
Greater Cambridge Local Plan Regulation 18 Consultation, December 2025 - Representations

1 Introduction

- 1.1 These representations have been prepared by CODE Development Planners (hereafter referred to as 'CODE') on behalf of G W Balaam & Son who are promoting the site at land north of Bartlow Road, Linton for residential development in the region of 15 dwellings.
- 1.2 The site is approximately 0.35ha and is located on the immediate southeastern edge of the village of Linton. Residential development is located directly adjacent to the west of the site which has recently been built out following grant of planning permission (reference S/1963/15/OL).
- 1.3 The site has been assessed within the 2025 Housing and Employment Land Availability Assessment (HELAA) as site reference '40044'. CODE have previously promoted the site through previous Call for Sites exercises to challenge the 'red' suitability rating within the 2021 iteration of the HELAA in light of the material changes to the site's suitability for development.
- 1.4 In summary, while CODE are broadly supportive of the approach taken by the GCLP in Policy S/JH (New jobs and homes) to meet their local housing needs in full over the plan period, there are key concerns raised in relation to Development Strategy and distribution of growth across Greater Cambridge alongside the assessment of the site at north of Bartlow Road, Linton within the HELAA.
- 1.5 These representations consider that there is an over-reliance on larger strategic sites, which do not afford sufficient flexibility to uplift housing delivery in the early years of the plan period in the likely event of delays or the potential non-implementation of strategic sites. Flexible delivery across a range of sites will also continue to be a requirement throughout the plan period, guarding against the vulnerability of housing delivery on the larger strategic sites being delayed by any one or several reasons such as market saturation, housebuilder business models or continuing delays in infrastructure provision.
- 1.6 Additionally, the lack of allocations within the Rural Centres and Minor Rural Centres fails to support the ongoing sustainability and vitality of local settlements which is not considered to be effective in step with the tests of soundness contained within paragraph 35 of the National Planning Policy Framework (NPPF). The Development Strategy fails to recognise the sustainability credentials of the settlement of Linton which benefits from a range of facilities and services alongside connectivity to public transport opportunities within walking distance of the site on Bartlow Road.
- 1.7 In order to remedy this, CODE considers that the Greater Cambridge Shared Planning Service (GCSP) should revisit the site allocations and distribution of growth across the Rural Centres and Minor Rural Centres to identify additional smaller site allocations, such as the site at land north of Bartlow Road,



Linton. This will ensure that sufficient flexibility is provided within the housing supply to enable sites to come forward quickly to address housing need in the short term while maintaining and enhancing the vitality and viability of settlements such as Linton.

2 Housing and Economic Land Availability Assessment

- 2.1 As set out above, CODE has previously promoted the site at Bartlow Road, Linton (reference '40044') within the previous iterations of the HELAA in 2019 and 2021 where the site received a 'red' rating for suitability. However, following the consent and construction of application S/1963/15/OL directly adjacent to the site which comprised of the construction of 12 dwellings to the west of the site as part of a wider development of 55 dwellings, this has had a material change on the site in relation to the impact of landscape and townscape.
- 2.2 The consented development means that the site is directly adjacent to the built extent of Linton providing greater connectivity into the settlement. As a result, the site at Bartlow Road is felt to provide a natural edge to the eastern boundary of Linton rounding off development in this location.
- 2.3 However, the most recent iteration of the HELAA 2025 maintains a 'red' suitability rating for the site on the basis of comments from the landscape officer which notes "*Having considered the submitted information, the site continues to be assessed as Red. Whilst there have been changes to parcels of land adjacent to the site, it is considered that the site continues to play a functional role as a buffer between the village of Linton and the A1307. Previous assessment findings continue to be relevant with the exception of those referencing isolation from the existing village edge.*"
- 2.4 The previous comments raised within the 2021 HELAA on landscape grounds referred to "*This placement of the site on the hillside allows for extensively long views to the south and generally gives a sense of openness to the site. Development on the site would be disconnected from already developed parts of Linton and this isolation would be out of character for the area. Equally, it would have a wider impact on the surroundings due to its presence on a corner. Development could not be reduced to acceptability due to potential for isolation for the existing village edge.*"
- 2.5 While CODE recognises that the HELAA is a technical assessment of sites and locations that may have potential for housing or economic development and does not preclude development coming forward on sites, the assessment of the site as Bartlow Road in relation to landscape raises a number of concerns.
- 2.6 Contrary to the comments within the HELAA, the site retains a degree of separation between the site and the A1307 and includes the provision of hedgerow planting along the eastern boundary of the site which could be enhanced as part of any subsequent planning application and landscape strategy. Any views of the site would be seen within the context of the existing built extent of Linton and the adjoining development with access achievable from Bartlow Road or Otter Burn, subject to further investigation as part of any subsequent planning application.



- 2.7 The updated landscape comments alter the assessment of the isolation of the site to the existing settlement, emphasising the connectivity of the site to the existing public rights of way network and the accessibility to a number of services and facilities within walking distance of the site. The scale of development on the site would not give rise to significant detrimental impact on these services but would instead continue to maintain and support the vitality of these services to the benefit of the local economy in accordance with paragraph 83 of the NPPF.
- 2.8 The concerns relating to the location of the site on a corner are not founded, as the site is not located on the corner of Bartlow Road and the A1307 roundabout. Instead, the site is set further back and is separated from the corner of the roadside, screened by a separate field and hedgerow along the eastern boundary.
- 2.9 As such, CODE considers that the site should be reassessed within the HELAA and upgraded from the 'red' rating for suitability of development in relation to landscape and townscape. The site is located directly adjacent to the built extent of Linton and would provide a logical extension to round off the eastern extent of the settlement. The site would be seen in the wider context of built development in the village and maintains a degree of separation from the surrounding road network which could be further mitigated through increased landscaping and buffering the hedgerow along the eastern boundary.
- 2.10 Therefore, it is considered that the landscape assessment within the HELAA is not justified based on the updated context of Linton and should be revisited to reflect that there are no overriding policy constraints which preclude the appropriate and proportionate development of the site within the sustainable settlement of Linton.

3 **Policy S/DS: Development Strategy**

- 3.1 The Development Strategy identified within Policy S/DS is not positively prepared, justified, effective and is not in accordance with the suite of national planning policies contained within the NPPF. The allocation of development appears to be disproportionately weighted towards larger strategic sites within the urban area and neglects the provision of medium and smaller allocations which are important to maintain a supply and delivery of needed housing in the short and medium term.
- 3.2 The NPPF is clear in paragraph 72 that policy-making authorities should "*identify a sufficient supply and mix of sites*" to provide deliverable sites across the plan period. Paragraph 73 of the NPPF highlights the "*important contribution*" small and medium sized sites can make in meeting the housing requirement of an area due to their ability to be delivered quickly. The NPPF encourages plan-making authorities to identify at least 10% of their housing requirement on sites no greater than one hectare to support this important contribution and Small and Medium Enterprise (SME) housebuilders.
- 3.3 However, the Development Strategy contained within Policy S/DS focuses on the creation and extension of new settlements and strategic sites, with smaller scale development limited to only Melbourn, Duxford and Caldecote. This is not in accordance with the provisions of paragraph 73 of the NPPF and this approach is not justified within the Sustainability Appraisal (SA). The Development Strategy Topic Paper



(December 2025) notes that this 10% small sites requirement can only be met over the plan period through the assumed windfall allowance within the settlement boundaries of Rural Centres and Minor Rural Centres. However, based on the defined extents of settlements within the plan area, CODE queries the likelihood of the extent of development to be accommodated within existing settlement boundaries. This does not demonstrate a positively prepared approach to secure the delivery of development for SME housebuilders through the identification of site allocations

- 3.4 CODE query the strategy to deliver these homes set out in Policy S/DS. The strategy places significant reliance on large strategic sites coming forward later in the plan period at Cambridge East, Eddington, Cambourne North and Grange Farm for a combined total of 11,550 dwellings.
- 3.5 Previous experience with settlement extensions and new settlements indicates that due to their large and strategic nature, they are often constrained, heavily opposed and reliant on the delivery of key infrastructure which causes further delays to anticipated trajectories. CODE is concerned that GCSP's ability to demonstrate a five-year housing land supply within the short-medium term could be significantly impacted by the over reliance on strategic sites without sufficient flexibility to uplift housing delivery in the early years of the plan period. This is exemplified within the supporting text at 2.41 in the case of the North East Cambridge allocation, where delivery is under threat due to changes in funding to the relocation of the Cambridge Waste Water Treatment Plant. While this loss of dwellings is accounted for within the Development Strategy, it highlights the inherent risk of the delivery of other larger site allocations particularly in relation to infrastructure capacity in the context of increasing water scarcity issues around the Cambridge Urban Area.
- 3.6 As such, due to the uncertainty of if and/or when these strategic sites will come forward and the lack of alternative options to deliver expressed housing need, there is a need for 'small' and 'medium' sized sites to come forward to ensure the plan is effective and deliverable across the plan period. The site at land north of Bartlow Road is considered to be suitable, available and deliverable in the short term to contribute the housing supply of Cambridge and include a provision of much-needed affordable housing for the area. Based on the current Development Strategy, much of the provision of affordable housing will be backloaded to the later years of the plan period restricting the ability of GCSP to address the affordable housing need of the district in the short term. According to the Local Authority Housing Statistics data returns (2024-2025), there are 1,956 households on the housing waiting list for South Cambridge District which emphasises the need to deliver affordable housing in the immediacy.
- 3.7 Therefore, CODE contends that in order for the Regulation 18 Greater Cambridge Local Plan (GCLP) to meet the tests of soundness, GCSP should revisit their Development Strategy to identify site allocations across the Rural and Minor Rural Centres to ensure an effective distribution of growth on small and medium sites can be delivered in the early years of the plan period. Sites such as land north of Bartlow Road, Linton should be allocated for development to reflect their suitable, available and deliverable nature as reflected in the HELAA 2025.



4 Policy S/SH: Settlement Hierarchy

- 4.1 CODE query the identification of Linton as a Minor Rural Centre within the settlement hierarchy and consider the hierarchy to be wholly inconsistent with the distribution of growth set out within the Development Strategy.
- 4.2 As set out above, Linton is identified as a 'Minor Rural Centre' in Policy S/SH. Paragraph 2.126 notes that Minor Rural Centres have a *"lower level of services, facilities and employment than rural centres, but a greater level than most other settlements in Greater Cambridge and often perform a role in terms of providing services and facilities for a small rural hinterland."* Paragraph 2.127 supports development of up to 30 dwellings as larger scale windfall development within the existing settlement boundary.
- 4.3 Land north of Bartlow Road, Linton is located outside, but directly adjacent to the settlement boundary of Linton fronting development to the west of the site and therefore does not benefit from this policy provision set out within the GCLP. Further the approval and construction of development (reference S/1963/15/OL), the site is felt to well defined and located to 'round off' development in Linton. The village benefits from a range of services and facilities including:
- Primary School
 - GP surgery and pharmacy
 - Frequent bus service between Cambridge and Haverhill
 - Library
 - Post office
 - Dentist
 - Bank
 - Community facilities
 - A range of over 20 shops and services
- 4.4 The site is well related to these services by sustainable transport methods and the site is of an appropriate and proportionate scale to accommodate up to 30 dwellings in accordance with the policy wording.
- 4.5 This is reflected within the supporting evidence base of the GCLP and the Settlement Hierarchy Study Update (2025) which recognises Linton as the highest scoring Minor Rural Centre against the sustainability criteria with a total of 16 points and identified as a *"service centre"* within paragraph 3.19 of the Settlement Hierarchy Study Update 2025. Despite this positive assessment, the study considers Linton to not be comparable with settlements in the Rural Centre grouping due to a lower number of services and facilities. This assertion does not appear to be supported by the assessment of Rural Centres within the study, with Great Shelford and Stapleford (classified as a Rural Centre) also scoring 16 points against the sustainability criteria. As such, there is considered to be limited justification for the



classification of Linton as a Minor Rural Centre and CODE recommends that the settlement hierarchy is revisited to upgrade the classification of Linton to a Rural Centre.

- 4.6 In any event, the settlement hierarchy indicated in Policy S/SH is wholly inconsistent with the Development Strategy and distribution of growth outlined in Policy S/DS. The allocation of housing within Rural Centres and Minor Rural Centres is not reflective of the settlement hierarchy with no residential housing allocations identified within the Rural Centres and only Melbourn receiving allocations within the Minor Rural Centres. Furthermore, Group Villages Duxford and Caldecote, which sit below Linton in the settlement hierarchy, have received allocations for 60 and 65 dwellings respectively. This is despite GCSP noting in paragraph 2.129 that “*Group villages are generally less sustainable locations for new development than Rural centres and Minor rural centres*” where development should only comprise of scheme sizes of circa eight dwellings (or up to 15 dwellings in exceptional circumstances).
- 4.7 The stark contrast in allocations between Rural Centres, Minor Rural Centres and Group Villages is not reflective of the settlement hierarchy or the direction of growth outlined within the Development Strategy. This distribution of growth to Group Villages appears to lack justification and ignores the sustainability of settlements in a higher order of the settlement hierarchy with higher sustainability credentials such as Linton. As such, this has resulted in an insufficient quantum of development to be identified in order to support and maintain the vitality of existing facilities and services within the village.
- 4.8 Paragraph 83 of the NPPF seeks to support sustainable development in rural areas where it will enhance or maintain the vitality of rural communities for villages to grow and thrive. The Development Strategy adopted by GCSP fails to secure the self-containment of Linton to the detriment of the existing services in the community and the overall approach to allocations undermines the Settlement Hierarchy set out in Policy S/SH.
- 4.9 In order to remedy this, GCSP should revisit the allocations outlined within the Development Strategy and instead allocate a proportionate amount of development to appropriate and sustainable sites in accordance with the provisions and recommended quantum in the Settlement Hierarchy. This can be achieved through allocating proportionate development on sites such as land north of Bartlow Road and south of Horseheath Road, Linton to ensure the ongoing vitality of the settlement and be in accordance with national planning policy to strengthen local communities.

5 Conclusions

- 5.1 While CODE are generally supportive of the approach in Policy S/JH to meeting Greater Cambridge’s housing needs in full, CODE have identified a number of soundness issues in relation the Development Strategy and Settlement Hierarchy which require amendment in order for the Regulation 18 Consultation version of the GCLP to be considered sound.
- 5.2 It is considered that the Development Strategy ignores the Settlement Hierarchy set out in Policy S/SH by allocating growth in Cambridge in lower order settlements and focusing on large strategic sites while



failing to provide a proportionate distribution of growth to sustainable settlements such as Linton to maintain the vitality of the key services and facilities within these villages.

- 5.3 The Development Strategy instead focuses on the provision of larger strategic sites which neglect the ongoing sustainability of settlements in the rural hinterland and carry the risk of delays and potential non-implementation due to the extent of infrastructure required to ensure development can come forward. This places additional strain on the ability of GCSP to demonstrate a five-year housing land supply in the short term and fails to provide sufficient flexibility and a mix of sites to support SME housebuilders and deliver much needed housing in the early years of the plan period. The approach taken by GCSP means the majority of affordable housing provided by the larger sites will be backloaded to the end of the plan period failing the positively address the affordable housing needs that currently exist in Greater Cambridgeshire.
- 5.4 By meeting the 10% small sites required (contained within paragraph 73 of the NPPF) through GCSP's windfall allowance as opposed to identifying specific site allocations, this fails to secure the delivery of sites across the area for SME housebuilders and is not an effective and positively prepared strategy to secure the delivery of homes in the districts.
- 5.5 These representations also contend that the evidence base which informed the preparation of the Settlement Hierarchy is flawed and fails to appropriately reflect the sustainability credentials of Linton despite the level of services being comparable to existing Rural Centres.
- 5.6 In order to remedy these soundness issues, GCSP should revisit their Settlement Hierarchy to upgrade Linton to the Rural Centre to reflect its sustainability credentials. The Development Strategy should also be redeveloped to ensure that is consistent with the Settlement Hierarchy and allocate proportionate growth towards Rural Centres and Minor Rural Centres as opposed to Group Villages and solely large strategic sites. CODE contend that land north of Bartlow Road represents a suitable, available and deliverable site which can accommodate up to 15 dwellings in step with the requirements of Policy S/DS and can be designed to overcome any policy constraints.
- 5.7 CODE also have concerns surrounding the retained 'red' assessment of the site in the HELAA 2025 and upgraded commentary in relation to landscape considerations. CODE (and G W Balaam & Son) maintain that the site north of Bartlow Road, which is well-related to the existing settlement and within walking distance of a range of facilities and services and therefore should be attributed a 'green' rating within the HELAA and allocated for up to 15 dwellings.
- 5.8 In summary, CODE recognises and is generally supportive of the progress made to develop the local plan review and identification of site allocations. However, at the time of preparing these representations, it is considered that the Regulation 18 Consultation Document (December 2025) does not currently meet the tests of soundness, with further work required to ensure that it is positively prepared, justified, and effective (as required by paragraph 35 of the National Planning Policy Framework (NPPF)).