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

Sustainability Appraisal

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 the Sustainability Appraisal prepared in support of the Proposed Submission Local Plan as it is considered that the assessment has not adequately considered the reasonable alternatives. As a result, it is considered that the Sustainability Appraisal is unsound due to flaws in the way that the reasonable alternatives have been considered, it is not justified or consistent with National Policy.

Land East of Gazelle Way (40250)

Endurance Estates acknowledge and are mostly supportive of the adjustments made to the Table 4.4 (Summary of SA findings for site options in Edge of Cambridge: Green Belt). The amendments made mostly recognise Endurance Estates' previous comments and result in a significantly more positive assessment of the Site at Land East of Gazelle Way (40250) as shown by those topics highlighted green below.

	1	2a	2b	3a	3b	3c	4a	4b	5	6	7	8	9	10	11	12A	12b	13	14	15
	Housing	Proximity to Services and Facilities	Proximity to Educational Facilities	Regeneration Potential	Social Deprivation	Community Uses	Proximity to Healthcare	Loss of Open Space or Sports Facilities	Bio and Geo Diversity	Landscape & Townscape	Historic Environment	Efficient use of Land	Minerals	Water	Adaptation to Climate Change	Proximity to Sustainable Transport	Proximity to Centres	Air Quality	Economy	Employment
LEGW 2025 (Reg 18)	+	-?	+?	+/0	0	0	++	-?	-?	--?	-- ?	--	0	--?	-	+	-	-	++	+
LEGW 2026 (Reg 19)	+	-?	+?	0	0	++	+	0	-?	?	?	Blank	0	?	-	+	-	-	++	++

However, the summary of the assessment in Table 4.4 still outlines uncertainty with regards to Landscape & Townscape, Historic Environment, Efficient use of Land, Minerals and Water, though these uncertainties affect the vast majority of the sites assessed, including some of the Plan's most high-profile allocations at the Biomedical Campus and the Cambridge Airport site.

Endurance Estates acknowledge the responses to Endurance Estates' previous representations which are outlined at Paragraph 19 of Appendix A. With respect to Land East of Gazelle Way (40250). The LUC response does not challenge Endurance's assessment that the SA assesses the site positively in terms of its sustainability. Instead, the SA defers to the Council to make allocation decisions. The LUC response states that "The Sustainability Appraisal provides an evidence-based assessment of sites identified and tested through the plan-making process but does not determine site allocation, that is the role of the plan-makers". LUC refer to Appendix E ('Council's justification for selecting the spatial strategy and site allocations for the plan') for confirmation as to why individual sites are not allocated.

For Land East of Gazelle Way (40250), Appendix E states the following: *"Development would result in coalescence between Cambridge, Teversham and Fulbourn and encroachment into the countryside. The Cambridge Green Belt Study (2026) identifies that release of land in this area would result in a moderate high/ high/ very high level of harm to the Green Belt. While a small part of the site is considered to be potential grey belt, the proposed development strategy has identified alternative locations to meet development needs, and it is not considered that there are exceptional circumstances for a Green Belt release in this location".* Accordingly, it can be concluded that, despite the SA's positive assessment of the sustainability of Land East of Gazelle Way, the site is not allocated principally due to its Green Belt designations, which themselves can be addressed in turn.

It is therefore clear that some of the most sustainable sites, as per the Sustainability Appraisal, are not proposed for allocation due to the Green Belt designation. This is concerning especially given that Endurance Estates have provided evidence to demonstrate that Land East of Gazelle Way is Grey Belt which is acknowledged for a small part of the site in the Council's assessment.

Consideration to Edge of Cambridge (Green Belt) sites appears to have been considered through Spatial Option 10, which was introduced to the Options in the 'Additional Strategic Spatial Options (2021)' and again in 2025 through Option 10a (Hybrid spatial strategy including Ede of Cambridge Gren Belt and expanding Cambourne) and finally in 2026 as Option 10b (Hybrid spatial strategy including Edge of Cambridge Green Belt and expanding Cambourne (but with no further development at North East Cambridge).

Appendix C of the SA confirms that Options 10 and 10a were not clearly rejected because they performed materially worse overall than the preferred strategy. It cannot be said that the SA states that that the options were unsustainable. The preferred option was concluded to be preferable with regards to Climate Change and Transport, seemingly due to the committed enhancements of East West Rail and the bus rapid transit improvements which benefit the A428 and Cambourne area. The SA does not provide any strong reasons against the pursuit of Option 10, 10a or 10b.

General Comments

It is considered that the Sustainability Appraisal has failed to fully consider the issues with regard to the balance between homes and jobs within Greater Cambridge and the effects of different levels of growth with regard to their social and economic effects. The higher housing growth options of circa 56,000 new homes over the Plan period are still relatively low and the effects of different levels of housing growth to reduce in-commuting and support the Greater Cambridge economy has not been fully assessed.

In terms of the allocation of developments in the Rural Centres, Minor Rural Centres and other villages of the district, the SA broadly assesses this under Option 5 (Dispersal – villages). The primary observations of this option are that the villages lack higher-order services, weaker public transport, car dependency and a lack of critical mass to deliver key infrastructure. These criticisms are all broadly accepted by Endurance Estates, however the LPA's reaction to this assessment is to allocate only very limited development across the lower tier settlements of the district, which Endurance Estates contend is a dramatic and unnecessary overreaction which is not justified by the evidence provided.

Endurance Estates also contend that strategic transport enhancements have been considered inconsistently through the assessment. In particular, it is noted that the assessment of the Grange Farm allocation (S/GF) includes specific reference to the CSET Busway improvement, however it is not clear from the assessment whether this has been carried over into the appraisal of Spatial Options 5 and 6 and the site-specific level. For Endurance Estates' site at Horseheath Road, Linton, the strategic transport enhancements, including the Linton Greenway and CSET bus and active transport scheme both materially improve the accessibility and sustainability of the site, and it is not clear that these have been fully accounted for in the updated SA.

Southern Cluster

Moreover, the Sustainability Appraisal notes at Paragraph 4.42 that the 'Southern Cluster' which includes Linton, would ensure that "housing is well-located in relation to existing centres of employment". Paragraph 4.35 continues "the scale of development in the Southern cluster should be sufficient to also provide some new services and facilities". Paragraph 4.49, also states that development in the 'Southern Cluster' villages, may "help to boost the vitality and viability of village services and facilities, which is particularly likely to benefit older people and the less mobile". The Southern Cluster is acknowledged in the SA to benefit from 'very good' public transport access. These

comments and acknowledgements are considered to chime with the requirements of Policy HO6 of the NPPF 2026, to allocate sufficient dwellings to support rural vitality, and are strongly endorsed by Endurance Estates.

Endurance Estates assert that a balanced strategy, which includes a sustained but proportional level of growth within the villages of the district, is the simplest and most effective way of ensuring the continued provision of essential services which are relied upon by existing residents and enhancing the sustainability of these villages further. The SA does not rule out this strategy, and on the contrary, the responses from LUC on Page 58 of the SA defers the strategy to the LPA. Regrettably, despite the good evidence that growth would support existing services, growth in the 'Southern Cluster' has largely been overlooked in the current proposed strategy. It is not considered that the LPA's choice in this matter is robustly supported by the SA.

As a result, it is considered that the Sustainability Appraisal is not sound due to flaws in the way that the reasonable alternatives have been considered and the subsequent conclusions drawn and taken forward as part of the Plan making process. Accordingly, it is not justified, effective or consistent with National Policy.

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

Greater Cambridge Economic Study

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

The Sustainability Appraisal should be updated in order to consider the social, economic and environmental effects of higher levels of housing development to further support economic growth within the Greater Cambridge economy in accordance with Government aspirations for the area. This should consider growth the implications of a housing requirement in the region of 66,000 new homes to begin to rebalance homes and jobs and reduce in-commuting.

The Sustainability Appraisal should also give further consideration to the social and economic implications of different levels of growth within the villages, taking account of those which would benefit from planned infrastructure improvements.

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Yes