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

Appendix D – 5YHLS and Housing Trajectory

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 strongly objects to the Housing Trajectory at Appendix D and considers that it is unsound on the basis that the housing trajectory includes insufficient sites with too much reliance placed on delivery at New Settlements. Moreover, notwithstanding Cambridge's recent Greater Cambridge Housing Trajectory and Housing Land Supply Report - Addendum (September 2026), Endurance consider that the Councils are currently unable to demonstrate a 5-year housing land supply. As a result, it is considered to that the Housing Trajectory at Appendix D is **not positively prepared, justified, effective or consistent with national policy and is unsound**.

Overall Housing Supply

The Regulation 19 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 D1 ('Anticipated Completions 2024 - 2025') of the Proposed Submission Plan, Endurance Estates considers the projected delivery rates to be unrealistic.

A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. However, it does though lead to the conclusion that Greater Cambridge needs to 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. 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.

Endurance Estates therefore consider that the 8.2% housing supply buffer currently proposed on the housing requirement for the Plan period, upon which the allocations and trajectory are based, is insufficient and will put the delivery of the housing requirement at risk, stifling economic growth. In addition, it is considered that it 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 as discussed further below.

5-Year Housing Land Supply

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).

It should also be noted that the calculation of the 5YHLS in Appendix 1 (on a joint basis) is different to the approach the Councils are now seeking to take for current decision-making purposes with the Councils now calculating the 5YHLS on a joint basis. The two approaches are inconsistent and will lead to uncertainty. In this regard, Endurance consider that the 5YHLS position should be calculated jointly and therefore agree with the approach within the emerging Plan in this regard.

We would also emphasise that the PPG [Paragraph 68-031] is clear that the Sedgefield method should be utilised for calculating the 5-year housing land supply position unless justified otherwise. The Council has provided no clear justification as to why the Liverpool method should be used for calculating the housing land supply position and accordingly the Sedgefield method should be used in accordance with National policy. On this basis, the Council's 5-year housing land supply would be extremely marginal and at risk from any delays in major sites coming forward.

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 remain up to date.

Notwithstanding the Councils' recent 5YHLS addendum, Savills consider that the Councils are currently unable to demonstrate a five-year housing land supply. 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.

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. Accordingly, 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 proportionate allocations on the edge of sustainable villages including medium-scale sites across the District. This approach would mitigate the risks of delays in delivery on these large strategic sites and ensure a more balanced, responsive and deliverable supply. 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. These include:

- 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 therefore considers that the Housing Trajectory at Appendix D is unsound on the basis that the housing trajectory includes insufficient sites with too much reliance placed on delivery at large scale New Settlements. As a result, it is considered to that the Housing Trajectory and associated housing supply is not positively prepared, justified, effective or consistent with national policy and is unsound.

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

Greater Cambridge Housing and 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 to provide for an increased level of housing provision of a minimum of 56,000 new homes over the Plan period (2,667 dwellings per a annum) in accordance with the higher levels of housing growth considered within the Sustainability Appraisal and with a minimum 10% buffer 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.

Moreover, based on our supporting evidence within the Greater Cambridge Economic Needs Assessment, the Plan should seek to aim for an aspirational housing supply target of 66,000 new homes to help address the imbalance between homes and jobs and fully support the Greater Cambridge economy.

In addition, given the reliance on New Settlements, a larger housing supply buffer should also be provided of a minimum of 10% in order to ensure that the Councils are able to maintain a five-year supply od deliverable sites throughout the Plan period including on Adoption of the Plan. This should include more medium and small sized sites in order to help provide a more flexible, robust and deliverable supply in accordance with the intentions of the NPPF.

Accordingly, 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)
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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.