
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 to the south of Horseheath Road, Linton for residential development in the region of 30 dwellings.
- 1.2 The site is approximately 0.8ha and is located on the immediate eastern edge of the village of Linton. Residential development extends on two sides of the site, which is 'The Pastures' development to the west and south. Beyond the eastern hedge boundaries are fields which extend up to the A1307. Horseheath Road runs along the site's northern boundary.
- 1.3 The site has been assessed within the 2025 Housing and Employment Land Availability Assessment (HELAA) as site reference '40013'. The assessment on landscape considerations from the previous iteration of the HELAA 2021 has been upgraded from a 'red' rating to an 'amber' rating noting that "*some limited development may be suitable if appropriate mitigations to screen the parcel and to soften the village edge is integrated into the design.*" Overall, the site has been upgraded to an 'amber' rating and the HELAA notes that any policy constraints "*could be overcome through the planning application process*". While CODE welcomes the upgraded assessments in relation to the site following the submission of additional information, we reiterate through the submission of these representations that the site remains suitable, available and deliverable for residential 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. 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.
- 1.5 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 south of Horseheath Road.

- 1.6 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 south of Horseheath 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 **Policy S/DS: Development Strategy**

- 2.1 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.
- 2.2 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.
- 2.3 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
- 2.4 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.
- 2.5 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.

- 2.6 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 south of Horseheath 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.
- 2.7 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 south of Horseheath Road, Linton should be allocated for development to reflect their suitable, available and deliverable nature as reflected in the HELAA 2025.

3 **Policy S/SH: Settlement Hierarchy**

- 3.1 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.
- 3.2 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.
- 3.3 Land south of Horseheath Road, Linton is located outside, but directly adjacent to the settlement boundary of Linton fronting development on two sides to the east and south of the site and therefore does not benefit from this policy provision set out within the GCLP. Further the approval and construction



of 'The Pastures' development, the site is felt to be 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

3.4 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.

3.5 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.

3.6 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).



- 3.7 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.
- 3.8 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.
- 3.9 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 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.

4 **Conclusions**

- 4.1 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.
- 4.2 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.
- 4.3 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.



- 4.4 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.
- 4.5 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.
- 4.6 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 south of Horseheath Road represents a suitable, available and deliverable site which can accommodate up to 30 dwellings in step with the requirements of Policy S/DS and can be designed to overcome any policy constraints.
- 4.7 While CODE support the improved 'amber' 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, 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 30 dwellings.
- 4.8 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)).