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

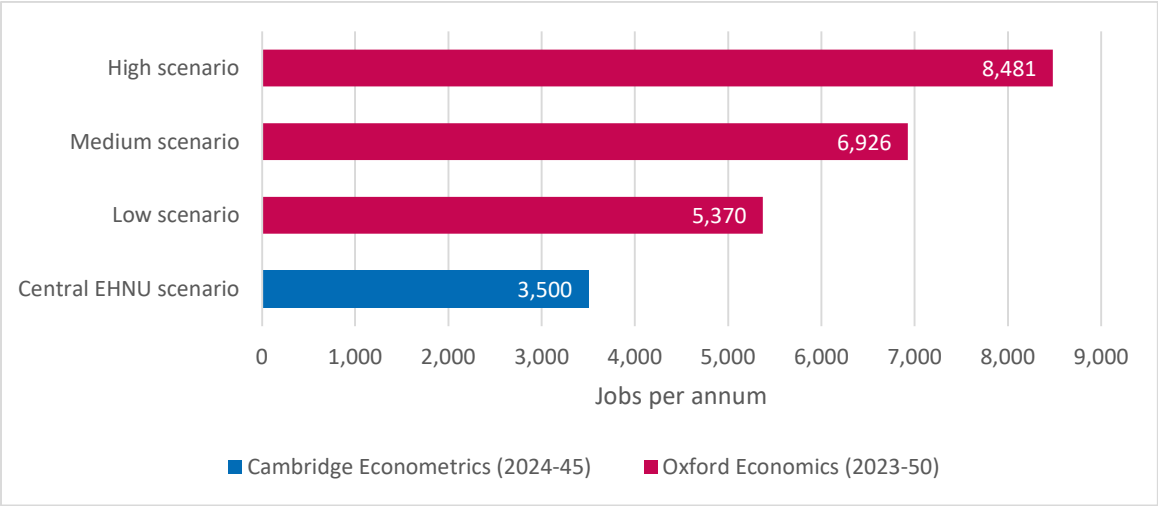
[11] Iceni (June 2026) Review of economic data, context and representations: Greater Cambridge Local Plan, section 2. This again reviews data from BRES and the CBR

[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].

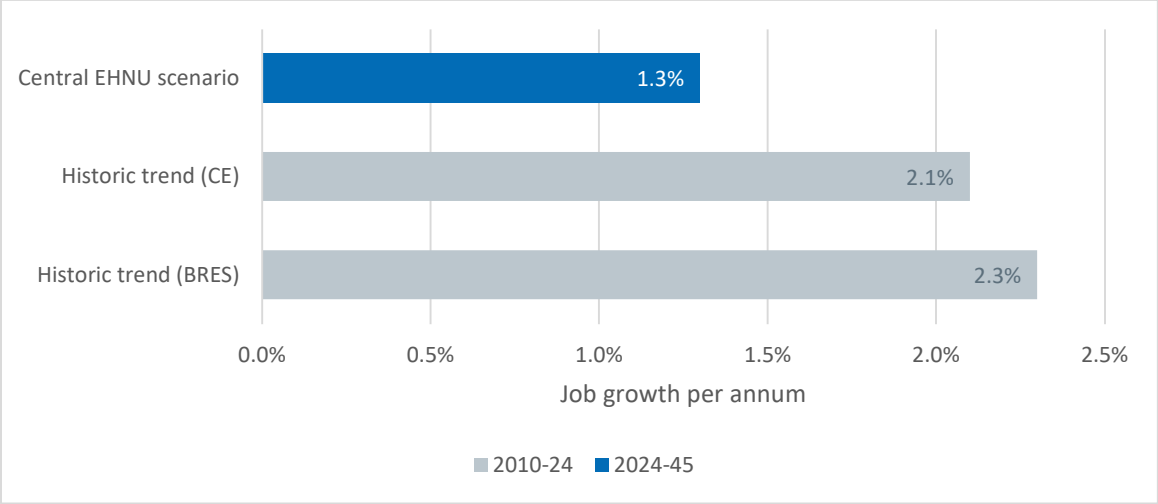
[15] CPCA (October 2025) Get Cambridgeshire and Peterborough Growing: a Local Growth Plan with National Reach and Global Impact

[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

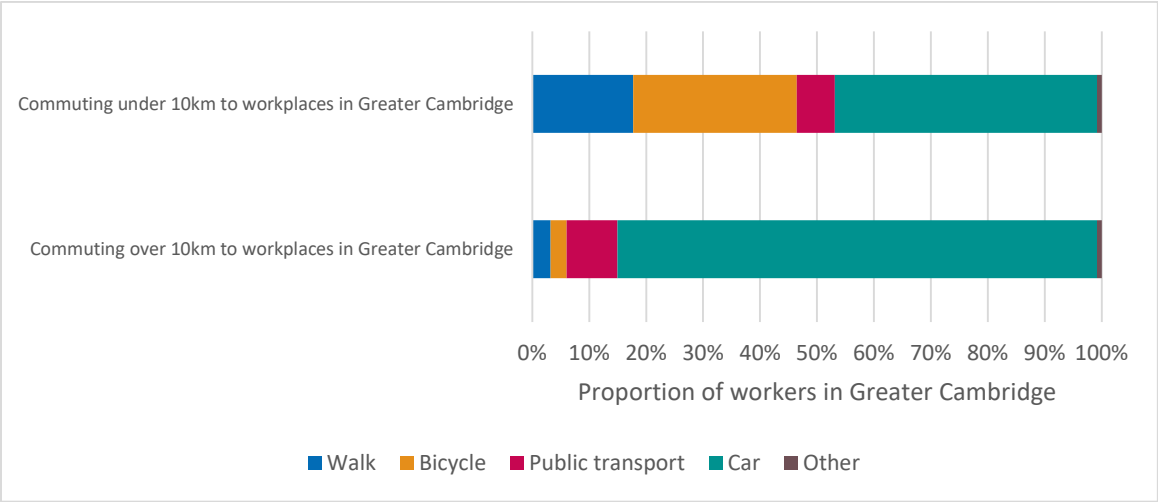
[36] MHCLG (December 2024) National Planning Policy Framework, paragraph 69

[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

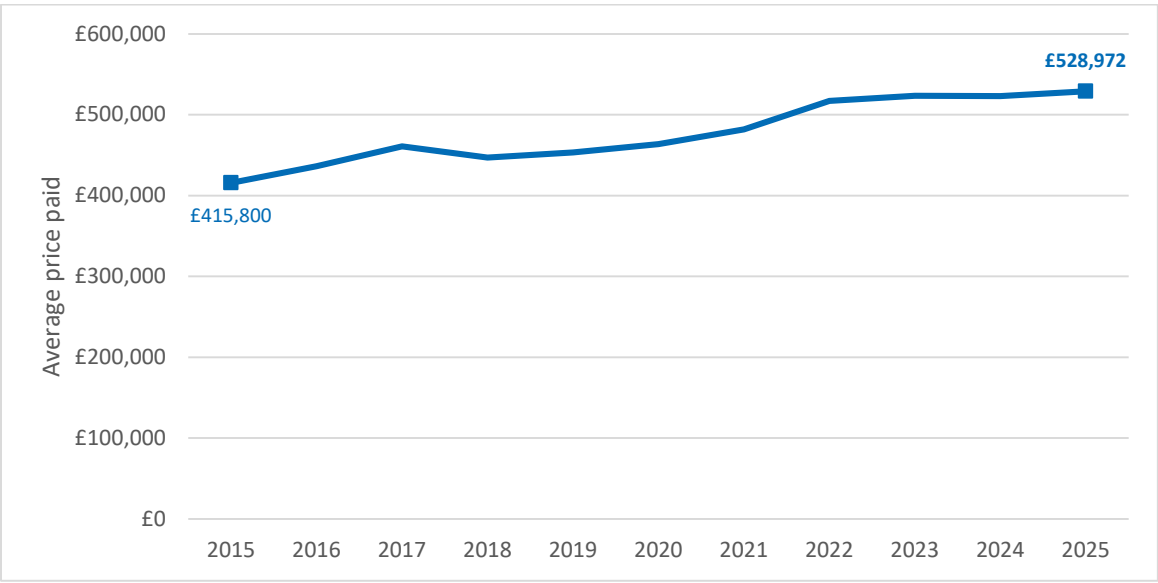
Figure 3: Method of Travel to Workplaces in Greater Cambridge by Distance (2021)



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