25 September 2026

Greater Cambridge Shared Planning
South Cambridgeshire Hal
Cambourne Park
Great Cambourne
CB23 6EA

Neil Waterson

E: [redacted]
DL: [redacted]
M: [redacted]

Savills
Botanic House, 100 Hills Road
Cambridge, CB2 1PH
savills.com

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/JH: New Jobs and Homes

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 object to Draft Policy S/JH on the basis that the proposed requirement for both jobs and homes is insufficient to meet the real-world need in Greater Cambridge. In particular, it is Endurance Estates' view that the proposed housing requirement in the Proposed Submission Local Plan is insufficient to meet the area's housing needs given the level of planned jobs growth and the existing imbalance between homes and jobs. Accordingly, Endurance considers that **the Policy is unsound on the basis that it is not positively prepared, justified, effective nor consistent with national policy**.

For many years, Cambridge has proved a nationally and internationally significant knowledge-intensive employment hub. The UK Government, of both Conservative and Labour administrations, has consistently emphasised its strong ambitions for Cambridge, both in terms of housing delivery and economic growth. The Case for Cambridge[1] (March 2024) sets out that the life sciences and healthcare industry in Cambridge alone employs nearly 23,000 people with a turnover of £9 billion, and that building 150,000 new homes by 2050 could add £6.4 billion to the economy.

The Proposed Submission Local Plan aims only to meet the minimum housing need between 2024-2045 of 48,069 new homes but is seeking to meet a more aspirational job target of a minimum of 73,300 jobs. Endurance supports the increase in jobs being planned for in the Proposed Submission Local Plan to around 73,300 additional jobs, up from the 66,600 jobs referenced in the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023 and the 58,500 included in the Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021). Whilst the planned jobs growth is therefore heading in the right direction to meet the economic potential of the Greater Cambridge economy and is supported, Endurance considers that the same is not true of the planed housing growth and that the housing requirement is insufficient.

The Proposed Submission Local Plan proposes around 25% more jobs across the plan period than the First Proposals version of the Plan. Endurance Estates welcome the increase in the proposed jobs growth from earlier versions of the Plan. However, the significant increase in planned jobs growth has not been met by a corresponding increase in planned housing requirement, which has increased by only 8.5% more compared to the First Proposals Draft, against an increase of around 30% in the Standard Method figure since then. Endurance is concerned that this will result in an increasing disparity between the proposed jobs target and the housing target.

Endurance considers that Greater Cambridge needs to plan for a higher level of housing delivery to support planned jobs growth and begin to redress the imbalance between homes and jobs that has been holding back the local economy, as any other strategy jeopardises the continued economic success of Greater Cambridge.

The current Government is clear that they intend to capitalise upon the previous success of the region with Matthew Pennycook confirming in August 2024 that "We believe that the recent focus on

[1] https://assets.publishing.service.gov.uk/media/65f1d8edff11704896615973/The_Case_for_Cambridge_March_2024.pdf

Cambridge and its untapped economic potential are entirely warranted" but that "there remain significant barriers to realising the area's full potential".

The UK Government regard the Growth of Greater Cambridge as nationally important. The Government has issued statements outlining wide-ranging support for housing growth across the country. A July 2024 Ministerial Statement on 'Building the Homes We Need'[2] noted the following: "*Nowhere is decisive reform needed more urgently than in housing. We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home*."

Further, on the 23rd of August 2024, Matthew Pennycook (Minister of State for Housing and Planning) sent a letter[3] to local leaders to reiterate that Cambridge is central to the Government's priorities. The letter states: *"We believe that the recent focus on Cambridge and its untapped economic potential are entirely warranted…", "While I recognise that in recent years much has been delivered, there remain significant barriers to realising the area's full potential. The Deputy Prime Minister and I are determined to help remove them and overcome the issues that have held up planned development for essential housing and laboratory space."*

It is therefore clearly the intention of the UK Government to support significant economic growth in the Greater Cambridge area, and to facilitate this through the delivery of housing to tackle existing housing shortages and affordability constraints that have proved a barrier to the growth of the Greater Cambridge economy to enable the area to fulfil its full economic potential.

In this vein, the Government have established the Greater Cambridge Development Corporation which is tasked with delivering "transformational economic growth". Notwithstanding the emerging structure, it remains the view of Endurance Estates that Greater Cambridge Planning should not be relying upon the Development Corporation to deliver this step-change in growth which is envisaged by the Plan and should instead plan to meet this step-change in growth in the next Plan period.

Endurance consider that the Local Plan has failed to acknowledge or seek to begin to address the significant imbalance between the number of jobs and the number of homes within Greater Cambridge which is resulting in a growing reliance on in-commuting to service the growing number of jobs, leading to both unsustainable travel patterns and placing further strain on housing affordability. This is evidenced in the attached Greater Cambridge Economic Needs Assessment prepared by Savills.

The Councils' evidence[4] confirms that "a critical assumption informing the relationship between the number of jobs and homes - is imperfect." The reliance upon the 2011 Census data is understood, given the impact of Covid-19 on the 2021 data, however Endurance Estates contend that it is not robust to use "Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this" as the basis for justifying the housing requirement. These previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for this approach moving forward. This under-delivery versus employment growth is evidenced in the relatively low housing-to-jobs ratio of 0.63 – significantly below both the regional and national averages.

This approach risks entrenching this historic, unsustainable position. We therefore consider it is therefore disappointing that Greater Cambridge are content to pursue only the minimum housing requirements, effectively shifting residual housing demands into neighbouring authorities and as a result, embedding the unsustainable commuting patterns which are straining the infrastructure of the region and holding the City back.

---

[2] https://questions-statements.parliament.uk/written-statements/detail/2024-07-30/hcws48

[3] https://assets.publishing.service.gov.uk/media/66cdf3f68e33f28aae7e1f67/housing-minister-letter-to-greater-cambridge leaders.pdf

[4] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/TPGCLPDGCLPSTPDec25.pdf

The Councils' Development Strategy Topic Paper[5] (August 2026 - September 2026) makes no reference to commuting, despite this clearly being a key assumption of the strategy pursued.

Moreover, the Councils' Consultation Statement[6] Appendix 6: Response to Representations - Development Strategy states "Regarding commuting assumptions, the 2011 Census is used in the EHNU 2025, considering the issues at the time of the 2021 Census (pandemic enforced work from home). As a result, this means the Greater Cambridge modelling assumes a greater draw from other areas than the 2021 Census implies. This is the same approach taken as in previous iterations of the work. The Plan's Standard Method requirement already incorporates an uplift for affordability in its calculation; therefore, further uplifts are not considered suitable." Those previous iterations of the work were not sound, and taking the same approach now remains unsound.

As evidenced within the Government's Case for Cambridge report (March 2024), it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country.

The 2025 Affordability Ratio data from the ONS, published in March 2026, demonstrates that Cambridge and South Cambridgeshire remain unaffordable. Across England as a whole, median house prices equated to 7.6x median earnings. Across Cambridge and South Cambridgeshire this multiple was 10.82 and 9.31 respectively.

The attached Greater Cambridge Housing and Economic Assessment prepared by Savills' Economics' Team in support of these representations provides further detail and evidence on the growing disparity between homes and jobs within Greater Cambridge and the economic implications.

Endurance Estates therefore contend that **the Policy is unsound as it is not positively prepared, justified, effective nor consistent with national policy**. The Policy as currently drafted risks artificially constraining housing provision. In doing so, the Plan risks worsening affordability pressures, increasing in-commuting, restricting labour supply and constraining business growth. These potential pitfalls are 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.

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 (September 2026) prepared by Savills

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

The proposed housing target should be increased to 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 to more fully support the local economy and supporting planned jobs growth.

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, reduce in-commuting and enable Greater Cambridge to fulfil its full potential in accordance with Government objectives.

[5] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-08/PSDSTP2026_0.pdf
[6] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2026-08/Appendix 6_Response to Representations_Development Strategy.pdf

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.