25 September 2026

Greater Cambridge Shared Planning
South Cambridgeshire Hal
Cambourne Park
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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/SH: Settlement Hierarchy

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

Whilst the broad objective of this policy is supported, Endurance Estates objects to Policy S/SH as proposed in the Regulation 19 Plan and consider that it is **not positively prepared, justified, effective or consistent with national policy and is therefore unsound.**

Draft Policy S/SH sets out the groupings of settlements into categories that reflect their scale, characteristics, and sustainability. The settlement hierarchy is proposed to direct housing to the most sustainable locations and control windfall development in the least sustainable locations.

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.

In particular Endurance Estates objects to the arbitrary indicative limits on the scale of housing developments set out within the Policy. The indicative housing limits do not ensure the continued vitality of the villages, nor recognise their sustainability for proportionate and controlled housing growth.

Policy S/SH currently restricts Minor Rural Centres to residential development up to an indicative maximum size of 30 dwellings and Group Villages to an indicative maximum scheme size of 8 dwellings with up to 15 in 'exceptional' circumstances.

For Group Villages, as mandatory Affordable Housing provision is only triggered on Major sites, the Council are relying exclusively on goodwill and rural exceptions sites to meet affordable housing needs, which is not considered a robust approach to meeting the affordable housing needs of the District's villages.

These arbitrary indicative limits on the scale of housing developments set out by the Draft Policy have not been properly justified. They are unlikely to ensure the continued vitality of the villages and do not recognise their individual needs or the sustainability for proportionate and controlled housing growth. Moreover, the Draft Plan proposes very few new housing sites within the more sustainable villages, but where there is capacity to provide additional housing which could come forward in advance of the strategic New Settlement sites and support a more balanced, robust and deliverable housing supply. As a result, the policy is not considered to be positively prepared or justified, as it will result in unmet housing needs across the villages of the District. It is therefore considered to be unsound.

As set out at Paragraph 83 of the NPPF (December 2024), housing should be located where it will enhance and maintain rural communities, and planning policies should identify opportunities where villages can grow and thrive. However, as currently drafted, Policy S/SH is hugely restrictive and risks undermining the vitality and sustainable growth of village settlements by placing somewhat arbitrary limits upon housing development.

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.

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.

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 proportionate development that can be supported by existing or planned infrastructure can come forward.

Whilst it is acknowledged that the Plan will be examined under the December 2024 NPPF, it is important to have regard to Annex A of the August 2026 NPPF which states that "development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight". In this regard, Endurance Estates contend that the blanket and arbitrary numerical restrictions on residential development within settlements are inconsistent with national policy and are not justified.

The 2026 NPPF includes Policy S4, which establishes a presumption in favour of development within settlements. Further, S5 establishes a similar framework for determining developments outside settlements. Neither S4, nor S5 of the NPPF include any reference to limiting or restricting development inside villages, and on the contrary the NPPF actively promotes, in Policy L3, the optimisation of site capacity through higher densities in appropriate locations. An arbitrary limit of 8 dwellings in Group Villages and 30 in Minor Rural Centres, is not considered to accord with this aim and so is not in accordance with National Policy.

Accordingly, the arbitrary numerical limits on development expressed in the hierarchy are unsound as they are not justified, effective or consistent with national policy and would only attract 'very limited weight' following adoption of the Plan. **It is therefore considered that the restrictions on the scale of growth at different levels of the settlement hierarchy should be deleted**.

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.

It is therefore considered that the restrictions on the scale of growth at different levels of the settlement hierarchy should be deleted.

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.