

Greater Cambridge Local Plan: First Proposals

Land at Long Lane, Fowlmere

December 2021

Ref: P843



Tel: **01234 330624**

Email: enquiries@optimis-consulting.co.uk

optimis-consulting.co.uk

Validation

This report has been prepared by Optimis Consulting Limited in collaboration with the client and where necessary other professionals. This report is only considered acceptable for use once signed by the Project Director from Optimis Consulting Limited as follows; and at all other times shall be considered to be in draft only.

Project Manager:**Name:** Joe Read**Signed:** JR**Position:** Planning Assistant**Date:** 13/12/ 2021**Project Director:****Name:** Duncan Mason**Signed:** DM**Position:** Associate**Date:** 13/12/2021 enquiries@optimis-consulting.co.uk 01234 330 624 07984 972 922 www.optimis-consulting.co.uk 16 St Cuthbert's Street, BEDFORD. MK40 3JG @OptimisInfo

1.0 Introduction

- 1.1 Optimis Consulting Limited (OCL) presents these representations on behalf of our client Croudace Homes.
- 1.2 These representations are submitted in response to the Greater Cambridge Local Plan First Proposals which is out to consultation until 13 December 2021. This submission relates to land at Long Lane, Fowlmere and follows submissions made to the Greater Cambridge Local Plan Call for Sites.
- 1.3 These representations are provided in two parts. Part 1 is a presentation of the qualities of land at Long Lane, Fowlmere in terms of its suitability for future development to support Fowlmere. Part 2 details specific representations in the context of the emerging Greater Cambridge Local Plan and its supporting documents.
- 1.4 These representations are submitted alongside a conceptual masterplan for the site which demonstrates the suitability of the site to accommodate up to 130 homes, to comprise both market homes and affordable homes in a sensitive and sustainable manner.

Croudace Homes

- 1.5 Croudace Homes is a private, family-owned company founded in 1946. Croudace Homes has an excellent track record of successfully promoting strategic land for development to consistently deliver high quality, sustainable neighbourhoods. Croudace Homes has a recognised presence within South Cambridgeshire, currently delivering homes on a site in Linton.
- 1.6 Croudace Homes is committed to building quality places and works studiously to develop positive and constructive relationships with local authorities, stakeholders and the community. Care is taken to design masterplans to meet the needs of local people and recognise that consideration of the environment is of ever-increasing importance. Croudace Homes is committed to the following principles:
 - Consider the social and environmental effects of the developments we design and build, balanced against the need to produce more homes;
 - Work towards recognised good practice sustainability;
 - Invest in the communities we develop to contribute more to local need;
 - Provide excellent customer care;
 - Provide a safe and healthy working environment for our staff; and
 - Promote the skills of our workforce.
- 1.7 Croudace Homes takes responsibility towards the immediate and wider community seriously, incorporating play areas and sports facilities, hosting community fun days and events, and

raising money for charity – all part of the commitment to ensuring developments are desirable and social places to make a home. Croudace Homes has consistently been rated as a 5-star home builder by the Home Builders Federation.

- 1.8 Croudace Homes design and build homes to suit all budgets and set high standards for the design and build quality of their developments, whilst also ensuring a suitable fit for the local environment. Where relevant, well thought out and creative solutions are provided to ensure homes and landscapes are attractive and well designed, facilitating successful placemaking of enduring value. The proposed development in Fowlmere will be no exception to this.
- 1.9 As a company, Croudace, are already embracing the Future Homes Standard due to come into effect in 2025 to ensure house are future-proofed with low carbon heating systems and high level of energy efficiency. Croudace are building homes to this standard and the intention is that development at Fowlmere would target these standards.

2.0 Site Specific Considerations

Site Details

- 2.1 The site is located to the north of the village of Fowlmere in the South Cambridgeshire District, and currently comprises agricultural land. The site is bound to the south by Long Lane, which leads to the neighbouring settlement, Shepreth to the north west.



- 2.2 The site is approximately 8.14ha in size and is bounded to the north east by an existing watercourse, with some mature planting. Existing residential dwellings are located to the south east and north west of the site, and two existing dwellings are located towards the centre of the site, of which the boundary avoids, and are accessed via Long Lane.
- 2.3 Fowlmere benefits from a number of amenities including pubs/restaurants, a nursery, primary school, village hall, recreation ground and employment areas. It is served by bus routes, which provide connections to Royston and Cambridge. The nearby villages of Meldreth and Shepreth are within a 5-minute drive and provide direct train services into Cambridge and London.

Site Strengths

- Not located within a Conservation Area;
- Outside of the Green Belt;
- Land immediately available for development, without additional infrastructure;
- Sustainable village location;
- Good access to local and district facilities;
- Good access to transport infrastructure and larger nearby settlements;
- Clearly defined and strong boundaries,

Potential Opportunities

- Enhancements to public open space
- Significant Biodiversity Net Gain
- Creation of a strong village gateway;
- Critical mass able to contribute to local community and support local services;
- Valuable contribution to housing supply in a sustainable location

3.0 Planning Context

- 3.1 The site itself does not have any planning history.
- 3.2 Fowlmere does not have any existing or proposed allocations for residential development in either the adopted South Cambridgeshire Local Plan or the emerging Greater Cambridge Local Plan.
- 3.3 Within the emerging Local Plan, Fowlmere's classification within the settlement hierarchy remains as a 'Group Village'. Development within such settlements is capped at 8 units albeit exceptionally up to 15 may be permitted where it is considered that this would lead of a sustainable reuse of a brownfield site and subsequently deliver an overall benefit to the village.
- 3.4 Greater Cambridge is identified as having a strong and nationally important economy and is an area in which jobs have been created faster than new homes over recent years. This has in turn, been a contributing factor in the higher house prices and as such, the development strategy aims to meet an increased need for homes. The emerging Local Plan proposes a total of 44,400 homes across the plan period of 2020-2041, which includes all types, sizes and tenures of market and affordable homes.
- 3.5 The Plan seeks to reflect an annual objectively assessed need of delivering 2,111 homes per year. In line with the NPPF, the Plan looks to the period of 2041, and beyond to 2050, thus reflecting that the significant development identified within the strategy will continue beyond the plan period within both the strategic sites and new settlements. To ensure that the housing needs identified within the new Local Plan can be met, the number of sites allocated includes an approximate 10% buffer in order to ensure flexibility and deal with unforeseen circumstances. Flexibility is also proposed in the amount and type of employment land supply to help enable the Greater Cambridge economy to prosper.

Existing Allocations

- 3.6 The Greater Cambridge Plan looks 10 years beyond the adopted South Cambridgeshire Local Plan. The plan therefore relies heavily on further dwellings coming forward in the strategic allocations identified in the Adopted South Cambridgeshire Local Plan.
- 3.7 To the north of Cambridge, the existing allocations for new settlements at Cambourne, Longstandon and Waterbeach are expected to contribute significantly up to 2041.
- 3.8 To the south of Cambridge, and thus more pertinent in this context, there are a series of existing allocations that are to be maintained. Further south, there is an existing allocation for housing at the site known as 'Land South of Babraham Road, Sawston', in the Green Belt for 260 homes.
- 3.9 On the southern boundary of the district, within the Rural Southern Cluster, a new allocation is made at the Genome Campus in Hixton. Albeit again, outline permission has already been granted for a phased mixed-use development including employment, leisure and up to 1500 residential dwellings.

New Allocations to the South

3.10 The below lists new allocations made to the South of the City of Cambridge within the new Greater Cambridge Local Plan.

Site	Size	Allocation	Notes
Land between Hinton Way and Mingle Lane, Great Shelford	10ha	Max. capacity 100 homes	There is potential for further capacity if an additional access is provided. The site is very well located in relation to an existing railway station, with access to Cambridge and the Biomedical Campus.
Land at Maarnford Lane, Hunts Road, Duxford	2ha	60 homes	The site is considered to well-related to the existing village, being close to a school and train station.
The Moor, Moor Lane, Melbourn	1ha	20 homes	A smaller residential allocation to the north of Melbourn.
Land to the West of Cambridge Lane, Melbourn	6.5ha	Mixed-use including 120 homes and 2.5ha employment	There is an outline permission on the site for 160 homes.
Land at Highfield (Phase 2), Caldecote	6ha	64 homes	A planning application is currently being assessed for the construction of 74 homes.
Land at Mansel Farm, Station Road	1.4ha	20 homes	The site is situated in close proximity to a Busway stop with excellent public transport access

3.11 Several things are evident from the Greater Cambridge Local Plan First Proposals therefore as currently put forward:

- The delivery of new dwellings to 2041 is heavily reliant on strategic locations – limited regard is had to how complications with delivery could impact the consistent delivery of housing for which need is identified;
- Generally future housing is not allocated to villages despite weight being given to the need to sustain and enhance the facilities and services in these locations – further to this the ceiling to speculative development has been reduced;
- The general supposition is therefore that village locations will not grow the risk of which is that they become ever less self-sufficient and more heavily reliant upon points of strategic growth;
- Removal of sites from the Green Belt has been prioritised over non Green Belt sites such as Long Lane Fowlmere.

4.0 Planning Policy

National Planning Policy

- 4.1 The revised National Planning Policy Framework was adopted on 24th July 2018 and updated in July 2021. The most relevant policies relevant to the site are as follows:
- 4.2 **Paragraph 8** of the NPPF covers the three dimensions to sustainable development: economic, social, and environmental.
- *“Help build a strong, responsive and competitive economy”*
 - *“To support strong, healthy and vibrant communities”*
 - *“To contribute to protecting and enhancing our natural, built and historic environment”.*
- 4.3 **Paragraph 11** requires that *“plans and decisions should apply a presumption in favour of sustainable development...”* Therefore, *“plans should positively seek opportunities to meet the development needs of their area”.*
- 4.4 **Paragraph 60** highlights the national position to significantly boost the supply of homes as *“it is important that a sufficient amount and variety of land can come forward where it is needed... and that land with permission is developed without unnecessary delay”.*
- 4.5 **Paragraph 68** outlines how *“small and medium sized sites can make an important contribution to meeting the housing requirement of an area.”* Therefore, local planning authorities should *“support the development of windfall”.*
- 4.6 **Paragraph 102** states that *“transport issues should be considered from the earliest stages”.*
- 4.7 **Paragraph 105** highlights the importance of limiting the need to travel, however, recognises that *“opportunities to maximise sustainable transport solutions will vary between urban and rural areas”.*
- 4.8 **Paragraph 119** encourages the promotion of *“effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”.*
- 4.9 **Paragraph 126** explains that *“good design is a key aspect of sustainable development”.*
- 4.10 **Paragraph 130** makes clear that developments should *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”.*

4.11 Paragraph 174 requires planning policies and decisions to contribute to and enhance the natural and local environment.

South Cambridgeshire Local Plan (2018)

4.12 **Policy S/1 (Vision)** states that South Cambridgeshire will contribute to ‘be the best place to live, work and study in the country’, whilst demonstrating impressive and sustainable economic growth.

4.13 **Policy S/2 (Objectives of the Local Plan)** outlines 6 key objective that aim to secure the vision for the Local Plan. As below:

- To support economic growth by supporting South Cambridgeshire’s position as a world leader in research and technology-based industries, research, and education; and supporting the rural economy;
- To protect the character of South Cambridgeshire, including its built and natural heritage, as well as protecting the Cambridge Green Belt. New development should enhance the area and protect and enhance biodiversity;
- To provide land for housing in sustainable locations that meets local needs and aspirations, and gives choice about type, size, tenure, and cost;
- To deliver new developments that are high quality and well-designed with distinctive character that reflects their location, and which responds robustly to the challenges of climate change;
- To ensure that all new development provides or has access to a range of services and facilities that support healthy lifestyles and well-being for everyone, including shops, schools, doctors, community buildings, cultural facilities, local open space, and green infrastructure.
- To maximise potential for journeys to be undertaken by sustainable modes of transport including walking, cycling, bus and train.

4.14 **Policy S/3 (Presumption in Favour of Sustainable Development)** ensures that, when considering development proposals, the Council takes a positive approach that reflects the presumption in favour of sustainable development, in line with the NPPF.

4.15 **Policy S/5 (Provision of New Jobs and Homes)** states that over the plan period of 2011-2031, 22,000 additional jobs will be provided to support the Cambridge Cluster, and 19,500 new homes, including affordable housing will also be provided.

4.16 **Policy S/10 (Group Villages)** identifies the Group Villages within the District, of which Fowlmere is classified. It states that residential development and redevelopment up to an indicative maximum scheme size of 8 dwellings will be permitted within the development frameworks of Group Villages. Development may exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site.

5.0 Long Lane, Fowlmere

- 5.1 It is proposed that the site is able to accommodate the development of up to 130 new houses, to comprise both market homes and affordable homes. A conceptual masterplan identifying developable area and possible patterns of development is included at Appendix 1 to these representations.
- 5.2 The Masterplan has been formulated to articulate how housing might be delivered on the site whilst responding to the rural location, flood risk, existing vegetation and to not only retain, but enhance open space and wildlife habitats.
- 5.3 The village of Fowlmere is sustainably located and benefits from a number of facilities and amenities that are within a 10-minute walk of the site. This includes bus stops which provide services into Cambridge and the surrounding settlements. In addition to this, the nearby villages of Medreth and Shepreth provide direct rail links into Cambridge and London.
- 5.4 The development seeks to retain, where possible, existing vegetation, including the denser planted areas in the east of the site, and the boundary vegetation along the stream to the north and south east.
- 5.5 There is potential for there to be an offset to the south east and north west boundaries, which will ensure that the retained trees would be in areas of open space that can be controlled and appropriately managed.
- 5.6 An existing public right of way (Ref: 93/1) runs across the site from the north west corner to midway through the site's south eastern border. The retention of this right of way will allow for a direct connection into the countryside to the north.
- 5.7 Key opportunities with regards to landscape include fronting new dwellings out to the north west, by careful and sensitive planting to ensure a retention and enhancement of the open character of the local landscape.
- 5.8 In addition, the woodland in the eastern part of the site would be retained to support an increase in biodiversity, as well as an incorporation of a generous offset to the existing vegetation along the eastern and western boundaries.
- 5.9 There is potential for the existing areas within the flood zone to be planted with water tolerant species to provide a contribution to the variety of vegetation across the site.
- 5.10 On-site wildlife habitats have been identified with the potential to support bats, nesting birds, badgers and water voles. A 10-15m buffer zone has been recommended to protect the existing woodland, stream, and hedgerows with trees.

- 5.11 In terms of topography, the site is fairly flat, but has a general fall to the north. Ground levels slope towards a stream along the north site boundary. A suitable surface water drainage strategy is required to ensure that the runoff regime is managed appropriately so that there is not an increased flood risk.

- 5.12 Mitigation measures, including screening the development along Long Lane on the south west boundary of the site, utilising sympathetic materials, and careful design and massing, are proposed to help preserve the aesthetic value and setting of the listed Farmhouse.

- 5.13 It is proposed that all the houses will be built to the Future Homes Standard.

6.0 Representations

6.1 This section sets out the specific representation in the context of the new Local Plan and its supporting documents.

Section 2 Aims (P21):

6.2 We support the aims of the Greater Cambridge Local Plan, as set out at Section 2 of the Plan, to respond to:

- Climate Change;
- Bio-Diversity & Green Spaces;
- Wellbeing and Social Inclusion;
- Great Places;
- Jobs;
- Homes; and
- Infrastructure.

Recommendation: Support

2.1: How much Development and Where? (P22)

6.3 We support suggestion that the Greater Cambridge Plan wants “our rural villages to continue to thrive and sustain their local services...” We object however to subsequent suggestion that the plan actively seeks not to “encourage lots of new houses in places where car travel is the easiest or only way to get around.”

6.4 The provision of the appropriate number of new houses within rural Cambridge will be fundamental to ensuring villages thrive and survive. If the vast majority of growth is to be focused in a few strategic locations then it is clear that both the sphere of influence of such areas will grow and present threat to village facilities and the lack of growth will hinder further villages ability to support their communities.

6.5 The strategy pre-supposes that sustainability policy should be driven by transport considerations alone. How people work and live are evolving rapidly. Travel is only one issue that must be considered in the overall sustainability of future housing provision.

6.6 **Recommendation:** We strongly encourage that housing provision is facilitated in village locations that allows such settlements to grow comparatively alongside the strategic locations identified for growth.

Neighbourhood Plan Housing Targets (P27)

6.7 Neighbourhood planning is specifically aimed at ensuring communities retain direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. It seems wholly inappropriate therefore for the Greater Cambridge Plan to centralise these decisions stating that “...As such we are not relying on neighbourhood areas providing additional homes to meet our requirements.”

6.8 **Recommendation:** Where an appropriate case can be made, in the context of national planning policy, Neighbourhood Plans should be afforded the ability to bring forward housing developments appropriate to their needs and objectives.

What Alternatives did we Consider (P28)

6.9 It is not clear that alternative patterns of growth were considered in preparing the plan. In particular it is not clear if the Plan has considered the benefits of allowing an appropriate proportion of future growth to be located in rural areas to support existing villages.

6.10 **Recommendation:** A refined strategy should be considered that allows an appropriate proportion of growth to take place in sustainable village locations to compliment that being focused to strategic allocations.

Policy S/DS – Development Strategy (P29)

6.11 We support the proposed development strategy for Greater Cambridge in seeking 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, whilst ensuring all necessary utilities can be provided in a sustainable way.”

6.12 We do not agree however that this necessary dictate that a ‘very limited amount of development’ come forward in rural areas. The development strategy as proposed is overly reliant on strategic allocations. It does not consider what may happen to 5 year housing supply if these limited locations encounter delivery issues.

- 6.13 Whilst the plan allows for the development of sites of up to 8 and possible 15 in exceptional circumstances it is anticipated that these will come forward on a windfall basis. It is considered that the plan should be more proactive spatially in terms of ensuring that a proportion of housing need generally is used to underpin and safeguard the vitality of village locations going forward.
- 6.14 Indeed, on this the strategy goes onto state that ‘we have identified a limited number of new sites for housing at our more sustainable villages’. This appears to demonstrate that proactively planning for growth in village locations is beneficially however it is not then clear why these villages have been deemed appropriate for allocated development whilst villages such as Fowlmere are not.
- 6.15 Fowlmere continues to be classified as a Group Village within the emerging Local Plan, and whilst this is not necessarily considered the focus for strategic growth, modest growth is important in supporting, sustaining and enhancing local amenities and services.
- 6.16 Delivering extensions to existing communities and continuing to build on the strong cultural and social aspects of the larger settlements is vital in the progress towards achieving healthier communities. Proposing modern homes that create improved sustainable credentials and add vitality to existing neighbourhoods is not only a requirement of local and regional policy, but one that is adopted within the National Planning Policy Framework.
- 6.17 Limiting growth to larger settlements presents risks with regards to disproportionate settlements that could leave smaller villages, such as Fowlmere, with stagnated growth and poor support for local facilities.
- 6.18 Much of south Cambridgeshire is protected by Green Belt. Fowlmere falls outside of the Green Belt and the accommodation of development there offers the added benefit of not needing to remove further parcels of land from Green Belt designation.
- 6.20 It is considered that the development of Land off Long Lane, Fowlmere can valuably contribute to the Greater Cambridge housing requirement whilst supporting and contributing to the Fowlmere local community. In this respect a site that is immediately developable, with minimal site-specific constraints, presents a positive opportunity for residential development that should be fully considered.
- 6.21 The site was submitted in response to Greater Cambridge’s call for sites (ref: 40012). In response Greater Cambridge concluded that that whilst the site was available and achievable it was not suitable. Much technical assessment of the site has subsequently taken place. As

shown on the concept plan, submitted alongside these representations, it is considered that all technical issues relating to development of the site can be overcome and in this respect the site is considered suitable for development. This is expanded on below in the context of some of the key obstacles identified by the Council:

- **Adopted Development Plan Policies:** Assessed Amber on the basis that the site sits outside the development framework for Fowlmere as currently defined. The purpose of the emerging Greater Cambridge Plan however is to identify what sites are needed to meet housing supply have regard to the need to proactively identify sites and remove policy constraints as necessary. Within an emerging Local Plan therefore a settlement boundary need not be a barrier to suitability;
- **Flood Risk:** Again this has previously been assessed amber. It is acknowledged that part of the site is in flood risk zone 2 and 3. However, as shown on the attached concept plan technical analysis has confirmed that the site can come forward for development outside of these areas. In short flood risk does not prejudice the sites suitability for development;
- **Landscape and Townscape.** This was assessed to be Red given the potential impact on the village form and townscape of Fowlmere. Much design work has been undertaken to consider how residential development could come forward on the site in a manner that is sensitive to both the built form of Fowlmere and the streetscene itself. The Council's assessment appears to pre-judge the site solely on the principle of its location outside of the existing settlement framework. In design terms it is considered that the site could come forward without significant impact in both landscape and townscape terms. This is not considered an issue that should cut to the principle of development on the site and not an issue therefore that can at this initial stage i.e. without consideration of detailed proposals, deem the site to be unsuitable;
- **Bio-diversity and Geo-diversity:** Again this has been assessed Amber but it is not clear on what basis. As the concept plan submitted alongside these representations shows the site allows for ample provision of green space. The delivery of new and enhanced open space within the site will include areas of native planting, wildflowers and trees and will assist in strengthening biodiversity in this location. The site is currently arable and as such offers only limited ecological value. Development of the site will deliver a net bio-diversity gain, in line with policy aspirations;
- **Historic Environment.** This has been assessed Amber on the basis that the site is within 100m of a listed building. The Concept Plan attached to these representations however shows that this relationship can be treated sensitively, in this instance a buffer is shown between and development and the sited asset. Again this is not considered an issue that need cut to the principle of development but rather one that can be handled sufficiently sensitively through the consideration of detailed proposals;
- **Accessibility to Services and Facilities:** This has been assessed as Red and as such a major issue in terms of the suitability of the site. All of the Local Amenities within Fowlmere are within a 10 minute walk and as such are accessible. Furthermore, development of the site offers the opportunity to provide important economic support to safeguard these facilities and the potential, in this respect, to provide support for further services.

- **Site Access:** It is not clear why this has been assessed as orange when the assessment concludes that access to the site is 'acceptable in principle'. Technical work has further confirmed this. Development of the site can be appropriately accessed;
- **Transport and Roads:** Fowlmere, as a village, is sustainably located and benefits from a number of facilities and amenities within a 10-minute walk of the site. With regards to transport connections Fowlmere is served by two bus services with the 915 bus service passing directly in front of the site connecting Fowlmere with Cambridge and Royston. In terms of village locations the site is fully accessible. This is not a barrier to development and indeed it is considered that the ability to use the development of this site to help contribute towards and safeguard these transport services should be reviewed further.

6.23 Overall, given the village's sustainable location, combined with the district's growth targets and housing delivery requirements set out within the new Local Plan, it is considered that land off Long Lane, Fowlmere, presents an appropriate location for additional housing. The site is bounded by logical and permanent boundaries and lacks substantial constraints. Further, the site is capable of delivering enhancements to open space and biodiversity. We strongly urge the Council to review the opportunity presented by the site.

6.24 **Recommendation:** Village locations can provide sustainable locations for growth coupled with an ability to support existing communities, services and facilities. This should be acknowledged within policy. The need for growth in these places to sustain and help these existing settlements thrive should also be acknowledged.

6.25 The Spatial Strategy should seek to proactively plan for growth in village locations and should make clear that growth will be encouraged in village locations where it is shown appropriate to support and enhance the village moving forward.

6.26 Land at Long Lane Fowlmere be identified as a site suitable for the development of up to 130 new homes.

Policy S/SH Settlement Hierarchy (P48)

- 6.27 Given the range of services and facilities we support Fowlmere's continued identification as a Group Village over and above an infill village. It is not clear however why the level of housing to come forward in such locations need be pre-judge i.e. ceiling of 8 units or exceptionally 15.
- 6.28 **Recommendation:** Policy should allow for development in Group Villages up to a scale that can be demonstrated to support and enhance the village moving forward.

Policy S/SB Settlement Boundary (P51)

- 6.29 We acknowledge a requirement to identify existing settlements and their boundaries. It should be acknowledged however that this reflects a snapshot in time. A blanket ban should not be adopted on development outside of the settlement boundaries, as is in effect currently proposed. Rather policy should allow for the consideration of all future proposals on their respective merits in line with the NPPF.
- 6.30 **Recommendation:** Policy should not put a blanket ban on development outside of the settlement boundary, in effect pre-judging any such proposal, rather it should set out a series of criteria allowing development where needed to support and enhance a village location to be assessed on its respective merits.

2.6 Rest of Rural Area (P122)

- 6.31 The Plan states that '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.'
- 6.32 As per the above, in terms of ensuring that rural villages 'thrive' we consider that the plan should be proactive in allocating some of the anticipated growth in the region to these village locations. Where development is considered important to contribute to the vitality of a village location, it is important that it is assessed against a series of criteria. Transportation will be an important factor in any such consideration obviously but in terms of sustainability this should not be the sole consideration. Equally, it should be recognised that village locations do still have access to bus facilities and this should be factored in consideration of any site. Indeed one key reason for managed growth in village locations is to further support and safeguard existing bus services.
- 6.33 **Recommendation:** The Plan must acknowledge the benefits of allowing a proportion of the plan period growth in rural areas and should proactively promote sites such as Long Lane,

Fowlmere as appropriate locations for future development well placed to benefit from existing bus services and support the local community.

Policy S/RRA (P123)

- 6.34 Further allocations in rural areas are strongly encouraged.
- 6.35 **Recommendation:** The Plan must acknowledge the benefits of allowing a proportion of the plan period growth in rural areas and should proactively promote sites such as Long Lane, Fowlmere as appropriate locations for future development well placed to support local communities.

Policy CC/NZ – Net Zero Carbon New Buildings (P145) and Policy CC/DC – Designing for a Challenging Environment (P152)

- 6.36 These policies seek to set the amount of energy use that will be allowed in new development and to ensure that all new dwellings must be designed to achieve a low risk of overheating.
- 6.37 Croudace Homes support such initiatives. They are already developing to the standard of New Homes and fully intended to deliver housing at Fowlmere, were it to come forward, to the highest building and sustainability standards.
- 6.38 These and the other environmental policies demonstrate that development should not be promoted on the basis of transport links alone, but rather wider regard has to be had to the scope of the site for development of the highest sustainability standards in terms of energy consumption, access to renewable and sensitivity to, and ability to work with, the immediate environment.
- 6.39 **Recommendation:** Support

Policy BG/BG: Biodiversity and Geodiversity (P168)

- 6.40 No sound basis has been provided for the requirement for a 20% net gain in biodiversity proposed under this policy.
- 6.41 The Government considers a 10% net gain sufficient to mitigate the impact of new development and it should be recognised that the Environment Act does not set this as a minimum. No basis is presented therefore as to why Greater Cambridge should adopt a different approach to the other areas of the Country.

6.42 **Recommendation:** It is strongly recommended that the policy is amended to require no greater than a 10% net gain in bio-diversity, as per the approach established through the Environment Act.

Appendix 1: Conceptual Site Masterplan

LEGEND

-  Site boundary (8.14 Ha)
-  Potential LEAP
-  Potential LAP
-  Potential vehicular access point
-  Pedestrian access point
-  Potential emergency access point
-  Potential emergency access point
-  Existing trees and root protection area
-  Perimeter of flood zone
-  Public Right of Way (PRoW)
-  Primary road network
-  Secondary road network
-  Proposed planting
-  Potential visitor parking



REV.	DESCRIPTION	APP. DATE
15/11/21	Client definition of PRoW	

Carter Jonas

PROJECT TITLE
CROUDACE HOMES
LAND AT FOWLMIERE

DRAWING TITLE
CONCEPT PLAN

ISSUED BY London T: 020 7016 0720
DATE Dec 2021 EV
SCALE @A2 1:2500 JC
STATUS Draft
CHECKED APPROVED
APPROVED JC

DWG. NO. J0045337_004

No dimensions are to be scaled from this drawing.
 All dimensions are to be checked on site.
 Area measurement for indicative purposes only.
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 Sources: Ordnance Survey

