GLADMAN

Greater Cambridge Local Plan

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) welcomes the opportunity to comment on the Greater Cambridge Local Plan Regulation 19 consultation and requests to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 Gladman has land interests across Greater Cambridge that are not included within the plan for allocation, further detail about each omission site is provided in Section 5. These sites are:

- Land off Back Road, Linton
- Land off Balsham Road, Linton
- Land off Whitecroft Road, Meldreth
- Land off Station Road, Over
- Land south of Willingham Road, Willingham

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

2.1.1 The Duty to Co-operate, as a legal test, was rescinded by the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023. However, engaging with prescribed bodies on relevant strategic and cross boundary matters remains an important part of the plan making process. It will be important for Greater Cambridge to demonstrate how it has engaged constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of preparing the Local Plan.

2.1.2 Both the 2024 NPPF and the recently passed 2026 NPPF emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process (in paragraphs 24-28 and in PM10 respectively). They confirm that this is integral to the production of a sound plan, and that a plan must be positively prepared with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

2.1.3 Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process[1]. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with, for example, unmet housing needs.

[1] PPG Reference ID: 61-001-20180913

2.2 Sustainability Appraisal

2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, local planning authorities must subject proposals in development plan documents to Sustainability Appraisal (SA) and prepare a report on the findings of the appraisal.

2.2.2 The SA must incorporate the legal requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 and associated directive. The Directive sets out the relevant requirements and considers that the preparation and adoption of a Local Plan should be subject to an environmental assessment as defined in Article 2b), this will include the preparation of an 'environmental report' as defined by Article 2c) and involves information required in Article 5 and Annex I.

2.2.3 Crucially, the SA process should clearly justify its policy choices in meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified, and transparent.

2.2.4 Greater Cambridge published their SA in July 2026. Three Strategic Spatial Options were considered:

a. Minimum – Standard Method homes-led.

b. Medium – central scenario employment-led.

c. Maximum – higher employment-led.

2.2.5 Subsequent updates in 2021 led to the minimum and maximum growth levels to being considered as unreasonable. Further options were subsequently considered; however, Gladman's stance is that the growth option proceeded with is insufficient for an area of Greater Cambridgeshire's nature. Further details on this can be found in our Housing Figures and Requirement and Growth Strategy Section (4.3) below.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The latest iteration was published in August 2026 however as the Greater Cambridge Local Plan is being prepared under the legacy plan making system the 2024 version of the Framework should be used for the preparation of the Greater Cambridge Local Plan. All references to the NPPF through this document therefore refer to the 2024 version.

3.1.2 The National Planning Policy Framework 2024 sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

4 DRAFT LOCAL PLAN

4.1 Plan Period

4.1.1 As this draft local plan is being written in accordance with previous iterations of the NPPF (i.e. prior to the latest version from August 2026), the plan period must be for a minimum of 15 years.

4.1.2 This draft plan covers years 2024-2045. As outlined in our representation to the Regulation-18 consultation, whilst we support the plan covering additional years above and beyond the minimum of 15 years, we reiterate that the start and end dates should be shifted to be consistent with national policy. The standard method is a forward-looking assessment of housing need taking into account both under and oversupply in its methodology and uses a base period that is required to start from the year that the housing need is calculated. Gladman would recommend that the plan period starts in 2026, i.e. the year in which the plan is scheduled to be submitted to the Planning Inspectorate. The council may then want to amend the ending year to 2047 to maintain the 21-year plan period.

4.2 Housing Figures and Requirement and Growth Strategy

4.2.1 It is noted that the minimum number of homes in the draft document has decreased slightly from the figures from the Regulation-18 consultation – from a minimum of 48,195 new homes to a minimum of 48,069. This is to reflect the annual housing need, which has been calculated at 2,289 dwellings (down from 2,295).

4.2.2 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach

4.2.3 Gladman is concerned over the seemingly low numbers proposed for the authority, in terms of the economic opportunities that are available and thus the subsequent housing numbers that would support this. Gladman have jointly appointed Turley to explore this further and findings are set out below.

4.2.4 The former Chancellor announced plans, in January 2025, to go 'further and faster' to unlock growth along the Oxford-Cambridge corridor to capitalise upon its potential to be Europe's Silicon Valley and add £78 billion to the UK economy by 2035[2]. The current Minister of State for Housing and Planning subsequently described how 'numerous long-standing barriers to further growth' had been historically preventing the corridor from 'realising its true potential', reporting these to be '*particularly acute in Greater Cambridge*[3]'. He referred to the Cambridge Growth Company (CGC) having been tasked with the development of an 'evidence base to support an infrastructure-first growth plan and a long-term delivery vehicle' befitting the 'nature, scale and complexity of ambitious and high-quality sustainable growth in Cambridge and its environs'. This was found to require 'a delivery vehicle with the necessary powers, authority and access to finance', leading the Government to conclude that 'a centrally led development corporation' (DC) would be the best option for delivering 'nationally significant growth in Greater Cambridge'. An 'ambitious funding package' of up to £400 million would initially be made available to such a body to 'remove barriers to sustainable growth and boost housing supply', with this having notably been 'welcomed' by the leaders of both Councils[4].

4.2.5 The Councils could have been far more ambitious in developing the draft Plan, targeting the creation of at least 90,900 jobs – to align with the higher growth scenario presented in the Employment and Housing Needs Update (EHNU) – rather than the 73,300 proposed at draft Policy S/JH.

4.2.6 It should consequently plan, as a minimum, for what the EHNU reports to be the associated need for circa 2,829 homes per annum, rather than meeting only the minimum need that is currently suggested by the standard method (2,289dpa). This is clearly permitted by an NPPF that allows housing requirements to be '*higher than the identified housing need if, for example, it…reflects growth ambitions linked to*

[2] https://www.gov.uk/government/speeches/chancellor-vows-to-go-further-and-faster-to-kickstart-economic-growth

[3] https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws990

[4] https://www.cambridge.gov.uk/news/2025/10/23/council-leaders-welcome-multi-million-pound-investment-in-greatercambridge---but-say-more-detail-is-needed

economic development or infrastructure investment[5]*'*. It is indeed this that was last year cited by the Oxford Growth Commission, at the opposite end of the corridor, in concluding that 'delivery above the new standard method will be required' since that was acknowledged to not 'make any specific allowance for a growth strategy' and doing so would '*support the potential for economic growth in a sustainable way*[6]*'*.

4.2.7 Simply providing for the number of homes calculated under the standard method (2,289 dpa) would lead to there being an insufficient number of homes in Greater Cambridge if this area does indeed create more than 73,300 jobs, the draft Plan notably acknowledging this prospect in discussing the need for '*flexibility in employment land in case the market delivers more jobs than anticipated*'[7]. This logic can naturally extend to cover the homes in which workers would live, as the alternative would be expected to only increase the burden on neighbouring areas that were already relied upon to fill some 39% of the jobs that existed in the area's workplaces as of 2021. It would likely thus increase use of private vehicles where some 84% of those commuting more than 10km to work in Greater Cambridge travelled by car, compared to only 46% of those travelling shorter distances[8].

4.2.8 Further details on this matter have been appended to this representation under Appendix 1: Technical Note on Planned Job Growth and the Proposed Housing Requirement.

4.3 Development Strategy

4.3.1 Gladman supports many of the objectives of the draft Local Plan, recognising the need for the planning system to respond to and reach an appropriate balance between the varying significant interests involved in plan preparation.

[5] MHCLG (December 2024) National Planning Policy Framework, paragraph 69

[6] Interim Report of the Oxford Growth Commission (December 2025) p3

[7] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation, paragraph 2.11

[8] Including both drivers and passengers as well as those travelling by taxi

4.3.2 Further, Gladman supports the objective of delivering a diverse range of housing in a variety of tenures, size and type to meet future needs of Greater Cambridge residents.

4.3.3 However, Gladman object to the spatial development proposed as part of this draft local plan, as set out in draft policy S/DS – Development Strategy. Whilst we concur with the settlement hierarchy, in terms of the settlements within the hierarchy itself as well as their respective designation, we disagree with the allocations proposed for the tiers within the hierarchy.

4.3.4 Across the 14 Minor Rural Centres proposed, only Melbourn has draft residential allocations, totalling 145 units (i.e. one site for 125 units, and one site for 20 units). Whilst we do not object with this proposal for the settlement, we disagree with approach to not allocate any further land for residential development across any of the other 13 settlements in this tier.

4.3.5 It should be noted that the draft local plan proposes employment allocations within a number of Minor Rural Centres and Group Villages, such as policy S/RRA/CRH which allocates 0.40 hectares of land for office development in Hauxton, policy S/RRA/BBP which allocates 2.11 of land for B2 and B8 development in Swavesey and policy S/RRA/NW which allocates 1.7 hectares of land for office development in Over. Whilst the strategy is positively prepared in supporting employment growth and economic development, it is considered that the approach to residential growth is not similarly positively prepared, resulting in an inconsistency whereby additional employment opportunities are promoted within Minor Rural Centres and Group Villages without corresponding provision for housing. Increasing employment provision in these locations is likely to generate additional demand for housing, and it is therefore considered that a more balanced strategy would support both employment and residential development in order to promote sustainable patterns of growth and reduce the need to travel.

4.3.6 Likewise, settlements identified as Group Villages within the draft settlement hierarchy are also appropriate for proportionate residential development. Settlements such as Meldreth and Over are sustainable settlements which have sufficient services available to allow for further growth.

4.3.7 The other 13 settlements are identified as being appropriate for growth, hence their ranking within the settlement hierarchy. Appropriate levels of development must be allowed to take place to ensure that existing settlements do not stagnate and become unsustainable. Linton, for example, has a demographic imbalance characterised by relatively low numbers of young children and younger adults. A balanced age structure is important in maintaining healthy and sustainable communities, supporting social cohesion, intergenerational interaction and the viability of local services. Increasing the supply of homes capable of meeting the needs of younger households would help address this imbalance, contributing to the long-term social sustainability and wellbeing of the area. Such development should be planned for through allocations rather than being reliant on only windfall development.

4.3.8 It is identified in the Meeting Our Needs section in paragraph 2.41 that the requirement of 10% of land that must be identified for small and medium sized sites by national policy has been met, with 4.3% being identified (allocated), meaning that the remaining 5.7% is through windfall development.

4.3.9 The justification for allocating less than half of this type of development site is explained in paragraph 2.42, where it is stated that further allocations would be extremely challenging (in terms of the larger numbers of sites that would need to be identified) and that planning for development in less sustainable locations would compromise the development strategy related to climate change and net zero carbon, with more car use needed in such locations.

4.3.10 Whilst we acknowledge the impacts on the environment, it would be inappropriate to elect not to plan for appropriate growth in settlements that have been identified in the settlement hierarchy as being sustainable. As above, settlements with no planned growth will, over time, become unsustainable settlements for the communities that live in them. The draft local plan heavily relies on larger developments, including new strategic sites, to deliver within the plan period whilst simultaneously overlooking the needs of the smaller settlements which can inherit growth, but are seemingly being denied this based on officer workload and a push for net zero carbon.

4.3.11 This approach will be unsustainable in the longer term for smaller settlements, and appropriate planned growth must be identified in each of these settlements. As outlined above, Gladman are promoting five sites across Linton, Meldreth, Over and Willingham which would all contribute to maintaining each settlement's sustainability through appropriate and organic growth.

4.3.12 Minor development (i.e. development of less than 10 dwellings, or is less than 0.5ha in size) would not suffice for the sustainability of such settlements. Planned growth is vital for the prosperity and longevity of a settlement, and as such appropriate residential allocations must be included in these locations. The five sites Gladman are promoting all exceed 10 dwellings and 0.5ha and are all suitable for the growth of the respective settlements.Given the reliance on the larger and strategic sites in the draft plan, and that such sites only realistically deliver in the latter years of a plan period, it falls on the smaller allocations to ensure delivery is made within the first five years of the plan to maintain the five year supply.

4.3.13 As outlined, such allocations are limited in number, and as such Greater Cambridge runs the risk of falling below a five-year supply of housing. More planned development, in the form of allocations, should be designated in this plan for small-medium sized sites to ensure delivery of housing in the first five years of the plan. Such sites would need to consist of more than 10 units and be larger than 0.5ha to have a realistic impact on the housing provision.

4.3.14 As above, Gladman is promoting such sites in Linton, Meldreth, Over and Willingham which will support this approach.

4.4 Development Management Policies

4.4.1 Draft Policy CC/SD: Sustainable development and the climate emergency

4.4.2 This policy is not necessary and over-onerous. We argue that the content requested in a Sustainability Statement can easily be included as part of a Design and Access Statement and/or Planning Statement. This appears to be acceptable for minor development applications (within paragraph 3 of the draft policy), however there is

no explanation for why there is a requirement for this to be a separate document for medium and large schemes.

4.4.3 We therefore request that this draft policy be removed and any such content required can form part of an application's Design and Access Statement and/or Planning Statement, regardless of the size of the scheme. There is no necessity for the information sought to be in a separate, standalone document when it can easily be incorporated within documentation which is already a requirement.

4.4.4 Draft Policy BG/BG: Biodiversity and geodiversity

4.4.5 We agree with paragraph 1 of this draft policy, as it reflects the legislation under the Environment Act (2021).

4.4.6 However, Gladman objects to paragraph 2 where it has a requirement of 20% Biodiversity Net Gain (BNG). Government guidance confirms that there is a requirement of at least 10% BNG on site. This paragraph must therefore be removed to reflect both national guidance and the Environment Act (2021) – Schedule 7A Part 1 para 2(3) and Schedule 2a para 3(2) which confirms that required amount is at least 10%.

4.4.7 It is noted that 20% is only requested where it is 'feasible and effective.' However, given that the request is 10% higher than what is required by national policy, inevitably the majority of the development industry will be seeking exemptions with the primary focus being the viability of a scheme. Such an exercise is unnecessary and overly onerous to result in a requirement that is already set nationally. Therefore, the request for 20% minimum BNG should be removed

4.4.8 Draft Policy H/CB: Self and Custom Build Homes

4.4.9 Gladman agree with the principles of this policy, as those who wish to commission/build their own home can play an important part in an LPA's housing numbers and delivery. Such avenues are becoming more popular and so an appropriate mechanism should be in place via policy to accommodate this type of development.

4.4.10 The draft policy requires all developments of 20 or more dwellings to provide at least 5% self or custom build plots. Whilst Gladman acknowledges the importance of self and custom build units, having a 5% requirement on schemes of just 20 units or more would surmount to a significant number of such units being a policy requirement.

4.4.11 It is suggested that this policy is amended to have a 'sliding scale' for the percentage of such dwellings needed per site (i.e. a lower percentage on much larger scheme, as this will still provide a larger number of self/custom build dwellings). Alternatively, the threshold of 20 units should be increased to a number in the region of 70 units, which is the approach being taken by Tonbridge and Malling in their draft local plan.

4.4.12 We disagree with paragraph 3a in this policy. We concur with the 12-month turnaround to sell such plots as self or custom build dwellings, however should they not be sold as such dwelling-types then they should be sold as open market plots, rather to registered providers as affordable dwellings. There is already a requirement of 40% of units on major developments to be affordable units (under draft policy H/AH: Affordable Housing), which is already a significant number per site. Additionally, it is likely that revised legal agreements will need to be drawn up if the plots switch from open market dwellings (marketed as self/custom builds) to affordable units, causing more unnecessary delays, costs and officer time to a scheme that has already been determined.

5 OMISSION SITES

5.1 Overview

5.1.1 Gladman are promoting a number of sites that have not been proposed for allocation within the Local Plan. For the reasons set out in response to the development strategy and housing delivery, further sites will be required to ensure delivery of the overall housing requirement of the plan. Each of the sites represents a suitable, achievable and sustainable site that could be included within the Local Plan.

5.2 Land off Back Road, Linton

5.2.1 Linton is designated as a Minor Rural Centre in the draft settlement hierarchy (Policy S/SH). With an estimated population of around 4,500, it is a sustainable location for growth.

5.2.2 Gladman is promoting Land off Back Road, Linton (SHLAA ref: Site 197) for a high-quality residential scheme of 75 new homes and associated community infrastructure. The 3.97-hectare site, as shown on Figure 1 below, offers an ideal opportunity for sustainable growth in Linton and would represent an organic extension of the village. The site is currently subject to a planning application (ref 26/01304/OUT) for 75 units.

5.2.3 The site comprises a single agricultural field on the northwestern side of the village. It is well-related to the existing settlement edge of Linton, lying immediately adjacent to the established built-up area. This close relationship to the settlement ensures that the site is visually and functionally connected to the existing community, while maintaining a logical and defensible boundary with the countryside beyond.

5.2.4 The site is sustainably located within easy walking and cycling distances of local facilities and the public transport network. Linton benefits from an excellent range of services and facilities that meet the daily needs of its residents, including a nursery, infant school, junior school, village college, community sports centre, doctors' surgery, pharmacy, dentist and a convenience store. There are bus stops located to the southeast of the site on Back Road that provide links to the local area and further afield within South Cambridgeshire

5.2.5 The site can deliver a wide range of market and affordable homes to meet the district's general and specialist housing needs, with the potential to deliver around 75 high-quality new homes including a policy compliant level of affordable homes. The site would be deliverable in the short term and would help to increase the supply and choice of housing in Linton.

5.2.6 The site is not subject to any statutory ecological, or landscape designations. The site is free of any overriding technical constraints that would frustrate its delivery and is in a sustainable location for growth.

5.2.7 As above, there is an over-reliance on larger sites to come forward and be built out within the plan period. There needs to be a more proportional breakdown to allow for organic growth in suitable settlements (as broken down in the settlement hierarchy, draft Policy S/SH) to ensure that there are appropriate levels of development in these locations. The most appropriate way to resolve these issues would be to approach a greater number of small-medium sized sites, as these not only assist with the overall housing need but also greatly assist with the delivery in the first few years of a local plan, and thus give further reassurance to the 5-year housing land supply.

5.2.8 Land off Back Road, Linton is a suitable, available, and deliverable site that will enable the Council to meet the need for new homes in the immediate five-year period. Gladman can confirm that there is no known physical, environmental, legal or ownership restriction that would impede the successful delivery of the site. On this basis, the site should be allocated for residential development.



FIGURE 1: LAND OFF BACK ROAD, LINTON

5.3 Land off Balsham Road, Linton

5.3.1 Gladman is also promoting Land off Balsham Road, Linton for residential development. The site is also subject to a planning application (ref 26/02429/OUT) for 65 dwellings. The site extends to a total area of 7.70 acres, with the site's location and the extent of the land under promotion by Gladman shown in Figure 2 below.

5.3.2 Located to the east of the settlement, Land off Balsham Road is capable of delivering 65 dwellings and, as outlined in 5.2.4 above, Linton benefits from an excellent range of services and facilities that meet the daily needs of its residents, including a nursery, infant school, junior school, village college, community sports centre, doctors' surgery, pharmacy, dentist and a convenience store. There are bus stops around 300m

to the west of the site provide links to the local area and further afield within South Cambridgeshire.

5.3.3 The site comprises of one agricultural field with residential properties running alongside its western and south-western borders. The northern side runs along Balsham Road which would provide the access, with the east border having thick tree coverage, and the southern boundary lying north of further agricultural fields.

5.3.4 A policy-compliant level of affordable housing could be provided, in a range of sizes and tenures. The site will accommodate a range of house types and sizes informed by local need.

5.3.5 Suitable mitigation and precautionary measures will be implemented on site to ensure that there are no significant adverse effects on ecology and 10% biodiversity net gain can be achieved through new habitat creation and enhancement.

5.3.6 In its SA score (site reference 40336), the site's only negative is associated with Objective 8, which relates to Efficient use of land. Gladman disagrees with this conclusion, as making the site available for residential development is wholly appropriate given the location in the settlement, the settlement itself, and the site's very limited number of constraints. Residential development in this location is suitable in the context of the settlement and, given its small-medium size, will greatly assist with the housing supply in the early years of the local plan.

5.3.7 In light of the above, the site off Balsham Road should be reconsidered for a residential allocation as part of this draft local plan.



FIGURE 2: LAND OFF BALSHAM ROAD, LINTON

5.4 Land off Whitecroft Road, Meldreth

5.4.1 Meldreth is designated as a Group Village in the draft settlement hierarchy. With an estimated population of around 1,900 people, it is a suitable settlement for small-medium scale residential growth. Gladman are promoting Land off Whitecroft Road for residential development.

5.4.2 Land off Whitecroft Road is capable of delivering around 85 homes and relevant community infrastructure. The entire site is approximately 6.0 acres, and its geographical position makes it a commutable distance to larger settlements, such as Royston to the south and Cambridge to the north. It lies near excellent transport links, with the A10 just one minute drive away to link with the aforementioned settlements, and a railway station just 600 metres away with excellent links to Cambridge and beyond.

5.4.3 The site is comprised of one agricultural field, with further agricultural fields immediately to the north. Whitecroft Road runs along its western boundary, with

residential dwellings to the south and east. The site's location can be seen in Figure 3 below.

5.4.4 A policy- compliant level of affordable housing could be provided, in a range of sizes and tenures. The site will accommodate a range of house types and sizes informed by local need

5.4.5 Suitable mitigation and precautionary measures will be implemented on site to ensure that there are no significant adverse effects on ecology and 10% biodiversity net gain can be achieved through new habitat creation and enhancement.

5.4.6 Any site-specific issues such as surface water flooding can be alleviated through design and layout of a scheme, as well as any flood-mitigation measures required.

5.4.7 The site is suitably positioned within the village and, given its size, will allow for an appropriate level of dwellings to be formed in the context of the wider settlement. Its strong transport links (both road and rail), size and overall location make the site an ideal residential prospect for the draft local plan. Given that more small-medium sites are needed, this site in Meldreth should be reconsidered for residential allocation to ensure that there is no risk to the housing need not being met over the plan period, as well as assisting with the 5-year housing land supply. Additionally, the site lies within reasonable distance to a railway station in a confirmed top 80 Travel to Work Area, and whilst the train frequency is not throughout every day, clearly the government's push for more development by railway stations is a consideration for this site and thus NPPF (2026) Section S5 paragraph 1h can be partially applied.



FIGURE 3: LAND OFF WHITECROFT ROAD, MELDRETH

5.5 Land off Station Road, Over

5.5.1 Like Meldreth above, Over is designated as a Group Village in the draft settlement hierarchy. With an estimated population of around 3,000 people, it is a suitable settlement for small-medium scale residential growth. Gladman are promoting Land off Station Road for residential development, with an application being submitted in due course.

5.5.2 Land off Station Road is capable of delivering around 70 homes and relevant community infrastructure. The entire site is approximately 8.6 acres, with strong commuter linkages, as it is a short drive to the A14 which then joins Cambridge to the east.

5.5.3 The site is suitably positioned, with it naturally 'rounding off' the settlement at its western side, with it effectively 'in-filling' within Station Road and New Road (i.e. the village is not expanding any further outwards).

5.5.4 The site consists of one field, and is surrounded by residential use to the north, Station Road and New Road to the west and south, and a sports pitch to the east. The site's location can be seen in Figure 4.

5.5.5 Suitable mitigation and precautionary measures will be implemented on site to ensure that there are no significant adverse effects on ecology and 10% biodiversity net gain can be achieved through new habitat creation and enhancement.

5.5.6 The site is suitably positioned within the village and, given its size, will allow for an appropriate level of dwellings to be formed in the context of the wider settlement. Its strong transport links, size and overall location make the site an ideal residential prospect for the draft local plan and for Over itself. There are no notable constraints for the site of any kind and, given that more small-medium sites are needed, this site in Over should be reconsidered for allocation to ensure that there is no risk to the housing need not being met over the plan period, as well as assisting with the 5-year housing land supply.



FIGURE 4: LAND OFF STATION ROAD, OVER

5.6 Land south of Willingham Road, Willingham

5.6.1 Land south of Willingham Road is capable of delivering around 100 homes and relevant community infrastructure. The entire site is approximately 11 acres, and it lies on the main access road into the settlement from the west. The main commuter route for Willingham is a short drive south of the settlement, where vehicles can join the A14. Given the site's position to the western side of Willingham, any vehicular impacts will be minimal due to commuters only driving through a small part of the settlement (along Willingham Road/Over Road and Station Road) before exiting the village towards the A14. The majority of dwellings are situated to the north and east of the settlement, thus meaning that there would be no notable impact upon the existing residents.

5.6.2 The site comprises of one, flat, agricultural field, with further fields immediately to the west and south, Willingham Road adjacent to the border to the north and one residential property to the east. The site's location can be found in Figure 5.

5.6.3 A policy- compliant level of affordable housing could be provided, in a range of sizes and tenures. The site will accommodate a range of house types and sizes informed by local need.

5.6.4 Suitable mitigation and precautionary measures will be implemented on site to ensure that there are no significant adverse effects on ecology and 10% biodiversity net gain can be achieved through new habitat creation and enhancement

5.6.5 The site has no notable constraints for development. Only minor flood risk (surface water) runs along Willingham Road on the site's northern boundary. Such a constraint can easily be mitigated against with careful design and layout, as well as any required mitigation measures.

5.6.6 The 30mph zone can be extended from its current position on Willingham Road (just west of Haden Way) to the western side of this site. This would provide further safety to existing residents as well as any future residents of the site.

5.6.7 The site is suitably positioned within the village and, given its size, will allow for an appropriate level of dwellings to be formed in the context of the wider settlement. Its

strong transport links, size and overall location make the site an ideal residential prospect for the draft local plan and for Willingham itself. There are no notable constraints for the site of any kind and, given that more small-medium sites are needed, this site in Willingham should be reconsidered for allocation to ensure that there is no risk to the housing need not being met over the plan period, as well as assisting with the 5-year housing land supply.



FIGURE 5: LAND SOUTH OF WILLINGHAM ROAD, WILLINGHAM

6 CONCLUSIONS

6.1 Summary

6.1.1 Gladman welcomes the opportunity to comment on the Greater Cambridge Local Plan and the spatial approaches that are currently being explored by the Council. These representations have been drafted with reference to the National Planning Policy Framework (NPPF 2024 – unless otherwise specified) and Planning Practice Guidance.

6.1.2 Gladman has provided comments on a number of the objectives and spatial approaches that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new local plan.

6.1.3 We hope you have found these representations informative and useful towards the preparation of the Greater Cambridge Local Plan.

6.1.4 Gladman welcomes any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.

7 APPENDICES

7.1 Appendix 1: Technical Note on Planned Job Growth and the Proposed Housing Requirement

Technical Note on Planned Job Growth and the Proposed Housing Requirement

Greater Cambridge Local Plan

September 2026

Introduction

1. Turley has been commissioned by Gladman Developments Ltd and Nightingale Land ('our clients') to review the evidence base underpinning the housing requirement of the Proposed Submission Greater Cambridge Local Plan[1] ('the draft Plan') which is currently subject to consultation, until 25 September 2026.

Proposed requirement

2. The draft Plan rightly refers to '*the Government's objective of significantly boosting the supply of homes*', and its expectation that authorities provide '***as a minimum**, the number of homes informed by a local housing need assessment using the standard method in national planning guidance*'[2] (our emphasis).

3. In the case of Greater Cambridge, the standard method is correctly noted as having indicated that **a minimum of 2,289 homes** are needed each year, since the underlying data was last updated in May[3].

4. The draft Plan refers to last year's Employment and Housing Needs Update[4] (EHNU) concluding that a '*similar*' rate of provision would support the '*continued flourishing of the Greater Cambridge economy*' by providing the labour force that will be needed to '*support the most likely forecast for future jobs*', whereby '*around 3,500 additional jobs per annum or more*' could be created through to 2045[5]. This is described as having taken '*account of what is unique about the Greater Cambridge economy*', allowing for a continuation of '*the recent period of rapid growth seen in…knowledge intensive sectors, but also building in an assumption that there will be slower or contracting periods and unforeseen shocks*', deemed '*likely in most economies*'[6]. The validity of this scenario is implied to have been '*reconfirmed*' through a '*review of economic data, context and representations*', in June 2026[7].

[1] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation

[2] *Ibid*, paragraph 2.8

[3] *Ibid*, paragraph 2.13

[4] Iceni (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045

[5] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation, paragraph 2.10 and paragraph 2.13

[6] *Ibid*, paragraph 2.10

[7] Iceni (June 2026) Review of economic data, context and representations: Greater Cambridge Local Plan

5. It is seemingly on this basis that the draft Plan proposes to align precisely with the outcome of the standard method by setting **a requirement for at least 2,289 dwellings per annum** over the period from 2024 to 2045, equivalent to '*a minimum of 48,069 new homes*' in total[8].

An underlying job forecast that is lacking in ambition

Flawed reliance on a single baseline forecast

6. Our clients welcome the depth of analysis in the EHNU and particularly its scrutinisation of a baseline forecast, where these have been previously found to have historically underestimated job growth in Cambridgeshire and Peterborough by '*a significant margin*' even when '*state-of-the-art techniques*' were employed[9].

7. They are, however, concerned by the EHNU's reference to only one such forecast – from Cambridge Econometrics (CE) – when comparable studies often draw upon several from a range of providers. It does so despite having seemingly recognised the value of triangulating available data on *historic* employment growth, in both the EHNU[10] and the subsequent '*review*'[11]. This makes the continued use of a single forecast – believed to have been originally developed by CE in 2022[12] – all the more surprising.

Other available forecasts of economic growth in Greater Cambridge

8. The '*review*' does indirectly reference the views of another of the leading forecasting houses – in Oxford Economics (OE) – who are noted as having been commissioned by the Ministry of Housing, Communities and Local Government (MHCLG) to develop '*growth scenarios*' for Greater Cambridge within an '*independent report*' that was published in April 2025[13]. It is surprisingly dismissive of this objective analysis, claiming it to '*not…be based in evidence*' despite its technical annex making clear that it has been based on OE's '*suite of global and national macroeconomic and industry forecasting models*', comparable to those believed to have been used by CE[14]. It is thus entirely reasonable to note that OE envisage up to 8,480 jobs being created annually over the period from 2023 to 2050, with at least 5,370 even in a '*low scenario*', the draft Plan's targeting of only 3,500 jobs per annum – over a slightly shorter period (2024-45) – appearing very pessimistic within this context.

[8] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation, Policy S/JH

[9] Cambridgeshire and Peterborough Independent Economic Review (September 2018) p68

[10] Iceni (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, p19-20. '*Survey-based*' data from the Business Register and Employment Survey (BRES) is here compared to '*separate employment data*' assembled by the Centre for Business Research (CBR) at the University of Cambridge Judge Business School

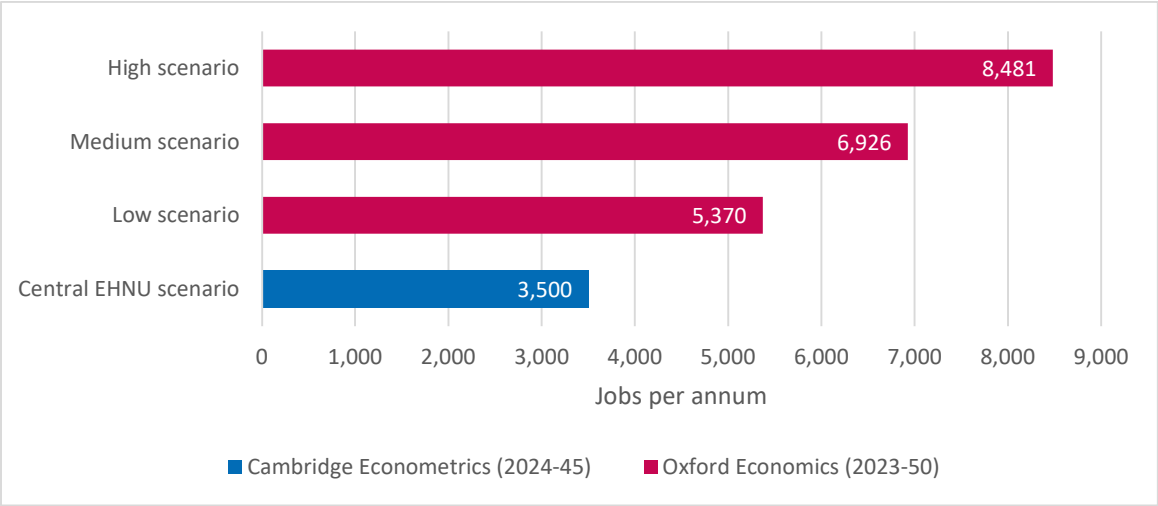
[11] Iceni (June 2026) Review of economic data, context and representations: Greater Cambridge Local Plan, section 2. This again reviews data from BRES and the CBR

[12] *Ibid*, footnote 5

[13] *Ibid*, paragraph 3.5

[14] *Ibid*, paragraph 3.5; MHCLG (November 2025) Greater Cambridge: Growth Scenarios

Figure 1: Comparing OE Forecasts to EHNU Baseline



Source: OE; CE; Turley analysis

9. It likewise appears modest in the context of the Local Growth Plan (LGP) that was produced by the Cambridgeshire and Peterborough Combined Authority (CPCA) in October 2025[15]. This describes how economic output – measured in gross value added (GVA) – could grow by an average of around 1.2% per annum based even on '*business as usual*' but it proceeds to set the '*core target*' of doubling the size of the economy, seemingly returning to a '*competitive rate of 2.8%*'[16]. The Mayor's ambition is stated as being to actually '***triple** the size of the economy by 2050*' (our emphasis) with it noted that this area's '*historic growth and track record*' make it one of the '*few UK areas capable of achieving this magnitude of economic growth*'[17].

10. The job growth targeted by the draft Plan would represent an increase of only 1.3% per annum, which – though not directly comparable to measures based on GVA – does appear modest in an area that is aiming to increase its economic output at over twice as fast a rate. The draft Plan would be arguably more likely to undermine these ambitions, where the '*review*' itself points towards two separate sources having confirmed that employment in Greater Cambridge has grown by an average of more than 2.1% per annum since 2010, with the proposed target effectively slowing this by more than a third[18].

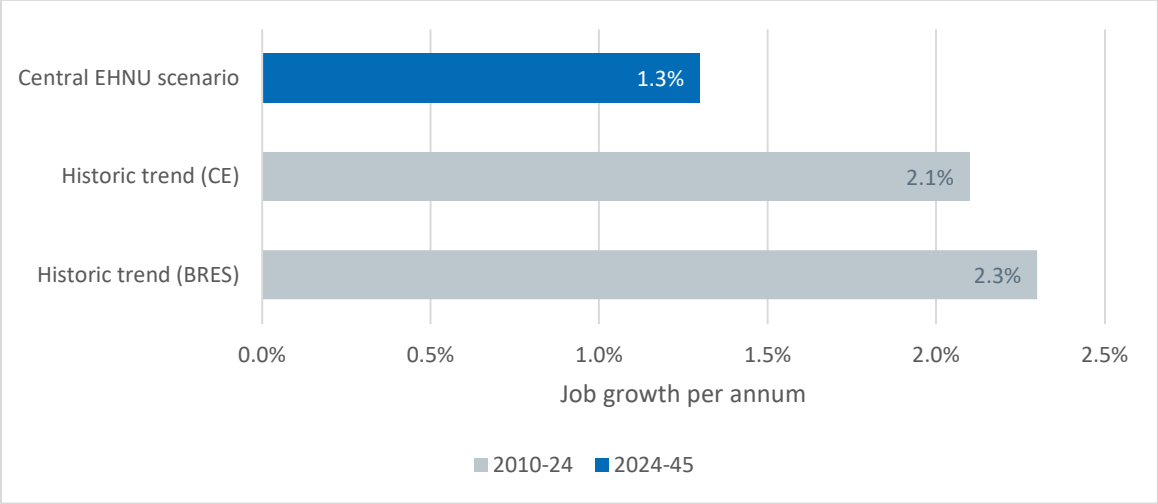
[15] CPCA (October 2025) Get Cambridgeshire and Peterborough Growing: a Local Growth Plan with National Reach and Global Impact

[16] *Ibid*, p10-11

[17] *Ibid*, p11

[18] Iceni (June 2026) Review of economic data, context and representations: Greater Cambridge Local Plan, Table 2.2

Figure 2: Benchmarking EHNU Baseline to Historic Trend (2010-24)



Source: Iceni; Turley analysis

11. The apparent involvement of CE in the production of the LGP – which commenced over two years ago[19] – does suggest that it would have been possible to align the draft Plan with its ambitions, given that its forecasts have previously fed into the EHNU. A more up-to-date economic forecast aligned with the LGP – as is believed to have been encouraged by the CPCA[20] – would provide a more representative basis from which to assess the alignment with population change, and understand related housing needs, than the increasingly dated forecast used in the EHNU.

Accounting for economic investment – a higher growth forecast

12. Whilst a forecast aligned with the LGP has not been produced, the draft Plan does note that the EHNU '*identified a higher growth forecast*', in which an average of 4,329 jobs would be created annually over the period from 2024 to 2045[21]. It is unequivocal in stating that this '*could be achieved*' or even '*exceeded*' if there is '*a step change in infrastructure investment and development*'[22].

13. Despite this acknowledgment of the potential for higher growth in Greater Cambridge, the EHNU appears – without clear justification – to then assess these underlying preconditions as being unlikely to be realised, recommending a more cautious approach. The lack of justification for this assertion is concerning where it appears to directly contradict the stated intention of the Government and its plans to invest in return for economic growth in Greater Cambridge.

14. The former Chancellor announced plans, in January 2025, to go '*further and faster*' to unlock growth along the Oxford-Cambridge corridor to capitalise upon its potential to be Europe's Silicon Valley and add £78 billion to the UK economy by 2035[23]. The current Minister of State for

[19] A report to the Combined Authority Board, on 19 March 2025, confirms that '*a Local Growth Plan Working Group…was established in August 2024 to oversee the development of the LGP*'

[20] Appendix 6 of the Councils' Consultation Statement indicates, on p40, that the CPCA requested for the Plan to be updated '*to reflect the ambitions of the…Local Growth Plan, including key growth sectors*'

[21] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation, paragraph 2.11; Iceni (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, Table 3.6

[22] Iceni (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, paragraph 3.62

[23] https://www.gov.uk/government/speeches/chancellor-vows-to-go-further-and-faster-to-kickstart-economic-growth

Housing and Planning subsequently described how '*numerous long-standing barriers to further growth*' had been historically preventing the corridor from '*realising its true potential*', reporting these to be '*particularly acute in Greater Cambridge*'[24]. He referred to the Cambridge Growth Company (CGC) having been tasked with the development of an '*evidence base to support an infrastructure-first growth plan and a long-term delivery vehicle*' befitting the '*nature, scale and complexity of ambitious and high quality sustainable growth in Cambridge and its environs*'. This was found to require '*a delivery vehicle with the necessary powers, authority and access to finance*', leading the Government to conclude that '*a centrally led development corporation*' (DC) would be the best option for delivering '*nationally significant growth in Greater Cambridge*'. An '*ambitious funding package*' of up to £400 million would initially be made available to such a body to '*remove barriers to sustainable growth and boost housing supply*', with this having notably been '*welcomed*' by the leaders of both Councils[25].

15. With the EHNU drawing parallels with Milton Keynes as an area that is claimed to have seen '*huge population and economic growth*' only because of '*an unrivalled programme of investment and development*', it is of note that this was also led by a DC of the kind that the Government has now, as of July 2026, formally established in Greater Cambridge[26].

16. One of the '*six core objectives*' of the DC[27] – which has effectively replaced the CGC – is '*achieving transformational economic growth*' and our clients do question the extent to which this marries with a draft Plan that is based on only '*likely*' growth, the Councils having seemingly limited their ambitions due to perceived constraints that the Government is actively tackling[28].

17. The relevant National Planning Policy Framework (NPPF) notably does not limit authorities to only pursuing economic growth that is likely – referring instead to '*growth **ambitions***'[29] (our emphasis) – and the accompanying Planning Practice Guidance (PPG) likewise expects them to '*reflect economic growth **aspirations***' (our emphasis) in considering '*the merits of planning for higher growth*'[30]. The NPPF more generally expects authorities to '*address potential barriers to investment, such as inadequate infrastructure, services or housing*', rather than assuming that they will prevent areas like Greater Cambridge from capitalising on '*their performance and potential*'[31]. It expects planning policies to be based on '*a clear economic vision and strategy which positively and proactively encourages sustainable economic growth*', suggesting that '*this is 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*'[32]. Cambridge is unquestionably one such area, as a city with '*higher-than-average rates of productivity*' that is viewed as '*one of the United Kingdom's most innovative economies*'[33].

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[24] https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws990

[25] https://www.cambridge.gov.uk/news/2025/10/23/council-leaders-welcome-multi-million-pound-investment-in-greater-cambridge---but-say-more-detail-is-needed

[26] Iceni (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, paragraph 3.62

[27] https://thecgc.org.uk/index.php?contentid=180

[28] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation, paragraph 2.10

[29] MHCLG (December 2024) National Planning Policy Framework, paragraph 69

[30] PPG Reference ID 2a-040-20241212

[31] MHCLG (December 2024) National Planning Policy Framework, paragraph 85 and 86c

[32] *Ibid*, paragraph 85 and 86a

[33] Department for Levelling Up, Housing and Communities (March 2024) The Case for Cambridge

18. In responding to the Councils' previous consultation, the CGC – now the DC – was unequivocal in stating that '*employment and housing growth exceeding the Local Plan could be delivered within the plan period*' so long as '*infrastructure constraints can be addressed*', going so far as to recommend that '*the policy wording should acknowledge this and include sufficient flexibility to accommodate higher levels of growth prior to 2045*', potentially even '*beyond*' its '*High Growth assumptions*'[34]. The CPCA similarly advocated planning for '*at least*' the higher growth scenario, given the '*ambitions*' of its LGP, '*rapid economic growth, transport improvements…and government support'*[35].

19. A failure to account for the stated commitment to invest in this area to overcome infrastructure constraints does not represent a positive approach to plan-making. The result is an unsound plan.

Implications – justifying a higher housing requirement

20. In light of the above, our clients believe that the Councils could have been far more ambitious in developing the draft Plan, targeting the creation of **at least 90,900 jobs** – to align with the higher growth scenario presented in the EHNU – rather than the 73,300 proposed at draft Policy S/JH.

21. It should consequently plan, as a minimum, for what the EHNU reports to be the associated need for **circa 2,829 homes per annum**, rather than meeting only the minimum need that is currently suggested by the standard method (2,289dpa). This is clearly permitted by an NPPF that allows housing requirements to be '*higher than the identified housing need if, for example, it…reflects growth ambitions linked to economic development or infrastructure investment*'[36]. It is indeed this that was last year cited by the Oxford Growth Commission, at the opposite end of the corridor, in concluding that '*delivery above the new standard method will be required*' since that was acknowledged to not '*make any specific allowance for a growth strategy'* and doing so would '*support the potential for economic growth in a sustainable way*'[37].

22. Simply providing for the number of homes calculated under the standard method (2,289 dpa) would lead to there being an insufficient number of homes in Greater Cambridge if this area does indeed create more than 73,300 jobs, the draft Plan notably acknowledging this prospect in discussing the need for '*flexibility in employment land in case the market delivers more jobs than anticipated*'[38]. This logic can naturally extend to cover the homes in which workers would live, as the alternative would be expected to only increase the burden on neighbouring areas that were already relied upon to fill some 39% of the jobs that existed in the area's workplaces as of 2021. It would likely thus increase use of private vehicles where some 84% of those commuting more than 10km to work in Greater Cambridge travelled by car, compared to only 46% of those travelling shorter distances[39].

[34] CGC comments on GCSP Emerging Local Plan (Reg 18 consultation version) – January 2026 (Representation ID 203900)

[35] Appendix 6 of the Councils' Consultation Statement, p40

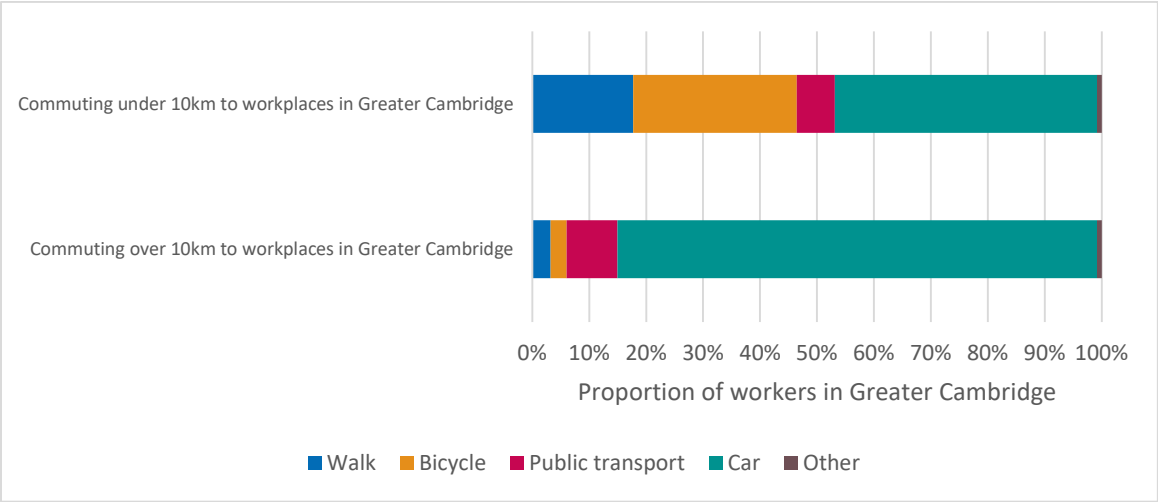
[36] MHCLG (December 2024) National Planning Policy Framework, paragraph 69

[37] Interim Report of the Oxford Growth Commission (December 2025) p3

[38] Greater Cambridge Shared Planning (August 2026) Proposed Submission Local Plan – Regulation 19 Consultation, paragraph 2.11

[39] Including both drivers and passengers as well as those travelling by taxi

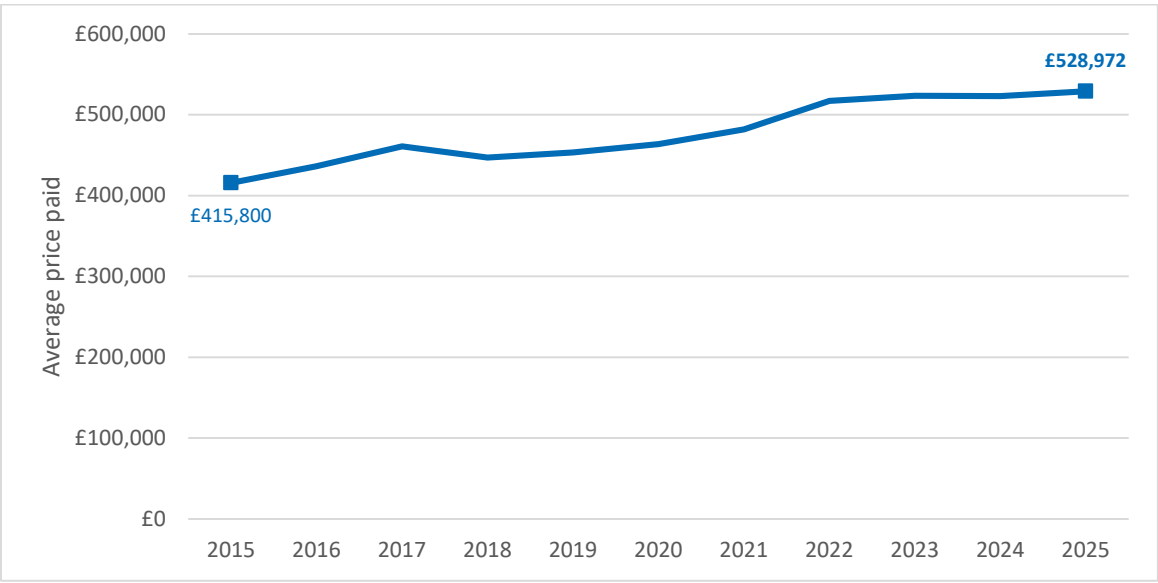
Figure 3: Method of Travel to Workplaces in Greater Cambridge by Distance (2021)



Source: Census 2021; Turley analysis

23. It would also be expected to only increase demand for whatever homes are available in Greater Cambridge, threatening to exacerbate a situation that has already seen prices rise by an average of 2.5% per annum over the last reported decade, and indeed by slightly more (2.7%) over the last five years alone[40]. The average home in Greater Cambridge cost almost £529,000 last year, some 27% more than was recorded a decade earlier.

Figure 4: Change in Average Price Paid to Purchase Housing in Greater Cambridge



Source: Land Registry; Turley analysis

24. **Planning more positively for at least 2,829 homes per annum** should help to improve this situation, allowing the housing stock to grow by an average of 1.8% per annum over the 21-year plan period (2024-45) and thus markedly improving upon the trend over the prior such period,

[40] Land Registry (2026) Price paid data

back to 2003, with the stock having grown by an average of only 1.4% per annum in that time[41]. The proposed requirement for only 2,289 dwellings per annum would contrastingly enable growth of only 1.5% per annum, bringing only a modest improvement at a time when the Government is aiming to '*significantly*' boost the supply of homes[42]. Our clients firmly believe that the Councils must be more ambitious to fully capitalise upon planned investment and ensure that historic constraints do not prevent Greater Cambridge from realising its full economic potential.

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[41] MHCLG (May 2026) Table 125: dwelling stock estimates by local authority district, England, 2001-2025

[42] MHCLG (December 2024) National Planning Policy Framework, paragraph 61



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