



# **GREATER CAMBRIDGE LOCAL PLAN: FIRST PROPOSALS CONSULTATION 2021**

## **Land Rear of Fisher's Lane, Orwell, Cambridgeshire**

Prepared by Strutt & Parker on behalf of Endurance Estates

December 2021

Site Name:	Land Rear of Fisher's Lane, Orwell
Client Name:	Endurance Estates
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Appendix B: Strategic Representation, Barton Willmore

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Appendix D: Proposed Site Access Junction

## **1. EXECUTIVE SUMMARY**

- 1.1 Endurance Estates are supportive of the Councils' aim of preparing a comprehensive long term local plan which sets out a clear aspiration for sustainability objectives to be met.
- 1.2 We do however have some concerns regarding the detailed approach and evidence that has currently been presented. As a critical friend to the Councils, in view of the early stage of plan making, we are keen to flag our concerns and work with the Councils.
- 1.3 Overall, we do not believe that the Councils are planning for enough growth. We also have concerns at the lack of new planned commercial space, as highlighted in the appended evidence report by Savills.
- 1.4 The Council's over-reliance on a few major sites (and critically the complex nature of some), we believe, is flawed and likely to result in delivery challenges.
- 1.5 As such, we think it would be prudent for the Councils to allocate more sites in a variety of locations for a wider range of housing. Additional allocations in the villages will help in this regard, as would less complex/constrained sites closer to Cambridge.
- 1.6 In respect of the Site [Ref: 40496] at Orwell, we consider that the Councils' HELAA assessment is not accurate and all potential impacts can be satisfactorily and comprehensively mitigated. Further technical information is submitted in this regard.
- 1.7 Site [Ref: 40496] should be allocated for residential development in the emerging Local Plan to support delivery on unconstrained sites that can come forward early in the plan period.

## 2. INTRODUCTION

- 2.1 This representation has been prepared by Strutt & Parker on behalf of Endurance Estates to support the promotion of to Land Rear of Fisher's Lane, Orwell (40496) as part of the Greater Cambridge First Proposals Consultation 2021.
- 2.2 In September 2021 Greater Cambridge Shared Planning Service published the Greater Cambridge HELAA, which provided an initial assessment of the sites put forward for allocation as part of the Call for Sites consultation within Greater Cambridge.
- 2.3 This representation provides a response to the 'First Proposals' Consultation. The representation has been structured to respond to relevant policies on as set out within the First Proposals Consultation. In addition, a detailed assessment is provided in respect of the HELAA Assessment for the site.
- 2.4 The site covers an area of approximately 1.35 hectares and is capable of delivering approximately 26 dwellings. For further details of the site please refer the submission made in relation to this site for the Greater Cambridge Call for Sites Consultation and the Issues and Options Consultation.
- 2.5 The site was deemed not suitable by the Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) Report 2021. In particular, an assessment of Red was given in relation to the Historic Environment. In response to this assessment, a Built Heritage Assessment has been produced by RPS Group, and is appended to this representation. In addition, it is considered that several of the assessments criteria should be re-categorised. It has been demonstrated in the supporting information provided that the allocation of this site would not result in a significant adverse effect on the historic environment and that the site should be put forward for allocation. Further analysis of this is set out within section 6 of this report.
- 2.6 In support of this report, the following documents have been prepared;
- Built Heritage Assessment, prepared by RPS Group;
  - Proposed Site Access Junction Design, prepared by Transport Planning Associates.
  - Spatial Planning Response, prepared by Barton Willmore
- 2.7 In addition to the above documents, where relevant reference is also made to documents prepared and submitted previously as part of earlier rounds of consultation on the Local Plan.

### **3. POLICY S/JH: NEW JOBS AND HOMES**

- 3.1 Policy S/JH is the first strategic policy within the Local Plan and sets out the total number of jobs and homes proposed over the plan period.
- 3.2 We agree with the supporting text for this policy, that it is very important that housing delivery keeps up for demand for increased jobs within the area.
- 3.3 As part of the preparation of the emerging Greater Cambridge Local Plan, the Shared Planning Service has identified a need for 2,321 dwellings to be built per year. A significant proportion of this growth is made up of existing allocations within the Local Plan. As set out in paragraphs 5.2-5.4 below, over reliance on large scale, strategic, and importantly complex sites, is contrary to policy in the NPPF 2021, and an approach which spreads growth more evenly, with less associated risk, is urged.
- 3.4 The initial evidence base and spatial options assessment for the emerging Local Plan, set three growth options; 'minimum' (40,300 dwellings - based upon standard methodology); 'medium' (46,200 dwellings- based upon economic forecast based upon long term historic employment) and 'maximum' (67,700 dwellings – based upon fast economic growth in the recent past). In view of this, the housing delivery target of 44,400 new homes over the plan period alongside 58,500 new jobs would fall between the 'minimum 'and 'medium' growth scenarios previously suggested.
- 3.5 The Development Strategy Topic Paper that accompanies this consultation acknowledges that the Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for job growth. In particular, it has a world-renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates. It is also acknowledged that in the recent past employment growth within the region has been significantly higher than predicted.
- 3.6 Accounting for the evidence set out within the Development Strategy Topic Paper, it is not clearly justified why only 44,400 new homes and 58,500 new jobs are proposed over the plan period. The Local plan sets out a projection for 1.1% growth, whereas CPIER recommends 2.4% growth and ONS recommends 4.2% growth. Accordingly, it is considered that this approach should be re-visited to increase both housing and employment allocations within the Local Plan. It is considered that the delivery of housing should be significantly increased, to align with economic growth within the recent past. The case for maximum growth forecast is further supported by significant transport investment within the area over the plan period. This includes schemes such

as East- West Rail, Cambridge South Station and the delivery of a number of Rapid Transit Routes proposed by the Greater Cambridge Partnership.

- 3.7 The provision for lower growth scenarios does also not appear to be consistent with the government's objectives for the Ox- Cam Arc as a centre for housing and employment growth.
- 3.8 Further information on this, is set out within a further report that has been completed by Barton Willmore on behalf of Endurance Estates, in relation to a number of sites that are being promoted by Endurance as part of the emerging Local Plan.

#### **4. POLICY S/DS: DEVELOPMENT STRATEGY**

- 4.1 Policy S/DS states that the proposed development strategy for Greater Cambridge is to direct development to where it will have the least climate impact and where active and public transport is the natural choice.
- 4.2 In general, we support the principle of focusing development on sites 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. In relation to minimising car travel, this needs to be considered holistically along with a number of other competing objectives, and provision for car travel is not the only criteria to consider when selecting the most appropriate sites to allocate. It is also very important that due regard is given to the national policy and the three objectives of sustainable development set out in the NPPF 2021 (economic, social and environmental). This means allocating land for development to ensure choice and competition for market land, along with ensuring growth to ensure vitality of villages. Growth within villages can also assist with meeting localised housing need (particularly for affordable housing), which will not be met by a small number of strategic allocations around the largest settlements. In accordance with national policy it is also important that where possible growth is directed to sites that are situated outside of the Cambridge Green Belt.
- 4.3 In this regard, it is also important that a suitable level for growth is directed to the villages within South Cambridgeshire. National policy is clear within paragraph 79 of the NPPF that planning policies should identify opportunities for villages to grow and thrive, especially where they will support local services. This, however, has not been reflected within the First Proposals within the Local Plan, with minimal allocations within the villages of South Cambridgeshire.
- 4.4 It is suggested that the provision for increasing the range of sites to include smaller and medium sites in the rural area would provide significant benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately and more reliably. This is a point recognised by the Inspector that examined the 2018 Local Plan for South Cambridgeshire as referenced within paragraph 31 of the report.

*“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing”* (paragraph 114).

- 4.5 Accounting for the clear recommendations from the Planning Inspector on the 2018 Local Plan, it is not clear why this strategy has not been followed as part of the First Proposals.
- 4.6 Orwell, benefits from being a sustainable settlement in its own right. Orwell is a Group Village (as defined within the adopted Local Plan) that is not situated within the Green Belt. It benefits from primary education facilities, and a range of services, including shops, a pub, and community facilities.
- 4.7 Orwell has a very tightly drawn Development Framework which has remained unaltered since 2003. This does not allow for any windfall development. Orwell did not receive any allocations within the 2018 Local Plan and therefore provision for additional growth as part of the Local Plan 2041 would be appropriate and assist with maintaining viability and vibrancy of the village and meeting identified affordable housing need within Orwell.
- 4.8 For the above reasons, it is considered that the distribution of growth needs to be revisited and that the First Proposals are unsound in their current form. Whilst, clearly allocations that seek to minimise car travel has significant benefits, this should not be the only factor that dictates the most appropriate locations for new housing and employment development. In this regard, policy S/DS is not in accordance with national policy and it is not considered to be justified or effective in its current form.

## **5. POLICY S/SH- SETTLEMENT HIERARCHY**

- 5.1 Policy S/SH relates to Settlement Hierarchy. Orwell is categories as a 'Group Village' within the emerging Local Plan, which is consistent with its position in the settlement hierarchy within the Adopted Local Plan.
- 5.2 Policy S/SH states that within group villages windfall developments for residential development should be limited to 8 dwellings and exceptionally consist up to 15 dwellings where it would make use of a brownfield site. This policy is considered to be overly restrictive, particularly for the more sustainable group villages that are situated outside of the Green Belt.
- 5.3 As set out within our Issues and Options Stage representations for this site, it is recommended that the Local Plan should be more flexible, in particular by providing a more flexible policy position in relation to suitable development sites that adjoin existing village development boundaries. It would be our recommendation that a new village group is provided within the Local Plan that encompasses the more sustainable group villages, and allows for development of up to 30 dwellings. 8 dwellings are considered to be overly restrictive, and flexibility should be given to ensure that villages with strong demand for local housing/affordable housing are allowed modest expansion.
- 5.4 In order to be considered to be sound, the Local Plan should allow for more flexibility in allowing the development of sites that abut the village development framework to come forward for development. Land adjacent to Fisher's Lane, is one such site which would fit into this category and could be developed to assist with sustaining the vitality and vibrancy of rural settlements.

## **6. POLICY S/SB SETTLEMENT BOUNDARIES**

- 6.1 Policy S/SB relates to Settlement Boundaries. Details of settlement boundaries have not been provided at this stage but are to be drawn on the Policies Map that will accompany the draft Local Plan for consultation. The Greater Cambridge Local Plan Topic Paper 1: Strategy explains: “Defining settlement boundaries (previously known as development frameworks) is necessary to ensure that the countryside is protected from gradual encroachment, but in particular they help guard against incremental growth in unsustainable locations”.
- 6.2 This approach is considered to be overly restrictive and does not accord with paragraph’s 69 and 79 of the NPPF, which states that housing should be located where it will enhance or maintain the vitality of rural communities and that small and medium sized sites can make an important contribution towards housing. . This policy direction should not preclude growth in sustainable locations, which may include sites well related to settlements but previously outside of settlement boundaries. It is noted that in the past settlement boundaries have been drawn to tightly, and do not provide for many (if any) windfall opportunities.
- 6.3 The settlement boundary for Orwell were last reviewed some time before the Adopted Proposals Map Published January 2010. The tight settlement boundary has artificially constrained development in a village which has a good range of services and facilities. Not allowing sufficient land within settlement boundaries for windfall sites is contrary to Paragraph 69 c) of the NPPF. The south-east side of site 40496 abuts Orwell’s settlement boundary. It is considered that the site would form a logical extension to Orwell, resulting in a site that is well related to the existing village, and that would not create amenity issues for existing residential properties.

## **7. POLICY S/CBC CAMBRIDGE BIOMEDICAL CAMPUS (INCLUDING ADDENBROOKE'S HOSPITAL)**

- 7.1 We agree that supporting the development and further expansion of Cambridge Biomedical Campus should be one of the key principles of the new local plan. To support this objective, it is imperative therefore that new housing growth is located within areas that are accessible to the Biomedical Campus. In this regard Orwell is within ease of commuting distance to the Biomedical Campus, with ease of access from the south- west side of Cambridge. Orwell also benefits from good transport connectivity to the proposed Cambridge South Station on the Biomedical Campus, via Shepreth, which is a short cycle from Orwell.
- 7.2 It is also very important that the emerging Local Plan 2041 aligns housing and employment growth, with major transport schemes that are being promoted in and around Cambridge. The First Proposals provide a number of references to East- West Rail and the provision for Cambridge South Station, both of which are important new transport infrastructure projects. It is considered important that substantial housing growth is provided within the villages to the south east of Cambridge which will benefit from these new transport links and will ensure ease of access to the Biomedical Campus by sustainable transport means.

## **8. POLICY S/RRA: SITE ALLOCATIONS IN REST OF THE RURAL AREA AND POLICY S/RRP: POLICY AREAS IN THE REST OF THE RURAL AREA**

- 8.1 The supporting text for policies S/RRA and S/RRP states that the GCSPS wants rural villages to thrive and sustain their local services. However, this unfortunately has not been reflected within policy S/RRA or Policy S/RRP, which proposes a very limited number of allocations. In addition, the vast majority villages have had no growth allocated to them at all, which will not assist in thriving or sustaining rural services, nor meet local housing need.
- 8.2 For reasons outlined above within section 3 we consider that the strategy needs to be revised, to include appropriate distribution of growth in the villages. In particular, this additional growth should be focused on sustainable villages, such as Orwell, which benefit from a range of services and are located outside of the Cambridge Green Belt.
- 8.3 The proposed strategy for growth is considered to be over reliant on a few large sites, with which there are associated risks in relation to delivery. The larger sites are particularly complicated in of the infrastructure requirements, associated with the early stages of delivery. As required by the NPPF 2021, a more balanced approach is urged, which spreads growth more evenly, reducing risk, providing choice and competition for market land, and providing more homes where they are needed.
- 8.4 It is worth noting that recently the St Albans Local Plan was withdrawn in November 2020 following a number of serious concerns raised by the Inspectors which included an overreliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas. The Inspectors noted that such sites, provide choice and flexibility in the housing market and secure affordable housing more immediately as advocated in national planning policy. The findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were very similar and also resulted in the local plan being withdrawn.
- 8.5 Accounting for the recent decisions on the St Albans and Uttlesford Local Plans, it is unclear why the GCSPS appear to be adopting a similar approach. The current GCSPS housing growth strategy is reliant on a handful of very large allocations to deliver the proposed proportion of the growth in predominantly urban areas. It is considered that it would be more sustainable to distribute a wider range of housing growth/allocations across the Greater Cambridge area, as this will provide sustainable benefits for the existing settlements and communities in terms of existing businesses, facilities, and give people greater choice over where to live. National planning policies recognises

that rural communities need to be able to grow and thrive to avoid decline. The inclusion of smaller sites will also aid delivery and more competition in the housing market.

- 8.6 It is important that a range of housing, jobs and facilities are provided within villages as part of new allocations to allow them to thrive and remain vibrant. Endurance Estates are responsible for the promotion of Land Rear of Fisher's Lane, Orwell and have a track record of promoting high quality housing developments and setting clear parameters for future housebuilders. Endurance Estates are fully committed, to engagement with the Greater Cambridge Shared Planning Service and Orwell Parish Council regarding the mix and type of housing to be delivered on Land Rear of Fisher's Lane, Orwell. The proposals also include the provision for the delivery of an area of public open space.

## 9. RESPONSE TO HELAA

9.1 This section provides responses to the findings of the Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) Report 2021.

9.2 The Land Rear of Fisher’s Lane, Orwell was promoted originally at Call for Sites stage for 26 dwellings on a site of approximately 1.35 hectares. The main reason given for not considering the site allocation in the HELAA Report, reviewed in detail below, related to potential impact on the historic environment. As set out in the Built Heritage Assessment, prepared by RPS Group (refer to Appendix C), the impact of the site would have a negligible effect on the Registered Parking Garden, and should therefore not be considered to make the site unsuitable. Further information on this is set out within the table below.

### Site Assessment Summary

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

Table 7.1

9.3 It is considered that the findings of the HELAA Report in relation to this site were on the whole positive. The HELAA Report found the site was both available and achievable. It was accepted that the development could be made available in the next 0-5 years and can also be completed within this timescale. The HELAA Report did find that the site was not suitable, however, solely in relation to the impact that development would have on the Registered Park and Garden. It is considered that the reasons given for this outcome can be addressed as explained below.

### Site Assessment

Issue	Assessment	Response	Suggested Assessment
Adopted Development Plan Policies	Amber	The south-east side of the site abuts Orwell’s Development Framework. The settlement boundary for Orwell were last reviewed some time before the Adopted Proposals Map Published January 2010. The tight Development Framework	Green

Issue	Assessment	Response	Suggested Assessment
		<p>has artificially constrained development in a village which has a good range of services and facilities.</p> <p>It is considered that the site would form a logical extension to Orwell, resulting in a site that is well related to the existing village, and that would not create amenity issues for existing residential properties.</p>	
Flood Risk	Green	Flood Zone 1. No flood risk issues identified.	Green
Landscape and Townscape	Amber	<p>The site is not within the Green Belt or any protected landscape area. The report acknowledges that the site has enough screening to limit views. As indicated in the Design Statement submitted in relation to the Issues and Options Consultation, additional screening to the north of the site could easily be incorporated into any planning application. Any development would respect the Local Character and Landscape Character of the area.</p> <p>A sympathetic design in relation to the adjacent Protected Village Amenity Area would also ensure the retention and enhancement of the character and tranquillity of the village. The design of the site incorporates open space and low densities. Endurance Estates would be open to further engagement to refine this design.</p>	Green
Biodiversity and Geodiversity	Amber	The nearest SSSIs is Orwell Clunch Pit approximately 0.2 kilometres east of the site. It is considered that the increased visitor pressure associated with 26 new dwellings would not be significant, and it is noted that public open space would be provided on site. If necessary mitigation could be provided at application stage.	Green

Issue	Assessment	Response	Suggested Assessment
		<p>Any development would protect habitats of ecological value, and the proposed development would ensure a net gain in biodiversity on site.</p> <p>As acknowledged, any impact on designated sites, or those with a regional or local protection could be reasonably mitigated or compensated.</p> <p>For the above reasons it is considered that the site cannot be considered unsuitable for reasons of biodiversity or geodiversity.</p>	
Open Space/Green Infrastructure	<b>Green</b>	The site would provide public open space. This would make a positive contribution to levels of publicly accessible open space in the area.	<b>Green</b>
Historic Environment	<b>Red</b>	<p>The Assessment within the HELAA acknowledges that some development within on this site would be possible, provided that it respects the views into and outside of Wimpole Hall.</p> <p>As a first point of principle, it is not considered that the site should score red on historic environment terms, given that the HELAA Assessment in itself acknowledges that some development on the site would be possible.</p> <p>Secondly, it also needs to be acknowledged that Wimpole Hall, which is referred to within the HELAA assessment is some 2.5km from the site and there are no direct views to or from Wimpole Hall from the site.</p> <p>Thirdly, it is also important to note that the Victoria Plantation Registered Park and Garden is the only heritage asset within proximity of the site. As set out within the response prepared by</p>	<b>Amber</b>

Issue	Assessment	Response	Suggested Assessment
		<p>RPS, views to and from Victoria Plantation are not prominent from the site and its significance as a heritage asset is not legible from the site.</p> <p>The site has the ability to be developed sympathetically having regard to the registered park and garden, by focusing built development away from the north- western edge. This would allow space for provision for extensive landscaping planting to provide screening if required.</p> <p>RPS are of the view that the development of the site could be undertaken with only negligible impact on the registered park and garden and therefore in our view the HELAA Assessment should be revisited.</p>	
Archaeology	Amber	<p>The site's location on the western edge of the historic village and of earthworks in the eastern part of the site are considered to be matters which can be dealt with at planning application stage. As this site is limited in size and would only be delivering 26 dwellings, any delays associated with archaeology would be unlikely to be significant and would not undermine the overarching housing delivery strategy.</p>	Green
Accessibility to Services and Facilities	Amber	<p>As acknowledged within the HELAA, the site has good accessibility to key local services, transport and employment opportunities, and would not require the delivery of accompanying key services.</p> <p>The size of the development being promoted is in keeping with the size of the village of Orwell and a development of this size has the potential for a positive impact upon existing facilities within the village, by maintaining the vibrancy of key</p>	Green

Issue	Assessment	Response	Suggested Assessment
		facilities within the village, such as the primary school.	
Site Access	Amber	As acknowledged, the proposed site is acceptable in principle subject to detailed design and any access constraints could be overcome through development. Details of the proposed site access, undertaken by TPA previously submitted at Call for Sites stage demonstrates that the site access is suitable and fully complies with the appropriate visibility standards.	Green
Transport and Roads	Amber	Accounting for the scale of the development at only 26 dwellings, the additional traffic movements on the strategic road network will be negligible. With this in mind it is considered very unlikely that the development in this location would have any impact on the strategic road network.  Reference is made to this site being part of a 'cluster' of developments. It would be helpful if further clarification could be provided on this point.	Green
Noise, Vibration, Odour and Light Pollution	Amber	To support the Call for Sites stage, a noise assessment undertaken by MLM was prepared, which has been re-appended to this submission. As detailed within this assessment the majority of the site is within an area of 'Low to Medium' risk of noise. The north- west boundary of the site is within a 'Medium to High' risk category, but it is proposed to set development back from the north- west corner of the site and therefore this will not impact upon the deliverability of the site.	Amber
Air Quality	Green	No issues identified. The site is located in a sustainable location with good access to services.	Green
Contamination and Ground Stability	Amber	If any contamination is detected this could be suitably dealt with following the grant of planning	Green

Issue	Assessment	Response	Suggested Assessment
		permission, but it will not impact upon the deliverability of the site.	

Table 7.2

### Further Constraints

Issue	Assessment	Response
Constraints to development	-	No issues identified.
Strategic Highways Impact	<b>Green</b>	No issues identified.
Employment	-	No issues identified.
Green Belt - Assessment of Harm of Green Belt Release	-	N/A

Table 7.3

## 10. CONCLUSION

- 10.1 This representation has been prepared by Strutt & Parker, on behalf of Endurance Estates to support the allocation of a housing site for 26 dwellings and associated landscaping. The promotion of the site has sought to clearly respond to the HELAA Assessment of the site.
- 10.2 As set out within the early stages of our representation, the plan is considered to be unsound in its current form and it is not considered to be justified, effective or in accordance national policy. The First Proposals are over reliant on the delivery of development through major sites that will require significant infrastructure provision and not provide for choice and competition for market land. In addition, the proposed housing growth numbers are not consistent with the more recent economic and employment growth within the Cambridge Sub- Region, which is likely to further exacerbate the recent trend of job growth out- stripping housing delivery. In order to be considered sound, additional growth needs to be provided within the villages, particularly sustainable villages such as Orwell, which are located outside of the Green Belt.
- 10.3 The site has a number of favourable attributes that would demonstrate it is a sound allocation for housing and employment growth, within the emerging Local Plan:
- The Heritage Assessment, prepared by RPS demonstrates that the site can be developed with negligible impact upon the Registered Park and Garden at Victoria Plantation. In this regard, it is proposed to set the development back from the north- west corner of the site and provide suitable landscape planting, to ensure that the setting of the Victoria Plantation is not impacted as a result of the development. It is considered that the HELAA Assessment should be re- visited in light of this assessment that has been undertaken.
  - It is located in a sustainable location and the proposed size of the development is consistent with the position of Orwell within the settlement hierarchy. Growth in this location could support the vibrancy and vitality of the village, which is strongly supported in national policy.
  - Orwell is a sustainable village to accommodate further growth and already has a range of services, community facilities such as excellent education opportunities;
  - The site is located to the south-west of Cambridge, and will benefit from sustainable transportation routes in the future such as the Cambridge South Station, which will provide ease of access to the Biomedical Campus and beyond.

- The application site is being put forward for residential, with a proportion of the site proposed as public open space.
- The site is unconstrained and fully deliverable in planning terms.
- Endurance Estates are committed to detailed engagement with both Planning Officers and statutory and non- statutory consultees, including working closely with the local community in the evolution of the vision for the site.

10.4 In light of the above, it there therefore considered that Land Rear of Fisher's Lane Orwell provides an excellent location for development and would be a sound basis for allocation as part of the emerging Local Plan.