# 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 | | Matthew Thomas |
| Organisation (where relevant) | G W Balaam & Son | CODE Development Planners |
| Job Title (where relevant) | | |
| Address, including Post Code | | 17 Rosemary House<br>Lanwades Business Park<br>Kentford<br>CB8 7PN |
| 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 | Policy S/DS |
| Proposed Submission Policies Map | |
| Sustainability Appraisal | |
| Habitats Regulations Assessment | |

**Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?**

| **Test** | **Yes / No** |
|---|---|
| Legally compliant | |

| | |
|---|---|
| Sound | No |

## Section 3: Your representation

**Please set out and explain your comments.** Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

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. G W Ballam & Son are landowners of the land to the south of Horseheath Road, Linton (HELAA site ID 40013) and land south of Barlow Road (HELAA ID 40044) where both sites have been promoted for allocation to deliver up to 30 dwellings.

1.2 These representations contend that as currently drafted the Proposed Submission Greater Cambridge Local Plan 2024 – 2045 (GCLP) does not meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF) (2024). CODE has specific concerns around the proposed spatial strategy set out in Policy S/DS and the distribution of development across the district.

*1.3* Paragraph 36 of the NPPF states that:

'*Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*

a) *Positively prepare – providing a strategy which, at minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent in achieving sustainable development;*

b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy, where relevant.*'

1.4 The following sections of these representations set out how Policy S/DS, with reference to relevant evidence base documents fail to satisfy the tests of soundness set out in paragraph 36.

## 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. Whilst CODE supports the overall level of growth to be planned for in the GCLP we have concerns around the proposed distribution of this growth. The GCLP plans for a total of 52,032 homes across the plan period, accounting for the updated standard method figure of 2,289 dwellings per year, or 48,069 dwellings over the plan period with appropriate buffer.

2.2 Policy S/DS sets out that development needs will be met as far as possible in the following order of preference:

a) Within the Cambridge urban area;

b) On the edge of Cambridge

c) At an expanded Cambourne;

d) At other new settlements; and

e) In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.

2.3 CODE recognises the aim of Greater Cambridge Shared Planning's (GCSP) approach to directing development to sustainable locations. However, we are concerned that the wording of the policy, in setting the order of preference, and the resulting allocations has resulted in a plan that cannot be considered sound and, in our view, ignores the conclusions of its own evidence base. A Settlement Hierarchy is set out under Policy S/SH. The policy is informed by Appendix 18 Settlement Hierarchy Study 2025, but, by making such limited allocations across Rural Centres and Minor Rural Centres, the third and fourth tier settlements, in a six-tier hierarchy, it fails to recognise the importance and ability of such centres to deliver housing and support the vitality of rural communities. .

2.4 The required development must be apportioned across these locations in an appropriate and balanced manner. Directing too much development to the highest ordered settlements risks undermining the rural parts of the district and would fail to enhance and support the vitality of rural communities contrary to the aspirations of the NPPF. In developing a spatial strategy there is a need for a balance to be applied in identifying sustainable locations for development but recognising the sustainability credentials of rural settlements and the important role development can play in improving sustainability of these settlements and supporting their vitality.

2.5 Figure 9 of the GCLP sets out the proposed distribution of development across these areas in the proposed plan against the previous development plans.

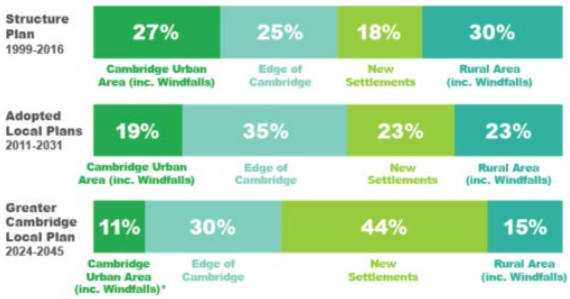



**Figure 9:** Distribution of growth in comparison to previous Local Plans

2.6 Figure 9 demonstrates that only 15% of the proposed development need for housing will be delivered in the rural area (including windfall provision) with a majority of development to be delivered through strategic scale allocations on the edge of Cambridge and at new settlements. The strategic allocations within the GCLP are proposed to deliver over 39,000 homes. CODE would contend this distribution is not supported by proportionate evidence nor is it consistent with the NPPF.

2.7 Paragraph 83 of the NPPF encourages housing in rural areas where development will enhance or maintain the vitality of rural communities. It explains that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Paragraph 2.67 of the GCLP states that the Council's evidence base has shown that villages should only play a limited role in meeting future development needs to support delivery of a range of smaller sites and support the vitality of villages. However, as currently drafted the GCLP makes new allocations for only 389 dwellings across the rural southern cluster and rest of the rural area. Paragraph 2.27 goes on to state that the rural area will have a lower share of development in the new plan, reflecting other more sustainable sources of supply, but will provide some development to help support rural communities. We suggest that the allocation of less than 400 dwellings across the rural southern cluster and remaining rural area, and an over reliance on windfall development proposals (by definition unknown in scale or deliverability) does little to support the vitality of Greater Cambridge's rural communities.

2.8 In addition to concerns regarding the lack of support for rural settlements, CODE also has concerns around the GCLPs reliance on larger strategic sites with regards to delivery of the plan as a whole, and conformity with the NPPF direction for local plans to identify a mix of sites. CODE suggests 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 terms.

2.9 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.

2.10 The Development Strategy Topic Paper (August 2026) 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. Based on historical windfall development the GCLP anticipates that 4,953 dwellings will be delivered on smaller windfall sites across the plan period. However, based on the defined extents of settlements within the plan area, CODE queries the likelihood and 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.

2.11 CODE is concerned 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. 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.

2.12 CODE is also concerned that GCSP 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 by the former North East Cambridge allocation included in the Regulation 18 consultation, which has been removed from the proposed submission plan 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 to 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.

2.13 Indeed, paragraph 2.76 of the GCLP acknowledges that the delivery of sites proposed for allocation are **reliant on** (CODE emphasis) the provision of a significant level of infrastructure, delivery of which falls under the responsibility of local and national partners. The GCLP goes on to state "*the delivery of the plan's vision relies on these partners reflecting the strategy for Greater Cambridge in their own strategies and delivering these in a timely way*." CODE's view is that a strategy so dependent on strategic sites, and external development partners cannot be considered effective as there are significant questions around the deliverability of the sites necessary to meet the housing requirements for Greater Cambridge.

2.14 Due to the uncertainty associated with the delivery of these strategic sites coming forward within a reasonable and hoped for trajectory and the lack of alternative options to deliver expressed housing need, there is a substantial need for 'small' and 'medium' sized sites to be identified and delivered to ensure the plan is effective and deliverable across the plan period. The sites at land south of Horseheath Road and at Bartlow Road are considered to be suitable, available and deliverable in the short term to contribute to the housing supply of Greater Cambridge and assist in maintaining the sustainability of an important Minor Rural Centre serving a wider rural community.

2.15 In addition to the contribution such sites could make to meeting the general housing needs of the Local Plan area and assisting in the sustainability of rural communities, the proposal would 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.

2.16 As described above and shown in figure 9, 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).

2.17 Topic Paper (Appendix 18 Settlement Hierarchy Study 2025) acknowledges that due to the availability of existing facilities, including all levels of youth education, shops, services, employment, medical facilities and access to public transport, Linton is the highest scoring Minor Rural Centre providing facilities not just for the existing village but also for surrounding rural communities. The village also benefits from an improving active travel route in the form of the now partly completed and soon to be extended Linton Greenway providing further connectivity between the village, Babraham Research Campus, the Cambridge Biomedical Campus, Babraham Park and Ride and Granta Park. The village therefore represents a highly suitable location for further sustainable growth.

2.18 CODE suggests that careful consideration, reflecting the guidance set out in the NPPF is required when developing a spatial strategy and how development should be distributed across the local plan area. This should reflect that while rural settlements may not have the same sustainable transport opportunities as urban areas, there is a need to ensure wider sustainability benefits achieved through the appropriate growth of rural settlements is supported. Without appropriate growth in these locations CODE suggests there is a risk that inequalities in services between the rural and urban areas will widen and the existing vitality of rural settlements diminish.

2.19 CODE suggests that Linton, as the highest scoring ‘Minor Rural Centre’ within the Development Strategy Topic Paper (appendix 18 Settlement Hierarchy Study 2025) is a suitable location to deliver proportionate development, achieved through the allocation of small and medium sites.

## 3 Conclusions

3.1 CODE have identified a number of soundness issues in relation the Development Strategy which require amendment in order for the GCLP to be considered sound.

3.2 It is considered that the Development Strategy ignores the Settlement Hierarchy set out in Policy S/SH by allocating growth across the GCSP area in lower order settlements and focusing too heavily 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.

3.3 In doing so GCSP have proposed a Development Strategy that neglects the ongoing sustainability of settlements in the rural hinterland and carries the risk of delays and potential non-implementation due to the extent of infrastructure these strategic proposals are reliant on to 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 to positively address the affordable housing needs that currently exist in Greater Cambridgeshire.

3.4 By attempting to meet the 10% small sites required (contained within paragraph 73 of the NPPF) through GCSP's windfall allowance as opposed to identifying specific site allocations, the GCLP 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.

3.5 In order to remedy these soundness issues, GCSP should revisit their Development Strategy and should ensure that it is consistent with the Settlement Hierarchy by allocating proportionate and balanced growth towards Rural Centres and Minor Rural Centres as opposed to Group Villages and 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.

3.6 While CODE support the improved 'amber' assessment of the site in the HELAA 2026 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 wide range of facilities and services should be attributed a 'green' rating within the HELAA and allocated for up to 30 dwellings.

3.7 CODE (and G W Balaam & Son) also suggests that the land south of Bartlow Road should also be considered suitable, available and achievable and would be a further appropriate site to accommodate small to medium scale residential development in Linton. The HELAA (2026) considers the site is unsuitable for development due to a 'red' assessment against landscape considerations. The HELAA landscape assessment suggests that views to the site functions as a buffer between the edge of Linton and the A1307 and would require a landscape buffer along the edge of the development to reduce harm to the village setting. The site is separated from the A1307 by an additional field to the east of the site which we contend would maintain any buffer between the village edge and A1307. With regards to a landscape buffer there is a well-defined hedgerow along the site's eastern boundary that, accounting for the ongoing development acts as a natural boundary for the village. It is CODE's view then that the 'red' landscape assessment is not appropriate and the site should be considered suitable for allocation.

3.8 In summary, CODE considers that the Regulation 19 GCLP does not currently meet the tests of soundness, with further work required to ensure that it is positively prepared, justified, effective and consistent with national policy as required by paragraph 35 of the NPPF. In order to rectify the identified issues GCSP should reconsider the application of the spatial strategy and associated distribution of development and redistribute an appropriate level of development to sustainable settlements within the rural areas of the GCSP area. Linton, as the highest scoring 'Minor Rural Centre' is considered an appropriate location to accommodate new residential development. In doing so GCSP would reduce the plan's over reliance on large strategic sites and new settlements and de-risk delivery concerns associated with developments of this scale and the associated infrastructure requirements.

**Please provide a 100 word summary of your representation.**

CODE considers that the Regulation 19 GCLP does not currently meet the tests of soundness, with further work required to ensure that it is positively prepared, justified, effective and consistent with national policy as required by paragraph 35 of the NPPF. In order to rectify the identified issues GCSP should reconsider the application of the spatial strategy and associated distribution of development and redistribute an appropriate level of development to sustainable settlements within the rural areas of the GCSP area. Linton, as the highest scoring 'Minor Rural Centre' is considered an appropriate location to accommodate new residential development. In doing so GCSP would reduce the plan's over reliance on large strategic sites and new settlements and

de-risk delivery concerns associated with developments of this scale and the associated infrastructure requirements.

**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.**

Regulation 19 representation

**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.

In order to rectify the identified issues GCSP should reconsider the application of the spatial strategy and associated distribution of development and redistribute an appropriate level of development to sustainable settlements within the rural areas of the GCSP area. Linton, as the highest scoring ‘Minor Rural Centre’ is considered an appropriate location to accommodate new residential development. In doing so GCSP would reduce the plan’s over reliance on large strategic sites and new settlements and de-risk delivery concerns associated with developments of this scale and the associated infrastructure requirements.

**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 | Yes |

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

CODE has soundness issues relevant to the broad spatial strategy to be considered by the Inspector and suggest it appropriate for CODE to attend to provide assist the inspector in considering the soundness of the proposed spatial strategy.

**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 | Yes |
| Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan | Yes |
| Informed of adoption of the Local Plan | Yes |