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		Andrew Hodgson
Organisation (where relevant)	CEMEX UK Properties Ltd	Pegasus Group
Job Title (where relevant)		Senior Director
Address, including Post Code		Victory House Vision Park CB249ZR
Telephone		[redacted]
Email address		[redacted]

* 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	S/JH
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	
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.

1.1. Policy S/JH: New jobs and homes confirms that the objectively assessed housing need for Greater Cambridgeshire for the period 2024-2045 is a minimum of 48,069 new homes (2,289 new homes per annum). This minimum number of new homes are required to deliver 73,300 additional jobs in Greater Cambridgeshire in the same period. CEMEX welcomes the Plan's headline commitment to address local housing need in full.

1.2. Notwithstanding the above, CEMEX still has a concern that the approach to planning for and delivering growth in the Local Plan is still to some extent disconnected from the wider regional and national ambition to deliver accelerated growth in the Greater Cambridge area. The evidence base document "Review of economic data, context and representations, Greater Cambridge Local Plan, June 2026" states that MHCLG's Greater Cambridge Growth Scenarios (November 2025) set out three growth scenarios for the period 2023-2050:

- Low 100,000 new homes and 145,000 new jobs;
- Medium 125,000 new homes and 187,000 new jobs; and
- High 150,000 new homes and 229,000 new jobs.

1.3. These projections provided to MHCLG by Oxford Economics have all been dismissed by the Councils in the preparation of the Local Plan. The concern is that whilst it is not uncommon for there to be a difference between economic growth scenarios modelled by different parties, the low growth scenario stated above is still in excess of double the growth put forward by the emerging Local Plan. The Cambridgeshire & Peterborough Combined Authority's (CPCA) Local Growth Plan (October 2025) identifies the potential to double or even triple the size of the economy in the period to 2050.

1.4. CEMEX believe the above projections and ambitions highlight a significant missed opportunity by the Councils to deliver more ambitious levels of growth via the emerging Local Plan. It feels as if the ambitions of MHCLG and the CPCA have been dismissed simply because the growth ambitions were published late in 2025, likely to close to the publication of the Regulation 18 Local Plan. This decision could ultimately stifle the economic growth of Greater Cambridge and or result in additional unplanned economic growth coming forward without a defined and robust strategy to deliver the required supporting housing growth. The latter scenario would heap further housing

affordability and availability pressures on Greater Cambridgeshire housing market at a time when there are already chronic existing problems relating to these two matters.

1.5. Accordingly, it is even more important that the proposed supply of homes in the Local Plan is robust. CEMEX's representations to Policy S/DS: Development Strategy will address this matter in full. However, of relevance to Policy S/JH is the approach to delivering new homes in Neighbourhood Plan Areas (NPA). Appendix C of the Local Plan provides the housing requirement for designated NPAs. Appendix C lists 27 designated Neighbourhood Plan Areas and allocates a total of 1,553 dwellings to be delivered across these Areas.

1.6. As stated at paragraph 2.22 of the Local Plan, it is not mandatory for a Neighbourhood Plan to include a housing requirement or identify sites to meet a housing need. Indeed, in the case of Orwell, early indications from the Parish Council (a key element of the Neighbourhood Plan Group) is that their emerging Neighbourhood Plan will not contain a housing requirement of site allocations. Indeed, this is a common approach across the country.

1.7. The Local Plan appears to include the 1,553 dwellings from Neighbourhood Plans in the Plan's overall Windfall Allowance of circa 6,660 dwellings over the Plan period. This equates to 23% of the already high windfall allowance. CEMEX have concerns that should a Neighbourhood Plan not make allocations, as is relatively commonplace, new sites will not come forward in these NPAs and ultimately the overarching housing targets set out in the Plan will not be met. Alternatively, a Neighbourhood Plan may simply not come forward or be Made, which again would result in housing need being unmet.

1.8. In the neighbouring local authority of Uttlesford District Council (UDC) their new Local Plan (adopted March 2026) takes a positive and proactive approach to housing delivery in this regard. Core Policy 19: Rural Area Housing Requirement Figures states:

"If a Neighbourhood Plan with sufficient allocations to deliver the housing requirement in full has not passed independent examination and referendum and been 'made' by the date two years after the Local Plan is adopted, then the local planning authority will instead make the allocations in either a Local Plan Review or other Development Plan Document. This is to ensure the delivery of the Larger Villages housing requirements during the plan period"

1.9. It is strongly contended that Policy S/JH and Appendix C should be amended to include similar policy wording to the above to ensure housing in Rural Areas is delivered and that Windfall Sites come forward at the proposed rate. Without this additional wording Policy S/JH cannot be considered positively prepared, justified or effective in the context of paragraphs 36 a), b) and c) of the National Planning Policy Framework

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.

n/a

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.

An additional paragraph should be added Policy S/JH as follows:

"If a Neighbourhood Plan with sufficient allocations to deliver the housing requirement in full has not passed independent examination and referendum and been 'made' by the date two years after the Local Plan is adopted, then the local planning authority will instead make the allocations in either a Local Plan Review or other Development Plan Document. This is to ensure the delivery housing at sustainable settlements such as Group Villages in the rural area of South Cambridgeshire."

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	Y

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

CEMEX are keen to further explain and reiterate these matters verbally as part of examination hearings as to date the Councils have had limited / no appreciation or acknowledgement for our representations.

Importantly, the proposed approach to neighbourhood planning/windfall delivery will result in very limited delivery of new homes at sustainable village locations which will result in the stagnation and or decline of village service provision. It is of vital importance that this matter is given due consideration and discussion at the examination hearings.

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	Y
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Y
Informed of adoption of the Local Plan	Y