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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/RRA: Site Allocations in the Rest of the Rural Area

**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**

Draft Policy S/RRA allocates specific sites within the rest of the Rural Area to help meet the development needs across Greater Cambridge. Endurance Estates, objects to the draft Policy on the basis that the housing allocations identified within the Rest of the Rural Area are insufficient to meet local housing needs in villages, and further, that it omits Endurances sites for residential development. The Policy is therefore not considered to be positively prepared, justified, effective or consistent with national policy and is unsound.

Endurance Estates consider that the housing allocations proposed in the Regulation 19 Proposed Submission Local Plan across the rural area are insufficient to meet local housing needs in the villages of the District The lack of new housing site allocations in the villages within the Rural Area reflect wider concerns set out in our responses to other Policies (S/JH and S/DS) that confirm the Plan is not providing for sufficient number of new homes in the right places.

In addition to the inherent spatial imbalance which exists due to the lack of significant allocations south and east of the City, the Development Strategy being pursued, has resulted in very few new housing allocations in the 'Rest of the Rural Area', which are largely overlooked in favour of significant New-Settlement allocations.

Endurance Estates are also concerned that the Plan does not appear to meet the requirements of Part (a) of Policy HO6 of the NPPF 2026 which requires the Council to allocate 10% of their housing requirement on sites no larger than 1 hectare, and a further 10% between 1-and-2.5 hectares.

Further, the Part (b) of Policy HO6 requires the Councils to allocate "sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services". The Government's intention is therefore clear - growth within villages is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. Such sites are necessary as part of a blended, robust housing land supply to meet needs across the whole of Greater Cambridge, and to deliver a spatial development strategy that is positively prepared, justified, effective and consistent with national policy.

The Regulation 19 Plan makes only a handful of allocations within the 'Rest of the Rural Area'.

- S/RRA/ML (Moor Lane) – 20 dwellings
- S/RRA/H (Highfields Phase 2) – 65 dwellings
- S/RRA/ (Cambridge Road, Melbourn) – 125 dwellings
- S/AMC/FD (Land Settlement Association Estate Area of Major Change) – No clear use
- S/AMC/HIS (Histon and Impington Station) – Mixed use – no quantum confirmed

As set out above, across the S/RRA Policies, there are only very limited allocations for residential development, with most being for employment, or unspecified mixed uses. The residential allocations are confined to Moor Lane, Highfields and Melbourn, totalling just 210 homes across the District - equal less than 0.5% of the identified housing requirement. Endurance considers this to be woefully

insufficient to meet the needs of the villages of the district and does nothing to support the local economies and services within these settlements.

It is considered that the housing allocations identified within the Rest of the Rural Area are not aligned with the settlement hierarchy in terms of distribution and scale of development.

As mentioned within our representations to Policy S/DS, there is a strong focus within the Draft Local Plan on the delivery of strategic sites, particularly New Settlements. Whilst it is recognised that strategic sites are capable of delivering large numbers of homes and making a meaningful contribution to meeting identified development needs, the proposed New Settlements make up almost half of the planned housing supply. This reliance on large strategic sites places an undue reliance and significant dependence on such sites and risks under delivery in the face of any delays to their delivery, particularly as many of these sites are subject to significant infrastructure delivery requirements.

**Over-reliance on Windfall**

Paragraph 2.41 of the Regulation 19 Plan confirms that the Councils intend to rely heavily upon windfall to meet the small-sites requirement. The Councils contend that allocating the full amount on specific identified sites would be "extremely challenging". Endurance Estates contend that this is not a sound strategy and Policy HO6 is clear that the Councils should be allocating specific sites to meet this need. Allocation of a small number of additional sites in the Rest of the Rural Area, such as Endurance Estates' sites below, would go some way to meeting this need.

The arguments for not allocating specific sites, such as the highly-sustainable Endurance Estates sites outlined below, in is not justified. The Councils state that allocation of the full small-sites requirement would direct "a significant portion of growth to less sustainable locations where levels of car use would be higher, negatively impacting our response to the challenges of net zero carbon and Climate Act obligations and undermining our vision and strategic priorities". Notwithstanding this, the reliance upon windfall to meet this need appears to be in conflict with this statement.

The Policy as currently drafted risks artificially constraining housing provision outside of Cambridge and the New Settlement allocations. In doing so, the Plan risks worsening affordability pressures, already present within the District, whilst increasing the need to commute and restricting labour supply. Ultimately, in failing to deliver sufficient new homes in the villages of the District – in addition to those in Cambridge and the new settlements – the Council are constraining business and economic growth. This is at odds with the stated ambitions of the Government, and the Councils' own evidence and as such will fail to support the planned economic growth of the City region.

In relying upon windfall developments to exclusively meet the housing needs of the majority of the villages of the District, and when considered in combination with S/SH - which Endurance have also made representations on within this submission – the Council are restricting the ability of developments to meet the affordable needs of the villages. Policy S/SH currently restricts Local Service Centres to "an indicative maximum scheme size of 30 dwellings" and Group Villages to "an indicative maximum scheme size of 8 dwellings" with up to 15 in 'exceptional' circumstances. As mandatory Affordable Housing provision is only triggered on Major sites, the Council are relying exclusively on goodwill and rural exceptions sites. This is not considered a robust approach to meeting the affordable housing needs of the District's villages.

**Meeting Local Housing Needs**

The evidence base does not assess affordable housing need within the District's villages, which raises the question of whether the Plan and Policies can be said to address local housing needs and whether they have been properly planned for.

The Plan itself acknowledges that locating homes closer to employment can reduce commuting. Sustainable villages, including those benefiting from committed transport improvements, can make a meaningful contribution to this objective. The absence of significant housing allocations in such locations therefore represents a missed opportunity to support sustainable travel patterns.

The proposed housing strategy also lacks sufficient diversity. Only a small proportion of housing need is expected to be delivered through specific small and medium-sized allocations, with significant reliance on windfalls and large strategic sites. This approach is inconsistent with the Government's increasing emphasis on the role of small and medium-sized sites in boosting housing delivery and market diversity. Evidence consistently shows that smaller sites are delivered more quickly and can improve resilience within the housing trajectory.

The Plan should therefore identify additional small and medium-sized allocations in suitable village locations and ensure new settlements are supported by sufficient employment opportunities to create balanced and sustainable communities.

In particular, Endurance Estates strongly objects to Draft Policy S/RRA on the basis that it omits the following proposed site allocations:

- Land South of Horseheath Road, Linton (Site ID 115248, HELAA ID 40554)
- Land to the rear of Old House Road, Balsham (Site ID 115953, HELAA ID 40438)
- Land off the Causeway, Bassingbourn (Site ID 116001, HELAA ID 40228)
- Land off Elbourn Way, Bassingbourn (Site ID 116006, HELAA ID 40227)
- Land at Hillside, Orwell (Site ID 115802, HELAA ID 40496)

These sites are considered in turn below.

**Land South of Horseheath Road, Linton (Site ID 115248, HELAA ID 40554)**

Endurance Estates have consistently promoted Land South of Horseheath Road and sought to provide updated technical information at every given opportunity. The 2025 HELAA relating to the landscape impact states that the "*Site is highly sensitive in landscape terms and development in this location would be highly visible, creating adverse impacts on landscape character and local views. These impacts are significant when considered cumulatively alongside other development on adjacent land*". It is not clear on what basis this conclusion was reached, as detailed Landscape and Visual Impact Assessments have concluded that development of the site can be sufficiently mitigated through a considerate, landscape-led design and planting scheme.

The July 2026 Sustainability Appraisal Appendix E (Justification for selecting the spatial strategy and site allocations for the plan) states the reason for not proposing the site for allocation as follows:
*"The landscape assessment has been changed from Red to Amber. However, the site sits on a slightly more elevated parcel of land compared to its surroundings, which will result in development being more visible. The required landscape mitigation would reduce the capacity of the site. There are a number of sites recently developed or committed on the edge of Linton. There are other sites considered more appropriate for allocation."*

It is considered to be significant that this response does not challenge the sustainability of the site. Further, Endurance Estates contend that the capacity of the site is demonstrated through the supporting plans and application materials which were submitted to Greater Cambridge Planning in support of the Outline Planning Application (Ref: 26/00415/OUT) for the Site in February 2026. Following submission of the Outline Planning Application, it is demonstrated that there are no significant or insurmountable constraints which should preclude development of the site.

As a Minor Rural Centre, Linton is demonstrably a sustainable settlement. Linton benefits from an Infant, Junior and Secondary Schools, a Library, several shops and cafes, public houses, a GP Surgery, dental practice, and an excellent range of sports and recreation facilities, including a skate park, swimming pool and sports pavilion. It is therefore considered that the site, and by extension the village of Linton, benefits from sufficient accessibility to essential shops and services, alongside the ability to travel sustainably further afield for a full array of services in both the surrounding villages and Cambridge.

Linton also now benefits from The Linton Greenway, which is now significantly advanced, providing a quality active travel route between Linton and the Abingtons (including Granta Park) and the planned CSET2 Busway scheme, which will provide fast and direct public transport connections into Cambridge and the Biomedical Campus from a new Travel Hub on the A11 Junction at Fourwentways. The Secretary of State has confirmed the CSET Busway is expected to commence Inquiry in October 2026. Both schemes will materially improve the sustainability of the settlement in a way which we consider has not been reflected in the assessment of the village's potential to accommodate growth sustainably. It is expected that subject to approval, the CSET scheme will come forward as envisaged prior to or in a similar timeframe to the development of the site.

The supporting text to Policy S/DS: Development Strategy outlines that "We [Greater Cambridge] also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion". This acknowledgement is endorsed by Endurance Estates as recognition of the sustainability of villages in the Southern Cluster, which includes Linton. Despite this sensible admission, it makes the lack of any residential allocations within Linton difficult to understand, particularly with the transport enhancement schemes being brought forward by GCP with the express purpose of improving the accessibility of the Village to employment sites.

Endurance Estates contend that the omission of Land South of Horseheath Road fails to recognise Linton's accessible location and the likelihood that this will shortly be enhanced through planned public transport improvements, along with the good level of existing service provision. The site and village as a whole is outside of the Green Belt and the identified landscape constraints are capable of being overcome through a landscape-led design approach

Linton is therefore demonstrably a sustainable location capable for accommodating further housing growth to meet the identified local need and its allocation would be consistent with the strategy of focussing growth in the Rural Southern Cluster, close to existing employment sites. In this regard, Greater Cambridge should allocate Land South of Horseheath Road for a sustainable development of approximately 100 market and affordable homes within the village.

The Site remains Available, Achievable and Suitable for residential development.

**Land to the rear of Old House Road, Balsham (Site ID 115953, HELAA ID 40438)**

Endurance Estates objects strongly to the proposed Inset Map for Balsham on the grounds that it does not propose allocation of Land at Old House Road for residential development. The Policies Map proposes no residential allocations within the village, Endurance Estates are promoting Land to the Rear of Old House Road, Balsham which is considered capable of accommodating a scheme of approximately 25 new dwellings.

Crucially, draft Policy S/SH states that "limited development will help maintain remaining services and facilities and provide for affordable housing to meet local needs". This acknowledgement is strongly supported by Endurance Estates, however the lack of any allocated development to ensure the long-term vitality of the village's facilities is disappointing.

Balsham had a population of 1,623 as of the 2021 Census, which represents an approximate 1% decrease on the 1,641 residents recorded at the 2001 Census. This contrasts starkly with the wider South Cambridgeshire district, which grew by just under 25% in the same time period. This stagnation places the village's existing services at risk of further decline. As correctly identified by the supporting text to Policy S/SH, additional growth in villages such as Balsham is key to maintaining their vitality. Simply, without growth, the range of shops and essential services is likely to continue to deteriorate.

In terms Land to the Rear of Old House Road, there were no significant issues which cannot be mitigated through the scheme design which were raised in the 2021, 2023 or 2025 HELAA documents.

Endurance Estates contend that the Inset Map for Balsham should be urgently updated to ensure that controlled growth can come forward, in support of essential services through the allocation of sites such as Land to the Rear of Old House Road.

The Site remains Available, Achievable and Suitable for residential development.

**Land off the Causeway, Bassingbourn** (Site ID 116001, HELAA ID 40228)
**Land off Elbourn Way, Bassingbourn** (Site ID 116006, HELAA ID 40227).

Endurance Estates objects strongly to the proposed Inset Map for Bassingbourn on the grounds that it does not propose allocation of either Land off the Causeway, or Land off Elbourn Way for residential development. The Policies Map proposes no residential allocations within the village, despite it being a sustainable Minor Rural Centre. Greater Cambridge recognises that the village plays a role in providing services and facilities for a rural hinterland; however, the lack of allocations to secure controlled growth moving forward puts existing services at risk of decline.

Bassingbourn had a population of 2,351 at the 2021 Census which represents a marked decrease on the 3,090 residents that lived in the village at the time of the 2001 Census. This decline is in stark contrast with South Cambridgeshire, which grew by just under 25% in the same time period. There is therefore an urgent need to protect the vitality of the village to secure the ongoing provision of shops, services and community facilities. The Village currently hosts a good range of shops and services including a Spar Convenience Store, Public Houses and a community centre. The Village also benefits from Bassingbourn Primary and Bassingbourn Village College. Without additional growth in villages such as Bassingbourn, which play key roles in the delivery of shops and services for rural areas of South Cambridgeshire, the breadth and quality of key shops and services is likely to deteriorate, ultimately harming the sustainability of the settlement in the long term.

The Inset Map for Bassingbourn should be updated to reflect the role of the village as a Minor Rural Centre. Proportional and sympathetic extensions to the village, such as those proposed at Land off the Causeway and Land off Elbourn Way, are the best and most effective way to securing the continued viability of essential services and facilities and maintaining the vitality of the village in accordance with paragraph 83 of the NPPF.

The Site remains Available, Achievable and Suitable for residential development.

**Land at Hillside, Orwell** (Site ID 115802, HELAA ID 40496)

Endurance Estates objects strongly to the proposed Inset Map for Orwell on the basis of the omission of a site specific policy allocating Land at Hillside, Orwell for a residential development.

Orwell is categorised as a Group Village under draft Policy S/SH. The village has experienced moderate growth since the 2001 Census, increasing by approximately 6%. However, this is significantly below the growth rate of South Cambridgeshire, which saw population growth of just under 25% during the same period. As of the 2025 Regulation 18 Consultation, there are no residential allocations proposed within the village.

Orwell benefits from a Primary School, Public House, Post Office, Convenience Store and a Village Hall. The Village also has a good bus connection to Cambridge for a wider range of services.

Land at Hillside, Orwell, is promoted by Endurance Estates for a landscape-led development of approximately 26 dwellings. The 2025 HELAA did not assess the site as it was deemed to "not align with the wider Local Plan Strategy". Endurance Estates consider that this fails to consider the contribution that the Site could make towards a controlled and proportionate growth of the Village in

order to support essential services and facilities to maintain the vitality of the village in accordance with paragraph 85 of the NPPF.

Since the development at Hurdleditch Road was approved in 2016 (**S/3190/15/OL)**, no further major schemes have been approved in the village. Partly as a result of the lack of site allocations there within the Adopted Local Plan.

Department of Education records indicate that the Petersfield C of E Primary School has 134 pupils on roll and a capacity of 210, indicating that the school is currently operating at around 64% capacity. This suggests there is capacity for growth within the village, which would help safeguard existing services for the benefit of current and future residents.

The Inset Map for Orwell should be updated to reflect the capacity of the village for a controlled and proportionate level of growth to support the Village's services. This should include, as a minimum, Land at Hillside, Orwell for a residential development of circa 26 dwellings.

The Site remains Available, Achievable and Suitable for residential development.

**Conclusions**

Accordingly, for the reasons outlined above, Endurance Estates contends that Policy S/RRA is unsound. By focusing growth almost exclusively on strategic sites and constraining the range and distribution of housing growth by largely excluding growth at sustainable villages, the Plan risks:

- Failing to meet local market and affordable housing needs.
- Increasing commuting and associated congestion and emissions.
- Undermining the vitality and viability of village services and facilities.
- Over-reliance on a small number of large allocations, reducing delivery resilience.
- Failing to capitalise on committed transport investments, including: GCP Greenways and the CSET Busway Mass-rapid transit scheme;.
- Exacerbating affordability pressures and undermining the labour supply and economic growth ambitions of Greater Cambridge.

Accordingly, **the policy is not positively prepared, justified, effective or consistent with national policy.**

The allocation of a small number of additional, smaller and more easily deliverable sites in the Rest of the Rural Area, such as Endurance Estates sites listed above, would go some way to meeting this need, whilst also strengthening the Council's slim 5-year housing land housing supply buffer, which by the Council's own admission, is marginal upon adoption of the Plan.

**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

Site Plans for Linton, Balsham, Causeway Bassingbourn, Elbourn Way Bassingbourn, Hillside Orwell.

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

The proposed housing in the 'Rest of the Rural Area' should be increased to meet the National Requirements as set out in HO6 – namely, to allocate specific sites to meet at least 10% of the housing

requirement; a further 10% for medium sites (up to 2.5ha) along with other proportionate allocations to meet local needs with sufficient sites to support the village economies, local services and facilities.

Endurance Estates' Sites should be allocated for residential development as follows:

- Land South of Horseheath Road, Linton (Site ID 115248, HELAA ID 40554)
- Land to the rear of Old House Road, Balsham (Site ID 115953, HELAA ID 40438)
- Land off the Causeway, Bassingbourn (Site ID 116001, HELAA ID 40228)
- Land off Elbourn Way, Bassingbourn (Site ID 116006, HELAA ID 40227)
- Land at Hillside, Orwell (Site ID 115802, HELAA ID 40496)

**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.