Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name	Holly Gardiner	Matt Clarke
Organisation (where relevant)	Wates Developments	Boyer
Job Title (where relevant)		Director, Head of Boyer East
Address, including Post Code	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
Telephone		01206 584750
Email address		mattclarke@boyerplanning.co.uk

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	**Policy S/JH: New Jobs and Homes**
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Policy S/JH: New Jobs and Homes

Policy S/JH sets out the level of need for jobs and homes in Greater Cambridge for the plan period of 2024-2045, whilst the supporting text discusses the basis for these, having regard to topic papers and evidence base documents.
It specifies that the plan will make provision for an additional 73,300 jobs in support of Greater Cambridge's knowledge intensive sector, and a diverse range of local jobs more generally, and a minimum of 48,069 new homes to meet the needs for the total population, including affordable housing and specialist accommodation needs of specific groups.

Key matters to address are whether the plan period has been appropriately defined and, in turn, whether the quantum of both employment and housing development identified is sufficient to meet the objectively assessed needs for the Greater Cambridge area.

On the first of these points, it is noted that the plan period encompasses a total of 21 years, from 2024 through to 2045. Whilst, on the face of it, this appears to be a reasonable timeframe, it is important to consider whether this would meet the NPPF24 requirement (set out at para. 22) for strategic policies to look ahead over a minimum 15-year period from adoption, and for policies to be set within a vision that looks ahead at least 30 years, where larger scale developments such as new settlements and significant urban extensions are proposed.

The Pre-Submission Local Plan suggests that adoption may not be envisaged until 2028/29, meaning that whilst this would theoretically provide for 16 years post-adoption, any further delay to the plan-making and examination process would risk falling below the minimum 15-year timeframe, whilst arguably a longer period should be covered on account of the large sites included in the strategy in any event.

National planning policy sets out that Local Plans should provide for the objectively assessed needs for housing and other uses. Para. 2.8 of the Pre-Submission Local Plan outlines the interrelationship between jobs and housing provision, explaining that in addition to ensuring that minimum housing requirements arising from application of the mandatory standard methodology are met, regard should be had to the need to support economic growth and productivity. This is particularly relevant in the context of the importance of Greater Cambridge's continued economic growth on a national scale, a point which is also acknowledged at para. 2.8 of the Reg 19 Local Plan, as justification for exploring higher employment and related housing figures.

During evolution of the emerging Local Plan, the Government has published statements underlining this important role, including 'The Case for Cambridge' in March 2024 and 'Realising the Full Potential of Greater Cambridge' in October of the same year, which

outline aspirations for delivery of 150,000 new homes by 2050 in order to support economic growth.

National planning policy provides information for local plans to support the Government's objective to boost the supply of homes, including the minimum provision of the number of homes informed by a local housing need assessment using the standard method in national planning guidance. Planning Practice Guidance notes that there will be times that the housing need is higher than indicated by the standard method. The Greater Cambridge economy is nationally important and therefore there is clear justification for higher employment and housing figures.

The Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU) identifies the Government's Standard Method for the calculation of the minimum housing need and notes that this increased significantly in 2024. The calculation was combined across Cambridge and South Cambridgeshire, and the assessed needs for homes applied together for the purposes of housing delivery including calculating housing land supply and the Housing Delivery Test.

With regard to jobs, the EHEU sets out a central scenario as the most likely outcome for employment growth, requiring an additional 73,248 jobs by 2045. However, it also identifies a higher scenario of 90,900 jobs that may be achievable. It goes on to conclude that application of the standard method requirements for housing would support 73,362 jobs (using its preferred 2011 commuting assumptions) and that the central scenario would therefore be achieved via the standard method derived housing growth levels.

Whilst the supporting text of the Pre-Submission Local Plan acknowledges that the EHEU recommended the need for flexibility to allow for potential achievement of higher job growth, so as not to restrict employment growth, it is unclear that this has been reflected in the wording of Policy S/JH itself, given application of the lower, central scenario and acceptance of the standard method on the basis that its housing levels would meet this.

As such there is a potential risk of restricting job growth and failing to meet the economic objective of sustainable development included in NPPF24 (para 8a). As set out in Paragraph 86a, planning policies should set out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth. As noted above, and acknowledged elsewhere in the Pre-Submission Local Plan, this is of particular importance given the aspirations to ensure the future economic growth potential of the Greater Cambridge sub-region is fully realised.

In order to provide flexibility to facilitate higher jobs growth, it will be necessary for the Greater Cambridge Local Plan to also provide flexibility in the delivery of additional homes to support any additional jobs and to reduce levels of in- and out-commuting to and from Greater Cambridge, and the resulting impacts this would have on climate change and congestion.

The latest standard method information (from May 2026) indicates a need for delivery of a minimum of 1,085 dwellings per annum in Cambridge City and 1,204 in South Cambridgeshire, equating to an annual figure of 2,289 across the joint plan area. Over the 21-year timeframe of the proposed plan period this therefore establishes a minimum requirement for 48,069 new homes, which is correctly identified in Policy S/JH.

Whilst the Councils propose allocation of enough sites to provide a buffer to enable flexibility to deal with unforeseen circumstances (under Policy S/DS, on which we provide separate comments), flexibility to support higher jobs growth should also be incorporated in the Local Plan.

To provide for appropriate flexibility for unforeseen economic growth, a range of additional contingency site allocations should be included within the housing trajectory. This will ensure the Local Plan is positively prepared, justified and effective in accordance with the NPPF24 tests of soundness. Land West of London Road, Fowlmere offers a sustainable location for development and is immediately available for development, therefore able to contribute to the Councils' short- to medium-term housing delivery rates.

In view of these assertions, it is considered that Policy S/JH is unsound, being neither positively prepared nor effective in meeting the economic growth aspirations for Greater Cambridge.

Please provide a 100 word summary of your representation.

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Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see accompanying statement

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

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Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

So that the matters raised within these submissions can be developed through direct discussion in order to assist the Inspector's assessment more efficiently than relying solely on these written representations.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes