Land at Hinxton Grange

Smithson Hill representations to the Greater Cambridge Regulation 19 Local Plan

Smithson Hill

25 September 2026

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk

© 2026 Nathaniel Lichfield & Partners Limited (trading as "Lichfields"), All Rights Reserved, is registered in England, no. 2778116.
Registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.
Formatted for double sided printing.
Plans based upon Ordnance Survey mapping with the permission of His Majesty's Stationery Office.
© Crown Copyright reserved. Licence number 10007707
70133/01/MS/RC
41635049v1

2.0 Policy S/JH: New jobs and homes

2.1 This section responds to Policy S/JH: New jobs and homes. It objects to the housing requirement on the basis that it does not adequately align planned housing growth with Greater Cambridge's economic growth ambitions.

2.2 SmithsonHill Ltd (SmithsonHill) has interests related to Land at Hinxton (Housing and Employment Land Availability Assessment (HELAA) Site ID 200765) ("the Site").

Policy Context

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

2.3 As GCSP intends to submit the draft GCLP for examination by December 2026, the plan-making policies in the NPPF (2024) apply. References to 'NPPF' in this section refer to the 2024 version unless explicitly stated. This is the same policy context that was referred to in our representations made at Regulation 18 stage but is repeated here for ease of reference.

2.4 For housing need, the NPPF 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).

2.5 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.

2.6 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)

2.7 This is directly engaged in Greater Cambridge given the scale of planned employment growth and national interest in the Cambridge economy.

2.8 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)

2.9 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)

2.10 National policy therefore treats housing provision not simply as a demographic exercise but as a necessary component of economic strategy. 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).

2.11 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 risks serious negative economic, social and environmental outcomes, contrary to the sustainable development objectives of the NPPF. This was important policy context we previously raised in our Regulation 18 representations but does not appear to be acknowledged in the Regulation 19 version of the plan or its evidence base. The Regulation 19 Plan retains substantially the same relationship between jobs and homes as the earlier draft, and therefore does not appear to address this objection.

Cambridge Context

Role in the National Economy

2.12 As we noted in our Reg 18 representations, Cambridge is of clear national economic significance, particularly through its world-leading life sciences, technology and research clusters.

2.13 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*

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

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.

2.14 The Government also sought to support Cambridge's economic growth potential through the establishment of the Cambridge Growth Company (CGC) (this was an interim delivery body until the establishment of the Development Corporation, discussed below). The objectives of the CGC included to "*address barriers to growth and help unlock Greater Cambridge's full potential*"[3]. The CGC recognised 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]. The Government's own diagnosis therefore identifies housing unaffordability as a constraint on growth.

MHCLG Response to establishing a Development Corporation

2.15 In January 2026 MHCLG undertook a consultation on the proposal to establish a centrally-led urban development corporation in Greater Cambridge, to be known as the Greater Cambridge Development Corporation (GCDC). The GCDC was established in July 2026 and whilst it is not expected to have plan-making powers until the next round of plan-making in Greater Cambridge, the Government's response to the consultation provides further context relevant to plan-making now.

2.16 In its response to the consultation, Government reiterated that Cambridge is "*one of Britain's most important engines of growth, home to the University of Cambridge, other world-class research institutions, and innovation-led ecosystems in technology, advanced manufacturing, and the life sciences*" but that it faces challenges with, amongst other things, "*housing affordability*" that is "*threatening its position as a global centre of innovation*"[5].

2.17 The consultation's findings in relation to housing included that:

- Housing affordability was a central concern; individuals and organisations alike felt that market rate homes are inaccessible to most of the population, while rent levels have climbed far above the national average in recent years. Respondents pointed to unmet affordable housing demand, forcing residents and families to live further away from the city, where they are increasingly dependent upon unreliable public transport.
- Many organisations reported that poor housing affordability, alongside increased living costs, has damaged the ability to attract and retain staff. They said that this has negatively impacted the diversity of the local skills pipeline, forcing companies to invest or outsource internationally, and threatening to undermine Greater Cambridge's research, education, technology and industry sectors.
- Many respondents noted that local housing delivery has been relatively high compared to the national average and pointed to the strong performance of the GCSP Service.

[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] MHCLG Greater Cambridge Development Corporation: Analysis of consultation responses and next steps, June 2026 (here)

However, the majority view was that housing delivery has not kept pace with levels of demand, amplifying affordability challenges, and constraining wider economic growth.

2.18 The Regulation 19 Plan should therefore be tested against whether it delivers that step change, not merely whether it meets the minimum standard method output.

The need for a 'step change'

2.19 The Government's response to the consultation uses the phrase 'step change' a number of times throughout, including that:

- The government believes that the scale and complexity of the challenges Cambridge faces will require a step change in delivery;
- The government recognises the increasingly complex challenges facing Greater Cambridge, and believes that this requires a bold, long-term approach, and a genuine step change in how infrastructure is planned, coordinated and delivered. The magnitude of these challenges cannot be met through incremental change; and
- In terms of objectives, it includes 'Transformational Economic Growth' which is to drive a step change in the sustainable and inclusive economic development of Greater Cambridge, commensurate with its status as a critical national growth area, to deliver a significant increase in high quality jobs and homes, and to cement Greater Cambridge's status as a global centre for science, technology, and innovation.

2.20 The principle of seeing a step-change in economic growth (including housing delivery) across Greater Cambridge and the wider OxCam Arc region is not new; it is now nearly a decade since the National Infrastructure Commission's report 'Partnering for Prosperity'[6] and five years since the publication of the [now abandoned] OxCam Arc Spatial Framework. Both laid the foundations for a long-term strategic joined up plan for the sub-region, recognising its importance to the national economy but also recognising its challenges, of which housing delivery was a fundamental theme.

2.21 During this time, the current Cambridge and South Cambridgeshire Local Plans were underway, taking significantly longer than average to be prepared and adopted (having commenced evidence gathering in 2011, the plans were submitted in 2014 and not adopted until over four years later, in 2018). These local plans targeted 1,700 dwellings each year in Greater Cambridge (c.1,000 per year in South Cambridgeshire and 700 per year in Cambridge – 33,500 in total). However, despite the prevailing economic context (as indicated by the NIC), these levels of growth did not actually represent an increase compared with prior plans; the Cambridge Local Plan (2006) required a similar overall target of 735 per year for the City and indeed the South Cambridgeshire Core Strategy (2007) had a higher target equating to just under 1,200 homes per year, or nearly 2,000 per year across both areas.

2.22 In other words, from the mid-2000s until now, there has actually been no plan-led system which has sought to significantly and progressively increase housing delivery in Greater Cambridge over time, despite the narrative that has clearly been prevailing for at least a decade. Indeed, the last round of adopted plans actually sought to reduce planned housing delivery across Greater Cambridge, not to increase it (and certainly not in any meaningful

[6] Partnering for Prosperity: A new deal for the Cambridge - Milton Keynes – Oxford Arc, November 2017 (here)

manner), from the prior set of plans. This highlights the urgency of delivering the necessary step-change as soon as possible, rather than to wait for yet another round of plan-making (which could realistically take another decade) to address this. Similarly, addressing these needs via a new local plan put in place by the GCDC is likely to be some time away; the Government's consultation scoping for the GCDC described plan-making for the Development Corporation as something for the 'medium to long term'. The GCDC's website discusses how decision-making powers are anticipated to commence in 2027 but with regard to plan-making:

"Plan-making powers would transfer to the development corporation, but it is intended that the Secretary of State will issue a direction preventing the Development Corporation from exercising plan making powers until a later date."

2.23 To delay meeting housing needs to the next round of plan-making (unlikely to result in plans materialising until around 2030 at least, with sites not being delivered until sometime later), would represent housing delivery being relatively stable for a period of decades when looking back over planned levels of housing delivery over the last few plan cycles.

The Mayor's Local Growth Plan

2.24 Ambitions for economic growth are also recognised locally, with the recently published 'Local Growth Plan' by the Mayor of Peterborough and Cambridgeshire setting "*an ambition for Cambridgeshire & Peterborough's economy to grow faster than any other region in the UK*"[7]. Its baseline growth 'business as usual' scenario assumes annual economic growth at 1.2%, but this plan considers two further scenarios:

1 'Doubling our Economy': its 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

2 'Aspirational Growth': a Growth ambition 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 <u>one of only a few UK areas capable</u> of achieving this magnitude of economic growth" (<u>emphasis added</u>)*.

2.25 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 <u>must be supplemented with infrastructure, housing</u> and regional connectivity" (<u>emphasis added</u>)*. Housing and infrastructure are discussed at length throughout the Mayor's plan.

[7] Local Growth Plan, Cambridgeshire and Peterborough Combined Authority October 2025 (here)

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

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.

2.27 We raised the above context for Greater Cambridge in our Regulation 18 representations, noting that it goes to the issue of 'soundness' given that, as drafted at Reg 18 stage, we did not consider that the plan was (36b) justified nor was (36d) consistent with national policy. It is therefore concerning that these issues do not appear to have been responded to within the evidence base or the plan itself.

2.28 We note that the recent Iceni 'Review of economic data, context and representations (June 2026)' seeks to address some of this additional context, however it ultimately concludes:

"The Local Growth Plan and OE work for MHCLG set out aspirational and illustrative scenarios which report higher outcomes than the Local Plan evidence. However they are not considered suitable for local plan making. OE's MHCLG work is termed 'illustrative'....Similarly whilst Government is taking a greater focus on Greater Cambridge's growth potential, it is not yet clear how this will manifest and what certainty it provides over long term economic outcomes." (para 3.10-11)

2.29 This response fails to acknowledge that the wider aspirations for a 'step change' in growth date back nearly a decade, and that GCSP's current approach ultimately will result in deferring how growth needs are addressed again until the next round of plan-making, which is some years away. As we have already noted, the last round of plan-making in Greater Cambridge (i.e. currently adopted plans) itself adopted a less ambitious plan for housing growth than the predecessor plans; it is therefore crucial that GCSP takes the opportunity for a step-change so that needs are not deferred by yet another round of plan-making. The following paragraphs set out why higher levels of housing growth are supported by the evidence base, including to align jobs and homes.

2.30 The logic represents a clear 'cyclical' approach whereby a lack of certainty over long-term outcomes delays decisions around planning for such outcomes, thus meaning long-term outcomes fail to materialise (or are at least delayed), and there is a resulting lack of evidence to plan for them. This logic appears to be the current basis of GCSP for the draft GCLP.

GCSP's Evidence of Housing Need

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

2.31 The EHNU was the basis of the Regulation 18 version of the GCLP and there is no change/update to the EHNU or to Policy S/JH in the Regulation 19 plan. Therefore all the

points we raised at Regulation 18 stage remain applicable; these are set out below for ease, and some points have been elaborated on with further evidence.

Approach to housing and population projections

2.32 The draft GCLP (Reg 19 version) remains underpinned by the EHNU (2025). 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. As a matter of principle, we note that this represents only a c.35% increase on planned housing targets in currently adopted plans in Greater Cambridge and only a c.15% increase on targets in the prior plans, thus raising the question of whether it represents the 'step change' needed that has been referred to extensively over the last decade.

2.33 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 Census[8]. 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).

2.34 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).

2.35 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.

2.36 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.

2.37 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

[8] 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.

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. In our Reg 18 representations we suggested it would be prudent for GCSP to consider these new data sets; in its 'Review of economic data, context and representations' (Iceni, June 2026) passing reference is made to these projections but it does not appear that any analysis has been undertaken and any conclusions reached about what the implications are for Greater Cambridge. Given the historic nature of the projections used in the EHNU (which the EHNU itself acknowledges) **it would still be prudent for the Councils to fully consider these projections**.

Alignment with job growth and impacts on commuting

2.38 Below we explain the approach of the evidence to the relationship between economic growth and housing; this remains as per the representations we previously made at Reg 18 stage. We discuss the various scenarios and their inter-relationship, before going to address the more fundamental problem at the heart of the approach.

Scenarios tested

2.39 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). We would strongly question whether an assumption based on periods of 'slower growth' is consistent with the context for this region discussed above.

2.40 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.

2.41 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). Again, we would query whether treating Greater Cambridge as behaving like 'most economies' and thus assuming some 'slower' or 'contracting' periods in this way is realistic or appropriate for planning in light of the context discussed above.

2.42 However, the EHNU 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).

2.43 As noted in our Reg 18 representations, 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 that economic growth. We contended in our Reg 18 representations, in short, that plan did neither of these, and as the Reg 19 plan carries forward the same evidence and strategy, these criticisms remain.

2.44 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 still 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 represents the amount of job growth that would occur simply by GCSP delivering the minimum amount of housing needed based on the standard method set by Government.

2.45 As we have also noted earlier, it is also questionable whether this represents the extent of 'step change' in delivery in light of housing targets that have already been in place across Greater Cambridge in the last roughly two decades. In the interests of ensuring Greater Cambridge exceeds expectations, and that this is not deferred for yet another round of plan-making, we **strongly consider that <u>much greater weight</u> should be given to the '<u>high</u>' scenario as an aspirational yet realistic scenario (or indeed consideration to scenarios that are <u>even higher</u>).**

2.46 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.

2.47 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*".

2.48 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, it is not evident there is much of a 'step change' occurring under the 'high' scenario, or indeed whether a true 'step change' would be a scenario associated with even higher housing and job growth.

2.49 There also appears to be a cyclical justification around high housing delivery and infrastructure needs in plan-making, which is being sustained in this round of plan-making in Greater Cambridge.

2.50 This will now be the third round of plan-making where the area is not planning for a true 'step change' in housing delivery, despite this being widely acknowledged as being needed for a decade. In this case, the fact that high housing growth scenarios would be 'policy on' and require a 'step change' in infrastructure appear to be the justifications for not adopting a higher housing growth scenario; but this is circular. Without planning policy to create the conditions in which housing delivery will see a 'step-change', there will be no impetus to also plan for the infrastructure that would come alongside that. To the contrary, there is no reason why planning for an ambitious amount of housing, in line with economic growth needs, would not be expected to come alongside the level of infrastructure needed to support that level of housing growth. Adopting GCSP's cycle of logic, a 'step change' in housing delivery would never arrive, given that it would always be deferred to an unspecified later date when infrastructure is 'ready' to receive such housing delivery.

The fundamental flaw in approach

2.51 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. This flaw was raised in our Reg 18 representations and has not been addressed in the Reg 19 version of the plan (or its evidence base).

2.52 It is well-established that Greater Cambridge sees worse workplace affordability (the ratio of house prices to workplace earnings) compared with wider averages, and the planning system should do all it reasonably can to address such issues, primarily through increasing housing supply. 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 for longer, or cohabiting with other young adults. It also increases pressures on affordable housing.

2.53 The draft GCLP'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. This approach is flawed primarily for several reasons:

1 **Firstly**, 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 **Secondly**, 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 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[9];

   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; and

   c The adjustment to HRRs only goes 'halfway' to the 2008 figure. It does not explain why it does not go 'all the way'.

3 **Finally**, and most importantly, 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 housing.[10] 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.

2.54 This is particularly pertinent in Greater Cambridge, where data shows that earnings have consistently grown at a faster rate than the national average (**Error! Reference source not found.**). Were this trend to continue in the future, we would expect housing affordability to worsen at an even faster rate (all else being equal) in Greater Cambridge compared with nationally, unless a material uplift in supply is generated that would meaningfully improve affordability.

[9] ONS Housing Affordability Statistics

[10] 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

Table 2.1 Median and mean weekly earnings (workplace) changes over 5, 10 and 15 year periods – Greater Cambridge vs England

	Median weekly earnings		Mean weekly earnings	
	Greater Cambridge	England	Greater Cambridge	England
2010 to 2025	66%	59%	67%	55%
2015 to 2025	55%	51%	53%	50%
2020 to 2025	41%	34%	40%	32%

Source: ONS Annual Survey of Hours and Earnings. Greater Cambridge figure has been derived using a weighted average for Cambridge and South Cambridgeshire based on employment for each district as a percent of Greater Cambridge total. Weekly earnings are used as this is the measure in the OBR's latest Economic and Fiscal Outlook.

2.55 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 logic. GCSP's current approach provides no material uplift to housing supply that might be reasonably 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 – something which was explicitly highlighted by respondents to the consultation on established the GCDC, cited earlier.

2.56 In combination, GCSP's approach is an 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, taking into account affordability challenges. It is inescapable that it under-estimates the number of homes required to address the problems of affordability, the needs of different groups and addresses barriers to investment, as required by NPPF paras 85-86. We raised this issue within our Reg 18 representations but unfortunately all of the above has gone unaddressed in the Reg 19 plan and its evidence base.

How much housing might be needed to address affordability?

2.57 To illustrate the scale of housing uplift that might be needed to generate any meaningful improvement in affordability in Greater Cambridge, we have modelled some potential house price scenarios based on assumptions about underlying housing demand, income growth and interest rates (see background and assumptions at Appendix 1).

2.58 If GCSP is correct, and underlying demand for housing is taken to be the 'central' jobs scenario, this would be taken to be 2,292 dwellings per year (also broadly aligning with the standard method). Under this scenario, if earnings growth were as forecast by the Office for Budget Responsibility (and this were sustained in the long-term), then earnings would be expected to have an upward impact on prices. At the same time, increases in mortgage rates would be expected to have a downward impact on prices, but would not be sufficient to balance this (and are in fact associated with a reduced ability for households to access housing due to increased borrowing costs, even if house prices are moderated). Furthermore, if long-term interest rates were any lower than assumed in this exercise, their moderating impact on house prices would be lessened, in turn further worsening affordability above that indicated here.

2.59 However, the overall impact would be house prices increasing such that affordability[11] worsened, from 10.0 currently to 11.1 in 2045, as shown in **Error! Reference source not found.**. If incomes in Greater Cambridge grew at a faster rate than the national average – which has been the case over the last 15 years (as shown above) - affordability would worsen further, to around 11.6[12].

2.60 **Error! Reference source not found.** shows the amount of housing per year that would be needed to maintain the affordability ratio at its current level of 10. If income growth in Greater Cambridge slowed in line with the national average, this would be in the region of 2,900 dwellings per year (representing a c.27% uplift on the 2,292 dwellings per year needed just to support the 'central' jobs scenario), or up to 3,350 per year if wage growth in Cambridge continued to outpace the national average (representing a c.46% uplift).

2.61 **Error! Reference source not found.** also shows the amount of housing per year that would be needed to improve the affordability ratio to around 9, which is the regional average as of 2025 (this itself is still above the national average which is below 8). If income growth in Greater Cambridge slowed in line with the national average, this would be in the region of 3,400 per year (a 48% uplift), or up to 3,950 per year if wage growth in Cambridge continued to outpace the national average (a 72% uplift).

Table 2.2 Forecast change in affordability – housing demand baseline as per 'central' jobs

	2025	2045 forecast – demand is **2,292** dwellings per year	
		Incomes grow as forecast by OBR	Incomes grow 18% faster than forecast by OBR
Incomes	£45,901	£74,127	£79,042
Prices	£457,238	£822,332	£920,262
Affordability	10.0	**11.1**	**11.6**
Homes per year needed to maintain affordability (10.0)	-	2,900 (+27%)	3,350 (+46%)
Homes per year needed to improve affordability (9.0)		3,400 (+48%)	3,950 (+72%)

Source: Lichfields based on ONS/various sources

2.62 If, however GCSP is wrong about the underlying housing demand arising from job growth, such that the 'true' underlying housing demand were that reflected by the 'high' jobs scenario – 2,829 per year – then planning for the 'central' jobs scenario would worsen affordability in Cambridge by a significant degree. This is because the 'central' scenario, at 2,292 homes per year, would fall short of just the amount of housing needed to cater to housing demand based on job growth. This under-supply of housing would worsen affordability, on top of the impact that rising wages also has.

2.63 Table 2.2. shows the forecast change in affordability if housing demand manifested at 2,829 per year (in line with 'high' job growth) but supply were at 2,292 per year (in line with the

[11] When weighted based on population, median workplace earnings for Greater Cambridge are £45,901 and median house prices £457,238, giving a [weighted] affordability ratio of 10.0.

[12] For the purposes of this exercise, we have taken the mean average weekly earnings (as this is comparable to the measure used in the OBR forecast) for Greater Cambridge and compared this with growth for England over the last 5, 10 and 15 years; on average over these periods wage growth in Greater Cambridge has been 18.3% higher than the growth rate seen nationally. Applying this to the OBR forecast (2.4%) would imply wage growth of 2.8% for Greater Cambridge.

'central'). This would result in affordability worsening from 10 currently to just over 12 by the end of the plan period, or nearly 13 if higher wage growth persisted. **Error! Reference source not found.** also shows the amount of housing that would be needed per year to either maintain or improve affordability, if underlying demand were 2,829 per year. This would be between around 3,400 to 3,900 per year just to keep affordability at its current level, or around 3,950 to 4,500 per year to improve affordability to the current regional average.

Table 2.3 Forecast change in affordability – housing demand baseline as per 'high' jobs

	2025	2045 forecast – demand is **2,829** dwellings per year	
		Incomes grow as forecast by OBR	Incomes grow 18% faster than forecast by OBR
Incomes	£45,901	£74,127	£79,042
Prices (with supply at **2,292** per year)	£457,238	£822,332	£920,262
Affordability	10.0	12.1	12.7
Homes per year needed to maintain affordability (10.0)	-	3,400	3,900
Homes per year needed to improve affordability (9.0)		3,950	4,500

Source: Lichfields based on ONS/various sources

2.64 Whilst it is not possible to arrive at an accurate forecast of long term house prices, housing supply clearly represents an important determinant (along with underlying household growth [housing demand], incomes and mortgage rates). The inescapable conclusion is that more housing must be provided than is demanded based on job growth (all else being equal) to improve affordability, and this is particularly important in Greater Cambridge where historic trends show wages consistently outperform the national average.

2.65 The planning system should play its role in ensuring that long-term house prices growth is such that affordability can at least be improved, if not maintained, when taking into account incomes. The above analysis demonstrates the extent to which adopting the 'central' scenario will worsen affordability in any event, but even more so if actual housing demand is higher (resulting from higher job growth) and/or if wage growth is sustained at a higher rate. The current draft GCLP approach seeks to seriously undermine Cambridge's ability to retain its role as an area of national economic importance because it would hinder the ability of people to be able to live and work in the area, let alone achieve any 'step change' in growth. This would fail to address housing as a barrier to investment, as required by NPPF para 86.

Proposed Housing Requirement in Plan

2.66 Notwithstanding the above critique, below we consider how the EHNU's housing and employment findings (inadequate though they are) have been taken forward within the draft GCLP and the misalignment even on the plan's own terms. These are criticisms that were raised at Reg 18 stage that remain applicable now.

2.67 Our concerns with the draft plan's approach to housing and jobs, and why the draft GCLP as currently drafted is unsound, relate 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.

2.68 These issues are considered in turn below.

1. Overall quantum of housing and jobs

2.69 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. In order to be found sound, the evidence should robustly identify the number of homes that are necessary to meet the housing needs associated with increased levels of economic activity and thus overcome barriers to investment necessary to achieve it, and then the plan should allocate sufficient housing to meet these needs.

2.70 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 48,069 homes (this represents a very minor reduction from the 48,195 homes referred to in the Reg 18 version of the plan). 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.

2.71 But this 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, in order to be 'sound' the draft GCLP should allocate sufficient housing to exceed its 'minimum' housing need figure, in line with national policy (specifically paras 85-86). The current strategy would demonstrably result in a worsening of affordability, as shown above, because it fails to provide a genuine 'uplift' in housing sufficient to moderate or improve affordability, once underlying demand, incomes and interest rates are factored in; the remedy to this is to identify and allocate the additional amount of housing needed to moderate affordability outcomes.

2.72 Within the supporting text (para 2.10 – this is the same text that appeared in the previous version of the plan) 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".

2.73 As we noted in our Reg 18 representations, 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 draft GCLP's own evidence (were it to be accepted on its own terms) and is misleading. It is concerning that these errors have not been corrected in this version of the plan. 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 draft GCLP (4,000 per year) is nearly 11,000 jobs. In order to be sound (specifically, in order to reflect its own evidence, as required by NPPF para 36(b)) the draft plan should allocate at least additional sufficient housing to align with its likely employment outcomes.

Scenarios for growth quantum assessed in Sustainability Appraisal

2.74 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).

2.75 At Reg 18 stage, we noted that the Sustainability Appraisal of the draft GCLP (October 2025 version) set out the background to the reasonable alternatives that were 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).

2.76 Within that version of 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 went 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."

2.77 We observed at the time that the assertion that the higher jobs forecast was not 'reasonable' was 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.

2.78 We also concurred 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 Cambridge 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 was 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.

2.79 The Reg 19 plan is underpinned by an updated Sustainability Appraisal (July 2026), however this does not introduce any additional options for housing or employment growth quanta, instead 'doubling down' on the preferred approach underpinning the Policy S/JH.

2.80 We previously noted that the SA should include alternative, higher, housing and job growth scenarios, so it is concerning to see that these have not been incorporated into the updated SA.

2. Flexibility in housing and employment provision

Housing

2.81 Table 2 of the draft GCLP shows that GCSP's total identified housing supply amounts to 52,032 (this is a slight increase on the 51,328 homes in the previous version of the plan), giving an 8.2% buffer above the minimum requirement of set out in Policy S/JH. The 'Liverpool' method is being applied which means there is a deferral in delivery of the backlog of housing not provided for in the first five years of the plan.

2.82 In theory, if all of the identified housing supply came forward, this would equate to 2,477 per annum being delivered over the plan period (2024-45). This would fall short of the number of homes needed to support the 'high' job 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.

2.83 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 c.7,400 homes (21 years' of need at 2,829 = 59,409, compared with 52,032 supply). 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).

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

Employment land

2.85 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) – we note that this is exactly the same text as appeared in the Reg 18 version of the plan. 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.

2.86 However, as we noted at Reg 18 stage, 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).

2.87 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]:

1 Office space at 280,000sqm, which is slightly below than the 302,600sqm cited in the plan;

2 R&D space at 380,000sqm, which is substantially below than the 600,000sqm cited in the plan; and

3 Industry and warehouse (combined) at just over 125,000sqm which is substantially below than the 317,000sqm cited in the plan.

2.88 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).

2.89 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.

2.90 As noted in our Reg 18 representations, 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 is asymmetric for this not to be supported by commensurate upward flexibility in (and thus delivery of) housing. It is concerning that this point has not been addressed in this version of the plan. 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 7,400 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.

2.91 On this basis, the draft GCLP is still not sound because:

1 It is not positively prepared (NPPF para 36a) as it does not meet the area's objectively assessed development needs; and

2 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.

2.92 These are capable of being addressed, i.e. making the plan 'sound', through identification of additional housing supply to the extent the evidence suggests is needed (and aligning with planned employment growth).

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

2.93 The NPPF (86) requires planning authorities to address the barriers to economic growth, including housing. Our Reg 18 representations set out the potential impacts of the lack of housing to support economic growth, all of which would fundamentally undermine sustainable development objectives of the NPPF and have real-world consequences for residents, businesses and the wider economy (including the regional and national economies). These remain applicable in light of there being no material change to the housing and job strategy in the Reg 19 version of the plan, and thus are reiterated below.

Unsustainable Commuting Patterns

2.94 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.

2.95 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) . 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 Trasport (CSET) programme which includes a new busway between a new A11 travel hub and Cambridge Biomedical Campus.

2.96 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.

2.97 For these reasons, we also disputed the finding of the SA (July 2026) 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 5.36 – this also appeared in the previous version of the SA [October 2025] at 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.

Affordability

2.98 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.

2.99 We have explained in our Reg 18 representations that the draft GCLP's evidence does not properly consider the relationship between population, households, homes, interest rates, jobs and incomes; a point we expand upon in these representations. The EHNU's assessment 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. We have demonstrated this further in these representations. This is arguably the key issue pertaining to housing in Cambridge, as highlighted in the responses to the consultation on the establishment of the GCDC which is discussed above.

2.100 Our analysis shows 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

2.101 A shortage of labour supply generally could in turn undermine local businesses and services and their ability to recruit and retain workers. Again, this was explicitly noted as a key issue

raised by consultees in the Government's response to the consultation on the GCDC, cited above. 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

2.102 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 for plan-making, sustainable development means 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 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 draft 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.

2.103 These were all points raised in our Reg 18 representations that have gone unaddressed in light of the fact that the overall housing and jobs strategy is ultimately unchanged. Without amendments to increase the amount of housing provided for by the plan, the plan at risk of being unsound due to inconsistency with national policy, as identified above. The misalignment of jobs and housing would also clearly undermine the overarching vision of the plan, which is:

"Greater Cambridge in 2045 and beyond will be a place where a big decrease in our climate and environmental impacts comes with the continued flourishing of our internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities. New development must: minimise carbon emissions and reliance on the private car create thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure we need…." (para 2.3)

2.104 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;
- **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;
- **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;
- **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; and
- **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.

Summary of Position on Draft Policy S/JH

Overall number of homes and jobs

2.105 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 – this is well-established and articulated in the recent Government response to the consultation on establishing the GCDC. 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, but this has unfortunately been down-played by GCSP which is seeking to continually defer any 'step change' in Cambridge owing to uncertainty and the fact that any such decision would be 'policy on', without recognising that this creates circularity in plan-making.

2.106 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. We raised this issue at Reg 18 stage and have elaborated on the issue of affordability in particular within these representations as a lack of housing affordability clearly represents a key undermining factor of Cambridge's economic growth.

2.107 As we have previously noted, it is 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. The evidence is overwhelmingly clear; planning to meet the 'minimum' housing need in Cambridge will worsen affordability in the long-term, and even more so if wage growth continues to outpace national averages and/or if actual housing demand is higher (as a result of strong job growth).

2.108 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 and indeed is narrowing its options (rather than widening them, in response to the representations we made at Reg 18 stage); this does not reflect the PPG.

2.109 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 we maintain that such scenarios should be explored within the evidence base (EHNU and SA).

Alignment of housing and jobs in the plan

2.110 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. This was the position at the time of the Reg 18 plan; we raised these concerns previously but they remain unaddressed.

2.111 Even on its own terms, at present, the draft GCLP's strategy is likely to result in a shortfall of over 7,000 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).

2.112 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. Again, these were all factors we raised in previous representations that have gone unaddressed.

Proposed Modification

2.113 Policy S/JH should be entirely re-written to reflect a true 'step change' in economic circumstances with an appropriate job creation figure at Part 1a). Even if Part 1a) remains unchanged, these modest job growth aspirations must be matched by commensurate housing growth in order to represent sustainable development. As such, Part 1b) would need updating to reflect a housing requirement figure which is substantially uplifted to address this.

2.114 The implications are that the draft GCLP would need to identify additional allocations to meet the actual housing needs of Greater Cambridge.

Birmingham
0121 713 1530
birmingham@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk