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
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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	Appendix D
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.

The Regulation 19 Local Plan seeks to guide development across Greater Cambridge to 2045. Policy S/JH identifies an objectively assessed need for a minimum of 48,069 new homes over the plan period, equivalent to 2,289 dwellings per annum (dpa). The Plan identifies a total supply of around 52,032 homes, providing approximately 8.2% headroom above the minimum requirement.

The Regulation 19 Local Plan proposes a joint and shared housing trajectory between the two Greater Cambridge authorities, Cambridge City Council and South Cambridgeshire District Council (SCDC). This approach follows in the footsteps of the existing adopted Local Plans for both Councils as whilst the two authorities have separate Local Plans the housing trajectory is combined and shared for monitoring purposes. In respect of South Cambridgeshire, this approach is set by Policy S/12: Phasing, Delivering and Monitoring.

In this context it is important to note the content of a September 2026 Cabinet report and decision by SCDC relating to an Addendum to the Greater Cambridge Housing Trajectory and Housing Land Supply Report 2026. The Addendum Report essential decouples the joint housing trajectory set by Policy S/12 and then assesses five-year housing land supply on the basis of the individual local authority areas. This amounts to the Councils superseding or reviewing Policy S/12 and a fundamental element of their existing spatial strategy without public consultation or independent examination. This decision is a clear deviation from strategies set out in the adopted and emerging Local Plan. It is unclear as to how this Cabinet decision and change in approach will affect the policies of the emerging Local Plan and the associated housing trajectory. CEMEX reserves the right to comment further on this matter at Examination stage should the emerging Local Plan be amended to reflect this recent decision.

CEMEX has instructed a detailed review of the housing trajectory supporting the Regulation 19 Plan, including a five-year housing supply assessment. This Report is appended to this Statement.

The Report concludes that the Councils' published supply position relies upon assumptions which are, in several respects, optimistic. Reliance is placed upon future base dates, anticipated completions, ambitious lead-in times and build-out rates, and pro-forma evidence from site promoters which does not consistently amount to the clear evidence required by national policy for category B sites.

Having reviewed the sources of supply, the deliverable supply should be reduced by 2,470 dwellings for the period 2025-2030 and by 3,923 dwellings for the period 2026-2031. These reductions reflect the absence of clear evidence that the relevant sites, parcels or phases will deliver housing completions in the timescales and numbers assumed by the councils.

The most robust current assessment is the 2025-2030 position, because it is based upon a known base date and known completions. That assessment identifies a deliverable supply of 9,705 dwellings against a requirement of 12,641 dwellings, equivalent to 3.84 years' supply and a shortfall of 2,936 dwellings. The 2026-2031 assessment produces a similar result, identifying 9,611 dwellings, equivalent to 3.81 years' supply and a shortfall of 3,019 dwellings.

Therefore in light of the monitoring arrangements set by adopted Policy S/12 (i.e. a joint and shared trajectory) the Councils cannot currently demonstrate a five-year housing land supply. The scale and persistence of the shortfall indicate that the supply position is materially below that required by national policy and that significant additional deliverable sites are required to address the identified need.

In decision-taking, the absence of a demonstrable five-year housing land supply is a material consideration. The presumption in favour of sustainable development is engaged, subject to the application of the relevant policies within the NPPF. This is particularly relevant where proposals would make a meaningful contribution to meeting evidenced housing need, including on sites capable of delivering homes earlier than the strategic sites relied upon within the emerging trajectory.

In plan-making terms, the emerging Local Plan's reliance upon later delivery from strategic sites, together with limited headroom above the minimum housing requirement, creates a risk that the plan will not provide a sufficiently flexible or resilient supply. Additional deliverable and developable sites should therefore be considered to increase supply, improve early delivery, and provide a more robust buffer against delay, non-delivery and slower than anticipated build-out.

Given the factors discussed above this is considered insufficient and a buffer of at least 15 to 20% should be considered to allow for the inevitable no delivery or slower delivery from some of the identified sites.

Please provide a 100 word summary of your representation.

In plan-making terms, the emerging Local Plan's reliance upon later delivery from strategic sites, together with limited headroom above the minimum housing requirement, creates a risk that the plan will not provide a sufficiently flexible or resilient supply. Additional deliverable and developable sites should therefore be considered to increase supply, improve early delivery, and provide a more robust buffer against delay, non-delivery and slower than anticipated build-out.

Given the factors discussed above this is considered insufficient and a buffer of at least 15 to 20% should be considered to allow for the inevitable no delivery or slower delivery from some of the identified sites.

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.

Five Year Housing Land Supply Assessment - Pegasus Group

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.

Our assessment work indicates that there is a clear need to allocate additional housing sites in the emerging Local Plan to ensure minimum housing needs are met over the Plan period. The Regulation 19 Local Plan is over reliant on strategic sites which often are slow to deliver or do not deliver at the rates anticipated. Furthermore, as outlined in our appended Report sites included within the trajectory are not supported by sufficient evidence to demonstrate that they are deliverable in the context of the national planning policy and guidance.

In its current form the approach to housing delivery (as set out in the housing trajectory) is not considered to be positively prepared, justified or consistent with national policy as it jeopardises the Plan's ability to deliver its minimum housing need and a five-year supply upon adoption. 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.

The proposed approach risks the Councils ability to deliver its minimum housing needs. This issue runs to the heart of the Plan and its spatial strategy.

CEMEX have instructed detailed evidence on this matter which warrants 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

Greater Cambridge Housing Land Supply 2024-2045 - Land West of Malton Road, Orwell

On behalf of Cemex UK Properties Limited.

Date: September 2026 | Pegasus Ref: P25-2504PL

Author: MG

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1. Introduction

1.1. This report provides an assessment of housing supply within the administrative area of Greater Cambridge. It considers the deliverable five-year housing land supply position within the periods 2025 to 2030 and 2026 to 2031 and the emerging plan period supply until 2045. Greater Cambridge consists of the local planning authorities of Cambridge City Council and South Cambridgeshire District Council.

1.2. The following report provides an analysis of the *'Greater Cambridge Housing Trajectory and Housing Land Supply Report', 'Proposed Submission Greater Cambridge Local Plan'* and the associated Topic Paper '*Appendix 10: Housing Trajectory for the Local Plan*'. The following analysis focusses solely upon housing supply and delivery.

2. Policy Context

2.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Local Plan

Extant Plan

2.2. The Cambridge Local Plan 2018 was formally adopted on 18th October 2025, and the South Cambridgeshire Local Plan was formally adopted on 27th September 2018. A plan review was undertaken in June 2023. A further update was undertaken in January 2025. Whilst the reviews identified that most of the plan remained up to date, they did indicate that the housing requirements set out in the adopted policies need updating. The local housing need (LHN) calculated using the standard method set out in the PPG should be used to calculate the housing land supply.

2.3. In relation to housing land supply the most relevant policies are Policy 3 of the Cambridge Local Plan 2018 and Policy S/5 of the South Cambridgeshire Local Plan. The requirements from each policy are set out below;

- Policy 3, Cambridge Local Plan 2018 - 14,000 dwellings over the period 2011 to 2031, at an average of 700 dwellings per annum (dpa),
- Policy S/5, South Cambridgeshire Local Plan - 19,500 dwellings over the plan period 2011 to 2031, at an average of 975dpa.

2.4. The housing requirement across the Greater Cambridge area as set out in the local plan is therefore 33,500 dwellings over the period 2011 to 2031, or 1,675dpa. However, as discussed above this figure is recognised by the councils to be out of date.

Emerging Plan

2.5. The Proposed Submission Greater Cambridge Local Plan 2024-2045 was published for consultation on 3rd August 2026. The consultation ends 25th September 2026. The proposed plan is intended to guide development across Greater Cambridge to 2045. Policy S/JH identifies an objectively assessed need for a minimum of 48,069 new homes over the plan period, equivalent to 2,289 dwellings per annum (dpa). The proposed requirement is substantially higher than the adopted 2018 local plan requirement of 1,675dpa and reflects the updated assessment of housing need across the joint plan area, including affordable housing and specialist accommodation needs. The plan identifies a total supply of around 52,032 homes, providing approximately 8.2% headroom above the minimum requirement.

National Policy and Guidance

National Planning Policy Framework

2.6. The most recent version of the NPPF was published on 17 August 2026 and became a material consideration for decision-making upon the day of its publication. This replaced the previous NPPF published in December 2024.

2.7. Chapter 4 of the August 2026 NPPF sets out national policy for achieving sustainable development. Policy S1 identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, and Policy S2 explains that this is to be achieved through mutually supportive economic, social and environmental objectives, including meeting housing needs.

2.8. Policy S3 of the August 2026 NPPF states that decisions should apply a presumption in favour of sustainable development. For decision-making, the presumption is then applied through Policy S4 for development within settlements and Policy S5 for development outside settlements, unless the following criteria apply.

i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

2.9. Policy S4 provides that development within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the policies in the Framework taken as a whole. Policy S5 identifies the categories of development outside settlements which should be approved, subject to the same substantially outweighed test, including development that would address evidenced unmet need and qualifying residential or mixed-use development within reasonable walking distance of a well-connected station.

2.10. Chapter 2 contains the plan-making policies. Policy PM1 requires plans and policies to be positively prepared, justified, effective and consistent with national policy, with evidence that is relevant, proportionate and up to date.

2.11. Chapter 6 of the August 2026 NPPF, 'Delivering a sufficient supply of homes', continues to set out the Government's objective of significantly boosting the supply of homes. Policy HO1 requires plan-making and decision-making to support the delivery of a sufficient amount and variety of land for homes where they are needed.

2.12. Annex D of the August 2026 NPPF sets out the national policy for assessing housing need and housing land supply. It requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old unless they have been reviewed and found not to require updating.

2.13. Annex D also requires the five-years' worth of housing to include the appropriate buffer, which is either 5% or 20% depending on the applicable circumstances, including the Housing Delivery Test and the additional buffer provisions introduced for certain recently adopted plans.

2.14. Annex B: Glossary of the August 2026 NPPF confirms that, to be considered deliverable:

"…sites for housing should ***be available now****, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) ***where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years****."* (our emphasis)

2.15. This definition of deliverable supersedes earlier versions of the NPPF and was effective upon publication of the August 2026 Framework. The following assessment of the deliverable supply within Greater Cambridge is therefore undertaken against the definition in Annex B, read together with Annex D.

National Planning Practice Guidance

2.16. First published in March 2014, the National Planning Practice Guidance (PPG) supplements the NPPF in that it provides guidance upon the application of national planning policy. The PPG is a material consideration in the development of plans and the determination of planning applications and appeals.

2.17. Section 68 of the PPG deals with housing supply and delivery. It identifies that the purpose of the five-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next five-years. Where strategic policies are more than five years old or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement. (ID: 68-003-20190722).

2.18. The PPG provides clear guidance as to what constitutes a 'deliverable' housing site and requires clear evidence for major sites without detailed permission to be included within the assessment (ID: 68-007-20190722). This places far greater emphasis upon the Council to provide robust evidence regarding housing delivery from such sources.

2.19. The PPG (ID 68-007-20190722) provides guidance upon what may constitute clear evidence, this includes:

- current planning status – including progress towards approved reserved matters or a planning performance agreement setting timescales for approval of reserved matters and discharge of conditions,
- firm progress towards submission of an application – such as written agreement between the local planning authority and site developer in relation to anticipated start and build-out rates,
- firm progress with site assessment work, and
- clear information relating to viability, ownership constraints or infrastructure provision – such as successful participation in bids for large-scale infrastructure.

2.20. In decision-taking, Annex D of the August 2026 NPPF should now be read alongside Policies S3 to S5. Where a local planning authority cannot demonstrate the required five-year housing land supply, this is relevant to the application of the presumption in favour of sustainable development, including Policy S5 where development outside a settlement would address evidenced unmet need.

2.21. For plan-making beyond the five-year period, Chapter 6 of the August 2026 NPPF requires authorities to identify a supply of specific, developable sites or broad locations for growth for later years of the plan period. Annex B explains that, to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that they will be available and could be viably developed at the point envisaged. This is a less immediate test than deliverability but still requires evidence that any site or broad location is suitable, available at the relevant time and capable of viable development.

3. Housing Requirement

3.1. In relation to housing land supply the most relevant policies are Policy 3 of the Cambridge Local Plan 2018 and Policy S/5 of the South Cambridgeshire Local Plan. However, as discussed in section 2 of this report both councils recognise that these policies are out of date. This is in accordance with Annex D of the August 2026 NPPF, which requires the five-year housing land supply requirement to be measured against local housing need where adopted strategic housing requirement policies are more than five years old.

3.2. The proposed housing requirement within the Proposed Submission Greater Cambridge Local Plan 2024-2045 is set out within Policy S/JH and identifies a minimum of 48,069 new homes over the plan period, equivalent to 2,289 dwellings per annum (dpa). The current LHN calculation for Greater Cambridge is set out with table 3.1 below, this suggests that the proposed housing requirement sits marginally above the LHN. Given that the LHN is a minimum, this is considered appropriate. However, for the remainder of this report the minimum LHN figure is relied upon.

3.3. In accordance with NPPF Annex D a 5% or 20% buffer is required to be added to the LHN in terms of the five-year housing land supply calculation. This is based upon the most recent HDT test result. The 2025 HDT indicates that a 20% buffer should be applied in Cambridge City and a 5% buffer in the case of South Cambridgeshire. The implications of the buffer are set out within table 3.1 below. The combined five-year requirement is currently 12,641 dwellings.

Table 3.1: Local housing need calculated using the standard method

Element	Cambridge City	South Cambridgeshire	Greater Cambridge
Standard method local housing need	1,091 dpa	1,161 dpa	2,252 dpa
Applicable buffer	20%	5%	Cambridge City 20%; South Cambridgeshire 5%
Annual requirement including buffer	1,309 dpa	1,219 dpa	2,528 dpa
Five-year requirement including buffer[1]	6,546	6,095	**12,641**

3.4. This figure varies from the five-year housing land supply requirement set out within both the *Greater Cambridge Housing Trajectory and Housing Land Supply Report* (paragraph 62) of 12,054 dwellings and the *Proposed Submission Greater Cambridge Local Plan* (figure D2) of 12,472 dwellings. These differences can be attributed to the change in the LHN calculation and the fact that the councils calculation relies upon a 5% buffer for both authorities rather than the 20% buffer required for Cambridge City.

[1] Does not add due to rounding of figures at earlier stages of calculation.

Under-supply

3.5. The emerging local plan requirement also factors in under-supply over the plan period. The PPG (ID: 68-031-20190722) sets out that:

"…the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure".

3.6. On this basis under / over-supply need not be currently considered for the calculation of the 5YHLS in Greater Cambridge. The *Greater Cambridge Housing Trajectory and Housing Land Supply Report* agrees with this stance (paragraph 54). However, once the emerging Greater Cambridge Local Plan is adopted under-supply will be a factor for consideration.

3.7. In terms of the *Proposed Submission Greater Cambridge Local Plan* this suggests that any under-delivery should be spread across the remainder of the plan-period, referred to as the 'Liverpool' method of dealing with under-supply. The plan states (paragraph D.4) that

"The Liverpool methodology has been used due to the circumstances that exist in Greater Cambridge, which mean that a sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period."

3.8. This is contrary to the general presumption within the PPG (ID: 68-031-20190722) that:

"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case-by-case basis on appeal."

3.9. The proposal by the councils will, therefore, need to be tested at examination. However, whilst the reasoning for the use of the Liverpool method is understood this is completely of the council's own making, due to the mix and type of sites it is choosing to bring forward. This could be rectified by considering additional sites which would deliver early in the plan period. In addition, a review of the trajectory (figure D1) identifies that post adoption the annual trajectory is only anticipated to dip below the LHN on one occasion in 2031/32 until the last two-years of the plan period. The justification therefore appears flawed.

3.10. Furthermore, the LHN is a minimum need, it is therefore considered inappropriate to suppress this need and deny households the opportunity to access appropriate accommodation for several years due to policy choices chosen by the councils. Based upon these factors it is considered that the Liverpool method should not be used to determine the future five-year housing land supply position.

4. Deliverable Supply

4.1. This section considers the deliverable supply, as set out within the 'Greater Cambridge Housing Trajectory and Housing Land Supply Report' and the 'Proposed Submission Greater Cambridge Local Plan' including the associated Topic Paper 'Appendix 10: Housing Trajectory for the Local Plan' and the '*Housing Delivery Study Addendum 2026 Update*'.

4.2. The Greater Cambridge Housing Trajectory and Housing Land Supply Report uses a base date of 1st April 2026. This estimates the number of completions achieved in the 2025/26 monitoring year (paragraphs 9 and 10) to then forecast the housing land supply position that would exist over the period 2026-31. The *Proposed Submission Greater Cambridge Local Plan* and its associated Topic Paper amend these figures through the inclusion of future allocations and updates following a review of adopted allocations. In addition, it also suggests a supply of 13,635 dwellings on 1st April 2028. The differing trajectories are set out in table 4.1 below.

Table 4.1: GC Trajectories

Trajectory	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33
Housing Land Supply Report	1,231	2,204	2,305	2,622	3,716	2,567	1,732	1,996
Emerging Local Plan / Delivery Study 2026 Update	1,231	1,969	2,316	2,734	3,925	2,601	1,693	2,682

4.3. The two trajectories suggest the supply included in table 4.2 at the three identified base dates.

Table 4.2: Council assessment of deliverable supply, over relevant 5-year period

Trajectory	1st April 2025	1st April 2026	1st April 2028
Housing Land Supply Report	12,078	13,414	12,633
Emerging Local Plan / Delivery Study 2026 Update	12,175	13,545	13,635

4.4. Unfortunately, the emerging local plan does not break down the amendments to the supply by local authority area.

Base date of supply

4.5. The use of future base dates in considering deliverable housing land supply is inappropriate. This is because one does not yet know how many completions will be achieved in 2025/26, 2026/27 or 2027//28 as would be necessary to determine how many homes are available for development in the period 2026-31 or 2028-2033. Indeed, this position has been found to be inappropriate in appeal decisions including for example in paragraph 22 of the Land west of Cody Road, Cambridge appeal decision (ref: 2207961) which found that:

> ***"The base date of 1 April 2013 ensures the housing land supply requirement figure is based on known completions because the actual level of historic completions is published in the 2012-13 AMR. This is the most up-to-date figure of known completions and anything else is conjecture. Moreover the Appellant refers to Mr***

Roberts's Appendix DR44 to show the principle that the further ahead the projection, the less accurate it becomes. The Council's approach is therefore less robust since it projects further into the future. For these reasons I find the Appellant's approach is the most robust and reliable."

4.6. This is particularly the case in Greater Cambridge, where projected completions have been previously incorrect. The 2024 version of the Greater Cambridge Housing Trajectory and Housing Land Supply Report published April 2024 predicted that 1,005 completions would occur in the monitoring year 2023/24. However, the 2025 version of the report identifies that actual completions were 1,372 dwellings, some 367 dwellings greater. Similarly, the 2025 version predicted that there would be 1,213 completions in 2024/25. However, actual completions were 2,169 in 2024/25 some 956 dwellings greater. The effect of this is that the 5YHLS calculation undertaken assumed that 956 dwellings would be delivered in the 2025-30 five-year period when these were in fact delivered in the preceding year and so were not available to be delivered within the period 2025-30.

4.7. The Greater Cambridge Housing Trajectory and Housing Land Supply Report anticipates 1,231 dwellings will be completed in the monitoring year 2025/26. The actual number remains unknown at the time of writing. Similarly, the figures for 2026/27 and 2027/28 within table 4.2 remain unknown at the time of writing.

Supply Assumptions

4.8. As part of the evidence base supporting the emerging local plan the councils commissioned Aecom to provide a 'Housing Delivery Study', the latest iteration is the '*Housing Delivery Study Addendum 2026 Update*', published in June 2026.

4.9. The 2026 Update provides analysis of comments made during the Regulation 18 consultation on the Draft Greater Cambridge Local Plan as they relate to the delivery of housing. The comments generally relate to 'Lead-in times', 'Build-out rates' and the scale of the 'Windfall allowance'.

Lead-in times

4.10. The 2026 Update addresses concerns raised during the regulation 18 consultation that over-optimistic delivery timescales have been applied for large scale sites, which are considered to take longer to be brought forward and have greater uncertainty of lead-in times. The representations drew attention to the Lichfield's 'Start to Finish' Report (2024) and the ability of public sector infrastructure, such as East-West Rail, Cambourne-Cambridge Busway, Waterbeach New Town rail station, etc.

4.11. Based upon the likely date of adoption of the Greater Cambridge Local Plan (previously anticipated to be 2029) many drew attention to the fact that the delivery of new strategic sites would begin in 2035/36 at the earliest, making the projected delivery of first completions at Cambridge East in 2032/33 and at Cambourne North and Grange Farm in 2034/35 unrealistic.

4.12. The 2026 Update rebuts these points and maintains that the identified lead-in times are appropriate (paragraph 2.2.14), suggesting that departures from the typical assumptions within the Lichfields Start to Finish document are justified considering site-specific factors and more detailed information. Whilst this is not disputed the report fails to consider past experiences. For example, the whilst the new Waterbeach Railway Station is scheduled to

be completed by summer 2028, this scheme has experienced multiple delays. Similarly, the Cambridge South East Transport (CSET) busway inquiry was scheduled for January 2026. However, the inquiry currently remains in abeyance. Clearly demonstrating that delays are occurring.

4.13. Based upon this evidence remains our firm view that the lead-in times identified are overly optimistic and any large-scale sites without detailed permission and/or clear evidence of progress should not be included at the base date of any housing land supply assessment.

Build-out rates

4.14. The 2026 Update identifies that regulation 18 representations identify the build-out rates suggested by Aecom are unrealistic, once again drawing reference to the Lichfields '*Start to Finish'* report, which suggests large sites usually deliver around **100–188 homes per year**, rather than the **300–350 homes per year** assumed in some of the Council's projections.

4.15. Once again, the 2026 Update rebuts this point suggesting that the Lichfields data is a national dataset and Greater Cambridge is a high demand and high value market area and being based upon site specific factors. Whilst it is considered that build-out rates within Greater Cambridge are likely to outperform national averages, rates more than double those averages are considered highly optimistic.

4.16. The 2026 Update identifies that representations conclude overall that it is not credible to assume all strategic sites can deliver exceptionally high build-out rates. The information contained within the 2026 Update does little to dissuade our client that this remains the case. It is, therefore, considered that the council should take a more realistic approach to build-out rates.

Pro-formas

4.17. The council's trajectory is heavily reliant upon the provision of pro-formas from site promoters. The NPPF Annex D is clear that the five-year supply should be made up of deliverable sites. NPPF Annex B states that sites which fall within the category b definition of a deliverable site should only be considered deliverable where there is clear evidence that completions will begin on site within five years. The PPG (68-007) requires that robust, up to date evidence needs to be available. Several appeal decisions[2] have interpreted this to require a need for something cogent to provide strong evidence that in reality a site will deliver housing in the timescale and in the numbers contended for, rather than relying upon mere assertion.

4.18. In general, and in accordance with the PPG, Inspectors and the Secretary of State have found that something akin to a written agreement or the submission of a reserved matters application is likely to be necessary to provide clear evidence. For example, in paragraph 21 of the Land off Audlem Road/Broad Lane, Stapeley recovered appeal decision (ref: 2197532), the view of the Secretary of State was reported as follows:

> ***"He considers that, on the basis of the evidence before him, <u>the following should be removed from the supply: sites with outline planning permission</u>***

[2] See for example paragraph 56 of the Land at Caddywell Lane/Burwood Lane, Great Torrington appeal decision (ref: 3238460).

which had no reserved matters applications and no evidence of a written agreement; a site where there is no application and the written agreement indicates an application submission date of August 2019 which has not been forthcoming, with no other evidence of progress; and a site where the agent in control of the site disputes deliverability." (emphasis added)

4.19. In this paragraph, the Secretary of State also clearly identifies that where the milestones identified in any evidence have not been achieved, the evidence is not up to date as required by the PPG and should no longer be relied upon as providing clear evidence.

4.20. The content and realism of any such written agreement will also be material to whether or not there is the clear evidence envisaged by the NPPF. For example, in paragraph 23 of the Land off Popes Lane, Sturry appeal decision (ref: 3216104) states inter alia:

"For a number of the disputed sites, the Council's evidence is founded on site specific SCGs which have been agreed with the developer or landowner of the site in question. I appreciate that the PPG refers to SCGs as an admissible type of evidence, and I have had full regard to that advice. But nevertheless, the evidential value of any particular SCG in this context is dependent on its content. In a number of cases, the SCGs produced by the Council primarily record the developer's or landowner's stated intentions. Without any further detail, as to the means by which infrastructure requirements or other likely obstacles are to be overcome, and the timescales involved, this type of SCG does not seem to me to demonstrate that the development prospect is realistic. In addition, most of the site-specific SCGs are undated, thus leaving some uncertainty as to whether they represent the most up-to-date position." (emphasis added)

4.21. Similarly, paragraph 57 of the Land at Caddywell Lane/Burwood Lane, Great Torrington appeal decision (ref: 3238460) states:

"Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are the planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed pro-forma from a developer or agent does not in itself constitute `clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward." (emphasis added)

4.22. It is, therefore, clear that cogent evidence that a site will deliver is required prior to the inclusion of a 'category b' site within the supply. A mere assertion within a pro-forma which is not backed by clear evidence is, therefore, insufficient.

Conclusions

4.23. An over-reliance upon optimistic lead-in and build-out rates either based upon generic assumptions or pro-formas provided by site promoters is likely to over-inflate the deliverable supply over the five-year period from adoption.

Identified supply

4.24. The housing land supply is identified in the '*Greater Cambridge Housing Trajectory and Housing Land Supply Report*' and updated by the '*Housing Delivery Study Addendum 2026 Update'*. As identified in table 4.1 above the changes to the trajectory from the 2026 Update are not just applied post adoption date, anticipated to be 2028, but from 2026 onwards. Those sites which would influence the five-year periods 2025-2030 and 2026 to 2031 have been considered in this assessment.

4.25. The analysis undertaken to inform table 4.3 below considers whether there is sufficient evidence to include the sites identified within the '*Greater Cambridge Housing Trajectory and Housing Land Supply Report'* and then considers the updated trajectory position provided in the '*Housing Delivery Study Addendum 2026 Update'* at 2 separate base dates, these being 1st April 2025 and 1st April 2026. This is because on 1st April 2025, both the supply and completions are known, providing a complete five-year housing land supply assessment. At the time of writing the completions data for the monitoring year 2025/26 has not been published and is, therefore, based upon assumptions. However, supply data at this date is known. Our analysis is summarised in table 4.3.

4.26. It should be noted that most sites identified in the *Greater Cambridge Housing Trajectory and Housing Land Supply Report* are not disputed due to the clear evidence of their progress. Those sites which are not considered to fulfil the criteria for a deliverable site within the NPPF and PPG are set out in table 4.3 below. Our analysis takes account not only of the guidance within the PPG but also that provided by relevant appeals and Secretary of State decisions.

4.27. **Position 1st April 2025**

4.28. Our analysis suggests that the deliverable supply over the period 2025-2030 should be reduced by 2,470 dwellings. This reduces the trajectory identified in the Emerging Local Plan / Delivery Study 2026 Update to just 9,705 dwellings.

Position 1st April 2026

4.29. Our analysis suggests that the deliverable supply over the period 2025-2031 should be reduced by 3,934 dwellings. This reduces the trajectory identified in the Emerging Local Plan / Delivery Study 2026 Update to just 9,611 dwellings. It should be remembered that this does not include any completions above those anticipated in the monitoring year 2025/26. If addition completions have occurred these will not be available for the five-year supply and hence the supply will reduce commensurately.

Position 1st April 2028

4.30. The deliverable supply on 1st April 2028 cannot be properly assessed. This is because the position on this date relies upon not only assumptions in relation to delivery but also the planning status of individual sites. It is, however, clear from the analysis we have undertaken that the council's assessment of a deliverable site is optimistic and beyond that set out within the NPPF and PPG. The net impact is that sites are likely to deliver later than identified. This will also have implications for delivery over the plan period.

Table 4.1 Sources of Supply 2025-2030 (Council Assumptions)

Disputed Site	Dwellings removed over 5-year period		Reason
	2025 - 2030	2026 - 2031	
Henry Giles House, Chesterton Road	38	38	**Not deliverable.** The site remains under lease and will not become available until 2027-2028. It fails the deliverability test as it is not available now.
Cambridge Professional Development Centre, Foster Road, Trumpington	20	40	**Not deliverable.** Site disposal still to occur and no valid application or clear progress identified.
North West Cambridge (Cambridge, Eddington) – Future Lots	207	207	**Lack of clear evidence.** These future lots are dependent upon new applications being approved. Two outlines (25/03746/OUT and 25/03753/OUT) were submitted in September 2025 but remain pending. Uncertain when a reserved matters application will be submitted and what this would entail.
Land between Huntingdon Road and Histon Road: Land at NIAB, Huntingdon Road	291	291	**Lack of clear evidence.** Full application (26/02606/FUL) submitted in July 2026 and subject to objections from Anglian Water and requests for additional information. No clarity upon when this will be resolved.
Cambridge East - north of Cherry Hinton: remainder, including RMA6	68	139	**Lack of clear evidence.** Wider allocation progressing but these elements currently have no applications approved or pending. No clear evidence when applications will be submitted approved.
North-West Cambridge (South Cambridgeshire, Eddington) - Future Lots	293	897	**Lack of clear evidence.** Comments same as Cambridge element of the same site.
Land between Huntingdon Road, Histon Road and the A14 (Darwin Green 2 / NIAB 2 and Darwin Green 3 / NIAB 3)	240	420	**Lack of clear evidence.** The site has outline permission (22/02528/OUT) for up to 1000 dwellings approved 25th September 2024. To date no reserved matters applications are approved or pending on this site. It noted that a PPA is in place which suggests key phasing. However, this is not in the public domain and the developer's response (Response 22) has been redacted so no information is available within the appendices to the council's assessment. Uncertainty and lack of clear evidence that any completions will occur in the five-year period
Northstowe - phase 2: remaining parcels, including 2C, TC1, C2 and 2F	320	514	**Reduced Delivery.** Reserved matters application approved for 409 dwellings submitted (26/00786) for parcel 2C on 1st September 2026. Developer response suggests dwellings will start in 2027 but not complete until 2033. The council's trajectory does not replicate the anticipated build-out of this phase and as such our trajectory for this site has been amended to coincide with the developer response. A separate RM application submitted for TC elements (26/03221) however this does not include any residential. On the basis of the above, delivery from these parcels is reduced from 588 dwellings to 268

			dwellings (2025-2030) and 842 dwellings to 328 dwellings (2026-2031).
Northstowe – phase 3A	24	114	**Lack of clear evidence.** Conditions discharge occurring and RM for highway infrastructure approved (24/04840). Progress is being made but to date no RM for residential parcels. Response 30A identifies development partner will not be selected until 2028. Given the need for reserved matters approval for the residential element and the lack of a development partner for 2-years there is currently no clear evidence that any dwellings will be delivered in the five-year period.
Northstowe - Digital Park	50	80	**Lack of clear evidence.** Extant outline permission (S/3854/19/OL) granted July 2023 and benefits from several conditions discharge approvals, only reserved matters (26/02389) relates to access, no residential. Response 32 provides no indication of when delivery will commence or complete.
Waterbeach New Town - West: remaining parcels, including P3.1, P6.1, P6.2, P7.1, P7.2, P8.1, P8.2, P8.3, P9.1, P9.2, P10.1, P10.2, P11 and KP2	284	442	**Reduced Delivery.** KP1 is progressing but to date no clarity upon when some of the identified parcels will deliver. Noted that parcel 3.1 is being marketed but at this stage no development partner. P8.1, P8.2, P8.3, P9.1 and P9.2, pending RM application for 276 dwellings (26/02681). Delivery reduced to 276. P10.1, P10.2 and P11 noted that these parcels will be redesigned and developer identifies not possible to identify likely submission of a reserved matters application or delivery dates. Key Phase 2 the developer states not possible to provide detail on the timings of appointing housebuilder partners, the timing of reserved matters for parcels, the precise number of homes which will come forwards, or timings for construction start and completions. All but 276 dwellings removed
Waterbeach New Town – East	75	150	**Lack of clear evidence.** Outline planning permission (S/2075/18/OL) for up to 4,500 dwellings and other uses was approved in December 2024. Grampian condition requiring a link road connection to/from the A10 and the relocated railway station to both be completed and open for use prior to any residential occupations. Whilst works are underway upon the A10 it is understood that the railway station will not be available until 2028 at the earliest, as such no dwellings can be completed prior to this. A condition on the outline requires the submission and agreement of a Design Code prior to reserved matters applications for each phase. No clarity when this will occur.
Cambourne West (land north west of Lower Cambourne) - remaining parcels	135	195	**Lack of clear evidence.** These dwellings relate to the remaining parcels which do not currently benefit from any submitted or approved reserved matters consent. The trajectory is proposed by officers. In their response (Response 36k) the developers Taylor Wimpey and Vistry identify that they; "…have not prepared programmes for the delivery of the remaining parcels".

Ravenscroft House, 59-61 Regent Street, Cambridge	12	0	**Post dates 2025 base date**. Site had no planning status and wasn't granted until after the base date of 1st April 2025. No impact upon 26-31 period.
Dukes Court, 54-62 Newmarket Road, Cambridge	6	0	**Post dates 2025 base date**. On 1st April 2025 the site benefitted from permission for 23 dwellings, council attributes 29. No impact upon 26-31 period.
Wellcome Genome Campus, Hinxton	249	249	**Lack of clear evidence.** Site only benefits from detailed permission for 84 dwellings (24/02106). The developer's response (Response 76a) suggests that further reserved matters applications will be submitted in 2027 but no timescale is given. Furthermore, the parcels to be brought forward and mix of units are as yet unclear with the developer suggesting 250, 'is possible'.
135 Station Road, Impington	11	0	**Post dates 2025 base date.** This site has permission for 11 dwellings. However, this was not granted until after the base date of the 2025-2030 assessment and these dwellings are therefore removed from this period.
Girton College, Huntingdon Road, Girton	50	50	**Lack of clear evidence.** This site benefits from an extant outline permission (22/00887) for student residential accommodation. The student accommodation remains solely in outline. Only RM relates to playing pitches.
Additional Capacity / Sites within the Housing Delivery Study Addendum 2026 Update			
Henry Giles House, Chesterton Road	12	12	**Not deliverable.** Removed on basis of discussion above.
1-99 Ekin Road and 1-8 Ekin Walk, Cambridge	26	26	**Post dates both base dates**. Full planning application submitted 7 Jan 26 (26/00039/FUL) net increase of 26 dwellings prior to base date for 1st April 26, remains pending. Remove until approved as no status prior to this
2-28 Davy Road and garage blocks	26	26	**Lack of clear evidence.** No application submitted or approved.
1-78 Hanover Court, 1-49 Princess Court and garage at Newtown garages	38	38	**Post dates both base dates**. Full planning application submitted 7 Jan 26 (25/04187) net increase of 38 dwellings prior to base date for 1st April 26, remains pending. Remove until approved as no status prior to this
1-33 Stanton House, Christchurch Street, Cambridge	-5	-5	**Lack of clear evidence.** No application pending or approved. Development would see net loss of 5 dwellings.
Total Change	**2,470**	**3,923**	

Plan Period Supply

4.32. Beyond the five-year period, the plan can legitimately include developable sites. Whilst the developability of individual sites are not currently disputed our commentary above does bring into question whether the plan period requirement will be met as a minimum. This is due to issues of overly optimistic lead-in times and delivery rates as well as over-optimistic assumptions upon when a site should be considered deliverable.

4.33. The plan includes a buffer of just 8.2% headroom above the minimum requirement. This provides very little flexibility if one or more of the strategic sites are delayed or deliver at a

reduced rates. Given the factors discussed above this is considered insufficient and a buffer of at least 15 to 20% should be considered to allow for the inevitable no delivery or slower delivery from some of the identified sites.

5. Five-year supply

5.1. Based upon the foregoing evidence provided within this report a five-year housing land supply cannot currently be demonstrated within the Greater Cambridge area. Our analysis identifies a 3.84-year supply for the period 2025-2030, representing a deficit of 2,936 homes. Given that completions are known at the base date of this period, this assessment represents the most robust assessment of housing land supply currently available.

Table 7.1: Five-year housing land supply 2025-2030

Element	Dwellings
1. Combined LHN	2,252
2. 5% / 20% buffer	276
3. Five-year requirement (step 1+2)*5	12,641
4. Deliverable Supply	9,705
5. **Year's supply**	**3.84**

5.2. It is notable that the supply deteriorates slightly once the council's evidence in relation to the period 2026-2031 is taken into consideration. This suggests a supply of just 3.81-years, a deficit of 3,019 dwellings. Whilst the calculation of five-year housing land supply is not an exact science and the relative housing land position may change, dependent upon new evidence, the scale of the shortfall over both periods is significant. This clearly demonstrates that a significant improvement in housing delivery is required across the Greater Cambridge area.

Table 7.2: Five-year housing land supply 2026-2031

Element	Dwellings
1. Combined LHN	2,252
2. 5% buffer	276
3. Five-year requirement (step 1+2)*5	12,641
4. Deliverable Supply	9,622
5. **Year's supply**	**3.81**

6. Conclusions

6.1. This report has assessed the Greater Cambridge housing land supply position against the adopted development plan, the Proposed Submission Greater Cambridge Local Plan 2024-2045, the Greater Cambridge Housing Trajectory and Housing Land Supply Report, the Housing Delivery Study Addendum 2026 Update, and the relevant national policy and guidance contained within the August 2026 NPPF and PPG.

6.2. The adopted housing requirement policies for Cambridge City and South Cambridgeshire are out of date for the purposes of calculating five-year housing land supply. The appropriate basis for assessment is therefore the current local housing need calculated using the standard method, together with the applicable buffers required by national policy. This results in a five-year requirement of 12,641 dwellings across Greater Cambridge.

6.3. The councils' published supply position relies upon assumptions which are, in several respects, optimistic. Reliance is placed upon future base dates, anticipated completions, ambitious lead-in times and build-out rates, and pro-forma evidence from site promoters which does not consistently amount to the clear evidence required by national policy for category B sites.

6.4. Having reviewed the sources of supply, this report concludes that the deliverable supply should be reduced by 2,470 dwellings for the period 2025-2030 and by 3,923 dwellings for the period 2026-2031. These reductions reflect the absence of clear evidence that the relevant sites, parcels or phases will deliver housing completions in the timescales and numbers assumed by the councils.

6.5. The most robust current assessment is the 2025-2030 position, because it is based upon a known base date and known completions. That assessment identifies a deliverable supply of 9,705 dwellings against a requirement of 12,641 dwellings, equivalent to 3.84 years' supply and a shortfall of 2,936 dwellings. The 2026-2031 assessment produces a similar result, identifying 9,611 dwellings, equivalent to 3.81 years' supply and a shortfall of 3,019 dwellings.

6.6. Greater Cambridge therefore cannot currently demonstrate a five-year housing land supply. The scale and persistence of the shortfall indicate that the supply position is materially below that required by national policy and that significant additional deliverable sites are required to address the identified need.

6.7. In decision-taking, the absence of a demonstrable five-year housing land supply is a material consideration. The presumption in favour of sustainable development is engaged, subject to the application of the relevant policies within the NPPF. This is particularly relevant where proposals would make a meaningful contribution to meeting evidenced housing need, including on sites capable of delivering homes earlier than the strategic sites relied upon within the emerging trajectory.

6.8. In plan-making terms, the emerging Local Plan's reliance upon later delivery from strategic sites, together with limited headroom above the minimum housing requirement, creates a risk that the plan will not provide a sufficiently flexible or resilient supply. Additional deliverable and developable sites should therefore be considered to increase supply, improve early delivery, and provide a more robust buffer against delay, non-delivery and slower than anticipated build-out.

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