

JANUARY 2026

## Vistry Representations to the Greater Cambridge Local Plan Regulation 18 Consultation

### Land North-West of Balsham Road, Linton

#### 1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Vistry in response to the Greater Cambridge Local Plan ('GCLP') Regulation 18 Consultation and should be read in conjunction with those previously submitted in respect of this site to the 2019 & 2025 Call for Sites, the Issues & Options Consultation 2020 and the First Proposals Preferred Options Consultation 2021.
- 1.2 Vistry have interests within the Local Plan area, including at Land to the North-West of Balsham Road, Linton ('Balsham Road, Linton'). The site was considered under site reference 396 (HELAA 40411). As such these representations are made in respect of Vistry's existing and potential future land interests within the Greater Cambridge Area, with a specific focus on issues affecting the site at Balsham Road, Linton.
- 1.3 Previous representations were prepared by Strutt & Parker on behalf of Countryside Properties (UK) Limited which is now a part of the Vistry group.
- 1.4 The responses below relate to a particular policy or paragraph within the consultation document, this report is therefore structured accordingly.

## **2. THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) CONSULTATION, DECEMBER 2025**

- 2.1 In respect of any representations made to policies within the Draft Plan, Vistry consider it extremely important to highlight the recently published consultation on the revised National Planning Policy Framework (NPPF).
- 2.2 The consultation proposes a number of changes to policies, which includes reforms to housing need assessment, delivery trajectories, density expectations in sustainable locations, and the operation of the Housing Delivery Test.
- 2.3 The consultation makes clear that areas with acute affordability pressures and strong economic performance – such as Cambridge and the wider Oxford-Cambridge Arc – will be expected to plan for substantially higher levels of housing. Should this consultation become government policy then this will have a material impact on the policies within this Draft Plan.
- 2.4 Vistry therefore reserve the right to amend these representations later once the results of the consultation are published.

### **3. RESPONSE TO THE DRAFT CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION**

3.1 Within this section, our response to the Regulation 18 consultation documents is provided, including the suggested policy directions set out by Cambridge City Council and South Cambridgeshire District Council ('the Councils'). These comments are provided in the context of our existing and potential future land interests within The Greater Cambridge Area, specifically those at Linton.

#### **Development Strategy**

3.2 Overall, Vistry are broadly supportive of the emerging Local Plan, its key themes and strategic priorities within them, as well as its strategy to direct the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge, and new settlements, recognising that that a range of sites will be required in order to deliver this strategy. However, the Councils should ensure that an appropriate proportion of smaller and medium scale sites are allocated, such as the site at Balsham Road Linton, to enable the delivery of a broad mix of tenures and dwelling types, including affordable housing, and to provide flexibility to ensure housing requires can be met in full within the plan period.

3.3 Our more detailed comments on the spatial strategy are set out under Policy S/DS below and should be read in conjunction with our comments to the other individual policies as well.

#### ***Policy S/JH: New jobs and homes***

3.4 Vistry welcome the depth of analysis in the Councils' Economic and Housing Needs Update<sup>1</sup> (EHNU) and particularly its scrutinisation of baseline forecasts, albeit only from one source rather than the increasingly typical range. They are aware that even 'state-of-the-art techniques' have previously led to such forecasts underestimating subsequent job growth by 'a significant margin' in Cambridgeshire and Peterborough<sup>2</sup>.

3.5 Vistry are, though, concerned by the apparent dismissal of the higher growth scenario, in which some 90,900 jobs are envisaged between 2024 and 2045 – generating a need for circa 2,829 homes per annum to provide the necessary labour – despite the study itself clearly accepting that this 'could be achieved or exceeded'<sup>3</sup>. It appears wary of the 'step change in infrastructure and development' that would supposedly be needed to facilitate such a level of growth, without appearing to recognise that this is precisely what the Government is aiming to achieve in Greater Cambridge.

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<sup>1</sup> Icen (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045

<sup>2</sup> Cambridgeshire and Peterborough Independent Economic Review (September 2018) p68

<sup>3</sup> Icen (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, paragraph 3.62

- 3.6 In a recent statement in the House of Commons, the Minister of State for Housing and Planning has directly acknowledged the ‘numerous long-standing barriers to further growth’ which have been preventing the wider region from ‘realising its true potential’, noting that these are ‘particularly acute in Greater Cambridge’<sup>4</sup>. He explained that the Cambridge Growth Company – established in October 2024 – had been tasked with the development of an ‘evidence base to support an infrastructure-first growth plan and a long-term delivery vehicle’ befitting the ‘nature, scale and complexity of ambitious and high quality sustainable growth in Cambridge and its environs’. This was found to require ‘a delivery vehicle with the necessary powers, authority and access to finance’, leading the Government to conclude that ‘a centrally led development corporation’ would be the best option for delivering ‘nationally significant growth in Greater Cambridge’. An ‘ambitious funding package’ of up to £400 million would initially be made available to such a body to ‘remove barriers to sustainable growth and boost housing supply’, with this having notably been ‘welcomed’ by the leaders of both Councils<sup>5</sup>.
- 3.7 With the EHNU drawing parallels with Milton Keynes as an area that is claimed to have only seen ‘huge population and economic growth’ as a result of ‘an unrivalled programme of investment and development’, it is of note that this was also led by a development corporation of the kind that the Government is now proposing to establish in Greater Cambridge<sup>6</sup>.
- 3.8 It is thus not inconceivable that such an intervention would bring a higher level of job growth, beyond what is assumed in the ‘central scenario’ that the EHNU deems ‘most likely’<sup>7</sup>. With the study having pointedly not discounted the prospect of this stronger job growth materialising, Vistry believe that it should form the basis of a Local Plan that even the current NPPF expects to ‘create the conditions in which businesses can invest, expand and adapt’, allowing Greater Cambridge to ‘build on its strengths’ as an area with ‘high levels of productivity’ that can capitalise upon its ‘performance and potential’<sup>8</sup>. It should be positively seeking to ‘address potential barriers to investment, such as inadequate infrastructure, services or housing’, rather than assuming that they will prevent Greater Cambridge from realising its ‘full potential’ as the Minister of State has indicated to be the Government’s ‘firm commitment...in the months and years ahead’<sup>9</sup>.

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<sup>4</sup> <https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws990>

<sup>5</sup> <https://www.cambridge.gov.uk/news/2025/10/23/council-leaders-welcome-multi-million-pound-investment-in-greater-cambridge---but-say-more-detail-is-needed>

<sup>6</sup> Icení (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, paragraph 3.62

<sup>7</sup> *Ibid*, paragraph 3.60

<sup>8</sup> MHCLG (December 2024) National Planning Policy Framework, paragraph 85

<sup>9</sup> *Ibid*, paragraph 86d; <https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws990>

3.9 Vistry therefore contend that the Local Plan should be more ambitious in terms of job growth, targeting the creation of 90,900 jobs rather than the 73,300 proposed at draft Policy S/JH. It should equally plan to meet what the EHNU reports to be the associated need for circa 2,829 homes per annum, surpassing what should be viewed as only the 'minimum' need suggested by the standard method (2,295dpa)<sup>10</sup>. This would better reflect paragraph 69 of the NPPF which sets out that the housing requirement may be higher than the identified housing need if, for example, it reflects growth ambitions linked to economic development or infrastructure investment.

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

3.10 The updated proposed development strategy (page 16) 'Our Development Strategy for Greater Cambridge' for Greater Cambridge is stated to be to:

"direct development to where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live. We have sought to make the most of brownfield land, and to use the land we have identified efficiently." The proposed development strategy for Greater Cambridge continues to direct the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge, and new settlements. A smaller proportion of growth is directed to the Rural Southern Cluster and other rural areas.

3.11 Vistry are supportive of the principle of the proposed development strategy and recognise that a range of sites will be required to deliver this strategy.

3.12 Concern, however, is raised regarding how the proposed strategy has been interpreted into the allocations proposed. We would highlight that the Plan is heavily reliant on allocations for large and complex sites, many of which will be dependent on the timely delivery of strategic infrastructure.

3.13 In this regard, Vistry consider that the development strategy would be strengthened by the inclusion of a wider variety of site sizes and locations, particularly smaller and medium-scale sites in the rural areas, which can play an important role in maintaining delivery rates, providing flexibility within the housing trajectory, and reducing reliance on a small number of strategically constrained sites. There is currently a notable absence of sufficient small and medium-scale

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<sup>10</sup> Icenl (September 2025) Greater Cambridge Employment and Housing Needs Update 2024-2045, Table 4.6; MHCLG (December 2024) National Planning Policy Framework, paragraph 62

allocations in locations such as Linton, despite their ability to deliver housing within the plan period in a timely and effective manner.

- 3.14 Furthermore, the Plan's housing supply position indicates that, excluding the North East Cambridge allocation (which is surrounded by uncertainty given its reliance on the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) and funding to do so which was withdrawn by Government in August 2025), the Councils are planning for only a modest level of flexibility above the identified housing requirement. Should funding be secured to enable full delivery at North East Cambridge, this headroom would increase, but it remains contingent on factors outside the Councils' direct control.
- 3.15 It is also noted that many of the proposed allocations within the draft Plan comprise existing commitments, including adopted allocations and sites with planning permission, with only a relatively limited number of new allocations being brought forward to meet the identified requirement for an additional 10,330 homes. In this context, Vistry recognise and commend the Councils' efforts to identify additional sites to support the emerging strategy. However, it is clear that a greater level of additional allocations will be required to deliver an appropriate and effective quantum of housing to support the wider Plan aspirations within the plan period.
- 3.16 We are supportive of the recognition that growth on the edge of Cambridge can be an appropriate and sustainable option, as clearly demonstrated by the long-standing allocation and Green Belt release at the former Cambridge Airport site, which has been identified for many years as a strategic opportunity to help meet the City's development needs. That site, together with other allocations such as Grange Farm and the expansion of the Wellcome Genome Campus at Hinxton, both which lie to the south of Cambridge within close proximity to Linton, illustrate how edge of Cambridge sites support and improve high quality public transport connections and access to existing services and facilities for the smaller settlements such as Linton.
- 3.17 Vistry consider that the opportunity at Balsham Road Linton has been prematurely discounted as a residential-led allocation with an element of rural employment space, and should be subject to further consideration as an additional allocation to provide greater resilience and flexibility within the development strategy. Linton is closely positioned to the Grange Farm new settlement and the Wellcome Genome Campus, which include sustainability measures and infrastructure investment proposed as part of that wider growth location. These factors materially enhance the sustainability credentials of Linton.

### **Ensuring a deliverable plan**

- 3.18 Importantly, the site at Balsham Road, Linton also offers clear benefits in terms of deliverability. As a medium-scale site, it can be brought forward without reliance on the provision of significant strategic infrastructure, unlike many of the larger allocations within the plan. This is particularly relevant given the Plan's own acknowledgement, at paragraph 2.79, that delivery of its vision is dependent on infrastructure provision by a range of external partners, including water supply, waste water treatment and transport bodies, over which the Councils have limited control. The inclusion of sites such as Balsham Road, Linton would therefore materially reduce delivery risk and support a more effective and resilient housing trajectory.
- 3.19 This point is further reinforced by the uncertainty acknowledged within the Plan regarding water infrastructure, including at paragraph 2.87, which confirms that further engagement with Anglian Water and the Environment Agency is ongoing and that positions will be refined ahead of the Proposed Submission stage, including the Drainage and Water Management Plan (DWMP) that is being prepared by Anglian Water. Vistry therefore reserve the right to comment further on this matter, and the DWMP, at Regulation 19, once the infrastructure position is clearer.
- 3.20 The Sustainability Appraisal (October 2025) prepared by LUC recognises the benefits of accommodating growth in close proximity to Cambridge and places a strong emphasis on delivering an appropriate quantum and mix of housing. Vistry maintain that opportunities such as Balsham Road, Linton perform well against these objectives, benefiting from proximity to existing services and facilities, whilst also being of a scale capable of delivering some complementary infrastructure.
- 3.21 As a matter of clarity and accuracy, paragraph 2 of Policy S/DS refers to "Figure X", however no such figure is identified within the Plan. The same issue applies to paragraph 4 of the policy. These references should be corrected prior to the Proposed Submission stage to ensure the policy is clear and unambiguous.

### ***Policy S/SH: Settlement hierarchy***

- 3.22 Under this policy the Councils set out a settlement hierarchy as follows:

- Cambridge
- Towns

- Rural Centres
- Minor Rural Centres
- Group Villages
- Infill Villages

3.23 The hierarchy is the same as drafted within the first proposals for the Greater Cambridge Local Plan (2021).

3.24 Within the Regulation 18 draft Local Plan, Linton continues to be identified as a Minor Rural Centre. The Settlement Hierarchy Review Update (2025) has been prepared to consider whether the existing categorisations of settlements remains appropriate. All the existing Minor Rural Centres are proposed to remain as such.

3.25 The Settlement Hierarchy Study Update represents a proportionate review of the earlier assessment rather than a comprehensive reassessment of settlement roles and relationships between settlements. As such, it provides limited analysis of how committed and proposed growth, improved connectivity and changing functional relationships may influence the suitability of settlements such as Linton to accommodate additional development.

3.26 While Vistry recognise the value of consistency in the application of the settlement hierarchy, it is considered that the approach taken through the update remains overly focused on existing services and facilities and does not sufficiently account for committed growth, proposed allocations, or the dynamic role that some settlements play within the wider spatial strategy. In particular, the assessment gives limited weight to the strong functional relationship between certain Minor Rural Centres and Cambridge itself, or to the sustainability benefits arising from proximity to major growth locations and strategic transport corridors.

3.27 Linton is well placed to benefit from, and contribute to, the Cambridge East allocation (Policy S/GF), and the future expansion of the Wellcome Genome Campus at Hinxton (Policy S/WGC), including the sustainability measures and infrastructure investment proposed as part of that wider growth location. These factors materially enhance the sustainability credentials of Linton and should be more fully recognised within the settlement hierarchy assessment.

3.28 It is also important that the hierarchy is applied flexibly and in a manner that supports the effective delivery of the development strategy. Linton can accommodate additional growth in a sustainable manner and can play an important role in contributing to housing delivery,

particularly where they are of a scale that complements existing services and facilities while supporting their long-term viability.

***Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm***

- 3.29 Vistry support the vision and objectives for Grange Farm, which is intended to be a new settlement serving the needs of existing and future communities, at the heart of the Rural Southern cluster, within which Linton sits.
- 3.30 Grange Farm will play a vital role in extending the Cambridge South East Transport scheme enabling future expansion of the proposed scheme to settlements further afield, such as Linton.
- 3.31 Importantly, the delivery of Grange Farm would also generate wider sustainability and infrastructure benefits that extend beyond the allocation itself. In particular, the proposed public transport, active travel improvements and the concentration of services and facilities would materially enhance the sustainability of surrounding areas, including locations such as Linton. The proximity of Linton to Grange Farm means that it would be well placed to benefit from, and contribute to, the new services, employment opportunities and sustainable movement networks introduced through the Grange Farm development, further strengthening the case for additional growth in this location.
- 3.32 Vistry note, however, that the comprehensive delivery of Grange Farm remains dependent on significant infrastructure interventions and funding arrangements that are not yet fully resolved. In this context, it is essential that the Local Plan does not rely disproportionately on new settlements to meet housing delivery requirements within the early and middle stages of the plan period. Medium-scale, well located sites such as Balsham Road, Linton are capable of coming forward without reliance on the relocation of existing development or other strategic infrastructure and can therefore play a critical role in supporting the housing trajectory and ensuring delivery against the plan's timescales.
- 3.33 The allocation of the site at Balsham Road, Linton would therefore provide important flexibility and resilience within the development strategy, helping to ensure the delivery of an appropriate and effective quantum of housing to support the wider aspirations of the Plan up to 2045, particularly in the event of delivery delays on large allocations and new settlements.

**Biodiversity and green spaces**

***Policy BG/BG: Biodiversity and geodiversity***

- 3.34 Vistry note that policy continues to require development to achieve a minimum 20% biodiversity net gain, which exceeds the mandatory requirement set out in the Environment Act 2021. While

Vistry support the ambition to secure significant biodiversity enhancements through development, however, a fixed requirement of 20% clearly represents a high aspiration and the overall viability implications of all the Plan requirements need to be considered collectively if this continues to be pursued. It is, therefore, important that the implications of this requirement are considered on a site-specific basis and assessed alongside the cumulative impact of other plan policies through the plan's site capacity and viability work progresses.

- 3.35 Vistry also support the policy's recognition that on-site delivery of biodiversity net gain may not always be achievable. Paragraph 3 of the policy appropriately states that, where on-site options have been exhausted to the satisfaction of the Local Planning Authority, biodiversity net gain may be delivered off-site through registered habitat banks, bespoke schemes or statutory biodiversity credits. This flexible approach is welcomed, as it reflects the overarching objective of biodiversity net gain, which is to leave the natural environment in a measurably better condition than before development takes place.
- 3.36 However, while the policy states that the Local Planning Authority "*will encourage delivery of replacement habitat*" within Local Nature Recovery Strategy priority areas, it is important to recognise that the availability of suitable credits within the Plan area cannot be guaranteed. In circumstances where sufficient local credits are not available, applicants should retain the ability to secure biodiversity net gain through alternative registered schemes elsewhere, to ensure that development is not unnecessarily constrained.

#### ***Policy BG/GI Blue and Green Infrastructure***

- 3.37 Vistry support the objectives of Policy BG/GI in seeking to secure high quality green and blue infrastructure as an integral part of new development. In particular, paragraph 4 of the policy states that "*all major residential development proposals, or proposals that are predominantly residentially led, must meet a minimum Greening Factor of 0.4.*" While the principle of requiring a minimum level of greening is supported, it is considered that the policy would benefit from further wording directing readers to supporting paragraph 5.37 which goes into further detail as to what constitutes a 'Greening Factor', including how it is calculated and the types of green infrastructure that contribute towards it, in order to avoid ambiguity and ensure consistent application in decision-making.
- 3.38 Vistry have extensive experience in delivering sensitive and innovative, landscape-led masterplans that maximise the potential of the natural environment, protect and enhance existing landscape assets, and create places with a strong sense of character and maturity. These principles would underpin the proposals at Balsham Road, Linton with green and blue

infrastructure forming a fundamental component of the development. The proposals will provide a range of key green infrastructure features to include:

- Landscape corridors with substantial planting;
- Green corridor and biodiversity area to the east of the site;
- Creation of a landscaped interface with Balsham Road.

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

- 3.39 Vistry support the overall objective of the policy to increase tree canopy cover and enhance the quality and resilience of the treescape across Greater Cambridge. However, while the policy appropriately allows for flexibility where a scheme can demonstrate *“significant ecological, historical, landscape or operational reasons to justify a canopy cover of less than 30% on site”*, it is considered that this flexibility should be more clearly and consistently applied throughout the policy.
- 3.40 In particular, paragraph 6 states that development *“will not be permitted which involves felling, significant surgery, and potential root damage to trees of amenity value, unless otherwise approved by the Local Planning Authority”*, but does not clearly acknowledge that tree removal may in some circumstances be necessary due to factors such as disease, age, structural condition or safety concerns, or where the benefits of development demonstrably outweigh the harm arising from tree loss.
- 3.41 Vistry also note that paragraph 3 of the policy sets out detailed submission requirements, including the need for an Arboricultural Impact Assessment, tree protection plan and/or Hedgerow Survey. It is considered that these requirements would be more appropriately addressed through the Local Plan validation requirements.
- 3.42 In addition, paragraph 7 of the policy states that development proposals *“should maintain a buffer zone of at least 15 metres”* from ancient woodland, ancient and veteran trees and ancient hedgerows, but then goes on to state that *“the size and type of buffer zone will vary depending on the scale, type and impact of the development”*. As currently drafted, this appears contradictory and could lead to uncertainty in interpretation. The policy would benefit from clarification as to whether the 15 metre buffer represents a fixed minimum or a guideline subject to variation based on site-specific circumstances.

***Policy BG/RC: River corridors***

- 3.43 Vistry recognise and support the importance of protecting river corridors in Greater Cambridge, including the River Cam, the River Ouse and their tributaries, and the role these corridors play in supporting biodiversity, water quality, landscape character and climate resilience.

- 3.44 However, concern is raised in respect of paragraph 2 of the policy, which states that development proposals should retain or reinstate “a buffer zone of at least 15 metres from the watercourse bank top, or 10 metres from a ditch bank top,” within which “no development shall be permitted except for domestic extensions, soft landscaping, small amenity areas, or proposals where it is necessary for the nature and function of the development.” While the principle of buffer zones is supported, Vistry consider that further clarity is required either within the policy wording or supporting text to ensure consistent interpretation and application across sites.
- 3.45 In particular, the policy would benefit from clarification as to whether the buffer requirement applies consistently to both sides of a watercourse in all circumstances, or whether a more flexible, site-specific approach may be appropriate depending on the nature of the watercourse, surrounding land uses and environmental constraints.

***Policy BG/EO: Providing and enhancing open spaces***

- 3.46 Vistry recognise the importance of delivering high quality and accessible open spaces as an integral part of new development and support the overarching objective of Policy BG/EO to ensure that development “addresses the open space needs it generates”, secured through an appropriate mix of on-site provision and/or financial contributions for off-site provision, enhancement and management. As set out in response to Policy BG/GI, the proposals at Balsham Road, Linton would deliver open space opportunities and green infrastructure, and Vistry would welcome ongoing engagement with the Councils, key stakeholders and the local community to ensure that provision responds effectively to local needs and aspirations.
- 3.47 Vistry note that the policy states that the Councils are “exploring the potential to require” a range of quantitative standards for major residential development, including Accessible Green Space, children’s play and youth space, food growing and allotments and outdoor sports provision. While the intent to establish clear standards is supported in principle, the policy currently lacks sufficient clarity as to how these emerging requirements will be applied in practice. In particular, the absence of confirmed standards creates uncertainty for site capacity assumptions, viability testing and the assessment of proposed allocations across the plan as a whole.
- 3.48 It is therefore important that the policy provides greater clarity and flexibility, particularly in acknowledging that the scale, type and location of open space provision should be informed by site-specific circumstances, existing local provision and identified gaps in accessible greenspace. Flexibility should be retained to allow for an appropriate balance between on-site provision and off-site contributions, having regard to the nature of the development, local opportunities and

constraints, and relevant national guidance, including Natural England's Accessible Natural Greenspace Standards.

- 3.49 Vistry also note the Councils' intention to develop locally prescribed standards for inclusive and accessible open space, informed by the Green Infrastructure Strategy and Open Spaces Study. While local context is important, it is essential that any such standards are robustly justified, aligned with national policy and guidance and capable of being viably delivered. Given that several of the standards remain under exploration, Vistry reserve the right to comment further on the detailed requirements of Policy BG/EO as the plan progresses.

### **Wellbeing and social inclusion**

#### ***Policy WS/HD: Creating healthy new developments***

- 3.50 Vistry support the objectives of the policy and the Council's proposed approach to creating healthy new developments. The site at Balsham Road, Linton will meet daily needs within walking distance to the services and facilities in Linton, encouraging active travel. This would reduce reliance on the private car, promote social interaction and contribute positively to both environmental quality and residents' physical and mental health. The proposed development would make a positive contribution to nature and deliver long-term health and wellbeing benefits for future residents.
- 3.51 However, Vistry consider that the policy would benefit from greater flexibility in its application to reflect local circumstances. It is suggested that the policy more clearly recognises that health principles should be applied to new development 'wherever possible' and 'as appropriate', drawing on the ten principles of creating healthy places from the Healthy New Towns programme or any future equivalent. This would ensure the policy remains proportionate and adaptable across a range of site types and scales.
- 3.52 Vistry also consider that the policy lacks clarity regarding the requirement for Health Impact Assessments (HIA). Where the Councils intend to undertake a plan wide HIA, it is considered unnecessary for development proposals that accord with the Local Plan to be required to submit a separate HIA, as such proposals should already be addressing the health outcomes identified through the plan-making process. Requiring additional HIAs at the application stage in these circumstances risks unnecessary duplication.
- 3.53 If the Councils nevertheless consider that HIAs should be required for individual development proposals, Vistry suggest that this is more appropriately addressed through application validation requirements rather than embedded within policy.

***Policy WS/NC: Meeting the needs of new and growing Communities***

- 3.54 Vistry support the overall aspirations of the policy. However, Vistry consider that minor clarification is required in relation to the requirements set out in paragraph 4 of the policy.
- 3.55 In particular, the policy states that proposals for residential developments of “200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure)” must be informed by detailed assessments of community needs and include strategies demonstrating engagement with local communities and stakeholders. It is unclear whether this requirement is intended to be addressed through existing submission documents, such as a Statement of Community Involvement or Statement of Community Engagement, or whether it represents an additional and separate requirement. Clarification on this point would assist in ensuring the policy is applied consistently and proportionately.
- 3.56 The policy further states that “developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery.” While Vistry support the principle of providing appropriate community infrastructure, it is important that this requirement is applied flexibly and takes full account of site-specific circumstances, including viability considerations and the capacity of existing or planned off-site facilities. In some cases, off-site provision or financial contributions may represent a more effective and sustainable means of meeting community needs, particularly where developments are well integrated with existing settlements.

***Policy WS/HS: Pollution, health and safety***

- 3.57 Vistry support the aims and overall approach of the policy in seeking to ensure that development protects human health and amenity and avoids adverse impacts arising from pollution and safety risks. However, clarification is requested in relation to paragraph 2 of the policy, which refers to “sensitive residential premises”. As currently drafted, this term is not defined and introduces unnecessary ambiguity. It would be helpful for the policy or supporting text to clearly set out what uses are intended to fall within this definition.
- 3.58 In addition, the policy refers to the need for Noise Impact Assessments and Air Quality Assessments where relevant. Vistry consider that these requirements should be referenced within the Council’s validation requirements instead of being included in the policy.

**Great Places**

***Policy GP/PP: People and place responsive design***

- 3.59 Vistry support the objectives of the policy. In particular, support is given to the emphasis on development responding to local character and distinctiveness. Given the significant variation

in character across Greater Cambridge, it is important that the policy is applied in a way that avoids a homogenised approach to design and instead allows proposals to respond appropriately to the specific qualities, scale and identity of their local context.

- 3.60 Vistry also consider it important that the policy is implemented proportionately through the planning process. Where appropriate, design matters should be assessed at the detailed design stage, with clear design principles established at outline planning application stage.

***Policy GP/QD: Achieving high quality development***

- 3.61 Vistry support the vision of the proposed policy. However, Vistry wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate.

***Policy GP/HD: Housing density***

- 3.62 Vistry support the overall principles of the policy. Although, Vistry consider that the policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always an appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.

***Policy GP/LC: Protection and enhancement of landscape character***

- 3.63 Vistry support the principles of the policy and recognise the importance of protecting and enhancing landscape character. However, it is essential that the policy is applied in a balanced manner to ensure that it does not excessively constrain the delivery of much-needed housing in sustainable locations.
- 3.64 The policy requires that development must “*protect and enhance the setting of Cambridge within the landscape by strengthening the well-defined, vegetated edges of the city and by protecting and enhancing the green corridors which extend into the city and along the River Cam corridor.*” While this objective is supported in principle, Vistry consider that the assessment of landscape setting and contribution should be undertaken on a site-specific, case by case basis, having regard to the existing condition and character of the land concerned.
- 3.65 In this respect, it should be recognised that not all land within the wider landscape setting of Cambridge currently makes a meaningful contribution to its character or special qualities. Where development proposals are capable of delivering landscape enhancement, strengthening

green infrastructure and reinforcing defensible settlement edges, they can positively contribute to the objectives of the policy while also supporting the wider growth strategy.

***Policy GP/HE: Historic Environment***

- 3.66 Vistry support the intent of the policy. However, it is considered that the reference within the policy to proposals being supported by a Heritage Impact Assessment would be more appropriately addressed through the Council's validation requirements, rather than forming part of the policy wording itself.
- 3.67 In addition, while the policy states that *"The Local Planning Authorities will balance the need for development with the conservation, enhancement and enjoyment of the historic environment"*, this wording does not fully reflect the structured approach required by the NPPF. Paragraph 208 of the Framework is clear that, where a proposal would result in less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use. It is therefore recommended that the policy is refined to explicitly reflect this test.

***Policy GP/HA: Designated heritage assets***

- 3.68 Vistry support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. In Vistry's view, the policy would benefit from being combined with Policy GP/HE.

**Jobs**

***Policy J/AL: Protecting the best agricultural land***

- 3.69 The policy states that *"planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless"* specific criteria are met. Vistry acknowledge the importance of protecting the best and most versatile agricultural land, however, it is important that the weight attached to the loss of such land is proportionate and evidence led. In addition, the context of agricultural land is also important to consider in respect of viability.
- 3.70 Furthermore, the Natural England Guide to assessing development proposals on agricultural land (2021) clarifies how impacts on agricultural land quality should be considered in decision-making. The guidance identifies that consultation with Natural England is only required where development would result in the loss of 20 hectares or more of best and most versatile agricultural land, as set out under Schedule 4(y) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This threshold provides a clear indication of the scale at which the loss of high quality agricultural land is considered significant in planning terms.

3.71 Accordingly, the application of the policy should reflect both the scale of any proposed loss and the wider planning balance, including housing need, sustainability, deliverability and the availability of alternative sites. Where the loss of best and most versatile agricultural land is limited in extent and outweighed by the benefits of development, including the delivery of much-needed housing in sustainable locations, the policy should allow for a balanced and proportionate assessment rather than operating as an absolute constraint.

## **Homes**

### ***Policy H/AH: Affordable housing***

3.72 Vistry recognise the importance of delivering affordable housing, particularly in areas such as Greater Cambridge which continue to experience acute levels of need and affordability pressure. The objective of the policy to secure a mix of affordable housing tenures as part of new development is therefore supported in principle.

3.73 Vistry note the conclusions of the Local Plan Viability Assessment (2025), which states that *“based on the assumptions, appraisals and sensitivity analyses contained herein, the proposed Local Plan policies do not undermine the viability of development on the whole within Greater Cambridge.”* Notwithstanding this conclusion, it is important that the Councils continue to review viability as the Plan progresses.

3.74 In seeking to deliver the affordable housing tenures identified within the policy, it is important that the Councils allocate a sufficient number of sites of varying sizes, types and locations across the District. In particular, the inclusion of an appropriate proportion of medium to large size sites will be critical to ensuring that affordable housing is delivered consistently and within the Plan period. Sites, including those promoted by Vistry, present clear opportunities to deliver a broad mix of tenures and a variety of affordable housing sizes and types as part of well-designed, mixed and balanced communities.

3.75 Paragraph 6 of the policy states that *“within major developments for housing, the new affordable homes must be dispersed in small groups or clusters.”* While the principle of tenure integration is supported, further clarification is required as to what constitutes *“small groups or clusters”* in practice.

### ***Policy H/HM: Housing mix***

3.76 Vistry support the approach taken within the policy, which sets out housing mix as a series of recommendations expressed as a range, rather than as fixed requirements. This provides an appropriate level of flexibility, allowing development proposals to respond to changing market

conditions and housing needs over the plan period, while still supporting the delivery of a balanced mix of homes.

- 3.77 To reiterate, it is important that the implementation of the housing mix policy relies on the allocation of a sufficient number of sites across a range of sizes, locations and settlement types. In particular, the Councils should ensure that an appropriate proportion of medium to large scale sites are allocated to enable the delivery of a broad mix of tenures and dwelling types, including affordable housing, within the plan period.

***Policy H/SS: Residential space standards and accessible homes***

- 3.78 Vistry support the principle of the policy. Although, it is important that the policy is applied with sufficient flexibility to respond to site-specific circumstances, particularly where the rigid application of minimum standards may not be achievable without undermining deliverability or viability in certain locations.
- 3.79 Where the policy refers to the *Government's Technical Housing Standards – Nationally Described Space Standard (2015)*, it is essential that these requirements are fully reflected within viability and site capacity assessments that underpin site allocations and housing numbers.
- 3.80 Similarly, paragraph 4 of the policy states that “*developments must meet or exceed the following private external amenity space standards*”. Vistry consider that these requirements should also be tested through viability and capacity assessments, and applied flexibly where justified, to ensure that high quality development can be delivered without placing unnecessary constraints on the effective use of land.

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

- 3.81 Vistry support the objective of the policy. However, concern is raised regarding the requirement that “*unallocated strategic sites of 1,000 dwellings or more will be expected to provide at least 10% of homes as specialist housing*”, alongside the additional criteria set out within the policy.
- 3.82 Whilst the principle of encouraging specialist housing on larger sites is understood, Vistry consider that the policy, as currently worded, risks having unintended consequences for scheme viability and deliverability.

**Infrastructure**

***Policy I/ST: Sustainable transport and connectivity***

- 3.83 Vistry support the aspirations of the proposed policy and consider the proposed development at Balsham Road, Linton is well aligned with this approach advocated through delivering a

sustainable and inclusive community. The site is in an accessible location by foot and cycle. In addition, the development could be supported by a range of transport measures which could include:

- Potential to divert an existing bus service into the site;
- Free/discounted bus travel for residents;
- Cycle initiatives such as cycle training for residents and e-bike incentives;
- Marketing information for residents and the surrounding area to promote travel by sustainable means;
- IT assistance campaign to promote working from home or a work hub and reducing the need to travel.

3.84 Vistry note that the policy states that developers of “*large developments*” or proposals with “*significant transport implications*” will be required to demonstrate that opportunities for sustainable travel have been maximised through the submission of a vision led Transport Assessment and Travel Plan. While the intent of this requirement is supported, it is considered that this wording more appropriately relates to validation requirements rather than policy itself.

***Policy I/EV: Parking and electric vehicles***

3.85 Vistry support the principle of the policy and objectives it seeks to achieve in promoting sustainable travel and the provision of electric vehicle infrastructure. It is important, however, that the policy is applied with sufficient flexibility to respond to evolving travel behaviours, technological change and advances in vehicle charging infrastructure over the plan period. Flexibility is also required to reflect the specific characteristics of individual sites, including their location, accessibility to public transport, availability of active travel options and existing cycle infrastructure. These considerations are particularly relevant to the delivery of the site in Balsham Road, Linton and will appropriately be addressed through the detailed design at reserved matters stage following the grant of outline planning permission.

3.86 Further, Vistry seek clarification in relation to the policy requirement for “*appropriate charging facilities*”, as it is currently unclear whether this refers solely to charging provision for mobility scooters, or whether it also encompasses electric vehicle charging infrastructure for cars and other vehicles.

3.87 In addition, the policy states that “*a site-wide Electric Vehicle charging strategy must be provided for large-scale Major sites detailing the location and phasing of the charge point installations, and grid capacity.*” Vistry query whether it is necessary or reasonable for developers to demonstrate grid capacity at this level, given that the provision and confirmation of network capacity ultimately falls within the remit of the relevant utility provider.

**Policy I/EI: Energy infrastructure Masterplanning**

- 3.88 Vistry are supportive of the policy. Although, Vistry wish to reiterate the importance of ongoing and meaningful engagement with key stakeholders in this process to ensure they are willing to support facilities coming forward through new development.

**Policy I/ID: Infrastructure and delivery**

- 3.89 Vistry support the principles of the policy. However, it is essential that the approach set out in the policy is underpinned by continued and meaningful engagement with key stakeholders to ensure that the facilities and networks required to support growth are deliverable and supported by those responsible for their provision.
- 3.90 Vistry also note that the policy refers to the submission of a Utilities Statement. It is considered that such requirements are more appropriately addressed through the Council's validation requirements rather than through policy wording.

**Policy I/DI: Digital infrastructure**

- 3.91 Vistry support the aspirations of the policy and recognise the importance of appropriate digital infrastructure in supporting new development. However, concerns are raised in respect of the requirements set out at paragraphs 6 and 7 of the policy and the practical implications of these for applicants.
- 3.92 Paragraph 6 states that *"planning applications that include either 30 dwellings or more, or commercial floorspace of 1,000m<sup>2</sup> or more must include suitable infrastructure that would support any future rollout of appropriate telecommunications equipment such as small cell mobile communications technology or mobile masts and towers."* While the principle of future proofing development is supported, it is unclear how applicants are expected to deliver or secure infrastructure that is ultimately dependent on network operators' investment decisions, which are outside the control of developers.
- 3.93 Similarly, paragraph 7 requires that *"planning applications that include the development of either 250 dwellings or more or 10,000m<sup>2</sup> or more commercial floorspace must assess the suitability of mobile coverage... and, where mobile coverage deficiencies are identified, provide details of proposed improvements and agreements with network operators or neutral host providers."* Vistry consider this requirement to be disproportionate, as developers have no direct control over mobile network coverage or the delivery of off-site upgrades, in a similar manner to utilities such as water and electricity.
- 3.94 Vistry therefore consider that paragraphs 6 and 7 should be clarified or amended to ensure that the policy does not place unreasonable or undeliverable obligations on applicants.

**Policy I/CM: Construction management**

- 3.95 Vistry are supportive of the principle and intent of the policy. Paragraph 1 of the policy states that *“all major development, infrastructure development, or development that, due to its nature or location, is likely to have an adverse impact on the local environment and amenity during construction must be informed by a Noise and Vibration Demolition Environmental Management Plan (DMP) and Construction Environmental Management Plan (CEMP), or a combined Demolition and Construction Environmental Management Plan (DCEMP), which should be agreed by the Local Planning Authority prior to the commencement of development.”*
- 3.96 It is unclear whether this requirement is intended to operate as a validation requirement at application stage or whether such documents are expected to be secured by planning condition. Vistry consider that this requirement should be secured through appropriately worded planning conditions rather than as a policy requirement at plan level.
- 3.97 Similarly, the requirements set out in paragraph 2 of the policy would be more suitably addressed with standard or bespoke planning conditions.

#### **4. CLIMATE CHANGE**

4.1 These representations are focused on the Climate Change Theme of the GCLP and the following policies:

- CC/SD Sustainable Development and the Climate Emergency
- CC/DC Designing for a Changing Climate
- CC/NZ Net Zero Carbon new buildings
- CC/WE Water Efficiency in new developments
- CC/IW Integrated Water Management, sustainable drainage and water quality
- CC/CE Supporting a circular economy and sustainable resource use
- CC/CS supporting land-based carbon sequestration and carbon sinks

4.2 In addition to the draft Policies, Vistry have also reviewed the following evidence base documents which have been referenced in our representations where appropriate;

- Climate Change Topic Paper (The Topic Paper); and
- Greater Cambridge Shared Planning – Update to Net Zero policy Cost Analysis Report. 2025 (The Evidence Base)

4.3 Vistry fully supports the strategic commitment by the GCLP to positively address the issue of climate change mitigation and adaptation within the plan period and welcome the opportunity to comment on the draft policies to ensure they evolve to meet the tests of soundness and are both deliverable and viable whilst supporting the delivery of much needed high quality, private and affordable homes within Greater Cambridge.

4.4 Vistry interests at Balsham Road, Linton have been discounted by the Plan as a sustainable location for residential development, however, Vistry are committed to working with the Councils and the draft Policies to ensure the proposed development is as sustainable as possible and implements the draft Policies in a commercially and technically viable manner.

4.5 As described in these representations, the land at Balsham Road, Linton is a sustainable location for development. Locating homes in sustainable locations is one of the most powerful steps to reducing carbon emissions given that approximately one third of UK Greenhouse gas (GHG) emissions are emitted from the transport sector and private vehicles is to locate housing close to sustainable modes of transportation.

## **The National Planning Policy Framework (NPPF) Consultation, December 2025**

- 4.6 Before any representations are made to the sustainability policies within the Draft Plan, Vistry consider it extremely important to highlight the recently published consultation on the revised National Planning Policy Framework (NPPF). The consultation has proposed several changes to policies which includes the ability of local authorities to set local standards for energy efficiency above Building Regulations. Should this consultation become government policy then this will have a material impact on the policies within this Draft Plan. Vistry therefore reserve the right to amend these representations at a later date once the results of the consultation are published.

## **The Greater Cambridge Local Plan Policies**

### ***Policy CC/SD: Sustainable development and the climate emergency***

- 4.7 Vistry consider that the requirements for a “standalone Sustainability Statement” for all major development, and for Sustainability Statements to accompany minor development applications are reasonable. Vistry welcomes the recognition that the Sustainability Statement should be “proportionate to the scale and nature of the application”.
- 4.8 With respect to the content of the Sustainability Statement, Vistry believe that the list of content described in paragraph 2 will need to be amended to reflect the final approved policies post examination which may include the need to remove the requirement for ‘net zero carbon’ should the proposed NPPF changes be implemented.

### ***Policy CC/DC: Designing for a changing climate***

- 4.9 Vistry have concerns regarding the prescriptive nature of part 3 of the policy, which states that “all new dwellings shall be designed to benefit from cross ventilation where possible, and take passive, design-led approaches to reducing excess solar gain.” While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Vistry consider that this Policy should be deleted to reduce reporting and administration associated with the Draft Plan.

### ***Policy CC/NZ: Net zero carbon new buildings***

- 4.10 Vistry note that the Government is progressing the Future Homes Standard (FHS), which is intended to deliver highly energy-efficient, low-carbon homes through Building Regulations at a national level. The FHS seeks to ensure new homes produce significantly lower carbon emissions than current standards, supporting the transition to net zero in a consistent and coordinated manner across the country. Delivering these requirements through Building Regulations, rather

than through locally specific standards, provides certainty to the development industry, avoids unnecessary variation between authorities, and supports efficient delivery at scale. As discussed in paragraph 3.6, the Government is proposing to change legislation to prevent local authorities from setting standards above Building Regulations and if this legislation is approved then draft policy CC/ NZ will need to be significantly amended or deleted.

- 4.11 Vistry note that the space heating (15-20kWh per m<sup>2</sup>) and the Total Energy Use Intensity (EUI – no more than 35 kWh per m<sup>2</sup>) are broadly equivalent to that required to meet the Passivhaus standard. This standard is recognised as the most difficult and costly sustainability standard to meet with only a very small number of homes being built to these standards every year. Table 3.1 of the Evidence Base document identifies that the projected cost of meeting the space heating and EUI standards in the draft Policy is £11,964 for a semi-detached house. Vistry and consider the actual cost is likely to be higher given that the government has estimated the cost of meeting the FHS to be £6,170 for a similar property leaving only a small sum of c£5,800 to cover the costs of a substantial increase in construction type to achieve the specified targets.
- 4.12 As yet, the housebuilding industry has not delivered homes at volume to these standards which, if required, would require huge investment in construction and supply chains, thereby reducing housing delivery. Vistry consider the forthcoming FHS to be the correct blend between carbon emissions reductions and deliverability at scale and, given the housing demand in Greater Cambridgeshire, request that the draft Local Plan adopts this as its main construction standard for new housing.
- 4.13 In light of the representations above, Vistry request that the space heating and EUI targets within draft Policy CC/NZ be removed and replaced with the requirement to build to the FHS 2025.
- 4.14 Vistry support the requirement of draft Policy CC/NZ 2 although with respect to CC/NZ 3, Vistry consider that there are certain building types (e.g. heavy manufacturing or R&D) where a gas supply could be required and therefore flexibility with this draft Policy would be appropriate.
- 4.15 In relation to Part C, the policy states that “proposals must seek to maximise opportunities to generate on-site renewable energy to enable the development, where possible, to achieve all energy demands through onsite energy generation”. Vistry consider that further clarification is required as to what level and type of information would be expected to demonstrate compliance with this requirement. In particular, it is unclear how the phrase “where possible” will be interpreted in decision-making, or how site-specific constraints, design considerations and viability will be taken into account.

- 4.16 Furthermore, Vistry consider it to be extremely challenging for new dwellings to deploy sufficient renewable energy to meet all its energy demands on site, particularly given the substantial power requirement from Electric Vehicles (EV'). For an average semi-detached house, Vistry consider it reasonable to assume that a maximum of c 3-4 kWp of PV could be installed on the available roofspace for those homes that have optimum orientation (a number will not because they are north facing). To meet all energy demands on site would require c8 kWp of PV which simply cannot be provided on the roof space. Vistry consider the draft policy to be undeliverable and request that it be amended to: "Proposals should maximise the deployment of renewable energy where feasible and viable."
- 4.17 Part D of draft Policy CC/NZ introduces the concept of an "Energy offset fund" to enable developers to make payments in lieu of failure to meet the energy and carbon standards. Vistry are concerned that the policy does not give any detail with respect to the cost of the fund and therefore do not believe this aspect of the draft Policy is sound and in accordance with Paragraph 59 of the NPPF which requires local plan policies to be accompanied by up-to-date viability assessments.

***Policy CC/WE: Water efficiency in new developments***

- 4.18 Vistry fully support the need to improve water efficiency in new developments given the serious issue within the Gretaer Cambridge area with respect to water stress. We acknowledge the need to find practical and viable solutions that can go beyond current targets but any solutions must also be reliable and acceptable to the home owner.
- 4.19 In relation to criterion 2 of the policy, Vistry consider that the practical and viability implications of the proposed standards should be carefully considered. In particular, the requirement for residential developments of 100 or more dwellings to achieve water usage of no more than "80 litres/person/day", which the policy acknowledges will necessitate "some form of water reuse or recycling... with dual pipe systems for potable and non-potable water", represents a significant uplift above current Building Regulations and typical industry practice.
- 4.20 Paragraph 6.31 of The Topic Paper references a report (Shared Standards in Water Efficiency for Local Plans (June 2025) which has been prepared by several water companies and the Environment Agency. The Topic Paper (paragraph 6.32) states that a water efficiency standard of 85 l/p/d can be achieved without the use of greywater recycling and using efficient fixtures and fittings. Vistry have reviewed the exact specific proposed and note that this is only achieved if a bath is not supplied, which is of course a necessity for many homeowners, particularly those with children or the elderly. Vistry consider the 85l/p/d to be extremely challenging with the

solutions presented in the topic paper (without greywater recycling) still not sufficient to meet the draft Policy requirement of 80 l/p/d.

- 4.21 Vistry conclude that greywater recycling is therefore necessary to meet the draft Policy target and note that paragraph 6.29 of The Topic Paper estimates the cost of such a unit to be £4,000 with the Viability assessment allocating a cost of c£6,000 per unit for the purchase of water efficiency equipment only. The Viability study does not make allowance for on-going maintenance costs which are anticipated to be significant, especially for greywater recycling systems.
- 4.22 When considered alongside the cumulative impact of other policy requirements relating to affordable housing, infrastructure contributions, design, energy efficiency and biodiversity net gain, this standard has the potential to materially affect development viability. The Councils will therefore need to ensure that an appropriate balance is struck between the ambition of the policy and the deliverability of development, supported by robust viability evidence.
- 4.23 Vistry also note that the requirement for developments of fewer than 100 dwellings to achieve water usage of between 90 and 100 litres/person/day is more closely aligned with existing best practice and is likely to be more readily achievable without disproportionate cost implications. In this context, Vistry consider that the draft Policy should be amended to allow for greater flexibility as follows:
- 4.24 Amend draft Policy 2a and 2b to apply a target of 100 litres/person/ day to apply to all dwellings where practical and viable. The reliability of greywater systems applies to all homes regardless of the development size. The 100 l/p/d target is far more achievable and practical than the 80 l/p/d proposed in the draft Plan.
- 4.25 In respect of criterion 5, which requires all new dwellings with private outdoor amenity space to provide a water butt and prioritises the use of rainwater for outdoor irrigation, support the principle of encouraging rainwater harvesting. However, consideration should be given to how this requirement would be secured and monitored in practice, particularly in relation to long-term management, maintenance and enforcement. Clarification on the intended implementation mechanisms, would assist in ensuring the policy is applied consistently and effectively.

***Policy CC/IW: Integrated water management, sustainable drainage and water quality***

- 4.26 The Topic Paper presents the changes to the draft Policy since the previous consultation exercise. It would appear that very little has changed with respect to the technical requirements.

- 4.27 Vistry fully support the need for integrated water management and strategic thinking on all new development and agree this would be a priority at Balsham Road.
- 4.28 Vistry repeat their concerns expressed previously with respect to the application of paragraph 6 of the policy, which states that, “To protect and enhance water quality, all development proposals must demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).” While it is reasonable to ensure that development is appropriately served by water and wastewater infrastructure, the policy as currently drafted risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage.
- 4.29 The provision and timely upgrading of wastewater treatment and conveyancing infrastructure is a statutory responsibility of water companies, who are required to plan for and accommodate growth through the relevant regulatory and investment frameworks.
- 4.30 Vistry consider that Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.

***Policy CC/CE: Supporting a circular economy and sustainable resource use***

- 4.31 Vistry support the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where “practical and viable” to meet all requirements in full.
- 4.32 However, Vistry have concerns regarding paragraph 5 of the policy, which introduces a requirement for the submission of a Circular Economy (CE) Statement. It is considered that this requirement relates to the information needed to support a planning application rather than to the policy tests against which proposals should be assessed. As such, this requirement would be more appropriately addressed through the Council’s validation requirements, rather than embedded within the policy itself. Vistry also believe that the submission of such a statement and/ or information within a Sustainability Statement should be limited at outline planning application stage given that building design information is very limited at that stage. A CE statement should be reserved for detailed design stage only where it will be more meaningful in terms of information.

***Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks***

- 4.33 Paragraph 1 of the policy states that “Where major development is proposed on land containing peat soils, a proportionate evaluation of the impact of the proposal on the soil’s carbon content and an appropriate soil management plan must be submitted as part of the planning application.” Whilst Vistry support the intent of this requirement, where relevant, the preparation and implementation of a detailed soil management plan could appropriately be secured by planning condition, informed by site-specific investigations undertaken at application stage.
- 4.34 There are varying types and quantities of peat, some of which are in poor condition and emitting carbon. Vistry consider that there could be the opportunity for overall carbon benefits with a suitable peat restoration plan which should be encouraged within the policy to allow developers the flexibility to build new homes whilst protecting or enhancing valuable peat soils.
- 4.35 This approach would ensure that the policy’s objectives are met, while avoiding the imposition of unnecessary upfront requirements that could affect the timely determination of applications.

## **5. LAND NORTH WEST OF BALSHAM ROAD, LINTON**

- 5.1 Vistry Group have previously made submissions as part of the Call for Sites for circa 300 dwellings and a rural business park. Our representation to the Preferred Options Consultation 2021 regarding the Land to North West of Balsham Road Linton, set out our response to the HELAA assessment, which dismissed the site primarily due to concerns about landscape impact.
- 5.2 In our response, we addressed the concerns with additional technical information and evidence including an updated Landscape Technical Note and Opportunities and Constraints Plan, prepared by Barton Willmore, which clearly demonstrate that perceived landscape impacts can be addressed or mitigated, thereby substantiating the site's suitability and deliverability.
- 5.3 The Land North West of Balsham Road is located on the north-eastern side of Linton. It benefits from a very good relationship to the existing development boundary for Linton, as set out within the adopted Linton Proposals Map that forms part of the adopted Local Plan (2018). The site is bordered to the south-west by residential properties in Tower View, which are located off Balsham Road. Balsham Road abuts the southern boundary of the site with residential properties opposite the site's southern boundary. To the west, is a green wedge which separates the site from a scrap metal yard. To the north, the site rises to the open countryside, and a water tower sits at the top of Rivey Hill. The site would be accessed from the south, onto Balsham Road, benefiting from good visibility in both directions.
- 5.4 Linton is a substantial sized village with considerable services, categorised as a Minor Rural Centre in the adopted Local Plan 2018. There is capacity for Linton to provide an increased amount office space for local business, or start-up businesses from the village, or surrounding villages to work. The employment site would provide the opportunity for residents within the new housing on the site or within the existing village to have a premise for the start-up of new businesses and could include additional facilities such as a nursery and café. The proposed employment hub of 1 hectare is consistent with the size of the settlement.

## 6. CONCLUSION

- 6.1 The emerging Greater Cambridge Local Plan represents an important opportunity to shape the future growth of one of the UK's most economically dynamic and nationally significant regions. Vistry are broadly supportive of the vision, local plan themes, strategic priorities, and development strategy within the Draft Plan.
- 6.2 Although, as set out in these representations, the scale of ambition currently reflected in the Draft Plan does not yet fully respond to the level of housing need, economic potential, and national policy direction now facing Greater Cambridge—particularly in light of the Government's December 2025 NPPF consultation and its explicit commitment to accelerating housing delivery in and around Cambridge.
- 6.3 The evidence demonstrates that Greater Cambridge is expected to accommodate substantially higher levels of employment and housing growth than currently planned for, supported by major national interventions including the Cambridge Growth Company, the proposed development corporation, and significant infrastructure investment. The Local Plan must therefore plan positively for a higher housing requirement, supported by a more diverse and resilient portfolio of sites capable of delivering early, sustained, and flexible supply throughout the plan period.
- 6.4 Small to Medium-scale, well-located opportunities such as this site in Balsham Road, Linton are essential to achieving this. The site is uniquely positioned to capitalise on the transformative infrastructure and connectivity improvements associated with growth areas to the east and south of Cambridge. Crucially, Linton can deliver new homes at pace without reliance on complex, long-term strategic infrastructure, thereby reducing delivery risk and strengthening the overall housing trajectory.
- 6.5 Vistry therefore maintain that the allocation of Land North West of Balsham Road, Linton is necessary to ensure the Local Plan is effective, justified, and capable of meeting the full scale of housing need arising from Greater Cambridge's economic potential. Its inclusion would enhance flexibility, improve deliverability, and support the Councils' wider spatial, environmental, and sustainability objectives.
- 6.6 As national policy continues to evolve, particularly through the ongoing NPPF consultation, Vistry reserve the right to update these representations at the Regulation 19 stage. Nonetheless, Land to North West of Balsham Road, Linton represents a sustainable, deliverable, and important opportunity that should form part of the development strategy for Greater Cambridge.