25 September 2026

Greater Cambridge Shared Planning
South Cambridgeshire Hal
Cambourne Park
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CB23 6EA

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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 H/AH: Affordable Housing

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 objects to Policy H/AH since the proposed requirements of the Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy.

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. It should also recognise the need for the mix to reflect the most up-to-date evidence of local need at the time in recognition of the fact that needs will change over the 21 year lifetime of the Plan and that local circumstances (i.e. needs in particular villages) may be different.

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.

Accordingly, the Policy as currently worded is overly prescriptive and inflexible in terms of the tenure mix requirements but in contrast does not provide sufficient guidance or clarity with regard to the full range of affordable tenures or affordable housing requirements for specialist housing. Accordingly, the Policy is not justified, positively prepared or consistent with National Policy and is therefore unsound.

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

None.

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

The Policy needs to expressly recognise that viability may justify a different percentage and / or tenure mix, including other forms of intermediate housing like discount to market provision. It should also reference the need for the mix to take account of up-to-date evidence of local needs. Finally, the Policy should be amended to provide additional clarity with regard to how the Policy should be applied in

respect of housing with care and Keyworker provision and whether Key worker accommodation is considered as affordable.

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.