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/DS
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.

Policy S/DS Development Strategy directs employment and housing growth to five specific areas or settlement types in Greater Cambridgeshire in an order of preference with top of the list being within the Cambridge urban area and the bottom of the list being "*the rural southern cluster and the wider rural area at Rural Centres and Minor Rural Centres".*

Supporting Table 1 in the Local Plan confirms that after taking into account the existing committed supply of 38,378 homes the Local Plan needs to find sites to deliver 9,691 dwellings to deliver the housing need in full. The approach to the distribution of making new allocation in the Local Plan is summarised as follows:

- CAMBRIDGE URBAN AREA: 321 dwellings across eight sites = 2.4%
- EDGE OF CAMBRIDGE: 7,800 dwellings across four sites = 57.1%
- NEW SETTLEMENTS: 5,220 dwellings across three sites = 38.2%
- RURAL SOUTHERN CLUSTER: 103 dwellings across two sites = 0.8%
- REST OF RURAL AREA: 210 dwellings across three sites = 1.5%
- TOTAL: 13, 654 dwellings (providing a buffer of 3,963 dwellings)

The above demonstrates that approx 95% (13,020 dwellings) of the proposed new allocations are located at sites of a strategic scale.

When examining the committed supply, it is evident that there is also a strong reliance on the delivery of strategic sites with approximately 63% (24, 133 dwellings) of supply coming from either New Settlements or strategic sites on the Cambridge fringe. Again, the rural areas of South Cambridgeshire are afforded a limited percentage of the planned growth with 422 dwellings identified over the Plan period (1.2%).

Table 1 of the Local Plan and the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2026) identify 313 and 442 dwellings respectively to be delivered at site allocations (existing and proposed) in the rural area of South Cambridgeshire across the Plan period. Of the new allocations only two are identified for delivery at Group Villages, 65 dwellings at Caldecote and 60 dwellings at Duxford. It is

unclear as to why these two Group Villages have been identified as being capable of supporting a specific site allocations in the Local Plan; when compared to other 31 Group Villages across the district.

The proposed Development Strategy has been devised by the Councils on the basis of delivering housing growth in the most sustainable locations or the most sustainable options i.e. away from Group Villages in the rural areas due to a perceived over reliance on the private car. However, the Development Strategy is so unbalanced and weighted away from delivering homes at Group Villages in the rural area, it will deliver the stagnation and decline of these settlements. In effect it will make what the Councils perceive to be less sustainable settlements even less sustainable to the detriment of existing communities. Without delivering proportionate and sustainable levels of growth at Group Villages the viability of local services and infrastructure will decline, and the local housing market will stagnate, likely resulting in an ageing population. Local public transport links will become unviable and thus then promote the use of the private car and or isolate residents of these communities – thus delivering the opposite of what the Development Strategy and policies of the Local Plan promote i.e. reducing the reliance on the private car and environmental sustainability.

The Development Strategy is not robust in its approach to providing a flexible housing supply and trajectory which is capable of responding to change in the housing market or delivery rates at strategic sites (the latter being common when considering delays in planning and the need to deliver costly upfront infrastructure).

Whilst the approach to providing a supply buffer is in principle supported by CEMEX, in this case the makeup of the buffer is not sufficient as it is largely formed by strategic sites which make up the supply to meet the initial 9,691 dwelling target. The buffer and wider supply should include non-strategic sites which are deliverable in the short term and without significant investment in new on-site infrastructure.

Without the further allocation of smaller non-strategic sites, at established rural settlements such as Group Villages, it feels inevitable that the Development Strategy and housing trajectory will not deliver the housing requirement established in Policy S/JH.

Windfall Sites

Included in the committed supply figure of 38,378 are Windfall Sites. Paragraph 2.37 of the Plan confirms that the windfall provision is 6,600 dwellings over the Plan period which equates to 314 dwellings per annum. The Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2026) uses a windfall figure of 425 per annum; thus, clarity is required over which figure is correct. Notwithstanding which figure is correct, CEMEX contend that the total Windfall Site figure should sit separately from the committed supply figure when stated in Local Plan policies and text. Windfall Sites are expected or estimated deliveries not firm commitments arising from a specific site.

Included in 6,660 windfall provision is 1,553 dwellings identified for Neighbourhood Plan Areas. As set out in CEMEX's representations there is no certainty that housing sites in

these areas or indeed Neighbourhood Plans will come forward. Furthermore, there is no review or alternative delivery mechanism in the Local Plan to deliver these dwellings. Accordingly, as a minimum, it is clear that there is significant uncertainty regarding this element of the already committed supply.

Please provide a 100 word summary of your representation.

The proposed Development Strategy has been devised by the Councils on the basis of delivering housing growth in the most sustainable locations or the most sustainable options i.e. away from Group Villages in the rural areas due to a perceived over reliance on the private car. However, the Development Strategy is so unbalanced and weighted away from delivering homes at Group Villages in the rural area, it will deliver the stagnation and decline of these settlements.

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.

The housing need and the 'total additional homes be identified to meet need' figures stated in Table 1 which supports Policy S/DS should be preceded by the word 'minimum' in order consistent with national planning policy and comply with paragraph 36 a) and 36 d) of the National Planning Policy Framework.

Windfall Sites should be disaggregated from the committed supply stated in the Local Plan and there should be continuity as to the correct Windfall Site figure between the Local Plan and the housing trajectory Housing Land Supply evidence.

Further site allocations should be made in the rural areas of South Cambridgeshire, particularly at Group Villages, to ensure the proposed housing trajectory is truly flexible and deliverable. In its current form the Development Strategy is not considered to be positively prepared or effective as it jeopardises the Plan's ability to deliver its minimum housing need and support the sustainable growth and vibrancy of rural communities. Thus, it is contrary to NPPF paragraphs 36 a), b) and d).

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 spatial strategy 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