

Introduction

This document is produced for SmithsonHill Ltd (SmithsonHill). The contents of this document form SmithsonHill's response to the Draft Greater Cambridge Local Plan (GCLP) which was published for consultation by Greater Cambridge Shared Planning (GCSP) on 1 December 2025 and closes on 30 January 2026. SmithsonHill's interests relate to Land at Hinxton, hereafter 'the Site' (Housing and Employment Land Availability Assessment (HELAA) Site ID 200765).

The Site is located to the immediate north of the Wellcome Genome Campus expansion site, which has outline planning permission for a mixed-use development (LPA ref S/4329/18/OL). The Site extends to the A505 roundabout at its northwestern corner, with a parcel of land on the northwestern side of the roundabout close to Whittlesford Parkway Station also forming part of the Site – this is known locally as "Ricketts Field". The Site Location Plan can be found in the accompanying document 'Hinxton Masterplan Diagrams to support Repls 23 January 2026' produced by PTE.

Russell Smith Farms and The Hill Group jointly own the Site as SmithsonHill Ltd. SmithsonHill also holds an option over the Hinxton Grange land currently owned by the Derham family. The Hill Group is one of the largest housebuilders in the UK and is very active in the Cambridge market through its respective investment partnerships with Cambridge City Council and South Cambridgeshire District Council.

It is anticipated that the SmithsonHill response to this consultation will be made via the Local Plan's digital consultation system, and therefore each of the sections of the report will be added as a comment to a specific local plan policy. The relevant policy is indicated at the top of each section. With regards to the work and technical reports which rebut the HELAA conclusions for the Site, a dedicated 'Sites Form' will be completed. The content of Section 5 will be transferred into the relevant format.

The Site is not an emerging allocation in the GCLP, but its development would fit with the spatial strategy being pursued by the GCSP. Save for Ricketts Field, the Site is not in the Green Belt. It is a location which is highly sustainable for development, and it has the potential to create significant betterment for the sustainable and active travel potential of the Rural Southern Cluster more broadly.

Housing Need and Jobs

This section responds to **Policy S/JH: New jobs and homes**.

Policy Context

National Planning Policy Framework (NPPF) (2024) and Planning Practice Guidance (PPG)

For housing need, the NPPF ('Delivering a sufficient supply of homes') states that:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance." (NPPF para 62).

The PPG ('Housing and Economic Needs Assessment') sets out the 'standard method' which gives a minimum housing need figure based on housing stock and an uplift for affordability. This is (as per PPG ID 2a-004):

- 1 Step 1 – Setting the baseline – 0.8% of existing housing stock for the area; and
- 2 Step 2 – An adjustment to take account of affordability. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. For example, an authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline.

The NPPF goes on to state:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...” (NPPF para 69) (emphasis added)

A similar narrative is found in the PPG which states:

“The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations...” (PPG ID 2a-040) (emphasis added)

Also relevant is the NPPF on 'Building a strong, competitive economy' which states that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth... particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential...planning policies should...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing...” (NPPF paras 85-86) (emphasis added)

National policy recognises that housing plays a key role in supporting economic growth. Ensuring an alignment of housing and jobs is also a critical underpinning for all three objectives of sustainable development under the NPPF: economic (building a strong economy and ensuring sufficient land of the right types is available in the right places), social (supporting strong communities by ensuring a sufficient number and range of homes can be provided and by fostering well-designed, safe places) and environmental (making effective use of land, improving biodiversity and moving to a low carbon economy).

In places where housing growth is essential to support economic growth – as in Greater Cambridge – plan-makers must therefore have a clear understanding of whether the amount of planned housing growth is sufficient to support economic growth potential, considering demographic change, economic activity, unemployment, commuting and affordability. A failure to adequately understand the link between housing and economic growth risk serious negative economic, social and environmental outcomes, contrary to the sustainable development objectives of the NPPF.

Cambridge Context

It is difficult to overstate the economic importance of Cambridge within the national economy, and by extension the importance of ensuring Cambridge can reach its full economic potential. The Government has described the Oxford-Cambridge Arc as “a globally significant place, home to world-leading technology clusters”¹ which has the potential to “be one of the most productive places in the world”² and recognises the life sciences cluster in Cambridge as being the most productive in Europe, with 400 companies contributing £2.9bn to the UK economy and playing a critical role in developing the Covid-19 vaccine.

The Government is also seeking to support Cambridge’s economic growth potential through the establishment of the Cambridge Growth Company (CGC) which was set up to “address barriers to growth and help unlock Greater Cambridge’s full potential”³. It recognises Cambridge as “a place where world-class research, innovation and enterprise thrive alongside a rich mix of architectural, cultural and natural heritage” but that it is also the “most unequal city in England, with housing unaffordability, [and] traffic congestion, ... holding back further sustainable growth...”⁴.

Ambitions for economic growth are also recognised locally, with the recently published ‘Local Growth Plan’ by the Mayor of Peterborough and Cambridgeshire, Paul Bristow, setting “an ambition for Cambridgeshire & Peterborough’s economy to grow faster than any other region in the UK”⁵. Specifically, its baseline growth ‘business as usual’ scenario assumes annual economic growth at 1.2%, but this plan considers two further scenarios:

- Doubling our Economy: our core scenario - would see the Cambridge economy **double** in size by 2050 to £62.3bn GVA. The Local Growth Plan states “we can achieve this goal of doubling the size of the economy by addressing major constraints, allowing us to return to this competitive rate of 2.8%. By doing so, we will be able to achieve the central economic pledge of the CPCA from the initial devolution deal, ie to double GDP in 25 years”; and
- Aspirational Growth: our Growth ambition is to see the economy **triple** in size by 2050 to £97.1bn GVA, unlocking an economic powerhouse. Whilst the plan acknowledges that this level of growth would require a strong and co-ordinated effort, including with central Government intervention and devolution, it notes that “our historic Growth and track record demonstrate that we are one of only a few UK areas capable of achieving this magnitude of economic growth” (*emphasis added*).

Housing forms a key element of the Local Growth Plan as a vital element of infrastructure needed to support economic growth; the plan notes that “our area has the potential to be one of the world’s leading science, technology and innovation clusters. We already have the requisite inputs in terms of knowledge and skills, but this must be supplemented with infrastructure, housing and regional connectivity” (*emphasis added*). Housing and infrastructure are discussed at length throughout the Mayor’s plan.

As the economic centre of this economic region, the GCLP must address the issue of housing insofar as it is a barrier to economic growth. This includes ensuring that there is:

¹ House of Commons Library Research Briefing, July 2021 ([here](#))

² Creating a vision for the Ox-Cam Arc, July 2021 ([here](#))

³ About the Cambridge Growth Company, CGC ([here](#))

⁴ Why Greater Cambridge? CGC ([here](#))

⁵ Local Growth Plan, Cambridgeshire and Peterborough Combined Authority,

- 1 a sufficient **amount** of housing in overall terms, to provide for the labour supply needed to support economic growth across Greater Cambridge and Cambridgeshire;
- 2 provision of the right **types** of housing, including housing across a mix of tenures, types and sizes to ensure businesses (and public services) are able to recruit the workers they need and respond to changing economic demands; and
- 3 provision of housing in the right **places** to support sustainable transport modes and make best use of existing infrastructure.

GCSP's Evidence of Housing Need

Greater Cambridge Employment and Housing Needs Update (2025) (EHNU)

Approach to housing and population projections

The draft GCLP is underpinned by the EHNU⁶. This identifies that Greater Cambridge's **standard method housing figure is 2,295 dwellings per year** (of which 1,103 in Cambridge and 1,192 in South Cambridgeshire). Over the 21-year period – 2024 to 2045 - this equates to **48,195 dwellings**.

To develop a demographic projection for Greater Cambridge, the EHNU adopts its own assessment based on 10-year past trends, taking account of the 2021 Census⁷. It also factored in more recent mid-year population estimates (up to 2023) which were available at the time the EHNU was prepared and which post-dated the 2021 Census. The result was a projected increase in population across Greater Cambridge from around 322,000 in 2024 to 394,000 in 2045; an **increase of 72,000 people** or 22% (rounded, see ENHU Table 2.2).

To this population change, the EHNU applies projected rates of household formation and an allowance for the communal establishment population to estimate household growth. This gives household growth of **34,689** over the plan period, growth of **1,652 households per annum** 2024 to 2045 (see EHNU Table 2.4).

The EHNU notes that this household growth is well below the standard method housing figure, and as such a scenario is prepared which flexes (i.e. inflates) migration such that the standard method housing figure is 'filled'. This yields population growth of just over **105,000**, reaching over 427,000 by 2045. This represents a 33% increase over the period and is higher than the trend-based growth projection. It represents annual growth of 1.6%, which is also higher than growth seen over the last decade (1.4%). This projection also has a younger age structure than the trend-based projection, as younger / working age people are more likely to migrate. Whilst we broadly agree with the EHNU's approach in principle (i.e. increasing population growth to 'fill' housing, as more housing is provided) we have some concerns with how household formation and affordability has been considered within the assessment of housing need, which are explored later in this section.

⁶ The EHNU updates an earlier version from December 2022. For the purposes of assessing overall housing needs, the earlier version is no longer relevant as the policy context (in terms of NPPF/PPG) and data (due to the release of the 2021 Census results) have changed or been fully superseded since 2022.

⁷ This is because at the time of preparing the EHNU, the latest official projections were the ONS 2018-based projections which were not considered robust given they pre-dated the 2021 Census; Lichfields concurs for this and other reasons.

Whilst the standard method housing figure for Cambridge suggests growth in excess of past trends, this is still relatively modest given some of the economic context for Cambridge set out earlier, and the aspirations of local and central government to see Cambridge's economy grow rapidly. Therefore, it is important that GCSP consider whether economic factors suggest that population (and therefore housing) growth is even higher than the standard method indicates is needed, particularly in the context of NPPF paras 85-86.

We would also note that since this evidence was prepared, ONS has produced its first full set of population and household projections which post-date the 2021 Census; the 2022-based sub-national population and household projections. These projections also reflect more up-to-date assumptions nationally about levels of future long-term international migration; something which is a key influence on demographic change in Greater Cambridge. **It would be prudent for GCSP to consider these new data sets.**

Alignment with job growth and impacts on commuting

Below we explain the approach of the evidence to the relationship between economic growth and housing. We discuss the various scenarios and their inter-relationship, before going to address the more fundamental problem at the heart of the approach.

The Scenarios

The EHNU considers future economic growth scenarios for Greater Cambridge, broadly as follows; (1) a 'high' growth scenario which sees recent (10-year) job growth rates continue for the next 5 years, with a gradual return to the long-term (20-year) more balanced growth rate thereafter; and (2) a 'central' scenario which similarly sees recent (10-year) growth rates continue for the next 5 years, but with a quicker return to the long-term (20-year) balanced growth rate thereafter. The EHNU states that latter represents "*a more moderate but still a 'growth scenario' considerably above baseline forecasts, reflecting overall strong prospects in key sectors, but also the potential for full economic cycles and periods of slower growth within the future 20-year period*" (para 3.8).

Under the 'central' scenario job growth is forecast at **73,200 jobs** in Greater Cambridge over the plan period (2024-45) and under the 'high' scenario **90,900 jobs** (see ENHU Table 3.6). These equate to **3,486** and **4,329** jobs per year respectively, with the higher scenario being around 25% above the central. These are shown in the context of past trends at Table 3.7 of the EHNU, which shows trends over various 10-30 year periods. These range from c.2,400 jobs per year (1.2% compound annual growth rate) in the 2001-23 period to 4,000 (2.1%) per year in the 2010-20 period.

The ENHU concludes that "*the updated Central scenario is considered the most likely outcome. This relies on much of the future period seeing (very) strong growth of around 3,500 additional jobs per annum or more, which is higher than the 2001-23 rate, so in part relies on the growing economic base, but also builds in an assumption that there will be slower or contracting periods and unforeseen shocks, which is likely in most economies. The central is the preferred scenario based on the data available.*" (para 3.60).

However, it still notes that "*the high scenarios could be achieved or exceeded*", with this requiring "*a step change in infrastructure investment and development ... to facilitate growth, notably in transport to connect in and move labour, as well as in wider services infrastructure and the expansion of both*

housing and commercial development programmes... the higher scenarios here would be a policy on approach ...” (paras 3.61-62).

We welcome the consideration of the ‘high’ (or indeed, even higher) economic growth scenarios within the evidence base because economic growth is clearly an important factor in plan-making in Cambridge and it is crucial that this is supported by commensurate housing and infrastructure growth. The key questions therefore are (1) whether the planned level of economic growth in the draft GCLP aligns with wider aspirations for Greater Cambridge and (2) whether the draft GCLP contains an amount of housing that is aligned with this.

The EHNU assesses the likely population (and therefore housing) needed to support its ‘central’ and ‘high’ job growth scenarios (Section 4). The EHNU finds that the ‘**central**’ economic growth scenario would require **2,292** dwellings per annum (broadly similar to the standard method at 2,295) and that the ‘**high**’ scenario would require **2,829** dwellings per annum (see EHNU Table 4.6). Therefore, the ‘central’ scenario would provide a very similar number of jobs to that which would be supported by the standard method (para 4.21). In this context, we question whether the ‘central’ scenario is as pro-growth as implied in the EHNU, or whether it actually represents a more modest/business-as-usual future growth scenario, given it would occur simply by GCSP delivering the minimum amount of housing needed based on the standard method set by Government. **In the interests of ensuring Greater Cambridge exceeds expectations, this suggests greater weight should be given to the ‘high’ scenario as an aspirational yet realistic scenario.**

We note the reasons that these jobs-led housing figures are slightly lower than comparable figures in the 2023 evidence (ENHU Table 4.7 and para 4.30-31) and these appear logical. However, as highlighted above it would be prudent for GCSP to test that the EHNU’s findings remain robust in light of the 2022-based population projections.

In summary, the evidence therefore shows:

- The level of housing indicated by the standard method (around 2,300 homes per year) is said by GCSP to be sufficient to support the ‘central’ job growth scenario which sees growth of just under 3,000 jobs per year;
- The level of housing needed to support the ‘high’ job growth scenario of just over 4,300 jobs per year is said to be higher, at just over 2,800 homes per year;
- The two job growth scenarios should be seen in the context of past trends which have varied over different 10-30 year periods between around 2,400-4,000 jobs per year (growth rates of 1.2-2.1% per year), covering different lengths and economic cycles; and
- The EHNU concludes that the ‘central’ scenario is preferred for economic growth, and that the ‘high’ “*could be achieved*” but would be a “*policy on approach*” that would require a “*step change in infrastructure investment*”.

In our view, given that the ‘central’ scenario would likely be the outcome simply by delivering housing in accordance with the standard method, and given the ‘high’ scenario is only around 25% above this, we question how much of a ‘step change’ is actually required (above the jobs that would be seen if the ‘minimum’ amount of housing were delivered) to achieve the ‘high’ scenario, or indeed whether a true ‘step change’ would be a scenario associated with even higher housing and job growth.

This is particularly notable in light of the Mayor’s scenarios which suggest that a step-change in Cambridge could result in the economy of Cambridgeshire and Peterborough doubling or even tripling in size; over a 25-year period (i.e. to 2050) a doubling or tripling of the economy that would represent annual growth of roughly 2.9-4.5%.

The fundamental flaw in approach

All of the above is to assume that GCSP’s evidence adopts the correct methodological approach. In this regard, we have a further – more fundamental - concern on the statistical relationship between population, households and jobs with a particular focus on its approach to household representation rates (HRRs) and its lack of consideration of affordability. The real-world effectiveness of the approach as a means of showing needs will be met is not evidenced and the approach has an intellectual lacuna at its heart.

A function of the shortage of housing supply and crisis in affordability is that people are less able to afford to access homes, with increases in young adults living with parents or cohabiting with other young adults. GCSP’s evidence seeks to make an adjustment for this by adjusting HRRs to use 2014-based projections and to slightly increase household formation rates for 25-44 year olds to go halfway to those assumed in 2008 projections. It is considered that this approach is flawed primarily because:

- 1 There is no evidence that aligning the number of homes to jobs in the way assumed by the evidence will have the impact on affordability necessary for those in the 25-44 age group currently unable to afford homes to access them. There is no evidence around the supply-price-affordability relationship to support the idea that the statistical relationship of homes will enable the needs of that particular group to be met by simply limiting the increase in supply to the specific number of additional households in that group.
- 2 The premise of the standard method is to provide a level of housing over and above the assumed projection of households (i.e. demographic change) to improve - or at least moderate - the worsening affordability of housing⁸. All else being equal – including housing supply and population change - affordability worsens when incomes increase. This means that in a growing economy, even if the number of homes matched the population growth linked to the number of jobs, affordability would worsen unless the supply of homes is increased further to a sufficient extent that it impacts on prices. Matching the number of homes to the number of additional households driven by economic growth (as is the approach in the GCSP evidence) misses this crucial thinking. In other words, GCSP’s current approach provides no material uplift to housing supply that might be expected to improve affordability; as such GCSP’s current approach is likely to create a deterioration in affordability for younger and lower income households, rather than an improvement. This is a failure to meet needs. This would also result in businesses struggling to recruit due to problems of affordability for workers.
- 3 The adjustment HRRs to use assumptions from the 2014-based projections and to go ‘halfway’ to the 2008-based projections are not, themselves, meeting need given:
 - a That starting point from which projections look forward bakes in significant problems of affordability and a mismatch between homes and housing need in Greater Cambridge; even in

⁸ Affordability of housing being affect by households (i.e. demographic change), incomes, interest rates and supply - see MHCLG, Analysis of the Determinants of House Price Changes, 2018, cited in GLA, Housing Research Note 10: The Affordability Impacts of New Housing Supply, 2023

2012, Cambridge had an affordability ratio of 9.5 compared to 7.6 in East of England and 6.6 in England as a whole (Source: ONS)

- b There is no benchmarking of the 'as is' position in Greater Cambridge in terms of its relative position on affordability, concealed households, household formation and what this means about the level of housing required to meet needs and address the historic problems that exist.
- c The adjustment to HRRs only goes 'halfway' to the 2008 figure. It does not explain why it does not go 'all the way'.

In combination, the approach is a rather abstract, simplistic and two-dimensional approach. There is insufficient basis to conclude that, once the different job growth scenarios are considered, the evidential method is effective in identifying the number of homes that are genuinely necessary to support the economy. It is inescapable that it under-estimates the number of homes required to address the problems of affordability, the needs of different groups and address barriers to investment.

Notwithstanding both that the EHNU should test even higher economic-led housing scenarios and that the methodological approach does not represent 'need', below we consider how the EHNU's housing and employment findings have been taken forward within the draft GCLP and the misalignment even on the plan's own terms.

Proposed Housing Requirement in Plan

Our concerns with the draft GCLP's approach to housing and jobs, and why the draft GCLP as currently drafted is unsound, relates to three key issues:

- 1 The overall amount of housing and jobs proposed (including the approach to reasonable alternatives within the Sustainability Appraisal);
- 2 The approach to flexibility within housing supply and employment land supply; and
- 3 The potential implication arising from the lack of alignment between jobs and housing.

These issues are considered in turn below.

1. Overall quantum of housing and jobs

We have identified the flaws in the methodological approach to quantifying the relationship between need for jobs and homes. It does not take account of the latest projections. Its approach to HRRs is flawed and bakes in historic housing shortages in Cambridge City and South Cambridgeshire. Critically, it fails to recognise that an increase in households associated with extra economic activity and household growth will worsen affordability pressures, and there is no uplift for affordability in the methodology that would have any material impact on the ability of those groups – such as younger people and other concealed households – to better access homes at a price consistent with their incomes. Consequently, the draft GCLP is **not currently sound because its evidence is flawed and likely underestimates the number of homes necessary to meet the housing needs associated with increased levels of economic activity and thus overcome barriers to investment necessary to achieve it, contrary to NPPF paras 61, 63 and 85 and 86 (d).**

The overarching development strategy – in terms of overall number of jobs and homes being planned for in Greater Cambridge to 2045 – is set out at Policy S/JH of the plan. It states that development will meet the need for **73,000 jobs** and **48,195 (minimum) homes**. If one accepted the EHNU

methodology (which we do not), this aligns with the ‘central’ job growth scenario, which the EHNU states is supported by the standard method housing figure.

But of course, the strategy represents no more than the ‘business as usual’ or ‘baseline’ economic growth that would be expected if housing delivery were in line with the standard method. In this respect, the draft GCLP is therefore **not currently sound** because it is **not consistent with national policy (specifically paras 85-86) as required by NPPF para 36(d)**.

Within the supporting text (para 2.10) the draft GCLP states “for jobs, the [EHNU] central forecast assumes strong growth of around 4,000 additional jobs per annum ... We consider that we should plan for this forecast of the most likely level of new jobs”. This statement is not reflective of the EHNU, which clearly shows (Table 3.7) the ‘central’ scenario being associated with 3,490 jobs per year. In fact, a figure of 4,000 jobs per year is actually closer to the ‘high’ scenario, which Table 3.7 of the EHNU shows is 4,330 jobs per year. **The assertion that the policy is planning on the basis of around 4,000 jobs per year is therefore not in accordance with the GCLP’s own evidence (were it to be accepted on its own terms) and is misleading.** Over a 21-year plan period the difference between the number of jobs indicated by the ‘central’ scenario (3,490 per year) and those asserted in the GCLP (4,000 per year) is nearly 11,000 jobs. The draft GCLP is therefore **not currently sound** because it **does not reflect its own evidence, as required by NPPF para 36(b)**.

Scenarios for growth quantum assessed in Sustainability Appraisal

The PPG (on SEA and SA) states that

“the sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach...., reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made” (PPG ID 11-018).

The Sustainability Appraisal of the draft GCLP (October 2025) sets out the background to the reasonable alternatives that have been considered for the overall quantum of housing and job growth underpinning Policy S/JH, including the rationale (this is separate to the reasonable alternatives that are tested for the spatial distribution of growth, which are set out earlier in the SA in Chapter 4). Within the SA (p.178) GCSP set out that draft Policy S/JH is the preferred option in terms of overall growth quantum because it meets the minimum standard method and the ‘most likely’ job growth scenario. It goes on to state:

“B. Alternative option - Planning for the higher jobs forecast (2025) and level of homes associated with it. This alternative was not assessed as it was not considered to be reasonable. This is because while the higher jobs forecast could be possible, it is not the most likely future scenario. As such the Councils did not consider that it represented the objectively assessed need, and would therefore not be a reasonable alternative.

C. Alternative option - Planning for a lower housing need that does not meet the government’s standard method local housing need figure. This alternative has not been assessed as it is not considered to be reasonable. This is because it would not support the most likely forecast for future jobs, and would not be compliant with national policy.”

The assertion that the higher jobs forecast is not ‘reasonable’ is not consistent with the EHNU and other evidence of economic growth potential set out previously. Furthermore, excluding it on the basis that it is ‘not the most likely scenario’ does not withstand basic scrutiny; applying this logic, any SA would only test one scenario - the most likely - which is clearly not the purpose of SA.

We concur that a lower growth option would not be a reasonable alternative given the standard method is clearly identified as a minimum in national policy, and the wider aspirations for growth in Cambridgeshire set out by Government. However, given the ‘high’ job growth is only c.25% above the ‘central’ (which can be considered a baseline level of job growth, since it would arise based on the minimum amount of housing that must be provided in any event), it is clear that the ‘high’ job growth scenario represents a reasonable alternative that should have been tested through the SA. Furthermore, other levels of economic growth (e.g. as outlined by the Mayor) would put housing and economic growth well in excess of the ‘high’ scenario.

On this basis, the draft GCLP is **currently not sound** because is it not **justified** (NPPF para 36b), insofar as the overall development strategy has effectively **not considered any reasonable alternative growth quantum scenarios. This can be addressed by updating the SA to include alternative, higher, housing and job growth scenarios.**

2. Flexibility in housing and employment provision

Housing

Table 4 of the draft GCLP shows that GCSP’s total identified housing supply amounts to 51,328 homes (excluding North East Cambridge), giving a 6.5% buffer above the minimum requirement of 48,195 dwellings set out in Policy S/JH. When North East Cambridge is included, the total supply increases to just over 55,000 dwellings which represents 14.7% buffer.

In theory, if all of the identified housing supply came forward, this would equate to between 2,444 and 2,632 dwellings per annum being delivered over the plan period. This would fall short of the number of homes needed to support the ‘high’ growth scenario, which is in itself:

- 1 An under-estimate of true housing need associated with the ‘high’ economic growth scenario, on the basis that the EHNU’s assessment does not contain a ‘true’ market signals uplift to housing provision that would materially improve affordability; and
- 2 The ‘high’ economic growth scenario is only a modest (25%) uplift in jobs over the ‘central’ scenario, so is unlikely to be a realistic picture of aspirational economic growth.

Even if all housing supply identified in the draft GCLP came forward, the plan would fall short in delivering enough housing to support the ‘high’ scenario by between c.4,000 and c.8,000 homes (depending on whether the North East Cambridge allocation is included). We consider this is the absolute best-case scenario for housing supply given that it is inevitable that not all housing supply will come forward (for example if there are changes to site capacity, changes in deliverability of sites, competition in the market, changing demand for other uses, etc).

This lack of flexibility in housing supply is important context for GCSP’s approach to employment land flexibility, which is discussed below.

Employment land

The supporting text of the draft GCLP for S/JH goes on to state that GCSP is “mindful that EHEU identified a higher job growth forecast, placing greater weight on rapid growth in the recent past, particularly in key sectors, and that it recommended providing flexibility in employment land in case the market delivers more jobs than anticipated” (para 2.11). As a result, the employment land supply for key sectors is 302,600sqm offices, 600,000sqm R&D and 317,000sqm industrial/warehousing (para 2.12). These reflect the recommended quanta of different types of floorspace set out at 5.30-40 of the EHNU.

However, it is important to consider how these recommended requirements relate to the labour-demand based floorspace requirements. Whilst it is acknowledged that there may be a need to plan for more employment space than required (based on labour demand) for a variety of reasons (e.g. to allow for flexibility, take account of losses, vacancy, reflect market signals, allow for choice, to reflect past trends, etc), if there is a substantial misalignment between the likely number of jobs created and the amount of labour supply generated by housing growth there is a real risk of negative sustainability outcomes (as discussed later in this section).

The EHNU sets out the labour-demand based floorspace need results by sector at Table 5.2; these figures already include an allowance for flexibility and vacancy. These show that for the ‘central’ scenario there is a labour-demand floorspace need for [figures rounded]:

- Office space at 280,000sqm, which is slightly below than the 302,600sqm cited in the plan;
- R&D space at 380,000sqm, which is substantially below than the 600,000sqm cited in the plan; and
- Industry and warehouse (combined) at just over 125,000sqm which is substantially below than the 317,000sqm cited in the plan.

For the ‘high’ scenario the labour-demand floorspace need is for 328,000sqm, 543,000 sqm and 150,500sqm for each sector respectively. This shows that the amount of R&D floorspace being planned for exceeds – by a significant margin – the amount needed based on labour-demand under even the ‘high’ scenario, and this is even more so the case for industry/warehousing (which is being planned for at over double the amount based on labour-demand).

This shows that based on GCSP’s own evidence (which on housing and jobs under-estimates need), **it is planning for a level of employment growth which substantially exceeds its ‘central’ scenario** and which forms the basis of the housing requirement. If all (or even most) of this floorspace came forward it would **likely exceed even the ‘high’ labour demand scenario**.

We welcome the upward flexibility in the amount of employment floorspace being planned for (and indeed, consider this could go even further in light of factors discussed earlier) as this will be key to achieving economic growth aspirations; but it must be supported by commensurate upward flexibility in (and thus delivery of) housing. As we have described above, whilst there is some flexibility also built into GCSP’s housing supply, even if this all came forward it would still fall short of the housing need under the ‘high’ economic growth scenario by around 4,000-8,000 homes over the plan period. However, given the draft GCLP’s employment strategy is likely to result in job growth that exceeds even the ‘high’ scenario, the shortfall in housing (which is needed to sustainably support job growth) is likely to be far greater than this.

On this basis, the draft GCLP as drafted is **not currently sound** because:

- It is not **positively prepared** (NPPF para 36a) as it does not meet the area’s objectively assessed development needs; and
- It is not **justified** (NPPF 36b) as it’s evidence base does not show that it would result in an aligned housing and employment strategy, that is consistent with sustainable development.

3. Potential impacts of lack of alignment between jobs and housing

Unsustainable Commuting Patterns

As shown above, GCSP’s employment strategy is likely to yield jobs even in excess of the ‘high’ job growth scenario (which is welcomed), yet – even on the terms of its own evidence (which we consider under-estimates the number of homes required to meet needs) - it is only planning for enough homes to meet the ‘central’ scenario. If there is an insufficient number of workers living close to employment growth arising in Greater Cambridge, this would certainly create the need for workers to travel further, into Greater Cambridge from elsewhere, leading to long-distance unsustainable commuting patterns.

The [2011] Census shows that for people commuting into Greater Cambridge from elsewhere, the vast majority – **nearly 80% - travel by car** (this actually rises to 84% when people who travel as passengers are included)⁹. Although the completion of East-West Rail might be expected to achieve some shift in commuting patterns, this will only occur insofar as (1) housing development outside Greater Cambridge is focused on areas where EWR stations are proposed, and (2) those people travel to employment opportunities in Greater Cambridge that are accessible via EWR stations. It should be noted that East-West Rail would be unlikely to impact the Rural Southern Cluster, where the Site is located, due to the areas it serves. The same two points are true for other transport initiatives, such as the Cambridge South East Transport (CSET) programme which includes a new busway between a new A11 travel hub and Cambridge Biomedical Campus.

On this basis EWR (and other initiatives) are still fundamentally unlikely to shift the balance of in-commuting into Greater Cambridge away from the private car being the predominant mode of transport. This is especially true for employment centres (such as research campuses) that are spread across the rural part of South Cambridgeshire. A strategy in which employment growth in Greater Cambridge is not matched by commensurate housing growth within the area will therefore almost certainly result in an increase in in-commuting to Greater Cambridge, the majority of which will be by private car, with knock-on impacts on traffic/congestion, air quality, climate change and overall quality of life.

For these reasons, we also dispute the finding of the SA regarding the overall development strategy in Policy S/JH, which states “*the housing target is supported by a substantial level of job growth in the area, which is likely to help support self-containment and minimising long distance commuting, as Greater Cambridge residents will be able to benefit from nearby employment opportunities*” (SA para 5.30). The substantially higher levels of job growth likely to be generated by the draft GCLP will clearly not result in self-containment given they are not matched by an equivalent level of housing, as set out above.

⁹ Source: Census 2011 Location of usual residence (UK, less those living in Greater Cambridge) and place of work (Greater Cambridge) by method of travel to work (WU03UK). 2011 Census trends have been used for the same reasons they are adopted by the Council’s evidence: the EHNU.

Affordability

Over the last decade housing affordability (the ratio of prices to workplace earnings) has been consistently high in Cambridge City at around 12-14 times workplace earnings and in South Cambridgeshire at around 10-12. This compares with the national average of around 7.

We have explained in our representations to Policy S/JH that the draft GCLP's evidence does not properly consider the relationship between population, households, homes, interest rates, jobs and incomes. Its statistical calculation makes no allowance for price elasticities and thus the level of additional supply that would be needed to moderate house price-income relationship taking into account the additional levels of financial demand being injected into the local economy by the economic growth anticipated by the plan. It is therefore under-estimating the number of homes required if the economic growth scenarios are to be achieved alongside improvements in housing affordability.

A lack of housing relative to demand (driven by employment growth) is likely to contribute to a further worsening of housing affordability (both for housing to buy and to rent), making it difficult for lower wage workers in particular to access housing close to near where they work. Further worsening of affordability could result in business and public services that rely on lower paid workers struggling to recruit and retain workers. This would also result in a knock-on impact on the demand for affordable housing, which would increase as fewer people are able to meet their needs in the private market.

Business resilience and competitiveness

A shortage of labour supply generally could in turn undermine local businesses and services and their ability to recruit and retain workers. Across all income levels, the immobility of workers undermines agglomeration benefits and could lead to reduced competition between businesses, stifling economic growth. Businesses may choose to locate elsewhere, either within the UK or internationally which would undermine Greater Cambridge's (and the wider Arc's) position as the potential global leader in education, life sciences, technology and other sectors. Stifling economic growth in Cambridgeshire in this way would also certainly undermine wider regional and national economic growth prospects.

Impacts on sustainable development

An employment strategy which is not aligned with the housing strategy is fundamentally contrary to a number of national policy objectives, including;

- 1 The NPPF's overall objectives of sustainable development (para 8) which include:
 - a An economic objective to ensure land of the right types is available in the right places and at the right time to support growth; and
 - b An environmental objective to protect the natural environment including by minimising pollution and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2 The NPPF's presumption in favour of sustainable development (para 11) which states that "*all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change ... and adapt to its effect*".

- 3 In the context of ‘Building a Strong, Competitive Economy’, which states that planning policies should:
 - a *“help create the conditions in which businesses can invest, expand and adapt”* (NPPF 85) – the conditions in Greater Cambridge will not provide sufficient housing to support job growth, will actively work against this objective, as businesses will be reliant upon attracting workers to travel in from further afield, limiting the labour pool which they can draw upon and potentially undermining business growth;
 - b The NPPF goes on to state that *“this is particularly important where Britain can be a global leader in driving innovation”*. This is clearly applicable in Cambridgeshire which consistently ranks amongst the most productive parts of the country and is a world-renowned centre for education and innovation; and
 - c *“seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”* (NPPF 86c). In the context of Greater Cambridgeshire, insufficient housing (in appropriate proximity to jobs, as indicated by GCSP’s clear reliance on significantly increasing in commuting from elsewhere) would represent a clear and serious barrier to investment and job growth, whilst also placing further unnecessary pressure on infrastructure, particularly highways.

- 4 As set out in our response to Policy S/AMC/WHD, in the context of ‘Promoting Sustainable Transport’, the NPPF states:
 - a “Transport issues should be considered from the earliest stages of plan-making and development proposals, so that...c) opportunities to promote walking, cycling and public transport use are identified and pursued” (NPPF para 108). These opportunities are fundamentally affected by an authority’s spatial strategy, and ensuring that sufficient housing is delivered close to job growth, which is not the case in Greater Cambridge;
 - b “The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (NPPF para 109, emphasis added). The draft GCLP’s strategy does not make the most of assets that already exist (e.g. Whittlesford Parkway Station) which are focussed around established and growing areas of employment; and
 - c Planning policies should *“support an appropriate mix of uses across an area, ... to minimise the number and length of journeys needed for employment...”* (NPPF para 110) – again, the draft GCLP’s does not make the most of assets they already have (e.g. Whittlesford Parkway Station) which are focussed around established and growing areas of employment.

- 5 In the context, of ‘Meeting the Challenge of Climate Change’, which states:
 - a “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions” (NPPF para 157) – the spatial strategy of the GCLP will be highly reliant on increased commuting by car, it needs to make the most of assets they already have (e.g. Whittlesford Parkway Station) which are focussed around established and growing areas of employment which will negate these car journeys for work; and

- b “New development should be planned for in ways that...b) can help to reduce greenhouse gas emissions, such as through its location” (NPPF para 159). This directly links to the above points that the draft GCLP’s plan’s does not make the most of sustainable transport assets they already have which are focussed around established and growing areas of employment.

The draft GCLP is therefore **not currently sound as per NPPF para 35(d) because it is not consistent with national policy**. In fact, it is highly contrary to national policy across a range of areas, as identified above. The misalignment of jobs and housing would also clearly undermine the overarching vision of the plan, which is:

“We want Greater Cambridge to be a place where impacts on our climate and environment are significantly reduced, balanced with the continued flourishing of our internationally significant innovation economy, and an increase in the quality of everyday life for all our communities. New development must minimise carbon emissions and reliance on the private car....”

It also undermines almost all of the draft GCLP’s strategic priorities, which are:

- Climate Change: Help Greater Cambridge transition to net zero carbon by 2050, by ensuring that development is sited in places that help to limit carbon emissions;
- Great Places: Sustain the unique character and identities of Cambridge and South Cambridgeshire, and complement it with beautiful and distinctive development, creating a place where people want to live, work, visit and play;
- Wellbeing and Social Inclusion: Help improve equality of access and opportunities for people in Greater Cambridge to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs;
- Homes: Plan for enough housing to meet our need, including significant quantities of housing that is affordable to rent and buy, and different kinds of homes to suit our diverse communities; and
- Jobs: Encourage a flourishing, dynamic and mixed economy in Greater Cambridge which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation

Summary: Proposed Housing Requirements

Overall number of homes and jobs

The economic importance of Cambridge within the national economy is recognised by local and central government, and the **planning system must ensure Cambridge can be supported to reach its full economic potential**. National policy is clear that **significant weight should be given in planning to the need to support economic growth**, particularly where Britain can be a global leader in innovation; clearly this applies to Cambridge. National policy and guidance is also clear in the **role that housing must play in supporting economic growth**, and ensuring it does not act as a barrier.

It is therefore **concerning that Greater Cambridge is only planning to meet the ‘minimum’ level of housing need** set out by government in national policy (with a modest buffer in the housing supply) and even on its own evidence (which we dispute) it is not aligning its housing ambitions with those it holds for the economy. This raises the fundamental question; if an area such as Greater

Cambridge only needs to plan for the ‘minimum’ level of housing need expected by Government, then what area would be expected to go above this minimum? There are surely no areas nationally where the economic growth imperatives in NPPF para 85-86 apply more than in Greater Cambridge. We are also concerned that **the Sustainability Appraisal fails to consider any reasonable alternatives aside from the preferred strategy**; this does not reflect the PPG.

For these reasons, we also disagree with the ENHU that the ‘high’ growth scenario (which sees job growth around 25% above the ‘central’ job growth scenario [which aligns with the standard method]) represents a ‘step change’ in economic circumstances. To the contrary, it represents a relatively modest increase on the level of job growth that is likely to occur by planning for the minimum amount of housing. The Mayor’s plan discusses scenarios which could see the **local economy double or even triple in size**, far exceeding past trends or **any scenario tested in the EHNU, and such scenarios should be explored within the evidence base (EHNU and SA)**.

Alignment of housing and jobs

The draft GCLP’s policy seeks to deliver the **minimum amount of housing need** set out by the standard method, yet as discussed, its **employment strategy is highly likely to yield job growth in excess of even the ‘high’ scenario** in the EHNU. We consider job growth aspirations could be higher still, but if the ‘high’ growth scenario is pursued, this **must be matched by commensurate housing growth** in order to represent sustainable development. GCSP’s evidence does not adequately address the relationship between homes and jobs given historic trends and the drivers of affordability. Even on its own terms, at present, the draft GCLP’s strategy is likely to result in a **shortfall of at least 4,000-8,000 homes overall, if not many more** (to address affordability pressures arising from extra economic growth); if most or all of the anticipated employment comes forward; or if the amount of employment land allocated increases to reflect greater economic aspirations).

The misalignment of housing and jobs will result in a substantial number of **negative outcomes** for **commuting** patterns (and by extension, traffic/congestion, air quality, climate change, and health and wellbeing), **affordability** and overall **economic growth**. It is contrary to a number of policies in the NPPF across these themes and also would **undermine virtually all of the draft GCLP’s strategic priorities**.

Housing Supply

This section interrogates the realism of the housing trajectory assumptions in the Cambridge Housing Delivery Study Addendum October 2025 (‘the trajectory’) in the context that the ‘best case’ scenario for housing supply over the plan period would create a deficit by between c.4,000 and c.8,000 homes (depending on whether North East Cambridge is included) relative to the ‘high’ growth employment scenario.

Even setting this aside, the trajectory presents only a modest 6.5% buffer (excluding North East Cambridge) against the minimum requirement of 48,195 dwellings aligned with the standard method.

In general, we wish to highlight the overreliance that the trajectory places on recent policy changes (rather than evidence) when asserting that there is no need to revise delivery assumptions made in the Council’s initial 2021 Housing Delivery Study (‘the 2021 study’).

Assumed delivery and build out

The trajectory references the relatively high build-out rates achieved in Greater Cambridge, attributing this to high demand and growth. The trajectory appears to suggest that the Councils' comparatively high affordable housing policy (40%, with 50% applying on Green Belt sites) will have the effect of increasing delivery/build out rates. In so doing, the trajectory cites Lichfields' 2024 Start to Finish 3 (StF3) research which records relatively high annual delivery rates on schemes such as Cambourne and North West Cambridge.

Further, the trajectory highlights the widespread issue around stalled sites and delayed phases nationally which leads to the under delivery of housing. It also highlights the current difficulties associated with affordable housing delivery in England, related in a large part to uncontracted units causing developer uncertainty and financial exposure. In spite of this, the trajectory asserts at para 2.40 that there is no need to revise delivery assumptions in the 2021 study, despite noting the increasingly unreliable levels of affordable housing delivery, and the effect that this has on the sites coming forward. We disagree with this conclusion.

Crucially, the trajectory fails to acknowledge the role of viability in the ability of sites to come forward, whether that is once planning permission is granted or before (in S106 discussions). It appears to follow a truism that meeting high housing demand in Cambridge will be supported by the delivery of a high proportion of affordable housing versus market housing. However, sites which do not yet have planning permission are now required to meet a range of policy requirements introduced since the original 2021 trajectory was released (such as BNG). They may also be subject to high infrastructure costs associated with certain schemes (such as potential contributions to the relocation of the Cambridge Waste Water Treatment Plant, noting that this is currently unfunded). Further, in the period 2021 to 2026, developers have had to account for an exponential estimated increase in build costs of c.20% between October 2021 and 2025¹⁰. These are expected to rise further, by as much as 15% by 2030¹¹. This issue was recognised in a December 2025 letter from Matthew Pennycook MP, Minister for Housing and Planning¹², which recognised the effect of the “*coronavirus pandemic, increased construction costs, high interest rates, regulatory changes and wider economic conditions*” on the deliverability of housing developments.

Finally, to the trajectory fails to take account of the slowdown in market absorption due to the affordability challenges which, since 2022 and the abolition of Help to Buy, have had no Government solution in terms of first-time buyer support. This is widely recognised across the sector as slowing the pace of build out of market homes on sites compared to what might have been expected in the period that is captured in the evidence base. This is particularly acute in the areas with the highest values (i.e. least affordable). Therefore, perhaps counter intuitively, the areas with the highest levels of value and past experience of strong demand (such as London, but which would include Cambridge), are now seeing reduced rates of build out. The issue explains why there have been reduced real-world demand for particular property types in Cambridge over recent years – notably apartments on some sites. This is something Hill has observed in its other projects in Cambridge (and elsewhere).

¹⁰ https://www.bcis.co.uk/insight/cil_index/

¹¹ <https://www.bcis.co.uk/news/bcis-construction-infrastructure-forecast/>

¹²

https://assets.publishing.service.gov.uk/media/6967728797d42030a67b0d67/Letter_from_Minister_of_State_for_Housing_and_Planning_to_the_Planning_Inspectorate_Modifying_planning_obligations.pdf

High development costs and Cambridge's high affordable housing policy, hold significant potential to undermine the viability and/or pace of build out of schemes. With the above in mind, the trajectory should consider the effect that **lack of first-time buyer demand, high affordable housing requirements and other layers of policy may have on the deliverability of sites within the plan period**, and indeed, any delays associated with the need to revisit schemes which are no longer viable.

Effects of delay and/or abandonment

Within Appendix E of the trajectory, there are three proposed allocations (Cambridge East (airport), Cambridge Biomedical Campus and Grange Farm) anticipated to deliver an average of c.315 units per annum (950 total) in the final three years of the proposed plan period (2042/43 to 2044/45). If delivery on all three of these sites was delayed by three years, this would result in practically no buffer against the minimum requirement of 48,195 dwellings, compared to the current 6.5% (all else being equal).

The draft GCLP relies on larger schemes for development, but delivery of such sites is inherently more complicated to bring forward, especially where there are significant infrastructure requirements and multiple landowners.

If any existing commitments become stalled or lapse (for example if there are changes to site capacity, changes in deliverability of sites, competition in the market, changing demand for other uses, etc), this situation will only worsen. A greater buffer will give flexibility for such circumstances. In this context, we recommend:

- 1 15% should be the minimum buffer if North East Cambridge is not included, and the current growth assumptions are taken forward. This would require an uplift of at least 4,096 homes within the proposed plan period which are not currently allocated; and
- 2 20% should be the minimum buffer if North East Cambridge is included, to allow for potential manifestation of recognised difficulties associated with the delivery of this Site. This would require an uplift of at least 2,445 currently unallocated homes within the proposed plan period.

Whilst the above relates to the planned growth scenario, these buffers (as a percentage) should be applied to whichever growth scenario is eventually adopted. On the basis that more housing sites should be allocated, the Site has an advantage as a larger development which has less uncertainty around delivery (being in the control of a housebuilder) and some 'plug and play' infrastructure (as set out in the accompanying Transport Summary document for the Site produced by Rappor).

Other comments

Windfall allowance

The draft GCLP plans for the delivery of 7,225 homes on windfall sites.

The trajectory asserts at para 2.103 to 2.106 that in spite of recent downward delivery trends on windfall sites, it has not been necessary to revise the assumptions in the 2021 study. In so doing, it states that recent changes to policy are likely to lead to a restored level of windfall delivery. However, this is not justified by compelling evidence and therefore falls short of para. 75 of the NPPF.

In addition, the Councils should consider the undesirability of maintaining high windfall assumptions and instead seeking to allocate a greater number of sites. Promoting greater levels of delivery on

allocations and lower levels on windfall sites would give Councils a greater level of control over development coming forward. By allocating more sites, with accompanying policies designed to meet the strategic goals of the plan, the Councils could facilitate a more joined-up approach to development for the 7,225 homes currently anticipated on windfall sites. This would encourage plan-led development, in line with the NPPF's ambitions. Furthermore, windfall development is inherently uncertain, it is hard to plan the necessary infrastructure around such a significant scale of windfall development, especially if it comes forward in a piecemeal nature.

It is also of relevance that the proposed NPPF is currently undergoing consultation which would give a "default yes" to development in many locations not allocated for development in this draft GCLP, including Green Belt locations which are within reasonable walking distance of a train station. From a decision-making perspective, it is inevitable that the Councils will have to consider this policy in the near future, regardless of whether sites in such locations appear as allocations in this emerging local plan. In the context of such a significant windfall figure, there is opportunity for the Plan to allocate land now to address this.

Employment Growth: Net market additions

We would challenge the Councils to consider which elements of the housing trajectory can be directly linked to existing expansion initiatives and therefore have a limited effect on the availability of housing overall. For example, on schemes such as the Wellcome Genome Campus extension (Policy S/WGC) where proposed housing growth will directly serve the expansion of the campus and require residential properties to be occupied by workers on the campus, it would be reasonable to argue that housing supply does not have a net positive effect on the availability of housing for existing residents of Greater Cambridge.

The Councils should consider the extent to which new housing delivery in the trajectory will serve different market needs. This should consider existing and future housing needs of different groups, as well as growth scenarios (both scheme specific and general).

Summary: Housing Supply

Overall, as currently drafted, the draft GCLP is **unsound** due to the overall number of homes and jobs not being aligned, insufficient headroom to the housing trajectory to ensure even the modest standard method housing need figure could be met, and the inclusion of an extraordinary high windfalls figure for unplanned development across the plan period:

- It is not **positively prepared**, as required by para 36a;
- It is not **justified**, as required by para 36(b); and
- It is not **consistent with national policy**, as required by para 36(d).

These issues can be addressed by ensuring GCSP has a clear and realistic understanding of likely levels of employment growth within the evidence base, assessing how much housing is needed to support these levels of employment growth, considering a range of reasonable alternatives within the SA and providing policy/ies which provide for aspirational job growth along with aligned levels of housing growth. The spatial dimension of the proposed strategy and its implications on sustainability are considered further in response to Policy S/DS of these representations.

Furthermore, the allocation of more sites for residential development will add clarity to the housing trajectory rather than the current uncertainty for significant unplanned growth through windfalls. An increase in the headroom (or buffer) to the housing requirement will help to mitigate the ongoing impacts being felt through the slowdown in market absorption due to the affordability challenges. This will ensure the GCLP is positively prepared by providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and justified based on an appropriate strategy based on proportionate evidence.