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

Policy S/DE: Defined Settlement Extents

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 Draft Policy S/DE and considers that **it is unsound** due to the lack of flexibility in the policy and on the grounds that as a result it is **not justified nor consistent with National Policy**.

Part 2 of the Policy as currently drafted, states that by default development outside the development extents will not be permitted except for allocations in Neighbourhood Plans, Rural Exceptions Sites, Agricultural Development or where supported by other policies of the plan.

The wording of the proposed policy is effectively identical to that of South Cambridgeshire's Local Plan (2018) Policy S/7. However, since adoption of the 2018 Plan, the national policy position has evolved significantly. The 2026 NPPF includes Policy S5, which establishes a framework for determining developments outside settlements. Part 2 of S/DE is considered to be significantly more restrictive than Policy S5 of the 2026 NPPF.

Whilst it is acknowledged that the Draft 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".

Accordingly, Endurance considers that Policy S/DE is unsound as it is not consistent with national policy and as such will only attract 'very limited weight' following adoption. The impacts of the draft Policy upon potential windfall sites of this are compounded by the lack of residential allocations across many the sustainable villages of the district (as referenced in the wider Endurance representations). As a result, there is a substantial risk that over the plan period, many of the villages will see their populations stagnate or even decline, with little-to-no affordable housing delivered across the period, placing unnecessary strain on local services and affordability.

It is considered that the inflexibility of this policy will make achieving the neighbourhood housing need outlined in Appendix C difficult to achieve in reality. Flexibility would also aid in ensuring Greater Cambridge's housing delivery can maintain a sufficient 5-year supply across the Local Plan period.

Accordingly, Endurance Estates contend that Policy S/DE is unsound as it is not consistent with national policy and as such will only attract 'very limited weight' following adoption.

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

Greater Cambridge Economic Assessment

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

Endurance Estates consider that the proposed Policy wording should be amended to allow for development outside the defined settlement boundaries where there is an evidenced unmet need and sites are well related to the settlement in accordance with Policy S5 along with Policies GB6, GB7 and GB8 of the NPPF. This will ensure that Policy S/DE is consistent with national policy following adoption. Endurance Estates suggest that Part 2 of the Policy is therefore 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.