



GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS

Land South of Horseheath Road, Linton

(HELAA Site Reference: 40554)

– Representation on behalf of the landowners

Client:

Endurance Estates

Landowners:

Mr Michael D. R. Fairey

Mrs Angela Whittome

Our Reference:

019-24

Date:

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1. Executive Summary

- 1.1 EELP are supportive of the Greater Cambridge Partnership's aim of preparing a comprehensive long term local plan which sets out a clear aspiration for sustainability objectives to be met.
- 1.2 EELP do have some concerns regarding the detailed approach and evidence that has currently been presented.
- 1.3 As a critical supporter of the involved councils, in view of the early stage of plan making, EELP are keen to flag our concerns.
- 1.4 Overall, we don't believe that the Greater Cambridge Partnership are planning for enough growth. This is set out in an evidence paper by Barton Willmore, appended to this representation. We also have concerns about the lack of new planned commercial space, as highlighted in the appended evidence report by Savills.
- 1.5 The Greater Cambridge Partnership's over-reliance on a few major sites (some with complex delivery issues), we believe, is flawed and likely to result in delivery challenges, as well as a lack of affordable housing delivery.
- 1.6 As such, we think it would be prudent for the Greater Cambridge Partnership to allocate more sites in a variety of locations for a wider range of housing. Additional allocations in villages across the Greater Cambridge area will help in this regard.
- 1.7 Regarding the specifics of our proposed site on Land South of Horseheath Road in Linton, we have addressed the points raised in the site-specific critique put forward by the Council.
- 1.8 We remain of the view that the Land South of Horseheath Road in Linton is suitable for development and that its allocation would help to bolster the robustness of the emerging local plan.

2. Representations on Land South of Horseheath Road, Linton

- 2.1 Cheffins has been instructed by Endurance Estates to promote their interests in 'Land South of Horseheath Road, Linton' (HELAA Site Reference: 40554). Endurance Estates propose a phased development of approximately 100 to 120 dwellings of mixed type and tenure with high-quality landscaping that will deliver up to 40 affordable dwellings in a sustainable location and create a more attractive entrance to the village.
- 2.2 Accompanying these representations is a Concept masterplan by LDA Design, which includes several illustrations in support of the proposals, and a review of the development strategy and housing figures by Barton Willmore.

Site Location and Context

- 2.3 Land south of Horseheath Road in Linton (HELAA Site Reference: 40554) comprises an agricultural field located on the eastern edge of Linton, a minor rural centre. The site extends to approximately 6.57ha and represents a logical extension to the village, being located adjacent to existing (and proposed) development on two sides.
- 2.4 The site is located wholly within Flood Zone 1 and there are no physical constraints that would prevent residential development coming forward on this site.

Masterplanning Approach

- 2.5 Appendix 1 provides an extract of the Concept masterplan for the site by LDA Design. An updated vision document by LDA Design will also be submitted alongside this representation. As illustrated, the site can deliver approximately 100 dwellings on the edge of a sustainable minor rural centre (including the full 40% affordable housing requirement proposed under Policy H/AH).
- 2.6 Circa 40% of the site area is proposed as public open space. The development will provide an improved soft edge to the village, as well as significant recreational and biodiversity benefits for local residents. New and improved cycle and pedestrian links will encourage sustainable modes of travel to existing local services and facilities.

Technical Assessment

- 2.7 Some initial site and contextual assessments have been carried out in relation to masterplanning, landscaping, access and ecology. This work indicates that some of the scoring in the HELAA needs to be updated, and the site reconsidered for development as part of the emerging GCLP. The following section provides commentary on the HELAA, including the assessment methodology and the individual scores given for site 40554.

Comments on the Scoring Methodology and System

- 2.8 The performance of sites proposed for the GCLP have been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.

- 2.9 According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. It is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be addressed through further detailed technical work or masterplanning. The current scoring matrix indicates deliverability issues where there are none. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the matter is unlikely to constrain development, then a green rating would be more appropriate.
- 2.10 Ultimately, the key question that needs to be answered by a site assessment would be, "is development of this site acceptable in planning terms?". A revised scoring system based on the following key principles would be easier for stakeholders to understand a site's suitability for development:
- **Red:** NO. This is a major concern which would likely result in planning permission being refused.
 - **Amber:** POSSIBLY. This is a potential concern for which there may be a design solution (i.e. further site-specific work is needed).
 - **Green:** YES. This is unlikely to be a significant concern or constraint on development.

Suitability for Development

Being outside the current settlement boundary for Linton (as defined in the South Cambridgeshire Adopted Policies Map), the site is assessed as being amber. However, the boundaries are due to be reviewed as part of the plan-making process for the Greater Cambridge Local Plan, "with boundaries defined to take into account the present extent of the built-up area as well as planned new development." It is unclear if these planned boundary changes have been considered by the HELAA assessment. Notwithstanding the fact that site 40554 is located in a sustainable position in relation to the centre of Linton, given that recent development has been permitted outside the settlement boundary on the eastern edge of Linton – directly to the west and south of the site – we note that the site will abut the settlement boundary moving forward.

Landscape and Townscape

- 2.11 Site 40554 has been scored red, meaning that development of this land would have a significant negative impact on landscape and townscape which cannot be mitigated. However, this assessment does not reflect the detailed conclusions reached by the Inspector in the recent Horseheath Road appeal.
- 2.12 The HELAA states that the site is within National Character Area 87 – East Anglian Chalk. At a local level, the site is considered to fall within the 7c Linton Chalk Hills Landscape Character Area. It is noted that the site is an open arable field which provides views over the village (although it is well screened in wider views). The HELAA concludes that site 40554 represents a 'significant extension into the countryside' and that the proposed development of the site was considered unacceptable in landscape terms.
- 2.13 To address comments made within the HELAA, further masterplanning exercises have been undertaken to ascertain how development impacts on local landscape characteristics might be further mitigated. Revised plans propose woodland planting along the site's

eastern boundary to connect an existing woodland belt to the north of the site with a woodland belt that will be introduced as part of approved development to the south. In addition to introducing a new wildlife corridor, this woodland boundary would maintain the rural approach into Linton along Horseheath Road. Meanwhile, the new masterplan keeps development away from the north-eastern corner of site 40554 to protect views to Rivey Water Tower. Proposed roads and footpaths are indicated to follow the natural contours of the land to, allowing for the planting of street trees and the subsequent creation of a green layered effect between rooflines from views to the south of the site.

2.14 It is worth noting that landscape impact was the main issue considered in the 2018 Appeal Decision at Horseheath Road in Linton¹ – a site directly adjacent to the land in question. The Inspector did not find that development in this location would have an unacceptable impact. On the contrary, a high-quality development with appropriate landscaping would improve the landscape context by softening the existing harsh edge to the village. Key conclusions are summarised below:

- The site is not a designated or valued landscape for the purposes of the Framework.
- Having reviewed both the appellant's Landscape and Visual Impact Assessment and an alternative assessment offered by the Parish Council, the Inspector determined that whilst *"the site displays an undulating land form and a rural character broadly consistent with the descriptions of the local character areas"*, existing residential development provides an unfavourably harsh edge to the village, with *"modern housing along two extensive and exposed boundaries [contributing] to a mixed rural/urban impression and those built forms are undoubtedly significant determining features of the site's immediate character and appearance."*
- In particular, Linton is of *"fairly ubiquitous residential form"* and not of any obviously local vernacular design which creates a *"jarring visual presence"*.
- There is potential for new, sensitively designed development to improve the existing landscape context. The Inspector concluded that in accordance with the Guidelines for LCA, *"a high-quality scheme ... set within a framework of strong and appropriate landscaping reinforcing the local rural distinctiveness of the setting could still provide a positive and sensitive relationship to its surroundings and significant visual and character benefits to the settlement edge and its approach."*
- The principle of a soft landscape edge to the eastern edge of the village (e.g. allotments) was accepted since it would offer significant mitigation to the existing hard edge to the settlement.

2.15 Based on the above, it is clear that a score of amber would be appropriate.

Biodiversity and Geodiversity

2.16 The assessment notes that the site is likely to be of low ecological value, however, an amber rating has been given to reflect potential difficulties in achieving a 10% net gain in biodiversity. Increased visitor pressure on the nearby SSSI is also referenced.

2.17 However, there is no evidence to support these conclusions. The proposed 2.56ha of public open space as envisaged in the Concept masterplan (see Appendix 1) would serve the wider community, contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against recreational pressure on the nearby SSSI.

¹ Ely Diocesan Board of Finance v South Cambridgeshire District Council [2018]

- 2.18 Furthermore, in accordance with national policy requirements, the First Proposals plan accepts that applicants may contribute to biodiversity enhancements elsewhere through strategic initiatives if the required level of net gain cannot be provided on site. Specifically, draft policy BG/BG recognises that in some locations, more significant and long-lasting biodiversity enhancements may be achieved via contributions towards off-site, larger-scale projects. These will be secured by planning conditions and obligations as appropriate. For these reasons, the site should be reclassified as being green in biodiversity/geodiversity terms.

Archaeology

- 2.19 Whilst excavations to the immediate west of site 40554 did identify two non-designated heritage assets, Cambridgeshire County Council's specialist Historic Environment Team confirmed that the remains were not of sufficient importance to necessitate preservation in situ. Furthermore, as noted in *Ely Diocesan Board of Finance v South Cambridgeshire District Council* [2018], the cursus and barrow were not in the form of monumental architecture, the site comprised arable farmland, was in private ownership and the assets had already degraded as a result of ploughing. These factors are also applicable to site 40554 and so if similar remains were to be discovered, it is likely that 'preservation by record' would also be appropriate and proportionate. As with the adjacent site, any archaeological evidence found at the site could be appropriately dealt with by a scheme of investigation, analysis and publication to be secured by way of a planning condition should permission be granted. There is therefore no evidence to suggest that development of the site would be constrained by archaeology and a green rating would be appropriate.

Accessibility to Services and Facilities

- 2.20 *The Settlement Hierarchy Study* (Appendix 1H of the Development Strategy Topic Paper) notes that Linton "performs well" under the current sustainability scoring system, with a regular bus service to Cambridge and Haverhill, and connections to active transport networks. Following planned improvements to the pedestrian and cycle network (secured as part of the development of site 40554), residents will be able to safely access the existing services and facilities within Linton by foot or bicycle. Site 40554's active transport connectivity will be further enhanced by the forthcoming Linton Greenway (as envisioned under the South East Cambridge Transport scheme), granting residents safe access to services in nearby villages, a new planned transport hub along the A11, and major employment hubs – including Granta Park and the Babraham Research Campus – by foot or bicycle.
- 2.21 As indicated by the accompanying *Services and Facilities Map* (page 3 in the accompanying *Vision Document*), Linton hosts ample key amenities, including a village college, infant and junior schools, a good range of restaurants and cafés, a village hall, local churches, a library, and a broad selection of shops and professional services. Whilst it is not considered to have a large food store, there is a Sainsbury's in nearby Haverhill which is accessible by public transport. For a rural district such as South Cambridgeshire, this represents good accessibility to key services and facilities as evidenced by the village's classification as a Minor Rural Centre.
- 2.22 Overall, site 40554 has appropriate accessibility to key local amenities, transport services, and employment opportunities by a range of modes of transport – a conclusion noted within the HELAA. Development of site 40554 would also provide a significant number of dwellings, including affordable and starter homes, in a sustainable location with active transport

connections to rapidly expanding employment hubs south of Cambridge, making commuting via active travel a more viable option for incoming employees that move to the local area – an outcome sought after by proposed policy *I/ST: Sustainable Transport and Connectivity*.

- 2.23 However, notwithstanding this assessment, it is clear that the current scoring system is in need of updating. The scoring system needs to reflect changes in modern living and long-term societal trends and technological advancements including increased homeworking, more widespread use of remote services (e.g. GPs and pharmacies), increased online shopping (including groceries), the growth in micro-mobility (e-bikes and electric scooters). Physical proximity to local services is not as important as it once was.

Site Access

- 2.24 No objection was raised by the local highway authority in relation to the development of the adjacent site and there are no known access constraints in relation to site 40554. The Concept masterplan indicates a vehicular access to the north-west of the site, off Horseheath Road, with an accompanying off-road footpath that will link existing public rights of way into the centre of Linton and Linton Heights School.
- 2.25 The Concept masterplan also indicates potential for new pedestrian and cycle accesses to neighbouring developments, which would encourage permeable travel across the settlement. These active travel links would also provide direct active travel routes to the proposed rural travel hub along Bartlow Road south of the site.
- 2.26 In summary, a series of safe vehicular and pedestrian accesses, which successfully integrate the site with the surrounding settlement, can be provided through development. Therefore, a score of green is appropriate in the context of site access.

Transport and Roads

- 2.27 Matters of traffic and congestion were considered as part of the recent appeal on the adjacent site, with detailed technical assessments carried out to assess the impact of 42 new dwellings. It was estimated that this level of development would result in a maximum increase of 2% in additional peak-hour vehicle movements over and above existing background traffic levels. The assessment was based on up-to-date traffic data and no objection was raised by the County highway authority. A similar negligible impact on traffic would be expected as a result of the development of site 40554.
- 2.28 For these reasons, the site should score green rather than amber as currently indicated.

Noise, Vibration, Odour and Light Pollution

- 2.29 Site 40554 is not located close to any significant sources of noise, vibration or odour and there is no reason to suggest that mitigation measures will need to be incorporated into the development. Based on the above, the HELAA should score green in this context. We request that the HELAA be updated.

Contamination and Ground Stability

- 2.30 Site 40554 comprises greenfield arable farmland and so it is unlikely that significant contamination is present. Sites of this nature would normally be rated as green in a

sustainability assessment. Even if contamination was found, this should not preclude development. Therefore, we request that the HELAA be updated to show a green rating.

Site Density

- 2.31 The HELAA estimates 18 dwellings per hectare, implying a low-density development. However, this figure is misleading as only c.60% of the total site area is expected to be developed for housing, with the remaining c.40% of the site as public open space. Therefore, within the built-up area, a density of c. 25dph would be a more appropriate figure to include.

The Proposed Policy Framework

- 2.32 The following section includes comments on the emerging policy direction as published in the Greater Cambridge Local Plan First Proposals.

Policy S/JH: New Jobs and Homes

- 2.33 The widespread promotion of Neighbourhood Plans (page 24) is likely to act as a constraint on development in the rural area. Research on the progress and effectiveness of neighbourhood plans² found that 55% of the draft plans published for consultation have 'protectionist' agendas and many are openly anti-development. Therefore, there is a likelihood that this agenda will create inevitable conflicts between the national aim to significantly boost housebuilding and local community NIMBYism. The idea of 'top down' housing targets being set by the local authority may also dissuade some areas from engaging with the neighbourhood planning process altogether.
- 2.34 A more pragmatic and flexible approach would be for the Greater Cambridge authorities to carry out up-to-date local housing need surveys for the whole area (e.g. at ward or parish level) to determine quantitative and qualitative need. Used as robust evidence for the determination of planning applications, this would be a fairer system which would guide development to the right locations and, given the reliance on the private housing building sector to deliver affordable housing, also ensure that housing needs are met across the whole District, more effectively tackling the chronic affordability issues present. The process could be managed and controlled by the relevant Council, with local input from the relevant Parish Council. A bottom-up approach where small to medium scale developments are planned for local people in housing need (those named on the housing register), would also be less controversial.
- 2.35 Additional commentary on the proposed housing and employment targets and overarching development strategy as outlined in Policy S/DS is provided in a separate report by Barton Willmore.

Policy S/SB: Settlement Boundaries

- 2.36 Although much of the Greater Cambridge area has a dispersed settlement pattern, the draft plan does not support the 'organic' growth of smaller settlements. To ensure that local housing needs can be fulfilled and prevent any further loss of key local services, a more flexible and tolerant approach is needed towards development in the rural area.

² Turley (2014). Neighbourhood Planning: Plan and Deliver?

- 2.37 Through the application of tightly drawn settlement boundaries, development is strictly controlled on sites in the 'open countryside'. But it is not logical to treat all sites equally in policy terms. Whilst sites within sensitive valued landscapes and the green belt should receive a high level of protection, the sensitive development of some sites on the edge of a village would cause no significant harm. Such a pragmatic approach is often taken at appeal. For example, rounding off development where there is a defensible physical boundary or allowing a high-quality development with extensive landscaping where it would soften an existing harsh area of built form can be acceptable in certain locations.
- 2.38 Furthermore, for minor rural centres such as Linton, the current strategy to restrict schemes to an indicative maximum of 30 dwellings within settlement boundaries will not deliver the quantum of development required to meet the pressing local need for affordable homes. As a result, the affordability crisis will deepen in the rural area. For example, to deliver 25 affordable homes within Linton, a minimum of 63 dwellings will need to be permitted as part of major developments. With limited scope for development within the tightly drawn settlement boundary, it will be necessary to find suitable locations on the edge of the village. To discourage the development of less suitable sites and assist in the delivery of much needed affordable housing, the most logical approach is to allocate further sites on the edge of sustainable villages such as Linton.
- 2.39 In summary, a carefully worded criteria-based policy which was supportive of organic growth adjacent to existing built-up areas should not perpetuate unfettered incremental growth.

Policy CC/NZ: Net Zero Carbon New Buildings

- 2.40 Draft policy CC/NZ sets a high threshold of 150 homes for calculating whole life carbon emissions. Support should also be expressed for developments of <150 dwellings where this information is provided voluntarily.
- 2.41 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in a supplementary planning document (SPD).

Policy CC/WE: Water Efficiency in New Developments

- 2.42 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

Policy BG/GI: Green Infrastructure

- 2.43 The adoption of a green infrastructure standard should be a recommendation, not a requirement. Developments should not be opposed where all reasonable steps have been taken to protect and incorporate green infrastructure.
- 2.44 Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

Policy WS/HD: Creating Healthy New Developments

- 2.45 Health Impact Assessments should be a requirement for major developments only. For minor developments, this information should be optional or simplified, for example through the use of a short questionnaire (similar to the Cambridgeshire Biodiversity Checklist).

Policy GP/PP: People and Place Responsive Design and Policy GP/QD: Achieving High Quality Development

- 2.46 It is accepted that good design is highly subjective. However, the planning system has allowed the steady homogenisation of built environments, with a dominance of bland, monotonous "identikit" housing estates from major housebuilders.
- 2.47 Design Guides/Codes are acceptable on large scale, strategic developments, but should not be imposed on smaller scale developments where other mechanisms, including parameter plans, can adequately achieve similar and proportionate outcomes. Local community input will also be as stated, and a robust consultation process will be needed since the 'devil will be in the detail'; these documents must go beyond broad requirements for new homes to be 'in keeping' with the character and appearance of the area.
- 2.48 However, it will take time for these design guides to be drafted and adopted. In the interim, developers could be signposted towards an alternative framework. For example, the National Design Guide, which includes 10 characteristics of a well-designed place: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan. Schemes which can demonstrate a high standard of design should be fast-tracked through the application process.
- 2.49 Additional measures should be introduced for strategic scale development to avoid monotony. For example, the policy could introduce a minimum number of individual house types, appropriate to the scale of development.

Policy H/AH: Affordable Housing

- 2.50 The First Proposals plan sets a challenging target for affordable housing to reflect the acute and substantial need for affordable housing across Greater Cambridge. This places a great responsibility on all major developments to provide an element of affordable housing.
- 2.51 Policy H/AH will have a significant bearing on the viability of individual residential developments, so it is vital that the affordable housing requirement is achievable in practice. Although the First Proposals plan indicates that viability evidence will be reviewed as appropriate as part of the plan-making process, this is not sufficient. Planning Practice Guidance indicates that plans should set out circumstances where review mechanisms may be appropriate, as well as a clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of a development to ensure policy compliance and optimal public benefits through economic cycles. Draft Policy H/AH does not do this. For example, changes in affordable housing tenure models or continued increases in build costs may render the viability evidence which underpins the affordable housing requirement out-of-date relatively quickly.
- 2.52 In relation to the development of land south of Horseheath Road in Linton, a Housing Needs Survey carried out in June 2019 indicated a need for 81 affordable dwellings in the village.

According to a recent appeal decision³ there was still an unfulfilled need for 64 affordable dwellings as of 16 February 2021. There are no allocations for residential development in the adopted Local Plan and no proposed allocations in the village as part of the emerging GCLP. It is understood that two permitted developments will deliver 39 affordable homes, leaving a presumed requirement for 25-42 affordable dwellings – a requirement which will likely increase across the life of the Greater Cambridge Local Plan. Dependence on the allocation of strategic sites with already high infrastructure burdens is unlikely to offer sustainable, long-term solutions to the chronic and worsening affordability issues being experienced across the Greater Cambridge area. Strategic sites alone do not deliver policy-compliant levels of affordable housing, so, if this is the target, more smaller sites that are far more likely to deliver a policy-compliant level of affordable homes at a faster rate need to be allocated.

- 2.53 Draft Policy H/AH of the First Proposals plan requires 40% affordable housing on sites of 10 or more dwellings. With a total of 100 dwellings proposed on site 40554, 40 dwellings – of which at least 10 will be allocated as 'First Homes' under the national First Homes initiative – would be sought for affordable housing under this policy. As well as helping to address the current shortage of affordable housing over the Greater Cambridge area, the delivery of up to 40 affordable dwellings would satisfy the full affordable housing need in Linton – a significant benefit for local residents.

Policy H/CB: Self- and Custom-build Homes

- 2.54 The proposed policy approach will require continual updating of the self and custom build register(s) to reflect the permissions that have been granted with a self- or custom-build element. Close monitoring on sales and completions will also be necessary in case plots earmarked for self- or custom-build revert to market dwellings at the end of the prescribed 12-month marketing period.
- 2.55 It is also unclear if the current registers for Cambridge City and South Cambridgeshire are to be combined, with delivery of plots across the wider area. This would not be logical since many prospective self-builders will have preferred locations and few will have a search area as wide as Greater Cambridge. A more focused policy, perhaps split across the two administrative areas, would encourage the development of self-build plots in the right locations to meet local demand. For example, if all the need for plots was in and around Cambridge, it would not make sense to burden developers in other parts of the area.

Availability and Deliverability

- 2.56 The First Proposals plan is heavily reliant on the delivery of a handful of strategic developments – particularly large and complex sites which on average take 5-8 years for the first home to be delivered⁴. To ensure that housing delivery doesn't stall, and to prevent any subsequent worsening of the current affordability crisis, a pipeline of smaller developments which can deliver homes quickly will be needed in the short to medium term. Site 40554, land south of Horseheath Road in Linton is suitable, available, and deliverable within 0-5 years.

³ Mrs S Moor (c/o Hundred Houses Society) v South Cambridgeshire District Council [2021]

⁴ Lichfields (2020). Start to Finish: What Factors Affect the Build-out Rates of Large-scale Housing Sites? Second Edition

Appendix 1
Site masterplan.

