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**CONSULTATION ON THE DRAFT GREATER CAMBRIDGE PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT
REPRESENTATIONS ON BEHALF OF ENDURANCE ESTATES**

Strutt & Parker have been instructed by Endurance Estates to submit representations to the Draft Greater Cambridge Planning Obligations Supplementary Planning Document consultation which closes on 17th October 2025.

Endurance is a privately owned property company based near Cambridge, which specialises in high quality, design led sustainable development. Endurance has a number of site interests in Greater Cambridge and, as such, welcomes the opportunity to participate in the current consultation.

We set out below relevant policy context followed by our comments in relation to the draft SPD in turn below. Comments are provided in the interest of collaborative working between Endurance and the Greater Cambridge Shared Planning Service.

Policy Context

With regard to development contributions, Paragraph 35 of the NPPF (December 2024) states:

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”

Specifically with regard to planning obligations, Paragraph 56 goes on to state that:

“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”

Paragraph 58 then goes on to confirm that Planning obligations must only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms.
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

These tests are set out as statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations). These tests apply whether or not there is a levy charging schedule for the area. (PPG Paragraph: 002 Reference ID: 23b-002-20190901)

Importantly, Paragraph 004 of the PPG in relation to Planning Obligations also states,

“It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.” (Reference ID: 23b-004-20190901).

Furthermore, Paragraph 008 confirms that:

“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.” (Reference ID: 61-008-20190315)

Endurance is concerned that there are a number of new requirements within the draft SPD which are being introduced without the comprehensive consultation and scrutiny typically afforded during the Local Plan examination process. As explained in further detail below, the draft SPD seeks to introduce new formulaic funding requirements and extends the remit of the Council's current policies to cover a wider range of matters than was previously the case. Endurance is concerned that the cumulative effect of these requirements in terms of development viability has not been considered in the round and considers that the inclusion of these new formulaic funding approaches is contrary to the guidance in the PPG referenced above and therefore is not appropriate.

As a result, it is considered that the SPD should be introduced alongside the new Greater Cambridge Local Plan. Should the Councils still wish to proceed with the SPD at the current time aspects of the draft SPD need to be removed and/or updated to ensure compliance with Government guidance. These concerns are discussed further in turn below.

Scope and Appropriateness of the SPD

Paragraph 1.2 of the Introduction Chapter notes that:

“The purpose of the Planning Obligations Supplementary Planning Document (SPD) is to provide supplementary planning guidance in support of the Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy of the Cambridge City Local Plan 2018 and Policy TI/8: Infrastructure and New Developments of the South Cambridgeshire Local Plan 2018.”

With that in mind, it is important that the SPD is consistent with the wider policy framework provided by the adopted Plans and do not seek to introduce new policies or unduly undermine the deliverability of planned development in accordance with PPG Paragraph: 008 Reference ID: 61-008-20190315.

Endurance is concerned that there are a number of areas where the Councils appear to be introducing new policy approaches which go beyond the requirements of the adopted Development Plan, contrary to Planning Practice Guidance. This includes:

- An aspirational target for 20% BNG (Chapter 6) that is not supported by adopted policies.
- Financial contributions towards Social and Community Support Services (Chapter 8).
- Financial contributions towards Burial Space (Chapter 13)
- A requirement for residential developments to contribute towards Local Employment & Skills (Chapter 19)
- A requirement for large commercial developments to provide affordable workspace (Chapter 20)

Endurance considers that there is insufficient policy support to justify the use of planning obligations for these services and is concerned that the Councils appear to be introducing new policy approaches which go beyond the requirements of the adopted Development Plan contrary to the PPG. As such, it is considered that the proposed approach within the draft SPD would not meet the statutory and policy tests within Regulation 122 and the NPPF.

Proposed Funding Formulas

Endurance notes that the draft SPD proposes a number of new or updated funding formulas for financial contributions towards various infrastructure or services potentially impacted by new development and which are based on the Council's Infrastructure Costings Review (July 2025). These include formulas for calculating:

- Off-site provision of Natural Greenspace within South Cambridgeshire (Chapter 5),
- Community Services (Chapter 7),
- Burial Space (Chapter 13)
- Public Open Space (Chapter 14); and,
- Indoor Sport (Chapter 16).

Endurance is concerned that these have not been tested in the round to ensure that the cumulative effect of the proposed contributions does not compromise the viability of development. It is noted that the Infrastructure Costings Review on which the new formulas are based has been produced to support the emerging Greater Cambridge Local Plan and Endurance therefore question its appropriateness as a basis for justifying increases in development contributions at this time, ahead of the adoption of the new Local Plan.

We would highlight that, according to the PPG (Paragraph: 004 Reference ID: 23b-004-20190901), it is inappropriate for plan-makers to establish new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not undergo examination and the effect on site viability and delivery cannot be considered in the round. We therefore question the Councils' approach in seeking to undertake major changes to planning obligations funding requirements through this SPD and consider that the proposed approach within the draft SPD would not meet the statutory tests within Regulation 122

Accordingly, to remedy this, the Councils should either delay the publication of the SPD until the new Greater Cambridge Local Plan has been adopted or at the very least remove these new formulaic funding requirements from the SPD.

Conclusions

Endurance is concerned that the draft SPD includes a number of requirements with regard to the imposition of planning obligations which either have no clear policy basis to support them, or which are not fully justified by robust evidence demonstrating a clear link between new development and potential impacts on those services. As such, these requirements would not currently meet the statutory and policy tests for imposing planning obligations as set out in Regulation 122 of the CIL Regulations and the NPPF respectively. Modifications to various aspects of the SPD are therefore required to address this.

Endurance is also concerned that the PPG introduces a number of new formulaic approaches to calculating the requisite planning obligations which have not yet been subject to the scrutiny and viability appraisal typically afforded during the examination process. As such, Endurance considers that the SPD does not accord with Government guidance within Planning Practice Guidance (Paragraph: 004 Reference ID: 23b-004-20190901), which clearly state that it is inappropriate for plan-makers to establish new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not undergo examination.

To remedy this position, it would be necessary to remove all new formulaic contribution requirements that were not in place at the time of the adoption of the two Local Plans from the SPD. A number of the sections should also be removed or modified to ensure compliance with the statutory tests at Regulation 122. It is suggested that the best approach would be for the Councils to bring forward an updated version of the SPD alongside the new Greater Cambridge Local Plan to enable further scrutiny or the new requirements and formulas proposed.

I trust that these representations are in order and will be given due consideration by the Council prior to finalising the SPD. Should you seek any clarification on the comments made please do not hesitate to contact me.

Yours faithfully

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