

Boyer

Land West of London Road, Fowlmere

Greater Cambridge Draft Local Plan Reg 18
Consultation

REPORT CONTROL

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APPENDICES

- Appendix 1. Vision Document**
- Appendix 2. HELAA Site Assessment (Site Reference: 40116)**

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Wates Developments Limited and the Landowners (Martin Frederick Sheldrick, James Nicholas Sheldrick, Christopher John Ralph Sheldrick, Barr Ellison Trust Corporation Ltd, Raywood Ash Ltd, Annette Margaret Sheldrick and Benjamin Charles Sheldrick) in relation to the Draft Greater Cambridge Local Plan Regulation 18 Consultation document (December 2025-January 2026) (hereafter referred to as “Draft Local Plan”).
- 1.2 The representations in this document specifically relate to land west of London Road, Fowlmere (“the Site”), which is being promoted for residential development. A Site Location Plan is included with the Vision Document at **Appendix One**. The site at Fowlmere is located within South Cambridgeshire District.
- 1.3 Wates Developments Limited previously submitted representations to the ‘First Conversation’ consultation in February 2020 and the ‘First Proposals’ in November/December 2021. The Site was submitted to the Call for Sites at the same time, whilst updated information was also submitted to the more recent exercise in 2025. The emerging Local Plan has therefore been informed by several rounds of consultation and feedback in the form of representations from a range of stakeholders. At this further Regulation 18 stage, the Draft Local Plan proposes specific policies and an updated set of site allocations, as Greater Cambridge moves towards submission of the Local Plan for examination.
- 1.4 The consultation document identifies four ‘Big Themes’ that influence how homes, jobs, and infrastructure are planned (conveyed through the proposed development strategy) giving rise to a total of eight strategic priorities around which the Draft Local Plan document is structured, as follows:
- Development Strategy
 - Climate Change
 - Biodiversity and Green Spaces
 - Wellbeing and Social Inclusion
 - Great places
 - Homes
 - Jobs
 - Infrastructure.
- 1.5 These representations respond to relevant parts of the Draft Local Plan, in chronological order as they appear within the document, ordered in accordance with these strategic priorities.

- 1.6 Consideration has been given to whether the policy direction meets the tests of soundness set out by paragraph 36 of the National Planning Policy Framework (NPPF, December 2024), including whether the Plan is:
- a) Positively prepared;
 - b) Justified;
 - c) Effective; and
 - d) Consistent with national policy.
- 1.7 Chapter 2 of these representations sets out comments on the proposed development strategy. Chapter 3 addresses the remaining strategic priorities (themes), set against initial observations on the relationship between these policies and the government's proposed National Development Management Policies. Chapter 5 provides information on the Land West of London Road, Fowlmere.

2. DEVELOPMENT STRATEGY

Our development strategy for Greater Cambridge

- 2.1 The intention to direct development to where it has the least climate impact, 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 is supported. We also consider the principle of this strategy to align with the NPPF and principles of sustainable development.
- 2.2 The Draft Local Plan states:
- 2.3 *“We want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services, while in smaller villages, we propose that only small-scale infill development and affordable housing would be permitted. Any development in and around villages needs to be well-designed for the rural setting, with a strong relationship to landscape.”*
- 2.4 This is subtly altered from the wording at First Proposals stage, reflecting greater emphasis on access to transport links and services, rather than the size of the village.
- 2.5 Across the rural areas, owing to their location, communities are not usually served by public transport links that are as well connected or indeed frequent as urban areas. However, the reduced services should not be seen as a barrier or restriction to provision of growth as rural areas provide a variety of other services and facilities and work as a network, in tandem with other rural centres, to meet local needs. It should also be recognised that ensuring further growth at suitable villages in the rural area will inevitably support on-going investment in both new and existing services that will enhance accessibility.
- 2.6 Land West of London Road, Fowlmere, offers a sustainable location for development, which has acknowledged to have scored positively in the Councils’ HELAA assessment (Site ref: 40116). The Site benefits from good transport links, including bus services, which connect the Site to other settlements benefitting from train stations. Further details are set out later in this statement, as well as within the accompanying Vision Document

Policy S/JH: New Jobs and Homes

- 2.7 Policy S/JH sets out the level of needs for jobs and homes in Greater Cambridge for the plan period of 2024-2045, whilst the supporting text discusses the basis for these, having regard to topic papers and evidence base documents.
- 2.8 It specifies that the plan will make provision for an additional 73,300 jobs in support of Greater Cambridge’s knowledge intensive sector, and a diverse range of local jobs more generally and a minimum of 48,195 new homes to meet the needs for the total population, including affordable housing and specialist accommodation needs of specific groups.

- 2.9 The principal questions at this stage are whether the plan period has been appropriately defined and, in turn, whether the quantum of both employment and housing development identified is sufficient to meet the objectively assessed needs for the Greater Cambridge area.
- 2.10 On the first of these points, it is noted that the plan period encompasses a total of 21 years, from 2024 through to 2045. Whilst, on the face of it, this appears to be a reasonable timeframe, it is important to consider whether this would meet the NPPF requirement (set out at para. 22) for strategic policies to look ahead over a minimum 15 year period from adoption, and for policies to be set within a vision that looks ahead at least 30 years, where larger scale developments such as new settlements and significant urban extensions are proposed.
- 2.11 Para. 2.42 of the Draft Local Plan suggests that adoption may not be envisaged until 2029, meaning that whilst this would theoretically provide for 16 years post-adoption, any further delay to the plan-making and examination process would risk falling below the minimum 15 year timeframe, whilst arguably a longer period should be covered on account of the large sites included in the strategy in any event.
- 2.12 National planning policy sets out that Local Plans should provide for the objectively assessed needs for housing and other uses. Para. 2.9 of the Draft Local Plan outlines the interrelationship between jobs and housing provision, explaining that in addition to ensuring that minimum housing requirements arising from application of the mandatory standard methodology, regard should be had to how many jobs this would support. This is particularly relevant in the context of the importance of Greater Cambridge's continued economic growth on a national scale, a point which is acknowledged at para. 2.8 of the Draft Local Plan.
- 2.13 Since the previous consultation on the emerging Local Plan was undertaken the government has published statements underlining this important role, including 'The Case for Cambridge' in March 2024 and 'Realising the Full Potential of Greater Cambridge' in October of the same year, which outline aspirations for delivery of 150,000 new homes by 2050 in order to support economic growth.
- 2.14 National planning policy provides information for local plans to support the Government's objective to boost the supply of homes, including the minimum provision of the number of homes informed by a local housing need assessment using the standard method in national planning guidance. Planning Practice Guidance notes that there will be times that the housing need is higher than indicated by the standard method. Greater Cambridge economy is nationally important and therefore there is clear justification for higher employment and housing figures.
- 2.15 The Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU) identifies the Government's Standard Method for the calculation of the minimum housing need and notes that this increased significantly in 2024. The calculation was combined across Cambridge and South Cambridgeshire, and the assessed needs for homes applied

together for the purposes of housing delivery including calculating housing land supply and the Housing Delivery Test.

- 2.16 With regard to jobs, the EHEU sets out a central scenario as the most likely outcome for employment growth, requiring an additional 73,248 additional jobs by 2045. However, it also identifies a higher scenario of 90,900 jobs that may be achievable. It goes on to conclude that application of the standard method requirements for housing would support 73,362 jobs (using its preferred 2011 commuting assumptions) and that the central scenario would therefore be achieved via the standard method derived housing growth levels.
- 2.17 Whilst the supporting text of the Draft Local Plan acknowledges the need for flexibility to allow for potential achievement of higher job growth, so as not to restrict employment growth, it is unclear that this has been reflected in the wording of Policy S/JH itself, given application of the lower, central scenario and acceptance of the standard method on the basis that its housing levels would meet this.
- 2.18 As such there is a potential risk of restricting job growth and failing to meet the economic objective of sustainable development included in the NPPF (para 8a). As set out in Paragraph 86a. the planning policies should set out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth. As noted above, and acknowledged elsewhere in the Draft Local Plan, this is of particular importance given the aspirations to ensure future economic growth potential of the Greater Cambridge sub-region is fully realised.
- 2.19 In order to provide flexibility to facilitate higher jobs growth, it will be necessary for the Greater Cambridge Local Plan to also provide flexibility in the delivery of additional homes to support any additional jobs and to reduce levels of in and out commuting into Greater Cambridge, and the resulting impacts this would have on climate change and congestion.
- 2.20 The latest standard method information (from May 2025) indicates a need for delivery of a minimum of 1,103 dwelling per annum in Cambridge City and 1,192 in South Cambridgeshire, equating to an annual figure of 2,295 across the joint plan area. Over the 21 year timeframe of the proposed plan period this therefore establishes a minimum requirement for 48,195 new homes, which Policy correctly identifies in Policy S/JH.
- 2.21 Whilst it is acknowledged that the Councils propose allocation of enough sites to provide a buffer to enable flexibility to deal with unforeseen circumstances (under Policy S/DS, on which we provide separate comments), flexibility to support higher jobs growth should also be incorporated in the Local Plan.
- 2.22 To provide for appropriate flexibility for unforeseen economic growth, a range of additional contingency site allocations should be included within the housing trajectory. This will ensure the Local Plan is positively prepared, justified and effective in accordance with the NPPF tests of soundness. Land West of London Road, Fowlmere offers a sustainable location for development and is immediately available for development, therefore able to contribute to the Councils' short to medium housing delivery rates.

Policy S/DS: Development Strategy

- 2.23 It is noted that the 'Overview' section of the supporting text, at para. 2.55 refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported, although we have comments on the balance of supply from different sources, as well as on specific identified sites with regard to deliverability concerns.
- 2.24 It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and in forms which make best use of land whilst creating well-designed, characterful places. It is supported that sites should be developed at densities which make effective use of land (as specified at NPPF Para. 11a), alongside clarification that sensitivity to local context should also be applied.

Over-reliance on Large Sites and Existing Allocations

- 2.25 The proposed development strategy in the Draft Local Plan relies predominantly on large sites and existing allocations carried forward from the Adopted 2018 Local Plans and outstanding planning permissions, alongside a limited number of new sites, albeit noting that the number of new allocations has increased relative to those identified at the First Proposals stage.
- 2.26 The First Proposals document identified 13 'new' sites, totalling 11,640 homes, whereas the current Draft Local Plan now proposes a total of 19 'new' sites that are to deliver 13,463 dwellings within the plan period. Of these new sites, two sites (Eddington - North West Cambridge, and Cambridge East), are effectively existing allocations. An additional 2,500 homes are proposed to be provided through increased densities at Eddington (compared with 1,000 in the previous consultation document) and a further 3,950 new homes at Cambridge East (compared with 2,850 previously).
- 2.27 At the former of these it is noted that an outline planning application is currently under consideration which illustrates the implications of increased densities, in terms of consequent increases in the height, bulk and massing of proposed buildings (within associated parameter plans) within a sensitive context which includes adjacent Green Belt land and heritage assets. It therefore remains to be seen as to whether the proposed uplift in densities that the above figure relies upon will be acceptable.
- 2.28 The site at Cambridge East comprises land at Cambridge Airport that was safeguarded from the previous plan, which was also identified as a growth area as part of the Cambridge Local Plan (2003). As set out in greater detail below, noting the significant amount of time that this allocation has been identified within previous Local Plans, we raise significant concerns over the delivery of this site within the timescales anticipated, particularly noting larger sites by their very nature can take longer to be delivered.
- 2.29 Specifically, we have significant concerns with the deliverability of Cambridge Airport. The Airport has long been earmarked for future development and was identified in the 2003

Structure Plan and safeguarded in the 2018 Local Plans for development should the site become available. The assessment in the Cambridge Housing Delivery Study Addendum (October 2025) includes reference to assertions that Marshalls has committed to relocation of its operations to Cranfield Airfield, Bedford, for which vacant possession is anticipated by 2030.

- 2.30 However, the report also notes at para. 3.14 that *“The testing of the spatial options was undertaken ahead of the Government’s announcement that funding from the Housing Infrastructure Fund will not be made available to support the relocation of the Cambridge Waste Water Treatment Plant, and ahead of the announcement from the landowner of Cambridge airport (Marshall Group) that they are no longer proposing to relocate to Cranfield Airport. Therefore the testing of the spatial options does not take these announcements into account.”*
- 2.31 Even where there are assertions regarding vacation of the site, references remain that suggest *“The position should be kept under review during the plan making process as appropriate.”* (page 54). There is, therefore, clearly still a high degree of uncertainty regarding homes being delivered at Cambridge Airport within the plan period and even in the event that the site does come forward, it is ambitious that the site will start delivering 350 homes per year from 2031/32, as set out within the Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2025) when it is only expected to become available from 2030 at the earliest.
- 2.32 Within the above passage reference is also made to the status of the site at North-East Cambridge. It is noted that the government announced (in August 2025) that it would not be funding relocation of the Cambridge Waste Water Treatment Plant (WWTP) despite the granting of the associated Development Consent Order by the Secretary of State earlier in the same year. The Cambridge Housing Delivery Study Addendum (October 2025), aside from highlighting the above, had in any event noted that further work would be required to comprehensively plan the area and secure development, *“which is tied to the timely relocation of the water treatment works”* (page 51), and should therefore be kept under review during the plan making process.
- 2.33 The Draft Local Plan includes explicit references to this matter at various points, acknowledging at para. 1.33 that *“there is uncertainty as to whether the effective delivery of the Councils’ vision for North East Cambridge can be realised in full, including the assumed delivery of housing within the plan period.”* It therefore treats the site separately (for example in the context of the calculation of a suitable buffer, as set out below), yet it remains an allocation carried forward from the previous Plan as confirmed in Policy S/DS. Given the clear lack of certainty as to the site’s deliverability at the current time it is considered that its inclusion is unsound as this does not meet the test of effectiveness.
- 2.34 To encourage a more reliable delivery rate across the plan area we propose that additional sites are allocated to ensure the consistent delivery of dwellings to significantly boost the supply of homes as required by Paragraph 61 of the NPPF.

- 2.35 Aside from these concerns, it should be noted, therefore, that only 17 of these 19 sites are strictly 'new'. Given the relative scale of the two sites noted above, in total the 17 sites will provide 7,013 dwellings (equating to approximately 12.69% of the total supply).
- 2.36 It is therefore clear that the Draft Local Plan continues to make provision for a very limited number of new sites. There is a heavy reliance on existing and previously identified sites rolled forward from the adopted Local Plans and many of these sites are on a large scale which also means they typically take longer to be brought forward.

Additional Supply Buffer

- 2.37 At the First Proposals consultation stage it was indicated that there was an intention to include a 10% buffer to provide the flexibility to deal with unforeseen circumstances should any sites not be brought forward as planned. We asserted in representations at that stage that the heavy reliance on existing allocations and commitments is overly optimistic and along with the very limited number of new proposed site allocations, the 10% buffer was not considered sufficient, and consequently should be increased to a minimum of 20% alongside the allocation of further sites to ensure a robust strategy. It was noted that such an approach has been adopted in other local authority areas, including across Babergh and Mid Suffolk Local Authorities. We maintain this stance and this is reinforced by on-going concern over deliverability of the significant site allocations outlined above.
- 2.38 The draft Local Plan illustrates within Table 4 that with the inclusion of capacity at North East Cambridge a 14.7% buffer, in excess of the minimum housing requirement, would be provided. However, with insufficient certainty over deliverability of this site it should be excluded from the calculation and therefore a resultant buffer of just 6.5% would remain.
- 2.39 This is insufficient and therefore additional site allocations should be included at this stage in the plan making process to ensure the plan is effective (deliverable over the plan period) as required by the NPPF.

Over-reliance on Windfall Sites

- 2.40 In addition, there are concerns regarding the heavy reliance on windfall sites within the development strategy, which comprises 7,100 dwellings and equates to almost 15% of the total minimum housing need. The NPPF definition of 'Windfall sites' is "*Sites not specifically identified in the development plan*" whilst the Draft Local Plan document does not include a specific definition of the term.
- 2.41 Cambridge Housing Delivery Study Addendum (October 2025) reports that Greater Cambridge has historically achieved a high rate of windfall development and we have not sought to interrogate this evidence at this stage to confirm whether this conforms with NPPF Para. 75. It is noted that the above study has considered the appropriate rate to apply, having regard to assessment of data across a further 4 year period, to 2023/24. Despite a reduction over this additional period it has been determined, on balance, that the previous mid-point rate of 425 should be retained.

- 2.42 The windfall reliance is considered high, particularly in light of the Councils' apparent anticipation that these will mostly comprise previously developed sites. It is also noted that the defined settlement extents have been tightly drawn to the existing urban edges, which is unlikely to provide sufficient flexibility for (greenfield) windfall sites to come forward.
- 2.43 A more appropriate strategy is for the windfall requirement to be reduced and a greater range of sites explicitly allocated, including for the lower order settlements where the current development strategy is for very limited development.
- 2.44 Through the positive allocation of sustainable sites at the lower order settlements, including Group Villages, this will ensure that the Greater Cambridge growth strategy is genuinely plan-led, as required by Paragraph 15 of the NPPF and ensure that such growth is supported by the appropriate infrastructure. In addition, by re-allocating a proportion of the anticipated windfall growth to specific sustainable sites, this will provide a greater level of certainty of the anticipated location of growth to the Councils, developers and the local community compared with the current proposed strategy that will inevitably see a range of speculative development within the rural areas.

Lack of Development within the Villages

- 2.45 At page 165 of The Development Strategy Topic Paper (2025), it is stated:
- “Our evidence, Sustainability Appraisal and consultation responses above show that a strategy focussed on village development would be unsustainable, in particular regarding transport and associated carbon emissions, but also for supporting delivery of required infrastructure. As such we consider that villages should not be the primary focus for growth within the development strategy.”*
- 2.46 Whilst it is not disputed that villages should not be the primary focus for growth, the current strategy is too restrictive and cannot be supported. Appropriate village development can be sustainable in terms of transport and carbon emissions and provide the necessary infrastructure requirements, as would be the case for land West of London Road, Fowlmere.
- 2.47 In fact, the current development strategy with the high reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Council has control over ensuring village development is located where there is good access to a high quality public transport network and provides the required infrastructure.
- 2.48 Overall, we have concerns regarding the robustness of the development strategy and its ability to bring sufficient land forward for development at a sufficient rate to address the objectively assessed need over the plan period as required by NPPF para. 23.
- 2.49 The Draft Local Plan should increase the distribution of development across the plan area ensuring that a wide range of sites are proposed for development by including a greater number of site allocations in sustainable rural areas with good access to public transport and facilities, such as Land West of London Road, Fowlmere.

- 2.50 As identified by Paragraph 73 of the NPPF, small and medium sized sites (such as Land West of London Road, Fowlmere) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.
- 2.51 As acknowledged by para. 83 of the NPPF, housing in rural areas can maintain the vitality of rural communities and provide opportunities for villages to grow and thrive, especially where this will support local services. The same passage also recognises how, where there are groups of villages, development in one may support services in other nearby villages.
- 2.52 A growth strategy which predominantly focuses on growth within large scale settlements will also prevent the organic growth of more rural areas, which is needed in order to maintain the vitality of rural communities and support for local services.

Policy S/SH: Settlement Hierarchy

- 2.53 Development should be assigned across the settlement hierarchy, with development proportionate to the provision of services and facilities and access to the public transport network. The proposed policy approach of S/SH relating to the settlement hierarchy includes restrictions on the indicative maximum scheme sizes that will comprise acceptable windfall development for each settlement tier. Coupled with the overall development strategy for only a small number of site allocations within the rural area, the ability for sustainable developments to come forward is overly restricted. The graphic at Figure 12 of the Draft Local Plan illustrates that residential development in the Rural Area, combining both allocations and anticipated windfall sites, will represent just 16% of the total supply, significantly reduced relative to the adopted Local Plans (at 23%).
- 2.54 Para. 009 (Reference ID: 67-009-20190722) of the Planning Practice Guidance (PPG) states *“a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness”*. We are unaware of any clear and robust evidence to demonstrate that the policy direction putting a limit on development in the rural areas is appropriate.
- 2.55 Applying restrictions on the maximum amount of development that is appropriate to any particular tier is not considered to be a justified approach, as the sustainability of settlements and the availability of suitable sites for development can vary between settlements within the same tier. A more appropriate strategy would be to make additional site allocations, considering the rural settlements on an individual basis. This would help meet with the Government’s objective of significantly boosting the supply of homes by ensuring that that a sufficient amount and variety of land can come forward where it is needed (NPPF, para. 61).
- 2.56 It should be acknowledged that new development can increase the sustainability of an existing settlement through the provision of additional services and facilities, or through enhancing existing services and facilities. New development that is well related to the

existing settlement can also have a positive impact upon the long term viability of a place through indirect spending from future occupiers and through supporting rural schools and facilities.

Fowlmere (Group Village)

- 2.57 Fowlmere is identified in the Settlement Hierarchy as a “Group Village”. In accordance with S/SH, the Group Villages can accommodate indicative maximum scheme size of 8 dwellings, and exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site.
- 2.58 Notwithstanding our fundamental concerns with regards to the lack of development allocated to the Villages and the overly prescriptive restrictions on the quantum of development to come forward within the various tiers of the settlement hierarchy, we are also concerned by the lack of assessment given to Fowlmere in terms of its ability to accommodate growth.
- 2.59 The Draft Local Plan evidence base document which underpins the definition of the proposed settlement hierarchy is the ‘Settlement Hierarchy Study Update 2025’ which forms an appendix to the Development Strategy Topic Paper (2025) (which makes clear that this should be read in conjunction with the earlier ‘First proposals Topic Paper - Development Strategy’ (2021). This appears to apply analysis which aligns with the previous Existing Transport Conditions Report (2020). We have significant concerns with regards to this approach which appears to adopt a simplistic method of categorising settlements and their ability to accommodate development.
- 2.60 Those Group Villages identified as benefitting from very good existing or proposed sustainable transport links to Cambridge or other large settlements outside the district were subsequently assessed in terms of their position in the hierarchy. Whilst it is noted on Page 263 of the Development Strategy Topic Paper 2021 that all Group Villages were assessed using the points system, only those considered to have good existing or proposed sustainable transport links were assessed in further detail in terms of their ability to accommodate development.
- 2.61 Fowlmere was not further assessed as it was not considered to benefit from very good transport links. We disagree with this conclusion and consider this to be an omission in the Councils’ assessment as a result of overlooking the full range of bus services within the settlement and in turn the access to train services that is also available, as discussed below.
- 2.62 The nearest bus stop to the site is located directly east of the site on London Road, and there are additional bus stops less than a 5-minute walk away. For a village of its size, Fowlmere is very well connected by bus, having three bus services (17, 26 and 7A), primarily connecting to Cambridge and Royston as well as towns and villages in between. Importantly, Foxton Railway Station is a 5-minute bus journey away from Fowlmere and offers half-hourly journeys to Cambridge centre in 12-minutes. Foxton also offers high-

speed services to London Kings Cross in less than an hour. These local public transport connections offer a real opportunity for commuting trips to be undertaken by bus and rail. A Transport Vision for the site would seek to capitalise on these connections and will include enhancement to bus services and/or infrastructure.

- 2.63 A number of the Group Villages that are considered to benefit from good transport links, including Longstanton, are only currently serviced by an hourly bus service into Cambridge, which is less frequent than Fowlmere (which is occasionally throughout the day serviced by two bus services). Fowlmere is also located 2.6 miles from the train station in Foxton, which provides frequent links with Cambridge City. It is therefore unclear why Fowlmere has not been included within the Group Villages considered to benefit from good transport links.
- 2.64 The Councils' Development Strategy Topic Paper 2021 (which the Settlement Hierarchy Study Update 2025 clarifies it should continue to be read in conjunction with) clearly states that only those sites that were tested in the HELAA and identified as potential development options in the better served villages were subsequently subject to site specific consideration for allocation and for sustainability appraisal.
- 2.65 It is strongly considered that the failure of the evidence base to consider all modes of transport and bus services within Fowlmere and its connectivity to the surrounding settlements represents a flaw in the overall settlement assessment. This has subsequently resulted in sites that are being promoted within Fowlmere not being properly considered for development and not being subject to an independent site assessment.

Policy S/DE: Defined Development Extents

- 2.66 The proposed policy based on settlement boundaries (or defined development extents) around settlements is supported. Development extents play an important role in controlling development, however they should not be used as a basis for preventing otherwise sustainable development from coming forward. It is noted that the Draft Local Plan states (at para. 2.135) that boundaries will be defined to take into account the present extent of the built-up area and planned new development. However, the proposed development strategy to restrict the number of dwellings in certain tiers of the settlement hierarchy and the low number of site allocations proposed for the rural areas will prevent sustainable development from being brought forward unless further sites are allocated for development and included within the settlement boundary.
- 2.67 Should the Councils wish to continue to apply a heavy reliance on windfall development to accommodate growth, the settlement boundaries will need to be drawn more loosely around existing settlements, particularly those beyond the outer Green Belt boundary, to allow for speculative development to come forward.

Rest of the Rural Area

- 2.68 Policy S/RRA sets out the proposed policies for new site allocations in the rest of the rural area on a site by site basis. Within the Draft Local Plan there are a total of just three new housing sites proposed to be allocated within the rest of the rural area, excluding the rural

southern cluster, demonstrating the restrictions of the proposed development strategy to development in the rural area.

2.69 It is noted that two of these sites are located in Melbourn as follows:

- S/RRA/ML – The Moor, Moor Lane, Melbourn – 1.08 hectare, approximately 20 dwellings
- S/RRA/CR – Land to the west of Cambridge Road, Melbourn – 6.65 hectares, approximately 120 dwellings and 8,000 sqm of employment floorspace.

2.70 Fowlmere is located only 3.2 miles from Melbourn, which is recognised as a well-functioning place for residents and employment. Paragraph 8.68 of Greater Cambridge Employment Land and Economic Development Evidence Study (2020) states:

“...the villages are able to play an ongoing role in ensuring viable and available industrial floorspace to meet the needs of the city and the wider Greater Cambridge area. Industrial demand for those locations with good connectivity and / or proximity to Cambridge is anticipated to remain moderately strong in the medium term.”

2.71 Similar comments, which highlight the good transport connectivity at nearby Melbourn, are contained in the update evidence base, with the Development Strategy Topic Paper (2025) stating at para. 2.82 that *“Melbourn is considered a good location for offices due to strong public transport and highways links and existing high-tech hubs. New industrial users expected to be attracted from Royston, Cambridge and wider by the good transport links.”*

2.72 As set out within the accompanying Vision Document, Land West of London Road is located within 20 minutes of a range of local services and facilities to support daily needs. Fowlmere village centre is located less than a five minute walk away, with the facilities, education and employment opportunities of Foxton, Melbourn and Cambridge all easily reachable by bike or public transport.

3. THE PLAN THEMES

The Themes

3.1 As noted previously, the Draft Local Plan is focused on the following seven themes that will influence how homes, jobs, and infrastructure are planned within Greater Cambridge over the Plan Period. These are:

- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion
- Great places
- Homes
- Jobs
- Infrastructure.

3.2 We recognise the importance of these themes and welcome the council's addition of homes, jobs, and infrastructure to the first four big themes, as they form key considerations and tangible outcomes of sustainable development across the plan area.

Relationship with National Development Management Policies

3.3 It is noted that the introductory section of the Draft Local Plan, 'About the Plan', includes some consideration of the potentially changing relationship between the plan and the NPPF, under the heading 'National context'. In particular, (at para. 1.15) this refers to the expectation that government will produce a set of national development management policies and acknowledges that implications of this on the Draft Local Plan will need to be considered and reflected at the next stage.

3.4 Since the current Regulation 18 consultation on the Draft Local Plan was issued for consultation the Draft revised NPPF has been released for public consultation, from 16 December 2025 through to 10 March 2026. The Draft NPPF includes proposed National Development Management Policies, although notes at this stage that these are not intended to be applied on a statutory basis.

3.5 Nonetheless, the Draft NPPF consultation does make clear that the core aims of statutory National Development Management Policies can be secured within the current legal framework having regard to the following key principles:

- Setting out much clearer policies for planning and decision-making as proposed in this consultation;
- Making explicit that these decision-making policies should not be repeated in development plans; and

- Providing for these policies to bear on the system from day one, by requiring that any inconsistent local policies are immediately given very limited weight.

- 3.6 Based on these clear principles (and expectation that the finalised NPPF will be in place) it is evident that, at the next stage of the Local Plan process, the Greater Cambridge authorities will need to grapple with these implications, noting in particular that such policies should not be duplicated in Local Plans, which may ultimately render many of these policies redundant.
- 3.7 With the expectation that the theme-based policies will therefore need to be altered or removed altogether as matters evolve with regards to the government's proposed National Development Policies, we have not commented on these at this stage.

4. LAND WEST OF LONDON ROAD, FOWLMERE

Introduction

- 4.1 Wates Developments Ltd. are promoting Land West of London Road, Fowlmere. This Site was submitted to the Greater Cambridge Shared Planning Service (GCSP) as a component of their Housing and Economic Land Availability Assessment in February 2020.
- 4.2 The GCSP assessed the site against a range of criteria and allocated an overall amber rating in terms of suitability and a green rating in terms of availability and achievability.
- 4.3 We disagree with this amber rating and we have reassessed the Site on receipt of site specific technical evidence, on which basis the site is considered as having an overall green rating.
- 4.4 Wates are promoting two parcels of land which combine to form the full site, with the Manor Farm access providing the division. The full site is being promoted for approximately 145 dwellings.
- 4.5 Further information regarding site description, planning considerations and evolving masterplan are detailed below, and illustrated in the accompanying Vision Document prepared by Mosaic (**Appendix One**).

Site Description

- 4.6 The land that is being promoted, is approximately 10.33ha in size and is bound to the north by the Manor Farm Business Park, to the east and south by the B1368 and to the west by agricultural land. The site is of a Greenfield nature. A Site Location Plan is included at **Appendix One**.
- 4.7 As noted, the site has been identified through the Greater Cambridge Housing and Economic Land Availability Assessment as a potential site for development and allocated the reference 40116.
- 4.8 The site's location within Fowlmere provides a location with access to key amenities such as a Primary School and Bus Services, whilst nearby towns and villages such as Shepreth, Melbourn and Royston provide a full range of required jobs, services, leisure and cultural facilities.
- 4.9 The site is proposed to include considerable provision of public open space to enhance the quality of the site for new and existing Fowlmere residents. This is considered to be a key benefit to the future scheme and also meets the Councils' aspirations to delivery high quality open space to new and existing residents of Greater Cambridge.

Landscape and Design

- 4.10 A Preliminary Landscape Review of the Site has been undertaken by SLR Consulting Ltd.

- 4.11 The Review confirms that the topography of the site is broadly flat, ranging in elevation between approximately 20m and 25m AOD. The Site is surrounded by areas of built development, including derelict land and disused buildings and Butts residential area and employment site to the south, residential development properties along London Road to the east and London Road to the south along with further residential properties and caravan park. The western boundary of the site is defined by a tree belt which creates a defined physical barrier between the Site and the open agricultural land further to the west. The Site represents a logical location for accommodating development.
- 4.12 The Review confirms the Site is not within any formal landscape or landscape-related designations. The adopted Local Plan identifies land at the eastern edge of the site, along London Road, is described as “Important Countryside Frontage” as it is considered to provide open views. We disagree with this assessment. The mature tree boundary along the Site’s western edge provides a clear segregation between the settlement and the wider countryside.
- 4.13 The preliminary landscape review concluded that the landscape of the site is of low value to the north of the Manor Farm access. The susceptibility of the landscape is low to the north of the Manor Farm access and medium to high to the south of this access. Furthermore, the visual appraisal concluded that the site is visually enclosed but that there is the potential for sensitive views from residents and walkers to the east and south.
- 4.14 The concept masterplan as shown in the accompanying Vision Document has been landscape-led. As recommended by the Landscape Review, the masterplan proposes large swathes of the Site to provide publicly accessible open space in the form of a village park and provide a gateway to Fowlmere.

Highways/Access

- 4.15 A Transport Appraisal in support of the proposed development has been undertaken by i-Transport LLP and its summary findings captured in the Vision Document that accompanies these representations. This includes a careful assessment of how access can be achieved in design, safety and capacity terms.
- 4.16 The site has a long frontage onto London Road (that becomes High Street at its northern end), which is subject to a recently implemented 20mph speed limit zone with complementary traffic calming measures. The reduced speed limit, the existing footway provision (and that which would be introduced with the site) facilitates a safe and comfortable walking and cycling environment for trips to village amenities.
- 4.17 The appraisal demonstrates that safe and suitable access to both the northern and southern parcels is readily achievable in highway design terms from High Street and London Road respectively.
- 4.18 With regards to traffic impacts, a development of 145 dwellings is likely to generate approximately 70 two-way vehicle movements in the network peak hours. This will be split between travel southbound on London Road towards Royston and northbound via

Cambridge Road to Cambridge. Whilst a detailed traffic impact appraisal will be undertaken as matters progress, this level of traffic generation should not have a noticeable impact and should be well below a level that could reasonably be considered severe.

- 4.19 The proposed development is therefore in an acceptable location in transport and highways terms. Safe and suitable access is readily achievable, and traffic impact should not be a significant issue. A Transport Vision will be developed for the site to capitalise on the local public transport network and connectivity to local amenities for daily trips in line with 20-minute neighbourhood principles.
- 4.20 The proposed development is therefore considered to be acceptable in highways terms.

Flooding and Drainage

- 4.21 The Site sits entirely within Flood Zone 1, demonstrating that it has a less than 0.1% chance of flooding in any year. The flood risk from surface water on the site is predominantly very low.
- 4.22 The Concept Masterplan contained within the Vision Document proposes areas of sustainable drainage systems, which will be multifunctional, providing both biodiversity and amenity benefits as supported by the Draft Local Plan and supporting evidence base.

Ecology

- 4.23 The site has been subject to ecological assessment by Aspect Ecology and the findings reflected in the Vision Document. This has included a comprehensive suite of Phase 2 faunal surveys, as a result of which it is concluded that with inclusion of suitable avoidance and mitigation measures, faunal species can be protected under the proposed scheme and will not form a significant constraint.
- 4.24 There is a considerable buffer of over 1km between the Site and Fowlmere Watercress Beds SSSI, whilst the village of Fowlmere separates the Site and the Hummocky Fields SSSI to the west. It is not anticipated that residential development would have a detrimental impact on any designated site or those within regional or local protection.
- 4.25 The presence of Priority Grassland, Wetland and Woodland Habitats are recorded in the wider area surrounding Fowlmere. The site itself contains priority habitat in the form of hedgerows and deciduous woodland, these will be retained and incorporated into the proposed development where practicable.
- 4.26 The majority of the site is dominated by arable or other neutral grassland, Bramble scrub and tall ruderal vegetation. These habitats are species-poor, appear to be common in the local area and are not considered to constitute important ecological features. The proposed development is largely located within these habitats of low ecological value and habitats of higher ecological value are to be retained as far as practicable.
- 4.27 The proposals present an opportunity to provide biodiversity enhancements through the creation of new green infrastructure and habitat creation.

Heritage

- 4.28 Whilst it is acknowledged that there are a number of heritage assets within Fowlmere, some of which are relatively close to the Site, being in proximity to the setting of a heritage asset does not necessarily cause harm to it.
- 4.29 A Heritage Briefing Note, prepared by Orion Heritage Ltd. has been summarised within the Vision Document that supports these representations.
- 4.30 Its findings acknowledge the proximity of the Site to the aforementioned Conservation Area, however state that, through a sensitive approach to the rural frontage to the London Road, it is unlikely to be impacted.
- 4.31 The United Reformed Church, located opposite the Site, is also acknowledged, although its significance as a landmark building is reduced by the fabric concerned being a later addition, with significance from setting deriving principally from neighbouring buildings rather than its rural interface.
- 4.32 Orion Heritage conclude that in respect of all heritage assets, the development of the Site would result in a less than substantial range of impacts as a worst case scenario, which could be further mitigated through sensitive design and layout.

Arboriculture

- 4.33 An Arboricultural Technical Note, produced by SJA Trees has informed preparation of the Concept masterplan and its findings reflected in the Vision Document.
- 4.34 The Technical Note acknowledges that there are some existing Tree Preservation Orders (TPO) on the Site. These TPOs are shown to date back to 1975 and focus on Elm and Horse Chestnut trees. It should be noted that these orders were enacted prior to death of many Elm trees from Dutch Elm Disease, therefore no Elm trees remain on the Site. The remaining Horse Chestnut trees are suffering from lead miner infestations and are of reduced quality and value.
- 4.35 The non-protected mature trees on the site are Ash and Sycamores, although these trees are considered individually unremarkable and of moderate quality at best.
- 4.36 The Technical Note concludes that few protected trees remain and *“those that do are generally of limited value or quality”*. Development of this site is considered acceptable in arboricultural terms.

Evolving Masterplan

- 4.37 Following the design suggestions offered through the technical assessments, a preliminary Concept Masterplan has been produced. This masterplan seeks to maintain and enhance the existing green frontage alongside the London Road and proposes generous swathes of the southern parcel as accessible public open space.

- 4.38 As the design criteria suggests, the majority of the northern parcel will see provisions for residential development, whilst felicitous residential development is proposed on the southern parcel. A range of popular community features are outlined such as allotments, orchard planting, a children's play area and a village park. These features will complement the aforementioned generous allocation of public open space.
- 4.39 The masterplan proposes two options for development of the Site, both of which are underlined by the principles of a healthy and sustainable community and promote the concept of a 20-minute neighbourhood.

Summary

- 4.40 This site is considered to be suitable, deliverable and achievable, and there are no known significant constraints that should prevent the development of the site.
- 4.41 With appropriate master-planning and design, the site is capable of delivering a sensitively designed but comprehensive and well-connected sustainable development that could contribute to the local development needs of the Greater Cambridge Shared Planning area.

APPENDIX 1. VISION DOCUMENT

APPENDIX 2. HELAA SITE ASSESSMENT (SITE REFERENCE: 40116)

Site 40116 (Land West of London Road, Fowlmere) Assessment Comparison

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
Adopted Development Plan Policies	- Primarily outside Development Framework - Within 200m of the Cambridge Greenbelt	Amber	Amber	It is acknowledged that the Site lies predominantly outside the current adopted development boundary/framework.
Flood Risk	- Wholly in Flood Zone 1 - Minimal surface water flooding risk.	Amber	Green	- The Site lies within Flood Zone 1. - Flood risk on the Site is very low, there is flood risk on a very limited portion of the Site from surface water, which can be appropriately mitigated. - In accordance with the HELAA assessment criteria for a Green rating, the Site is at low risk of flooding (within flood zone 1) and limited areas identified as at risk surface water flooding.
Landscape and Townscape	- TPO on site - Site 1 (North of Manor Farm access): The existing boundary wall and vegetation limits local and visual amenity views into the site. With careful landscape mitigation works the site is capable of accommodating a development subject being of an	Amber	Green	- Very few protected trees remain on the Site and those that do are generally of limited value or quality. - The landscape of the Site is of low value to the north of the Manor Farm access. - The Site is visually enclosed. - The Site presents an opportunity to provide high quality public space that will be accessible to new and existing

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
	appropriate scale and landscape mitigation. Site 2 (South of Manor Farm access): Development upon this site would have a significant adverse effect upon the Important Countryside Frontage and local landscape character. Development would be an encroachment into the countryside.			Fowlmere residents, which will result in a positive lasting impact on the Site's landscape. Development of the Site would have a positive impact by introducing additional landscape features, through tree planting, creating a high quality landscaped area that would be publically accessible, thereby rendering an overall Green rating.
Biodiversity and Geodiversity	- Within 200m of a Wildlife Site. - All new housing developments will require assessment of increased visitor pressure on nearby SSSI. Any residential development above 50 outside of current urban area will require consultation with Natural England. The southern boundary of the site lies adjacent to London Road RSV CWS, cited for its frequent numbers of calcareous grassland indicator	Amber	Green	- A buffer of over 1km exists to the east between the Site and the Fowlmere Watercress Beds SSSI. - Portions of the Site lie within the SSSI Impact Risk Zone for both the Fowlmere Watercress Beds and Hummocky Fields SSSIs, however this does not render an amber rating. - The majority of the site is dominated by arable or other neutral grassland, Bramble scrub and tall ruderal vegetation. These habitats are species-poor, appear to be common in the local area and are not considered to constitute important ecological features. The proposed development is largely located within these habitats of low ecological value and

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
	species. There are no apparent priority habitats within the site; however, there are grasslands which may be calcareous in nature due to underlying geology, hedges and wooded boundaries on site that are likely to have ecological value. Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.			habitats of higher ecological value are to be retained as far as practicable. - The existence of a local County Wildlife Site is acknowledged outside of but in close/medium proximity to the Site. - As demonstrated through the accompanying Site masterplan, the proposed development will provide opportunities for biodiversity enhancement, therefore positively contributing to the biodiversity and geodiversity of the local area. - As per the HELAA assessment: Green criteria, development of the Site would not have a detrimental impact on any designated site or those with a regional or local protection.
Open Space / Green Infrastructure	- Within or Partially within an Important Countryside Frontage. - Site is not on protected open space designation.	Green	Green	- The existence of an Important Countryside Frontage is recognised, however, future development would incorporate high quality public open space to mitigate the impact of this lost frontage. - Development of the Site would not result in the loss of any public open space or green infrastructure, and in-return would provide a significant provision of such an amenity.
Historic Environment	Within 100m of a Listed Asset.	Amber	Amber	There are no listed buildings on the Site and the Site does not lie within a designated Conservation Area.

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
	- Within 100m of a Conservation Area. - Development needs to respond to the historic setting and context of the Conservation Area and the sensitive village approach.			- A limited proportion of the Site lies adjacent to the designated Conservation Area. - The proposed development, as shown on the supporting Masterplan, demonstrates how development can be delivered on the Site in a manner that is sensitive and complementary to the aforementioned Conservation Area and associated listed buildings. - It should be noted that some of the nearby listed buildings have been subject to architectural changes, namely the United Reformed Church, which has been subject to fabric changes to the elevation closest to the Site.
Archaeology	- Located on south side of historic village. - Ring ditch remains of Bronze Age date recorded to the east.	Amber	Green	- It is acknowledged that the Site has no particular archaeological significance. - There is a considerable buffer between the Site and any significant archaeological features to the East. - As per the HELAA assessment: Green criteria, development of the Site would have either a neutral or positive impact to Archaeology, thereby rendering a Green overall rating.
Accessibility to Services and Facilities	- Distance to Primary School: Less than or Equal to 450m - Distance to Secondary School: Greater than 2,000m	Amber	Amber	- Overall, we do not dispute the amber rating assessed by Greater Cambridge. - It should be noted, however, that the Site lies within 322m from a Primary School; adjacent to a Local, Neighbourhood

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
	- Distance to Healthcare Service: Greater than 2,000m - Distance to City, District or Rural Centre: Greater than 2,000m - Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 2,000m - Distance to Employment Opportunities: Greater than 1,800m - Distance to Public Transport: Less than or Equal to 450m - Distance to Rapid Public Transport: Greater than 1,800m - Distance to proposed Rapid Public Transport: Greater than 1,800m - Distance to Cycle Network: Greater than 1,600m			or Minor Rural Centre and adjacent to Public Transport, all of which offer a green rating.

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
	- Adequate accessibility to key local services, transport, and employment opportunities. - Proposed development would not require delivery of accompanying key services.			
Site Access	- The proposed site is acceptable in principle subject to detailed design. - There are potential access constraints, but these could be overcome through development.	Amber	Green	- The potential access to the Site has been assessed with low or negligible arboricultural impacts. - Access to both the northern and southern parcels is readily achievable in highway design terms from High Street and London Road respectively. - In accordance with the HELAA assessment: Green criteria, access by all means is possible, therefore rendering a Green scoring.
Transport and Roads	This site is located in a rural location and must ensure there are high quality walking and cycling links to local services and to the rail station. The site is located close to the A505 and should consider the outputs of the A505 Study. Also, the B1368/A505/Barley Road	Amber	Green	- The Site is accessible in transport terms - there are opportunities for non-car travel including bus services to Cambridge, Barley and Royston. - The increased vehicular movements from development of this Site would not have a noticeable impact on the functioning of trunk roads and/or local roads, and therefore should be assigned a Green rating regarding transport and roads.

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
	junction has been identified to be improved with signals installed.			
Noise, Vibration, Odour and Light Pollution	The site is capable of being developed to provide healthy internal and external environments in regard to noise/ vibration/odour/Light Pollution after careful site layout, design and mitigation.	Amber	Green	The Site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation and warrants a HELAA assessment Green rating.
Air Quality	- Site does not lie within an AQMA. - Minimal traffic impact on AQMA.	Green	Green	- The Site does not lie within an AQMA and any future traffic impacts shall be minimal. - The Greater Cambridge Green rating is agreed.
Contamination and Ground Stability	Potential for historic contamination, conditions required.	Amber	Amber	Any potential issues regarding contamination and ground stability will be appropriately assessed and addressed as part of a future planning application.
Strategic Highways Impact	- Within Highways England Zone 10 - South West. <2,000 dwellings / 5,000m2 employment - Capacity for growth.	Green	Green	- The Site lies within Highways England East Region and is not in close proximity to Strategic Road Network - Development on the site will have a neutral impact on the Strategic Road Network, the Greater Cambridge Green rating is agreed.

Criteria	GCSP Assessment	GCSP Traffic Light	Amended Traffic Light	Amended Assessment
Green Belt	No Comment.		Green	The Site does not form part of or lie in proximity to the Cambridge Green Belt, therefore rendering a Green rating.

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