Land at Hinxton Grange

Smithson Hill representations to the Greater Cambridge Regulation 19 Local Plan

Smithson Hill

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5.0 Housing Supply/Trajectory critique

5.1 The draft GCLP provides significant upward flexibility for its employment land provision (even with necessary allowances for vacancy and flexibility), providing significantly more floorspace than the EHEU shows to be required for the 'high' scenario in both R&D and industrial/warehousing uses. Whilst this is welcomed (because we consider that the draft GCLP could be more economically ambitious than it currently is, as discussed above) this degree of employment land must be supported by a commensurate amount of housing. If not, this would almost certainly exacerbate unsustainable commuting patterns, impact on housing affordability, and affect the ability of local businesses to be resilient and remain competitive. Fundamentally, a lack of housing to support employment growth would undermine all of the objectives of sustainable development in the NPPF and many objectives of the draft GCLP.

5.2 Notwithstanding that we consider the economic basis of the plan to be insufficiently ambitious, failing to reflect Cambridge's economic potential, the number of homes in the plan will fall foul of supporting even the minimum level of growth within the plan (i.e. the medium growth scenario). With this in mind, this section critiques the supply assumptions within the GCLP (Appendix D - Housing trajectory and five-year housing land supply calculation), expanded on in the Development Strategy Topic Paper: Housing Trajectory for the Local Plan 2026 (HTLP) and the Housing Delivery Study Addendum 2026 (HDSA 2026), both of which have been published since the Reg 18 GCLP stage.

5.3 There are a number of assumptions within the housing trajectory and five-year housing land supply (5YHLS) calculation which in spite of the additional evidence within the HDSA 2026 are considered highly optimistic. Moreover, the Council's calculation of 5YHLS upon adoption incorrectly includes a supply of windfall development which the NPPF 2026 does not advise. These are explored below. First, we demonstrate the need for a minimum 10% buffer against the minimum housing requirement, which is not currently accounted for.

5.4 The below commentary supersedes the comments made on housing supply in the Regulation 18 representations.

Buffer

5.5 It would be reasonable to assume that the level of housing growth would be flexible to match the amount of employment growth allowed for by the plan. However, the Councils' total identified housing supply amounts to 52,032 homes, giving an 8.2% buffer above the minimum requirement of 48,069 dwellings set out in Policy S/JH. As a point of principle, 8.2% is unlikely to provide sufficient headroom to ensure delivery of the housing requirement should some sites not deliver in the timescales, or at the pace assumed in the housing trajectory. This is particularly relevant in the context that NPPF 2026 no longer allows for an inclusion of windfall sites for the purposes of 5YHLS statements, meaning an even greater buffer on larger-scale sites supply is required in order to be able demonstrate a 5YHLS (see below).

5.6 At the very least, absent the other relevant factors concerning the need for additional flexibility to be incorporated into the plan, the Councils should seek to incorporate a 15% buffer (an additional c.3,250 homes) to allow for circumstances where sites do not come

forward and/or to avoid over-reliance on windfall sites. As discussed above, the "*high growth*" scenario would lead to a c.24% buffer being included against the minimum requirement (amounting to an additional c.7,400 homes above what is already planned for). Indeed, if the Councils were to truly 'bake in' a high growth scenario to the GCLP, an additional 15% buffer would be included on top of this, with the high growth scenario being the 'minimum requirement'.

The Council's forecasted 5YHLS positions

5.7 It is noted that the Councils have sought to apply the 'Liverpool' method to their 5YHLS calculation, having the effect of offsetting shortfalls in delivery against the latest (2026) standard method over the whole plan period from adoption (in 2028), rather than over the five-year period only (the 'Sedgefield' method). This is justified on the basis that:

"A sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period due to the sustainable development strategy set out in this plan and the infrastructure constraints relating to water and transport (for which improvements are not anticipated to be delivered until later in the plan period)."

5.8 However, the Council admits that using an alternative approach would have led to the Council being able to demonstrate only a marginal (5.03 years) 5YHLS on adoption of the plan in 2028. Instead, applying the Liverpool method, the Council states it will be able to demonstrate 5.47 years' supply on adoption. Whilst certainly less marginal than the alternative, this is nonetheless considered a tentative position which carries eminent risk of being challenged when considered in the context of its optimistic assumptions about the future deliverability of allocated sites, especially the volume of strategic sites which are planned to be delivering at the same time, and inclusion of a windfall allowance. A realistic assumption about strategic site delivery needs to be made, as experienced in all the new settlements in this draft GCLP (Northstowe, Waterbeach etc.) they take time to come to fruition. They are inherently complex and because of their significant lead in times, their delivery needs to be spread throughout the plan period. The Site offers an opportunity for delivery of a strategic site in the early part of the plan period which could compliment Grange Farm.

5.9 In addition, it is noted that the assumed future position applies only a 5% buffer to the housing requirement despite the acknowledgement that the Council is unlikely to meet its minimum housing requirements in the period between now and 2028. If the Councils significantly underdeliver on their housing need prior to the adoption of the local plan, then they would be required to apply a 20% buffer onto the 5YHLS requirement which could lead to failure of the 5YHLS test (even without the supply adjustments discussed below).

Windfall allowance in 5YHLS

5.10 The NPPF 2026, which has been published since the Reg 18 draft GCLP, excludes windfall supply in the methodology for calculating 5YHLS in Annex D, meaning this form of supply will have to be made up through other sources in order to for Greater Cambridge to avoid speculative development through the presumptions in favour of development at NPPF 2026 policies S5(1)(j) or GB7(1)(g). This is relevant to the Councils because despite the draft

GCLP being examined in accordance with the 2024 framework, the Councils' 5YHLS statements will be required to follow the method in Annex D of the 2026 NPPF.

5.11 Given that windfall sites account for 425 homes per annum in the trajectory, this would remove 2,125 homes from supply in a given five-year period. The effects of such a reduction in assumed supply means the Council would be unable to demonstrate a 5YHLS until 2036/37 based on the scenarios presented in the table at A.2 of the HDSA 2026.

5.12 Even if assuming that a 425 home-per-annum windfall supply were identified on specific sites for the first three years of a given 5YHLS period (on the assumption that three years is the maximum forward-looking gauge of supply possible on windfall developments), this would still amount to an 850-unit reduction in assumed supply over a given five-year period which the Councils will need to make up for as a matter of urgency if the plan is to be effective and the presumptions at NPPF 2026 policies S5(1)(j) or GB7(1)(g) avoided.

5.13 On the basis of the above, the proposed trajectory would not be effective in maintaining a supply of deliverable housing sites and is not sound with reference to NPPF 2024 paragraph 36(c).

Lead-in times and build-out rates

5.14 The HDSA 2026 suggests that comparatively low delivery in the earlier years of the draft GCLP as sites tend to need the Local Plan to be adopted before they can come forward through the planning application process and can be delivered. Whilst this principle is not necessarily disputed, this assumption appears to have been carried through to assume a four-year lead- in time from adoption of the plan to completions on as many as eight newly allocated sites in 2032/33 totalling 655 units: 56% of the total amount of anticipated oversupply in the whole 2028/29 to 2032/33 period. This is highly ambitious and demonstrates further the precarity upon which the Councils' future 5YHLS position rests (notwithstanding that they are unlikely to have one upon adoption).

Beyond 5YHLS

5.15 Notwithstanding the points made above in relation to the forecasted 5YHLS positions, SmithsonHill has more general concerns around the extent to which the housing trajectory can be relied upon as a forecast of supply in Greater Cambridge.

5.16 It is welcome that the HDSA 2026 has been updated to account for:

"concerns around over-optimistic delivery timescales for large scale sites, which are considered to take longer to be brought forward and have greater uncertainty of lead-in times. Comments highlight that there have been significant delays in the delivery of existing strategic sites in Greater Cambridge, and that this demonstrates the complexities of strategic sites."

5.17 However, Lichfields does not consider that the HDSA has appropriately demonstrated why its assumptions around lead-in times and build-out rates are appropriate. This is primarily because the HDSA 2026 repeatedly references the "*strength of the market*" as a reason behind the faith it has in development sites coming forwards. However, the HDSA fails to acknowledge the significant variations in market fragments around Greater Cambridge, and the impact this has on deliverability of sites, particularly when there is a blanket affordable

housing policy across the whole area (as discussed in more detail below). This will have significant viability implications for sites and limit their likelihood of coming forward. The reference to the build-out report produced by Savills and Cambridge Ahead[16] is noted, however the HDSA fails to acknowledge the decline in market absorption rates referred to, which is in-turn slowing down market housing delivery.

5.18 Similarly, the HDSA 2026 repeatedly references that build-out in Greater Cambridge is likely to be higher on the basis that schemes have greater levels of affordable housing which speeds up delivery as it is not subject to the same market absorption issues. Whilst it may be the case that the proportion of affordable housing delivered through s106 agreements in Greater Cambridge is higher than in other parts of the country, and that this does not in itself have an effect on market absorption levels of the market homes, which are themselves often necessary to support the delivery of affordable housing.

5.19 On this basis, SmithsonHill's view is that despite the additional evidence submitted since the Reg 18 stage, the fast lead-in times and the high build out rates of a number of the large-scale allocations are plainly unrealistic and therefore should be tempered.

Windfall allowance in plan supply

5.20 Notwithstanding the points made above relating to windfall supply in the context of the calculation of 5YHLS, it remains relevant that of the 52,032 homes identified in the draft GCLP for delivery over the plan period, more than 7,000 of these are windfalls. Of these, only 2,052 homes are on specific identified sites. Therefore, more than 5% of the draft GCLP's housing requirement is future speculative, unidentified development. Whilst the principle of applying a windfall allowance is not disputed, such a significant portion of windfall supply leaves significant parts of the Council's housing trajectory as unknowns. The Councils should consider the potential of omissions sites which could be strategically planned 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 unidentified windfall sites. This would encourage plan-led development, in line with the NPPF's ambitions.

Allocation of more development sites

5.21 It is evident from the commentary above that there is a need to deliver housing development on substantially more sites than is currently allocated in the draft GCLP. It is in this context that new allocations to this consultation, like the Site at Hinxton Grange, need consideration. The allocation of the Site from a spatial planning perspective is a logical conclusion when the evidence on sustainable patterns of development around the Greater Cambridge area are taken into account. This is explored extensively in our response to Policy S/DS. It is noted Grange Farm is heavily reliant on the delivery of the CSET busway to enhance its sustainability credentials. Whilst strategic transport growth is not opposed in principle, the Councils should recognise the benefits of utilising and connecting development to existing transport infrastructure such as Whittlesford Parkway, which is a well-connected station as defined by the NPPF.

[16] https://cambridgeahead.co.uk/wp-content/uploads/2026/01/CA-Savills-Planning-Consents-and-Build-Out-Rates-Q3-2025.pdf

5.22 The trajectory as drafted cannot be relied upon for the draft GCLP. With regards to the tests of soundness:

a It is not positively prepared because it cannot credibly make the contributions to the area's objectively assessed needs that are stated.

b It will not be effective as it will deliver as planned over the plan period.

Proposed Modification

5.23 The below changes need to be made to the housing trajectory:

1 A significantly increased buffer between the housing requirement (Policy S/JH) and stated supply needs to be incorporated to ensure delivery and to ensure the draft GCLP is positively prepared and effective.

2 More allocations must be made in the early years of the plan period to ensure that on adoption, when a 5YHLS cannot include a windfall allowance, the GCSP Service has enough sites to demonstrate a 5YHLS on adoption.

3 More realistic lead-in time and build-out rate assumptions need to be utilised to ensure there is no overconfidence by the GCSP Service with the "strength of the market" in light of both the blanket affordable housing policy across the whole area which will impact viability and the wider decline in market absorption rates slowing down market housing delivery.

4 To address the above, more sites for residential development will need to be allocated and included in this trajectory.

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