

Representations to the Greater Cambridge Local Plan First Proposals Consultation 2021

Land north of Cambridge Road, Linton

On behalf of [REDACTED]

December 2021

Turley

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Our reference

TAYS3017

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1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of [REDACTED] in respect of the Greater Cambridge Local Plan (GCLP) - First Proposals Consultation 2021.
- 1.2 [REDACTED] have interests within the Local Plan area including Land north of Cambridge Road, Linton (please see Site Location Plan in **Appendix 1**). As such this representation focuses on issues particularly affecting this site, and should be read in conjunction with the Vision Document that has been prepared for the site.
- 1.3 Each of the responses relates to a particular policy or paragraph proposed within the consultation document, and this report is structured accordingly.

2. Land north of Cambridge Road, Linton

- 2.1 Full details of [REDACTED] interest in Linton are provided within the accompanying Vision Document. A summary is however provided here, for context of the comments provided on the consultation document.

Site Description and Context

- 2.2 The site is located to the north of Cambridge Road, on the southern edge of Linton. It comprises two irregular shaped fields, with the scrubland/woodland to the west of the site. There are three Public Rights of Way which cross through the site. These include, Public Footpath 146/13, 146/14 and 146/16.
- 2.3 The northern boundary is defined by the Public Footpath 146/15 and the route of the River Granta. Shrubs and trees bound the line of the river, which obstruct some of the views from the current main urban edge of Linton, including the Grade I Listed Parish Church of St Mary the Virgin.
- 2.4 The boundary to the east is currently defined by a row of shrubs, with a small area of woodland beyond, which aids the visual containment of the site. The boundary to the south of the site is defined by a small hedgerow and tree planting that creates a boundary between the site and Cambridge Road. To the west of the site, denser vegetation from the adjacent gardens and small patch of wood land helps to contain views.
- 2.5 The site has a very gradual sloping topography with the lowest point being to the north near the River Granta at 38 metres Above Ordnance Datum ('AOD') and the highpoint in the south of the Site of 42m AOD.
- 2.6 The proposals for the site have been informed by a series of technical reports which are appended to this Report as follows:
- Heritage Note prepared by CSA Environmental (October 2021) (**Appendix 2**)
 - Preliminary Ecological Appraisal prepared by CSA Environmental (November 2021) (**Appendix 3**)
 - Biodiversity Metric Assessment and Calculation by CSA Environmental (December 2021) (**Appendix 4**)
 - Flood Risk Assessment & Drainage Strategy Report prepared by Transport Planning Associates (February 2020) (**Appendix 5**)
 - Hydraulic Modelling prepared by JBA Consulting (December 2021) (**Appendix 6**)
 - Noise Technical Note prepared by RSK Acoustics (November 2021) (**Appendix 7**)
 - Air Quality Feasibility Assessment prepared by RSK (December 2020) (**Appendix 8**)

- Landscape and Visual Impact Assessment prepared by CSA Environmental (November 2021) (**Appendix 9**)
- Transport Strategy prepared by Transport Planning Associates (December 2021) (**Appendix 10**)
- Arboricultural Survey Report, and Tree Survey & Constraints Plan prepared by CSA Environmental (December 2021) (**Appendix 11**)

Site Opportunities and Influences

2.7 A number of site opportunities and influences have been defined:

- Provision of a new vehicular, cycle and pedestrian access point from Cambridge Road.
- Linton Water Tower creates an opportunity to frame an important vista through the development, creating physical and visual connection to the settlement itself.
- Pedestrian links to existing public footpaths, allowing connections to the wider countryside and Linton. Safe cycle and pedestrian links, overlooked by the new homes can be provided, enhancing the connectivity and sustainability of the site.
- Boardwalks within the wetland meadow areas will ensure routes are accessible all year round, creating a varied user experience and adding to the naturalistic character.
- Creation of a wetland meadow habitat and large areas of informal open space, as well as further green corridors through and around the new homes.
- A new children's play area with a Trim-Trail, promoting an integrated, active and healthy community. With the addition of viewing/river dipping platforms to allow people to get closer to nature.
- New hedgerow, thicket and tree planting to significantly increase tree cover within the site and its boundaries and set the entire development within a strong green framework. The addition of community orchards will have both ecological and social benefits.
- In the west the creation of a designated wildlife and woodland area, where ecological enhancements could be implemented, supporting habitat creation and biodiversity net gain. Enhanced green and blue corridors along the River Granta will improve wildlife connectivity, and provide a connection to surrounding habitats and open space.
- The eastern corner of the site, where Mill Lane meets Cambridge Road could be set aside as open space to create a landscape gateway feature. This would provide a feeling of arrival into Linton and would help the new homes assimilate into the urban grain of Linton.

- SuDS will form an integral part of the development's green infrastructure, providing ecological benefits and habitat creation, as well as performing their principal function of controlling and managing the flow of surface water run-off during periods of heavy and persistent rainfall.

The Proposed Vision

- 2.8 The vision for the site at Cambridge Road, Linton is to create a place which is well integrated with its context and responds sensitively and appropriately with the assessed influences and opportunities. A mix of housing types and tenures will be provided that suit the needs of the local community, including first time buyer homes and family homes.
- 2.9 The development can provide high quality, sustainable and sensitively designed new market and affordable homes, which will create a locally distinctive new neighbourhood, drawing upon the local vernacular.
- 2.10 The development could deliver around 85 new homes at an average density of 30 dwellings per hectare, with a range of property types to suit people in all stage of their lives. A mix of affordable tenures would be provided, including social rent, affordable rent, affordable home ownership and shared ownership.
- 2.11 A number of pedestrian and cycle connections will link the development to the existing settlement and surrounding public footpath network.
- 2.12 Around 60% of the site will be delivered as new public open space and will provide recreational opportunities, children's play facilities, Trim-Trails, community orchards and ecological enhancements. A large wetland meadow walk with a boardwalk will allow the area to be accessible all year round, even when wet. This area will enhance the River Granta Corridor and link the woodland to west to the Pocket Park in the east, creating a wildlife corridor for both wildlife and people to enjoy.
- 2.13 The Concept Masterplan included in the Vision Document is provided within **Appendix 12** of this report.

3. Response to the HELAA

- 3.1 The evidence base for the GCLP First Proposals document includes the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (September 2021).
- 3.2 Within this, Land north of Cambridge Road, Linton is identified as site ref. 51721 with a potential capacity for 85 dwellings. The document provides a site assessment through a 'traffic light' colour coding, with the site receiving a 'red' outcome for suitability, and 'green' for both availability and achievability.
- 3.3 The suitability assessment contains a number of issues that the Council have considered. These are set out within the below table, with comments provided in response to this on behalf of Taylor Wimpey together with our revised assessment of the site.

Issue	HELAA Assessment	TW Assessment	TW Comments
Adopted Development Plan Policies			<p>Whilst the site is outside of the development framework, this does not prohibit the allocation of sites through an emerging Local Plan.</p> <p>The proximity of the Site Specific Policy referenced and District Boundary have no bearing on this site.</p>
Flood Risk			<p>A Flood Risk Assessment & Drainage Strategy (Appendix 5) and Hydraulic Modelling (Appendix 6) have been prepared.</p> <p>The majority of the site is located in Flood Zone 1, which means that it is at low risk of fluvial flooding, and suitable for residential development. The route of the watercourse along the northern boundary of the site results in areas falling within Flood Zones 2 and 3, meaning it has a medium to high chance of fluvial flooding. Localised parts of the site are liable to some surface water flooding due to topography falling generally from south to north.</p> <p>The proposed development footprint sits wholly within Flood Zone 1, outside and above predicted flood levels of the River Granta. Furthermore, by steering development away from areas currently at risk, the scheme ensures no increased adverse impact to the surrounding area. The proposed development will allow for its surface water runoff to be managed, discharging via gravity to the watercourse along the northern boundary of the site. Surface water will be treated on-site via the use of various Sustainable Drainage Systems</p>

			<p>(SuDS) measures, which could include permeable paving, filter drains, swales or attenuation basins. Attenuation basins or other SuDS features will retain excess surface water on site, in order to control its rate of release to that of the equivalent greenfield rates, plus a 40% allowance for climate change storm event. These SuDS features could be designed to have permanently wet areas, to enhance biodiversity and habitat creation.</p>
<p>Landscape and Townscape</p>			<p>A Landscape and Visual Impact Assessment (Appendix 9) has been prepared which concluded that the site is visible from the public footpaths which cross it, but well contained from beyond the site boundaries, with further views of the site mostly screened or heavily filtered in the summer, and filtered during the winter.</p> <p>The site is not covered by any statutory or non-statutory designations for landscape character or quality. The structural vegetation on the site is contained to its boundaries. The northern part of the site is well related to the adjoining river corridor, as well as to the settlement beyond to the north. The character of the southern part of the site is influenced by the busy A1307 along its south, and in parts by the adjoining petrol station, with these elements detracting from the rurality and tranquillity of the area. The western part of the site is overgrown and inaccessible.</p> <p>The site's landscape value, as well as its sensitivity to the proposed development, is affected by its surroundings, with the northern part of the site assessed as having a high landscape value and sensitivity, and the southern part as having a moderate landscape value and sensitivity.</p> <p>The Concept Masterplan responds to the varying landscape sensitivities of the site and its surroundings, by locating the Land North of Cambridge Road, Linton – Landscape and Visual Impact Assessment proposed residential development and access within the south of the site, and by creating a publically accessible riverside park within the north and west of the site, adjacent to the river and the Conservation Area. The new homes can be designed to form an attractive addition to the Linton, which reflects its rich historic vernacular.</p>

		<p>The proposed development will be well related to the existing settlement form of Linton, with the proposed open space areas forming a continuation of that which occurs to the east and north, and the housing forming a continuation of the built form evident further west along Cambridge Road/A1307.</p> <p>Overall, development at the site can be accommodate without resulting in significant landscape effects on the character of Linton, its heritage assets, or the surrounding landscape. There will be no material effects on the wider landscape around Linton. The proposed development will create an attractive new community asset in the form of the public open space in the north and west, which will benefit both wildlife, the environment, and the community in terms of recreation and well-being.</p>
Biodiversity and Geodiversity		<p>A Preliminary Ecological Assessment (Appendix 3) has been undertaken which identified two main ecological considerations that should be addressed in bringing forward development of the site; these are the River Granta Wildlife Site which bounds the site to the north, along with the hedgerows and trees that bound the site to the west. It is considered that these environments could be retained, buffered and enhanced through the development of the site.</p> <p>Further survey work can be carried out as part of the preparation of a planning application in order to determine if there are any protected or notable species on site.</p> <p>The development of the site would provide the opportunity for ecological enhancements on site, including:</p> <ul style="list-style-type: none"> • Habitat restoration/creation within floodplain south of River Granta; • Incorporation of native plant species and those of wildlife importance; • Provision of wildlife ponds to provide aquatic habitats; • Provision of orchards to provide foraging opportunities; • Provision of new bat roosting and bird nesting opportunities; and

			<ul style="list-style-type: none"> • 'Hedgehog Cut-outs' cut/built into all new timber fencing. <p>The development would also deliver a net gain in biodiversity, and a high level Biodiversity Metric Assessment has been prepared (Appendix 4). Based on the metric adopted and taking measurements from the Concept Masterplan the on-site post-intervention 'habitat units' were calculated as 24.67 habitat units totalling +35.60% gain. This would be in line with both the future 10% net gain objective as stated within schedule 14 of the Environment Act (2021) and potential future policy for Greater Cambridge of 20% net gain.</p>
Open Space/Green Infrastructure			<p>Agreed that the site does not contain any protected or designated open space.</p> <p>The development will deliver open space provision and green infrastructure, along with retention and enhancements to the quality of the existing Public Rights of Way.</p> <p>An Arboricultural Survey Report (Appendix 11) has been prepared which concludes that the development proposed is feasible from an arboricultural perspective. All trees of value could be retained and adequately protected during construction activities in order to sustain their health and longevity.</p>
Historic Environment			<p>A Heritage Note (Appendix 2) has been prepared, which sets out that the site forms part of the adjacent agricultural setting to Linton Conservation Area. It is anticipated that development would result in some adverse impact to this designated heritage asset through the alteration of adjacent agricultural land. Harm can be reduced through sensitive design including use of open space to offset built form.</p> <p>It is anticipated that development would result in some minimal adverse impact to the significance of the Grade I listed Church of St Mary through the loss of views to the church tower from the adjacent agricultural field. The potential for a negligible adverse impact to the Grade II listed Linton Mill is also identified.</p> <p>An assessment of winter inter-visibility with adjacent designated heritage assets and a detailed setting assessment are recommended to inform</p>

			any planning application. Whilst minimal harm has been identified this is less than substantial.
Archaeology			<p>The Heritage Note referenced above also provides some commentary on archaeology.</p> <p>This sets out that there is potential for below-ground remains of archaeological interest within the site including finds/features of Roman date and below-ground remains of a medieval dovecote mound. It is likely that any below-ground archaeological remains could be appropriately addressed by way of a programme of archaeological recording.</p> <p>A full desk-based assessment would be prepared to inform any planning application.</p>
Accessibility to Services and Facilities			<p>It is agreed that the site has excellent access to services and facilities. These are accessible locally by foot and cycle within Linton including schools, medical services, shops and pubs, amongst others. The village also has excellent bus services providing public transport to Cambridge and other settlements.</p>
Site Access			<p>A Transport Strategy (Appendix 10) has been prepared, which sets out that vehicular access will be provided in the form of a new three-arm traffic signal-controlled junction with the A1307 Cambridge Road. A proposed traffic signal-controlled junction will provide for safe access and egress movements by residents helping to manage the speed of traffic along this section of the A1307.</p> <p>Controlled pedestrian crossing facilities will improve the access to the section of the public rights of way network that existing through the site and on land on the opposite side of Cambridge Road. The access junction will lead to a 5.5m-wide internal carriageway to form a logical route through the development, with a wide footway cycle track on the northern side, connecting into the existing highways network and public rights of way network, creating a safe and convenient route for vehicles, cyclists and pedestrians alike. The existing public footpath (146/14) which joins Cambridge Road at this point will be retained and upgraded as part of the access proposals, further promoting safe and convenient sustainable travel options.</p>

			<p>Opportunities for enhancing walk and cycle connections to the site will be explored as part of any planning application submission, in close consultation with relevant parties. Improvements to pedestrian and cycle routes will allow for safer and more convenient access to the existing bus stop located approximately 300m to the west of the proposed access point, where Cambridge Road meets the High Street.</p>
Transport and Roads			<p>The Transport Strategy (Appendix 10) sets out that traffic generation from the proposed development has been estimated showing that the development would generate modest vehicular movements during the morning and evening peak.</p> <p>An effective and safe means of access can be achieved that will not detrimentally affect the free-flow of traffic on the local highway.</p>
Noise, Vibration, Odour and Light Pollution			<p>A Noise Technical Note (Appendix 7) has been prepared, which sets out that a desktop appraisal has been carried out of the potential noise environment of the site. The likely baseline noise environment would be the result of transportation sources, primarily the A1307 Cambridge Road.</p> <p>The note concludes that development plots towards the southern portion of the site would be subject to the highest levels of mitigation, both to the design of the building façade and external boundaries. Recommendations also include the principles of good acoustic design, including orientation of building plots to reduce level within garden amenity areas.</p>
Air Quality			<p>An Air Quality Feasibility Assessment (Appendix 8) has been prepared which concludes that existing air quality in the area demonstrates no exceedances of any of the relevant AQs at nearby monitoring locations and overall, exceedances of any of the relevant AQs are not anticipated at the development site.</p> <p>Construction phase impacts of the proposed development may potentially arise due to fugitive dust emissions, but with implementation of appropriate mitigation measures, significant residual effects are not anticipated.</p> <p>During the operational phase, air quality impacts are likely to be associated with traffic emissions,</p>

			and these can be subject to further assessment as part of a future planning application. Mitigation measures to support low or zero emissions vehicles and encourage sustainable transport choices can be incorporated.
Contamination and Ground Stability			Given historic land uses having been agricultural, the site is not known to be at risk of any historic contamination, but this would be explored fully as part of the preparation of a planning application.
Constraints to Development	-		At Grade 3 the land is not considered the most valuable agricultural land. The watercourse and Public Rights of Way will be retained and enhanced as part of the development.
Strategic Highways Impact			The Transport Strategy (Appendix 10) sets out that traffic generation from the proposed development has been estimated showing that the development would generate modest vehicular movements during the morning and evening peak, with a minimal increase on the local highway network.
Employment	-		The site does not contain any employment uses.
Green Belt – Assessment of Harm of Green Belt Release	-		The site is not within or near the Green Belt.

- 3.4 It is therefore considered that the issues identified by the Council as being ‘red’ or ‘amber’ would not prohibit the allocation and eventual development of the site. All of these issues can be dealt with through the provision of additional information to a planning application or through mitigation as part of the development of the site. As such, the site is considered to be suitable for the development proposed, and the Council are therefore urged to reconsider the site for allocation as part of the Greater Cambridge Local Plan.
- 3.5 As part of the HELAA, the Council have considered a number of sites within Linton that were submitted as part of the call for sites. A total of 15 sites have been assessed by the Council, and none have been proposed for allocation by the Council as part of the consultation document.
- 3.6 Firstly, it is considered that the Council should be looking to deliver housing in Linton as part of the plan period, owing to the highly sustainable status of the settlement. This matter is dealt with in more detail in the subsequent section of this report, which responds specifically to the content of the consultation document.

3.7 In providing housing within Linton, Land north of Cambridge Road is considered to be the most suitable site for housing in the settlement. The primary differentiating factor between the sites promoted around Linton is the impacts on landscape character which has been demonstrated as being capable of appropriate mitigation in respect of the Land north of Cambridge Road.

4. Response to the First Proposals Consultation Document

4.1 Within this section, responses are provided on behalf of [REDACTED] to the First Proposals Consultation Document, including the suggested policy directions set out by the Council. These comments are provided in the context of the land interest at Land north of Cambridge Road, Linton.

How much development, and where?

Policy S/JH: New jobs and homes

4.2 The Council states that the new Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:

- 58,500 jobs
- 44,400 homes, reflecting an annual objectively assessed need of 2,111 homes per year, which is rounded for the plan.

4.3 This figure equates to an average of 2,114 homes per annum, with a suggestion that this will meet an objectively assessed housing need for 2,111 homes per annum that has been rounded upwards in deriving the total figure. It is noted that the Plan seeks to provide for approximately 10% more homes than are calculated as being needed, a total of around 48,840 homes.

4.4 In justifying a housing need figure above the standard method, the First Proposals cite evidence assembled in the following two studies, with the higher need predicated on supporting anticipated economic growth within Greater Cambridge:

- Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), GL Hearn; and
- Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020), GL Hearn, SQW and Cambridge Econometrics.

4.5 The latter of these two studies presents two alternative forecasts of potential economic growth over the plan period:

- A Central Scenario under which 58,400 new jobs would be created, claimed to represent the *'most likely outcome taking into account long term historic patterns of employment'* with the Housing and Employment Relationships study also describing it as *'a 'business as usual' growth scenario'*
- A Higher Scenario under which 78,700 new jobs would be created, with this *'higher outcome placing greater weight on fast growth in the recent past, particularly in key sectors'* and the Housing and Employment Relationships study describing it as *'a plausible but more aspirational growth outcome'*.

- 4.6 The Housing and Employment Relationships study concludes that housing provision in line with the standard method will not support either of these economic growth scenarios. It estimates the housing need associated with supporting both as follows:
- Central scenario – 41,900 to 44,310 homes (1,996-2,110dpa) with the range reflecting alternative commuting assumptions, the upper end assuming that there is a 1:1 or balanced commuting ratio for new jobs and the lower end assuming continued in-commuting
 - Higher scenario – 53,500 to 56,490 homes (2,549-2,690dpa) with the range again reflecting alternative commuting assumptions.
- 4.7 The proposed housing requirement evidently aligns with the Central scenario (58,400 jobs), with the First Proposals therefore not looking to provide the housing infrastructure that would appear to be needed to accommodate a more ambitious level of employment growth.
- 4.8 Whilst [REDACTED] support that the Council have set a housing figure higher than the Standard Method, it is their view that the Council should be more ambitious in planning for what has been presented as a reasonable and higher forecast of employment growth. This is particularly when considering the important strategic position of Greater Cambridge within the Oxford-Cambridge Arc and the clear aspirations for economic growth within the Arc. Clearly the Greater Cambridge Local Plan will also need to conform with the Spatial Framework for the Arc when prepared which will have the same status of National Policy.

Policy S/DS: Development strategy

- 4.9 The proposed development strategy for Greater Cambridge directs the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge and new settlements. Only a very small level of growth is directed to the Rural Southern Cluster and the Rest of the Rural Area. Of the allocations proposed, the vast majority of these are existing commitments (adopted allocations, sites with planning permission etc.). The Council are only proposing a need for an additional 11,640 homes to be allocated through the emerging Local Plan.
- 4.10 As part of their strategy, the Council have stated that their top priority is to reduce carbon emissions and to that end provide jobs and homes in close proximity to one another and major public transport routes. Whilst [REDACTED] do understand this approach by the Council, they do have some concerns in relation to how this strategy has been applied.
- 4.11 Firstly, many of the settlements within South Cambridgeshire are highly sustainable in their own right and benefit from excellent public transport links to Cambridge, and other destinations. Linton is one such settlement, and further commentary on its position within the hierarchy is set out in the comments for Policy S/SH. [REDACTED] therefore consider that the Council should explore the option to deliver more housing in other sustainable settlements, including Linton, in order to provide a greater spread of housing distribution in the District and provide a portfolio of types of sites to meet needs in a

range of locations. In doing so such housing distribution would still accord with the strategy presented by the Council, by providing housing in highly sustainable Linton.

- 4.12 Such housing delivery would help meet the needs of smaller settlements over the plan period, providing greater variety in the types and location of development delivered. It is important to highlight that the National Planning Policy Framework (NPPF) is clear in paragraph 69 that ‘small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly’ and that local planning authorities should ‘promote the development of a good mix of sites’. It is considered that the Council strategy focuses on the delivery of very large sites with a much lesser number of smaller allocations. [REDACTED] are therefore of the view that the Council should look to deliver a greater number of smaller allocations to ensure that there is a supply of housing that can be built out sooner within the plan period. The site in Linton is one such site that could be built-out relatively quickly.
- 4.13 Furthermore, paragraph 79 of the NPPF is clear that in order to ‘promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.’ By delivering more housing in settlements such as Linton, development will continue to support local services and facilities, supporting their retention and growth. This point is also recognised in the appraisal of spatial options set out within the Greater Cambridge Local Plan: First Proposals Sustainability Appraisal (October 2021).

Policy S/SH: Settlement hierarchy

- 4.14 Under this policy the Council set out a settlement hierarchy as follows:
- Cambridge
 - Town
 - Rural Centre
 - Minor Rural Centre
 - Group Village
 - Infill Village.
- 4.15 This hierarchy is essentially the same as the adopted hierarchy in the South Cambridgeshire Local Plan (2018), with the addition of Cambridge and Town.
- 4.16 Within the First Proposals, Linton is identified as a Minor Rural Centre, which is again the same as adopted policy. This suggests that Linton is a mid-range settlement within the hierarchy.
- 4.17 Although an older document, the Village Classification Report (2012) sets out the review of the village hierarchy that informed the adopted Local Plan. This states that in the assessment ‘Cottenham, Bar Hill, Linton, Melbourn and Gamlingay perform significantly better in the scoring process than the other existing Minor Rural Centres.’ Given the time that has passed, with the intervening development and projected proposals through the emerging Local Plan, this only serves to further enhance the sustainability of Linton. An assessment should be undertaken to support the emerging Local Plan to inform a review of the settlement hierarchy and it is considered such an assessment

would conclude that Linton should be recognised for elevation in the hierarchy to a Rural Centre.

- 4.18 Linton benefits from a breadth of services and facilities, which include but are not limited to, two primary schools, two secondary schools, doctors surgeries, a library, a bank, a Post Office, a pharmacy, a Co-op convenience store, several local shops and pubs/restaurants/takeaways, a village hall, a recreation ground with sports pitches and two churches. To the south of the A1307 there are also further services including a petrol station and various other premises at The Grip Industrial Estate including a gym and further shops, along with Linton Zoo. The village is also served by an excellent bus service providing services 7 days a week to Cambridge and Haverhill. On weekdays these services are approximately every half an hour.
- 4.19 All of these services and facilities would be accessible from the Land north of Cambridge Road, Linton site by foot or bicycle. The site is therefore a highly sustainable location for development.
- 4.20 Linton has also been subject to transport improvements through the Greater Cambridge Partnership Transport Projects. In particular, the Linton Greenway will 'be an active travel route to make it easier for walkers, cyclists and horse riders to travel from Linton into Cambridge'. This work is ongoing and includes the following benefits to residents of Linton:
- Green active travel into and out of Cambridge for walkers, cyclists and horse-riders.
 - Easy and safe travel to workplaces, local schools and colleges, shops and transport hubs.
 - Links to the Cambridge Biomedical Campus, the Sawston and Melbourn Greenways and the Chisholm Trail.
 - Wider existing footways and verges to provide a path for cyclists, pedestrians and horse riders (where feasible), separated from the carriageway.
 - Improved footbridge and underpass on A11, including adding ramps and stud lights.
- 4.21 These works will therefore further enhance the sustainability of Linton, improving sustainable transport opportunities for residents, with the Land north of Cambridge Road, Linton site particularly well positioned to benefit from these enhancements.
- 4.22 Within the Greater Cambridge Local Plan: First Proposals Sustainability Appraisal (October 2021) appraisal of spatial options, note is made of Linton benefitting from services and facilities such as schools and doctors surgeries, at a comparable level alongside Great Shelford and Sawston. Both of these settlements are Rural Centres within the First Proposals, and it queried how Linton can be listed alongside these settlements as of equal service and facility provision, but at a lower position in the hierarchy. It is clear therefore that Linton should be classified as a Rural Centre.
- 4.23 Further commentary on this point is made in relation to the rural southern cluster below.
- 4.24 Furthermore, even as a Minor Rural Centre, Linton is not directed with any growth through allocations as part of the First Proposals. Despite the settlement hierarchy

categorisation, Linton is clearly a highly sustainable settlement appropriate for growth. [REDACTED] suggest that the Council should reconsider their distribution of proposed allocation sites so that the best reflect the sustainability of settlements within the authority area. There should therefore be some housing delivery through the emerging Local Plan in sustainable villages such as Linton.

Policy S/SB: Settlement boundaries

- 4.25 In line with their promotion of Land north of Cambridge Road, Linton, [REDACTED] advocate that the site should be included within the settlement boundary of Linton as part of the allocation of the site for residential development.

The rural southern cluster

Policy S/RSC: Other site allocations in the Rural Southern Cluster

- 4.26 This policy is considered to only illustrate further that despite this Rural Southern Cluster Area having been identified by the Council as a growth area, there is in fact limited residential development proposed within this area to support the level of employment growth. Delivering more housing within this area will provide development with opportunities for sustainable travel to the Genome Campus and Babraham Research Campus.
- 4.27 Residential allocations within the Rural Southern Cluster include a carried forward allocation in Sawston, along with new allocations S/RSC/HW in Great Shelford which will deliver no more than 100 homes and S/RSC/MF at Duxford which will deliver around 60 homes. For an area that is identified for growth to support significant employment development, 160 homes is a very small contribution. Linton is equidistant to the Babraham Research Campus compared to Great Shelford and Duxford, and Linton is closer to the Genome Campus than Great Shelford.
- 4.28 Whilst we do not comment on the appropriateness of the proposed allocations themselves at this juncture, it is notable that Duxford is a lower order settlement in the hierarchy than Linton however it receives an allocation whereas Linton does not.
- 4.29 The evidence base is clear that the Rural Southern Cluster is an appropriate location for focusing development as part of the Council strategy. The Greater Cambridge Local Plan: First Proposals Sustainability Appraisal (October 2021) states that development in this area ‘will help to ensure housing is well-located in relation to existing centres of employment’.
- 4.30 The Greater Cambridge Local Plan Development Strategy Options – Summary Report (November 2020) sets out work undertaken to assess further whether the spatial choices set out in the Greater Cambridge Local Plan: First Conversation consultation were indeed reasonable; and to identify whether there are any additional reasonable spatial options that should be added to the First Conversation choices. The assessment identified the following two options as being reasonable and substantively different to the six First Conversation options:

- Supporting a high-tech corridor by integrating homes and jobs (southern cluster); and
- Expanding a growth area around transport nodes (western cluster).

4.31 Consequently, eight choices were taken forward for testing as strategic options, which included:

‘Spatial Option 7: Supporting a high-tech corridor by integrating homes and jobs (southern cluster) - this approach would focus new homes close to existing and committed jobs within the life sciences cluster area around the south of Cambridge, including homes at existing villages and at new settlements.’

4.32 The assessment noted that opportunities for this area included a good relationship between jobs and homes. It however appears that more limited growth has been directed to this area due to anticipated high carbon emissions due to dispersed village homes. However, this is considered to be a rather general statement and does not focus in on specific settlements within the cluster that benefit from better sustainable travel opportunities.

4.33 As set out earlier, Linton offers highly sustainable travel opportunities for residents and these are being further enhanced through ongoing improvements. Residents within Linton are able to access Babraham Research Campus by regular bus service with a journey time of around 15 minutes. Whilst the Genome Campus is not directly accessible by bus, this is only a 10 minute drive. It is therefore considered that the conclusion that development in the southern cluster would result in high carbon emissions is not representative of Linton.

4.34 Furthermore, ██████████ launched their Environment Strategy in 2021. This sets out how they will help protect our environment for future generations, partner with suppliers to reduce the impact of the homes and developments built, and make it easier for their customers to live a sustainable lifestyle. The strategy focuses on the key environmental impacts for the business: climate change, nature, resources and waste. As such the development of Land north of Cambridge Road, Linton could be delivered sustainably, with reduced carbon impact.

4.35 It is therefore considered that the Council should look to deliver more homes in this important employment area, with the Land north of Cambridge Road, Linton providing a suitable site in a sustainable location for accessing jobs.

Climate Change

4.36 This section of the First Proposals contains a number of proposed policies relating to net zero carbon development, water efficiency, designing for climate changes, water management and reducing waste.

4.37 ██████████ have submitted a standalone response to these, and therefore these comments are not repeated.

Biodiversity and Green Spaces

Policy BG/BG: Biodiversity and Geodiversity

- 4.38 The policy wording suggests that there will be a requirement for development to achieve a minimum 20% biodiversity net gain. It is understood that this aspiration has stemmed from the Oxford-Cambridge Arc Environmental Principles and exceeds that in the Environment Act 2021. Whilst [REDACTED] are supportive of this approach to provide significant biodiversity improvements through development, this is clearly a high aspiration and it will be important to consider site specific requirements and the overall viability implications of all the Plan requirements considered collectively.
- 4.39 A suggestion to the wording is that this could be phrased as ‘the policy will require development to **aim to** achieve a 20% biodiversity net gain **with a minimum 10% to be achieved**’. By amending the wording in this way the onus is clearly on the applicant to meet the 20% wherever possible, but should there be a slight shortcoming (that would still result in an overall high net gain) this would not prevent otherwise acceptable development.

Policy BG/GI: Green Infrastructure

- 4.40 This policy wording sets out that ‘all development proposals – appropriate to its type, scale and location - to include green infrastructure, providing the following varied benefits for people, wildlife and planet’. It is suggested that further clarification should be provided within the wording of this policy as to what type, scale and location of development will be required to provide green infrastructure. This will avoid any ambiguity.

Policy BG/TC: Improving tree canopy cover and the tree population

- 4.41 The wording of this policy appears to contradict itself currently. It states on one bullet point that development proposals need to ‘protect and enhance the tree population on site, including its diversity and distribution’ but then adds on the subsequent bullet point the need to ‘protect existing trees of value (including landscape, heritage, cultural, amenity, biodiversity, ecosystem service or aesthetic value) as measured by a recognised tool such as iTree’.
- 4.42 The first point appears to suggest that all existing trees on sites should be protected and makes no allowance for instances where trees are required to be removed due to disease, age or safety concerns which renders their retention inappropriate. Furthermore, in some instances the removal of trees, in whole or in part, is required in order for the development to be brought forward. These could be trees of value. For example, this could be to allow for access to a development. This would not make a development unacceptable, particularly where appropriate mitigation could be provided. It is therefore considered that the two bullet points could be merged into a single point that references ‘**trees of value**’ and for them to be protected ‘**where possible**’.
- 4.43 The same comment is raised in relation to the bullet point stating the need to ‘protect existing hedgerows and the surrounding land that supports them, and to require the

planting of new ones where appropriate'. Again, it is suggested that '**hedgerows of value**' is stated in this point.

- 4.44 Concerns are also raised to the reference of using 'a recognised tool such as iTree' to measure tree value. This would appear to make the role of many arboriculturalists redundant if they do not use such a tool, and it is also unclear from this policy wording what other such recognised tools may be. It is therefore suggested that this text be removed from the wording of the policy, which would otherwise appear to take a very restrictive and unnecessary approach to arboricultural assessments.

Policy BG/RC: River Corridors

- 4.45 This policy relates to the impact of development on the River Cam and its tributaries. River Granta is such a tributary, which runs along the northern edge of the Land north of Cambridge Road, Linton. [REDACTED] are therefore supportive of the approach to protect, enhance and restore this natural feature, which the development of the site could help to achieve.

Policy BG/EO: Providing and enhancing open spaces

- 4.46 [REDACTED] are supportive of the delivery of open space and recreational land through development, with Land north of Cambridge Road, Linton having the ability to deliver a very significant amount of such space for both new and existing residents to enjoy.
- 4.47 The proposed policy wording states however that 'open space and recreation provision will be required to be provided by new development, appropriate to the scale and location of the development.' It is suggested that further clarification should be provided within the wording of this policy as to what scale and location of development will be required to provide open space, and indeed what type and amount of open space contribution will need to be on and off site. This will avoid any ambiguity. The wording adds that 'the type of provision sought will be guided by the needs and opportunities of the local area.' Again this requires further clarification. It will be important for these requirements to inform site capacities for the proposed allocations and assessments of viability of the Plan as a whole.
- 4.48 It is understood that the Council are looking to review their current open space standards, which is supported as this will provide important clarification for development sites. It is also agreed that the standards should continue to differ between Cambridge and South Cambridgeshire to reflect the differences between these areas.
- 4.49 It is also suggested that the wording should be amended to state that 'open space and recreation provision will be required to be provided by new development **where justified**'. This is so as to reflect the requirements of national policy, which requires that planning obligations meet the following tests; that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development, as set out in the policy tests in paragraph 57 of the NPPF.

Wellbeing and social inclusion

Policy WS/HD: Creating healthy new developments

- 4.50 Whilst [REDACTED] are supportive of the desire to apply health principles to new development, the requirement under the policy to draw on the ten principles developed from the Healthy New Towns initiative is considered onerous. It is suggested that the wording of this policy is amended to state that ‘we will seek to integrate health considerations into policies across the Plan. This would require health principles to be applied to new developments **wherever possible**, drawing on the ten principles developed from the Healthy New Towns initiative **as appropriate**.’
- 4.51 The requirement for a Health Impact Assessment to be submitted with applications is also currently ambiguous. The proposed policy wording states that ‘Health Impact Assessments will be required to accompany planning applications (at a level of detail appropriate to the scale and nature of the application).’ It is suggested that further clarification should be provided within the wording of this policy as to what scale and nature of development would trigger what level of detail. This would minimise the risk of documents not covering the necessary detail expected by the Council. For example South Cambridgeshire Local Plan 2018 Policy SC/2 specifies that such a report is required for developments of 20 dwellings or more.

Policy WS/CF: Community, sports and leisure facilities

- 4.52 [REDACTED] are supportive of the provision of facilities to support new development and residents, but would like to make some comments on the wording of the policy to minimise any uncertainty.
- 4.53 The policy states that ‘the Local Plan will require appropriate community, cultural, education, sports and leisure provision to meet the needs generated by new developments.’ Clarification should be provided as to the measure of what is deemed ‘appropriate’ and thresholds for whether this will be on-site contributions or off-site.
- 4.54 Related to this, the policy wording adds that ‘in large scale developments and new communities, community development strategies will be required, to explore how places will become communities, and how early residents will be supported’. The Council should quantify what is considered to be a ‘large scale development’ i.e. is this major development as defined by the NPPF, or is this a locally set measure.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

- 4.55 [REDACTED] agree with the Council ambition set out under this policy to support local business and provide local people with employment opportunities and experience through new development.
- 4.56 The Council note that they need to define ‘appropriate scaled development’ which is supported, to provide clarity on the scales of development that will be required to do this.

4.57 Furthermore, depending on local circumstances and labour availability at the time of works, it may not always be possible or realistic to meet the policy requirements. In order to not inhibit progress of sites and delivery of development, it is suggested that the wording is tweaked to add a degree of flexibility. It should state that 'it is proposed **that wherever possible**, appropriately scaled developments contribute to local training, skills and employment opportunities, for example apprenticeships, to help to ensure that the local community benefits from the development. In addition, appropriately scaled developments would be required to provide access for local businesses to supply chain opportunities in various stages of development, **wherever possible**.'

Policy WS/HS: Pollution, health and safety

4.58 Whilst [REDACTED] support the need for development to take account of sources of pollution, it is suggested that the policy fails to recognise that impacts could be mitigated against. It is therefore suggested that the wording is amended to state that 'we propose that this policy will require that development does not lead to, or is subject to significant adverse effects as a result of noise, vibration, odour, and/or light pollution **unless these effects can be satisfactorily mitigated against**'.

Great Places

Policy GP/PP: People and place responsive design

4.59 [REDACTED] support the approach that development should have regard to its context in design terms. The opening of the policy wording states that 'the policy will require all applicants to demonstrate how their proposals sustain and enhance the unique qualities of the Greater Cambridge area and the subtleties in the different landscape and settlement forms.' This wording suggests that all developments will need to address all of the qualities of the Greater Cambridge area through development, which is clearly unachievable and unreasonable. It is therefore suggested that this wording is amended to state that this is '**as appropriate to the local context of the development site**'.

Policy GP/LC: Protection and enhancement of landscape character

4.60 The content of this policy is supported by [REDACTED] in order to address landscape character through development. It is also positive that the policy references the Greater Cambridge Landscape Character Assessment as a clear point of reference in responding to this policy.

4.61 A slight amendment is however suggested to the wording to again provide flexibility. The third bullet point is suggested to be amended to state that developments will be required to 'retain and enhance landscape features within new developments **that positively contribute to the quality and character of the area, wherever possible**'. The wording as it currently stands suggests that any landscape features on sites should be retained and enhanced, whereas the proposed amendment ensures that features of limited value may be appropriately removed, or indeed where features of value may need to be removed, for example to facilitate access. The proposed wording is consistent with that currently set out under Policy GP/QP.

4.62 It is also noted that the policy makes reference to the need for protecting ‘important green gaps’. The only green gap referenced is Longstanton and Northstowe and therefore it is assumed the policy should be updated to refer to a singular gap.

Policy GP/QD: Achieving high quality development

4.63 [REDACTED] are supportive of the aspiration to achieve high quality design through development. A couple of minor points are however raised on the wording of the policy.

4.64 Firstly, the need to successfully integrate waste, recycling and parking is referenced twice in the policy under ‘climate-positive’ and ‘local character’ which does not need to be repeated under the same policy.

4.65 The policy also states that ‘any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will need to demonstrate through visual assessment or appraisal with supporting accurate visual representations, how the proposals enhance the existing landscape and townscape and do not cause unacceptable impact on the historic environment’. Clarification should be provided within the policy as to what is regarded as ‘significantly taller’.

Policy GP/QP: Establishing high quality landscape and public realm

4.66 The approach to high quality landscape and public realm is supported. A minor comment is made on the last bullet point of the policy, which sets out the need to ‘provide appropriate types of open space whether in urban or more rural places that link into other sequences of existing or new landscape spaces and wider settings’. It is queried what will be the measure of ‘appropriate’ and particularly whether in relation to Policy BG/EO certain thresholds and types of open space provision will be required dependent upon scale of development.

Policy GP/HA: Conservation and enhancement of heritage assets

4.67 The policy wording on archaeology states that ‘the policy will also require the appropriate treatment of archaeology.’ This is ambiguous and does not appear to identify that this applies to sites where there is likely to be an impact on archaeology. It is suggested that the policy wording is amended to state that ‘the policy will also require the appropriate treatment of archaeology, ***where development proposals have the potential to impact archaeological remains or deposits.***’

Jobs

Policy J/RW: Enabling remote working

4.68 [REDACTED] support the approach under this policy to take account of the current and likely future trend for working at home, largely as a result of the COVID-19 pandemic. Whilst the policy does not place any requirements on new developments to consider this matter, it is highlighted that the development of Land north of Cambridge Road, Linton would benefit from homes that include provision of studies and include the necessary broadband services to easily facilitate home working.

Homes

Policy H/AH: Affordable Housing

- 4.69 Whilst [REDACTED] are understanding of the requirements set out under this policy, comments are made in response to the point that ‘affordable homes must be designed to be indiscernible from market homes, and affordable homes should be distributed throughout the site in small groups or clusters, in accordance with the guidance provided in the Greater Cambridge Housing Strategy Annex 10: Clustering and Distribution of Affordable Housing (Cambridge City Council and South Cambridgeshire District Council, June 2021) or a successor document.’
- 4.70 The document referenced sets out maximum cluster numbers in relation to the total number of units proposed. For example, developments of 30 to 200 units must have maximum clusters of 15 units. Concern is raised on this point. It is considered that flexibility should be allowed for clusters to exceed the 15 unit restriction where this has been agreed with the relevant Registered Provider. The clustering of affordable housing units is generally a practical requirement for Registered Providers for management and maintenance reasons. As such, the policy should allow a degree of flexibility here.

Policy H/HM: Housing Mix

- 4.71 [REDACTED] are supportive of the approach to this policy in that housing mix ‘recommendations’ are provided, along with these being set out as a ‘range’. This is a positive format for the housing mix policy by providing flexibility, to also allow for differences between market and affordable housing mix, particularly with input from Registered Providers and to respond to local contexts.

Policy H/HD: Housing Density

- 4.72 [REDACTED] are supportive of this policy in that no density figure is stipulated, with this needing to be appropriate to each site specifically, taking into account local character and the need to provide higher densities where appropriate in order to accord with the requirements of the NPPF to boost supply of housing and make best use of land.

Policy H/SS: Residential space standards and accessible homes

- 4.73 The approach for the gross internal floor areas for all new homes to be required to meet or exceed the nationally described residential space standard or its successor is now a standard requirement, and [REDACTED] house types are all compliant with this requirement.
- 4.74 The policy also states that ‘new homes will be required to be Building Regulations M4(2) ‘accessible and adaptable’ dwellings’ and that ‘5% of affordable homes on new developments that include 20 or more affordable homes will be required to be Building Regulations M4(3) ‘wheelchair user’ dwellings, to be provided as Building Regulations M4(3)(a) ‘wheelchair adaptable’ dwellings unless the Council has identified a need for Building Regulations M4(3)(b) ‘wheelchair accessible’ dwellings’. [REDACTED] are supportive of this requirement which accords with their standard house types.

Policy H/SH: Specialist housing and homes for older people

4.75 This policy states that ‘provision of specialist housing will be required as part of the housing mix of new developments, particularly at new settlements and within urban extensions, to create balanced and mixed communities and to meet the identified need for specialist housing.’ Clarity should be provided within the wording of this policy as to the threshold and level of provision for this type of housing. The current wording suggests that this could be a requirement for all scales of development. Whilst there is understood to be a need to deliver housing for older people, it would be unreasonable to expect this provision on every housing development. Furthermore, the NPPF does not seek delivery of such housing on every residential development site. Clarity on this requirement will be necessary to inform site capacities of proposed allocations and the overall viability of the Plan.

Policy H/CB: Self-and custom-build homes

4.76 This policy states that ‘5% of all new homes in residential developments of 20 dwellings or more will be required to be custom and/or self-build, provided that the Greater Cambridge self and custom build register is recording a demand for self and/or custom build homes when a planning application for 20 or more homes is considered.’

4.77 Whilst the broad aspiration of the policy is supported, it is noted that the NPPF does not stipulate a requirements for sites to include custom or self-build homes. It is however positive that the Council have noted in the policy that there must be demand on the register in order for this to be a requirement. It is noted that Homes for our future Greater Cambridge Housing Strategy 2019 – 2023 evidence base document sets out that there are just under 400 applicants on the South Cambridgeshire self-build register.

4.78 [REDACTED] are supportive of the suggestion that ‘a mechanism will be included within the policy to allow for plots identified to be for self and/or custom build homes to be delivered by the developer or others if the plot has not been sold as a self or custom build plot after at least 12 months of appropriate marketing.’ However, 12 months is a long period of time, and concern is therefore raised regarding the implications this may have for the timescales for delivery of developments and the associated increased costs with developers potentially having to revisit earlier phases in order to complete the dwellings. This timescale should therefore be reduced to 6 months.

Infrastructure

Policy I/ST: Sustainable transport and connectivity

4.79 [REDACTED] are supportive of the approach to manage the impacts of new development on the transport network. In particular, sustainable travel should be encouraged through development, which the development of Land north of Cambridge Road, Linton would achieve.

4.80 It is also noted that the policy refers to ‘planned infrastructure schemes (such as East West Rail, improvements to the A428, and schemes planned by the Greater Cambridge Partnership and Cambridgeshire and Peterborough Combined Authority) will provide significant and wide ranging improvements for active travel modes’. As identified earlier

in this report, through the Greater Cambridge Partnership the Linton Greenway is being progressed which will enhance the sustainable travel options for the village and would be of direct benefit to Land north of Cambridge Road, Linton.

- 4.81 A concern is however raised on part of the wording of this policy. The policy states that ‘developers will be required to contribute to improvements to public and community transport and to deliver new and improved sustainable active travel connections for non-motorised users including for equestrians appropriate to the scale and nature of the proposal.’ This policy wording suggests that all developments will be required to deliver improvements, and clarity should therefore be provided on the types and thresholds of development that would trigger this requirement.

Policy I/EV: Parking and electric vehicles

- 4.82 This policy states that ‘larger developments and those within accessible locations will need to be able to accommodate space for dockless cycle hire schemes, such as at travel hubs and key destinations’. Clarity should be provided within the policy as what is considered a ‘larger development’ that would trigger this requirement.
- 4.83 It is noted that the policy does not currently contain any details of car and cycle parking standards, which are clearly a necessity for such a policy. This information should therefore be provided as part of the policy, with clearly there being a difference in the required provision between the urban area of Cambridge and the surrounding settlements. These figures should be indicative as set out in the South Cambridgeshire Local Plan (2018) in order to provide maximum flexibility.
- 4.84 The provision of 1 electric car charging point per dwelling for private parking and 1 charging point per parking space in communal parking areas is supported.

Policy I/DI: Digital Infrastructure

- 4.85 This policy sets out the need for applicants to submit a ‘Connectivity Statement’ with a planning application to demonstrate how their proposed digital infrastructure will meet policy requirements’ set out within the policy. This covers broadband, mobile phones, small cell mobile communications technology and publicly accessible Wi-fi. The latter three points provide thresholds of development that trigger the need for this information, but the first point on broadband does not. Whilst it is assumed that the intention of this is to therefore apply to all development, clarity should be provided.

