25 September 2026

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

Dear Sir/Madam,

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

Representations on behalf of Endurance Estates and the Landowners

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

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

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

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

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

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

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

- Sustainability Appraisal.

Strategic Policies – Responses Applicable to Cherry Hinton Only

- Policy S/GB - The Cambridge Green Belt.
- Policy S/EOC - Other site allocations on the edge of Cambridge.
- Inset Map for Cambridge.

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

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

Development Management policies:

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

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

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

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

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

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

d) **Consistent** with national policy.

These representations therefore relate to these tests.

Conclusions

We hope that Endurance Estates representations are in order and will be given due consideration by the Inspector(s) as part of the forthcoming Local Plan Examination.

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

Yours faithfully,

[redacted]

Neil Waterson
BA (Hons) DipTP MRTPI
Director, Planning

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

Policy S/DS: Development Strategy and Key Diagram

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

Yes

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

No

Please set out and explain your comments

Endurance Estates object to Policy S/DS 'Development Strategy' along with the associated Key Diagram as it is considered that **the Policy is unsound on the basis that it is not positively prepared, justified or effective** when considered against the reasonable alternatives in meeting the future development needs of Greater Cambridge.

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

However, notwithstanding Endurance Estates general support for the settlement hierarchy and the sequential approach to the distribution of development set out, Endurance consider that the proposed Development Strategy is flawed and unsound for three key reasons:

1. Firstly, the Proposed Submission Local Plan is not planning for a sufficient number of new homes, both in terms of the overall housing requirement (as identified in Policy SH/2) and in terms of the level of supply, including an appropriate housing supply buffer, to meet the housing requirement.
2. The lack of new housing being provided on the Edge of Cambridge relative to the proportion of the housing supply to be delivered at the New Settlements in the Plan Period is considered to be excessive and puts the effective delivery of the required number of homes at risk whilst failing to address housing need both within Cambridge City and within the Rural Area.
3. The Strategy does not allow for sufficient and proportionate growth in the Rural Area including Minor Rural Centres and sustainable Group Villages where these would benefit from existing or planned strategic transport infrastructure.

We address these points in turn.

Number of New Homes.

Endurance Estates' concerns in relation to the number of new homes being planned for are set out in detail within our separate representations to Policy S/JH. Concerns regarding the adequacy of the housing supply and buffer are addressed further below.

The Proportion of Growth being provided on the Edge of Cambridge and Reliance on New Settlements

The Draft Policy confirms that the 'Edge of Cambridge' is the second most sustainable location, and so it would be expected that this would be reflected 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 30% 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.

In contrast the Development Strategy proposed in the Proposed Submission Local Plan is increasingly reliant on New Settlements which account for 44% of the proposed housing supply whereas only 23% of the housing supply in the Adopted Plans were to be provided on New Settlement Sites. The Plan therefore concentrates development on the New Settlements at the expense of every other location across Greater Cambridge and the Development Strategy is therefore becoming increasingly reliant on housing being delivered at scale in the various existing and proposed New Settlements to meet the area's needs. This position is summarised in the Table below.

Table Summarising the Proposed Approach to Allocations

	Adopted Local Plans	First Proposals	December 2025 Regulation 18 Draft	September 2026 Regulation 19 Proposals	Percentage Point Difference versus Adopted Plans (and First Proposals)
Cambridge Urban Area (incl. Windfalls)	19%	20%	11%	**11%**	**-8** (-9)
Edge of Cambridge	35%	24%	29%	**30%**	**-5** (+6)
New Settlements	23%	38%	44%	**44%**	**+21** (+6)
Rural Area (incl. Windfalls)	23%	18%	16%	**15%**	**-8** (-3)

Endurance Estates endorses the proposed New Settlement Allocations, including Cambourne North, as these locations represent excellent opportunities to provide for the longer-term growth needs of the area in a manner which capitalise on recent and planed infrastructure growth and delivers housing at a large-scale. The new settlements should continue to have a significant role in the delivery of the overall housing need across the Plan period and beyond. However, Endurance Estates are of the view that these new settlements should be supplemented by additional development on the Edge of Cambridge and within the sustainable villages of the district.

Moreover, the reliance on New Settlements and other strategic sites in Greater Cambridge does though lead to the conclusion that Greater Cambridge must adopt a more substantial housing supply buffer than the contended 8.2% currently proposed. A higher buffer would provide the necessary flexibility of delivery and ensure a robustness of supply in accordance with the intentions of the NPPF.

The current buffer 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, including, for example, Bourn Airfield, which has a capped delivery of 500-units until the C2C busway becomes operational.

As a result, Greater Cambridge should employ a housing land supply buffer certainly over 10% and we would suggest circa 15-20% above the identified requirement which, for the reasons set out under the Policy S/JH: New Jobs and Homes heading above, also needs to be higher than the Standard Methodology figure.

The Greater Cambridge Shared Planning Service Housing Delivery Study Addendum 2026 Update includes a Trajectory for the Proposed Submission Local Plan as its Appendix A.1 with Five-year housing land supply calculations at A.2. This assumes the Local Plan is adopted in the 2028/29 monitoring year, and the first five-year housing land supply calculation period is 1st April 2028 to 30th April 2033. Even by the Councils' own calculations, the land supply would only be 5.03 years (Sedgefield method) / 5.47 (Liverpool method) and remains below 6 years until 2034/35 (Sedgefield method) / 2035/36 (Liverpool method).

Notwithstanding the Councils' recent publication of their Housing Trajectory and Housing Land Supply Report Addendum, Savills estimate that the Councils are currently unable to demonstrate a five-year housing land supply whether this is calculated on a joint or individual basis. This is largely as a result of the lack of progress with the delivery of the strategic sites on the Cambridge Fringe and at New Settlement sites which the Adopted Plans rely upon for the majority of delivery in the later stages of the Plan period.

From a delivery perspective, and to provide more resilience to the supply, the New Settlement allocations should be supported by additional allocations on the Edge of Cambridge, such as Land East of Gazelle Way, Cherry Hinton, alongside medium-scale sites, including in the sustainable villages within South Cambridgeshire such as Endurance Estates sites referred to below, which would help to improve the planned buffer whilst mitigating the risk of further slowdowns and ensuring a balanced supply.

It is therefore evident that the land supply is fragile even by the Councils' own calculations, and any delay to the delivery of the newly allocated sites, or the pace of delivery on the previous allocations, could mean the Council falling below the required 5 years. Additional identified supply through small and medium sized sites coming forward in the first five years post adoption would provide the necessary contingency to ensure the five-year supply is maintained, and the plan remains up to date.

Green Belt

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

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

The constraint of the Green Belt is understood and acknowledged. However, the Green Belt evidence relied upon by the Council makes no attempt to identify Green Belt land which would represent some of the most highly sustainable locations for growth anywhere in the Greater Cambridge region. Paragraph 2.51 of the Proposed Submission which follows Policy S/DS states that "We made sure to consider the sustainability impacts of focusing growth outside the green belt in comparison with alternatives of releasing green belt land, as we are required to do by national planning policy". Paragraph 2.50 then states that the Councils "also identified six development strategy choices which form geographically focused hybrids of the previously identified sources of supply" which included "A hybrid involving release of land from the Green Belt." The Councils have not given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which would justify a more flexible and permissive approach to grey belt release in particular.

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

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

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

The Site is acknowledged to be highly sustainable within the Sustainability Appraisal with major positives in terms of access to employment and community uses and supporting the Greater Cambridge economy in addition to the housing benefits and proximity to sustainable transport and healthcare. In contrast, No major adverse effects are identified. 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 Green Belt policies set out in the NPPF.

Spatial Imbalance

In terms of the Spatial Strategy, Endurance Estates contend that there is a fundamental imbalance between the location of jobs and the location of the existing and proposed New Settlements in Greater Cambridge.

Cambridge is a polycentric city, with distinct clusters of employment and housing spread across the region. There is a clear trend which is expressed on Figure 6 of the Proposed Submission version of the Plan, to allocate new homes to the north (Waterbeach New Town, Northstowe) and west (Cambourne North and Bourn Airfield) of Cambridge.

Endurance Estates do not object to these allocations, however it is noted that the spatial pattern emerging in relation to these residential-led developments is in contrast with the spatial location of the key employment centres of the District, which are, with the exception of the northern cluster around Cambridge Science Park, to the south and east of the City. This includes the Wellcome Genome Campus, Babraham Research Campus, Granta Park, Peterhouse Technology Park and Cambridge Biomedical Campus. To serve these substantial and growing employment centres, homes are proposed at Grange Farm (2,550 homes up to 2045), the Wellcome Genome Campus (1,500 homes to 2045) and the Cambridge Biomedical Campus (1,000 homes up to 2045). This level of growth, some 5,000 homes during the Plan period, pales in comparison to even the single allocation at Northstowe (6,382 homes in the period). This is despite the planned future growth of these employment sites, which are each supported by allocations in the Regulation 19 Local Plan.

The issue with this spatial imbalance is alluded to in Cambridge Ahead's report (Polycentric Growth and Place Based Policy, June 2026) which notes that strategic transport interventions are required to avoid undesirable transport impacts as a result of workers having to travel across the region to their places

of work. Whilst strategic transport enhancements may be effective in this regard, they are also, in many cases, prohibitively expensive. Endurance Estates contend that a far cheaper, simpler and more effective route to reducing congestion and undesirable commuting patterns is to locate housing close to the employment centres they serve. This includes Sites such as Endurance Estates' site at Land East of Gazelle Way which can readily access Peterhouse Technology Park, alongside allocations within the Rural Southern Cluster, including Land South of Horseheath Road, Linton, which is accessible to Granta Park and Babraham Research Campus.

The imbalanced approach of the Regulation 19 Plan is not considered to be justified in light of the lack of consideration to these alternative strategies. The Development Strategy Topic Paper Appendix 1 (2026) considers Option 7: "*Supporting a high-tech corridor by integrating homes and jobs (southern cluster)"* as having "*potentially good access to existing services, facilities and public transport links*" and "*good access to established employment hub(s), including Cambridge Biomedical Campus, and possibly Granta Park, resulting in positive effects on economy and employment, as well as helping to minimise traffic and related emissions*". Endurance Estates fully support these initial assessments of the benefits this strategy would bring. However, despite this identification, only limited further reference is made to the option in the remainder of the Appendix and primarily from the perspective of its perceived constraints at Gog Magog and the River Valley. No effort is made to consider developments such those proposed at Linton, which would not impact any of these identified constraints.

This relative lack of consideration is despite the Reg 19 Plan's recognition that the area is "*home to a range of major business parks with world-leading facilities and has some excellent and improving public transport links*".

Similarly, sites such as Land East of Gazelle Way, Cherry Hinton are dismissed despite the clear advantages outlined, which the Council state include: "***potentially good access to established employment hubs, existing services, facilities and public transport links, and provision of new employment, services and facilities if developments are of sufficient scale, resulting in positive effects for the economy and employment, accessibility, equalities, health, climate change mitigation and air quality***". The assessment also agrees that developments to the edge of Cambridge "*Can be designed around walking and cycling*" which would clearly reduce the impact of congestion.

Supporting the Villages of South Cambridgeshire

In addition to the inherent spatial imbalance which exists due to the lack of significant allocations south and east of the City, the Villages of the District are also overlooked in the proposed Development Strategy.

Growth within villages, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities as recognised in the NPPF. Such sites are necessary as part of a blended, robust housing land supply to meet market and affordable housing needs across the whole of Greater Cambridge including within the Rural Area, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

As part of a robust sustainable housing supply to meet the needs of all of Greater Cambridge, it is clear that medium sized sites, including sustainable village sites, are needed as part of a blended development strategy (reducing the reliance / dependency on strategic sites) to ensure that new homes are delivered throughout the Plan period to meet all needs as required by the NPPF.

Endurance Estates are promoting sites at:

- 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)

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, helping to address the prevalence of ageing populations within the villages of South Cambridgeshire.

Greater Cambridge has 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.

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.

It is noted from the Development Strategy Topic Paper, Paragraph 5.59, that Greater Cambridge *"did not identify any additional sites that would not cause a level of harm…considered justified in the context of other available options"* and that they *"do not consider villages to be a reasonable option for meeting a substantive amount of our additional need for homes".*

Whilst it is accepted that the scale of housing growth to be directed to the villages will need to be appropriate and proportionate, given that South Cambridgeshire has no towns and is entirely made up of villages of different scales and levels of service provision it is considered that this sweeping, generalised statement fails to reflect the reality of the District's geography and to adequately reflect the different needs and potential of the large number of villages across the District. In particular, it fails to reflect that a number of these villages currently offer a better range of services and facilities than currently on offer in the New Settlements of Northstowe and Waterbeach and the fact that villages such as Linton will benefit from new strategic transport infrastructure that will provide excellent transport accessibility with development along these transport corridors helping to support the viability of those transport services.
Indeed, 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 over recent years under the stewardship of the Greater Cambridge Partnership, 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 new and proposed transport schemes which, for the most part, are already committed and funded.

Endurance also disputes the Councils' contention that the development of all of village sites would cause unjustified harm. As shown within Endurance's separate representations to Policy S/RRA, the development of their various village sites would not lead to any material harm and would be highly sustainable.

It is considered that the District's villages still have the potential to perform an important role in accommodating similar scales of growth to those in the Adopted Local Plan and should therefore not be overlooked within the Development Strategy. The reduction in planned housing growth in the villages now proposed within the emerging Local Plan fails to adequately address the needs of the Rural Area and is considered to be unjustified and unsound.

As set out at Paragraph 83 of the NPPF (December 2024; as amended February 2025), housing should be located where it will enhance and maintain rural communities, and planning policies should identify opportunities where villages can grow and thrive. By seemingly overlooking rural locations for new

housing development, the Development Strategy risks undermining the vitality and sustainable growth of village settlements, failing to address local affordable housing needs and failing to provide housing choice and opportunities for those living in the rural area who wish to find a new home within their communities rather than in a New Settlement.

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 which risks jeopardising continued provision of one of the key features which make them sustainable locations to live.
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*".

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.

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 thee

Accordingly, Endurance Estates considers that proportionate growth within sustainable villages within South Cambridgeshire is therefore essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities and address local housing needs. This would ensure consistency with national policy, as outlined in HO6 of the NPPF 2026. Suitable sites in sustainable village locations are also necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

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.
Failure to support the vitality and associated loss of services and facilities in the villages.
Failure to allocate sufficient small-and-medium sites in the housing supply in accordance with National Policy and to ensure robust delivery across the plan period.
- Failure to capitalise upon already committed and funded transport enhancements, including the CSET Busway and the various Greenways.

For the reasons outlined above, Endurance Estates consider that the **Policy S/DS is unsound** on the basis that it **is not positively prepared, justified or effective or consistent with national policy**. The Policy as currently drafted risks artificially constraining housing provision. In doing so, the Plan risks worsening affordability pressures, increasing in-commuting, restricting labour supply and constraining business growth. These potential pitfalls are at odds with the stated ambitions of the Government, and the Councils' own evidence and as such will fail to support the planned economic growth of the City region.

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

Greater Cambridge Economic Study

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

The Development Strategy should be amended to provide for an increased level of housing provision of a minimum of 58,000 new homes over the Plan period (2,762 dwellings per a annum) to more fully support the local economy, supporting planned jobs growth and helping to address the historic imbalance between homes and jobs to address commuting patterns.

Additional sites should be allocated in the form of new urban extensions on the edge of Cambridge such as Endurance Estates site at Land East of Gazelle Way, Cherry Hinton along with additional small and medium sized housing sites in sustainable villages in the Rural Area including Endurances sites:

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

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

Land to the rear of Old House Road, Balsham (Site ID 115953, HELAA ID 40438)

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

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

Yes

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

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