents and enhancing the sustainability of these villages further. Regrettably, despite acknowledgement that growth would support existing services, growth in the ‘Southern Cluster’ has largely been overlooked in the current proposed strategy. It is not considered that this choice is robustly justified by the SA.
- 4.1.3 Overall, it is concerning that the SA fails to adequately consider and assess the full breadth of reasonable alternatives, particularly where it relates to releasing land from the Green Belt adjacent to Cambridge. The inadequacy of the SA risks the overall soundness of the plan and must be urgently rectified.
- 4.1.4 The consideration of suitable alternatives does not sufficiently consider alternative edge of Cambridge sites which, by the SA’s own admission, are the most sustainable sites after those within the City itself. Endurance Estates are promoting Land East of Gazelle Way, Cherry Hinton for a 120 acre, landscape-led, mixed-use development consisting of circa 1,000 high-quality homes, 500,000sqft of employment land and a significant provision of green open space. The development proposes to capitalise upon planned investments including the Fulbourn Greenway, whilst proposing extensive employment and a new Local Centre.
- 4.1.5 The East of Gazelle Way scheme has been assessed in the SA relatively positively, comparing favourably to the Cambridge East allocation which sits to the north-west of the site. Despite the similarity in the assessments of the two sites, Land East of Gazelle Way is not currently proposed for allocation.
- 4.1.6 The allocation of Cambridge East is supported, as are the mitigations and enhancements proposed as part of the Cambridge East scheme. Endurance Estates contend that Land East of Gazelle Way is the next most-logical Edge of Cambridge site for a comprehensive mixed-use development.

	1	2a	2b	3a	3b	3c	4a	4b	5	6	7	8	9	10	11	12A	12b	13	14	15
LEGW	+	-?	+?	+/0	0	0	++	-?	-?	--?	--	--	0	--?	-	+	-	-	++	+
CE	+	++	+++?	+	+	++	++	0	-?	0?	-?	+	0	-?	-	+	-	-	++	++/-

- 4.1.7 The Southern Cluster, which the SA confirms includes Linton, amongst other Rural Centres, Minor Rural Centres and Group Villages with ‘very good’ public transport access.

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