25 September 2026

Greater Cambridge Shared Planning
South Cambridgeshire Hal
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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

Appendix C – Housing Need in Neighbourhood Areas

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 strongly to the housing figures for Neighbourhood Areas set out in Appendix C on the basis that the methodology remains overly simplistic and is not positively prepared, justified or effective. Consequently, Appendix C is considered to be unsound.

There has been no fundamental change to the calculation of housing need in neighbourhood areas in the Regulation 19 version of the plan. Accordingly, it remains unclear what relationship, if any, the figures provided in Figure C1 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, which is then divided by the residual identified need of 6,183 dwellings which are to be delivered "from other sources or through windfall sites".

A simple apportionment approach is considered too simplistic and should be updated to reflect the true level of unmet local affordable, market and specialist housing needs. Local needs are influenced by local characteristics, demographics, affordability, and should consider any spare capacity in existing local services, alongside projected demographic trends.

Moreover, the current method does not appear to reflect the settlement hierarchy and takes no account of existing service provision or capacity. 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.

Endurance Estates representations to Policy S/JH and Policy S/DS raise significant concerns with regard to the housing requirement and the proposed Development Strategy and contend that the Local Plan should include a higher housing requirement to provide a better balance between homes and jobs and that more housing should be directed to sustainable villages to help meet local needs. It therefore follows that such changes would also require the level of housing needs directed to neighbourhood areas to be increased.

For these reasons Endurance Estates contend that the Councils should seek to both increase the proportion of growth directed to neighbourhood areas and to update the mechanism for distributing the residual housing needs to ensure that it is robust and consistent across the Plan policies. Appendix C and the Local Plan as a whole should be amended to ensure that market and affordable housing needs in each of the neighbourhood areas are addressed in full.

The relationship between the Appendix C 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 and whether this would include or exclude windfall development. Endurance Estates contend that this position is unacceptably subjective and open to significant interpretation from decision makers and should be addressed through amendments to the Plan.

Clarification should also confirm that these housing requirements are intended as minimum figures and not as a ceiling to village growth.

Endurance Estates therefore consider that the housing figures set out in Appendix C is not positively prepared, justified or effective and the Policy is therefore considered to be unsound.

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

Greater Cambridge Economic Needs Assessment

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

To ensure that Appendix C and the Plan more widely is sound, Endurance Estates contend that the Local Plan should be amended to:

- Increase the proportion of growth directed to neighbourhood areas.
- Update the mechanism for distributing the residual housing needs to ensure that it is robust and consistent across the Plan policies.
- Ensure that market and affordable housing needs in each of the neighbourhood areas are addressed in full.
- Clarify the relationship between the Appendix C housing requirements and Neighbourhood Plans.
- Confirm that these housing requirements are intended as minimum figures and not as a ceiling to village growth.

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.