

Greater Cambridge Local Plan: Draft Consultation Representations

Land at Long Lane, Fowlmere

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Tel: 01234 330624

Email: enquiries@optimis-consulting.co.uk

optimis-consulting.co.uk

1.0 Introduction

- 1.1 Optimis Consulting Limited (OCL) presents this submission on behalf of our client, Croudace Homes. The submission relates to Land at Long Lane, Fowlmere.
- 1.2 This submission provides an update to the previous representations made to the Greater Cambridge Local Plan First proposals in December 2021 and the Call for Sites consultations prior. This proposal reduces the size of the site and the quantum of development of approximately 65 dwellings. The previous HELAA reference number is **59408**.
- 1.3 This statement provides a presentation of the qualities of the site, in terms of its suitability for future development and the potential for it to contribute towards the sustainable growth of Fowlmere as a settlement. It is supported by parameters plans which demonstrate potential areas of the site suitable for development.

Croudace Homes

- 1.4 Croudace Homes is a well-established regional residential developer founded in 1946. To this day it remains a family-owned business.
- 1.5 Croudace Homes is committed to building high-quality homes backed up with a first-class customer service. Croudace believes in creating sustainable developments crafted with outstanding architectural design and placemaking. It builds safely and efficiently; sensitive to the demands of being a good neighbour to the communities in which it operates.
- 1.6 Croudace is proud to create homes of the highest quality, expertly designed by experienced professional using high quality materials, fixtures and fittings. The social and environmental effects of developments are always carefully considered, taking responsibility towards the immediate and wider community seriously. Croudace is committed to incorporating play areas and sports facilities, protecting local wildlife and hosting community events and raising money for charity which ensures its developments are desirable and socially vibrant places to live.

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 northwest.



Site Location (Source: Google Earth)

- 2.2 The site is approximately 5.3ha in size bound to the northeast by an existing watercourse, with some mature vegetation. Existing residential dwellings are located to the western and southern boundaries with a proposed access to the site being taken from 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

- Strong enhancements to public open space
- Potential for 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 within a sustainable location.

3.0 Planning Context

3.1 The site does have some planning history, with pre-application engagements being undertaken at the end of 2021, and a formal outline planning application which was submitted in May 2022. Throughout these processes various public consultations were undertaken. The following discusses the planning assessment and how a future development could overcome the reasons for refusal.

3.2 The planning application (LPA Ref. 22/02356/OUT) was refused for the following reasons:

1. The site lies outside of the development framework boundary of Fowlmere and is located on rural agricultural land in the open countryside. The application site does not adjoin the edge of the development framework boundary of Fowlmere and is separated by approximately 40 metres. Fowlmere is classified as a Group Village in the Council's settlement hierarchy, where residential developments up to an indicative scheme size of 8 dwellings, or 15 dwellings where development would make best use of a single brownfield site, can be supported within development frameworks.

The application proposes the erection of up to 125 dwellings on a green field site and one that is separated from the edge of the defined development framework boundary. The proposed development would be contrary to Policy S/7 of the South Cambridgeshire Local Plan 2018 as a matter of principle. The proposal forms residential development outside of a development framework boundary that does not fall within any of the exceptions cited by Policy S/7, nor would the development be supported in principle by other policies in the Plan. The development would therefore result in encroachment into the open countryside and a form of unsustainable development that is not compatible with its location.

The proposal is therefore contrary to Policies S/2, S/3, S/6, S/7, S/10 and TI/2 of the South Cambridgeshire Local Plan 2018 that seek to prioritise the development of new homes as part of a spatial and sustainable development strategy that protects the countryside from encroachment and to help guard against incremental growth in unsustainable locations and the National Planning Policy Framework in respect of achieving sustainable development and conserving and enhancing the natural environment and decisions should avoid the development of isolated homes in the countryside.

2. The proposed development would result in significant encroachment into the open countryside that would be harmful to the character of the countryside and surrounding area, and harm to the landscape character of the village edge. The development would erode the rural transition on the edge of the village on approach from Long Road, harming the gentle transition that currently exists. Furthermore, due to the site being located 40 meters from the defined settlement framework, the development would create an urban form of development detached from the existing form of development within the village. The proposal would therefore result in significant harm to the existing character of open rural landscape and village edge and would conflict with Policies S/7, HQ/1, and NH/2 of the South Cambridgeshire Local Plan 2018 and Landscape in New Developments SPD 2010.

3. The proposed development would result in significant harm to trees, hedgerows and encroach into the open countryside which would be harmful to the character of the countryside and surrounding area and harm to the landscape character of the village edge. The development would erode the rural transition on the edge of the village on approach from Long Road, harming the gentle transition that currently exists. The proposal would therefore result in significant harm to the existing character of the open rural landscape, existing tree belts and the village edge and would conflict with Policies S/7, HQ/1, NH/2 and NH/4 of the South Cambridgeshire Local Plan 2018 and Trees and Development Sites SPD 2009 and Landscape in New Developments SPD 2010.

4. The proposed development would result in the loss of grade two agricultural land. The proposed site is not allocated for development in the Local Plan or sustainability considerations and the need for development are sufficient to overcome the need to protect the agricultural value of the land. The proposal would therefore fail to accord with Policy NH/3 of the South Cambridgeshire Local Plan 2018 and Paragraphs 174(b) and 175 of the National Planning Policy Framework which states that decisions should contribute to and enhance the natural local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits including most versatile agricultural land.

5. The site lies within the immediate setting of a Grade II listed building forming Lower Farmhouse, a late 17th century timber framed and thatched house which lies on the southern side of Long Lane, to the south west of the site. The Conservation Area of Fowlmere lies further within the village approximately 350 metres from the site. The site lies approximately 80 metres to the south of the scheduled monument 'Settlement site SE of West Hill' (List Entry Number 1004670). The proposal would create an uncharacteristic urban edge to Fowlmere and would adversely affect the setting of the Grade II listed Farmhouse and the rural approach to the village. As a result, the proposal would harm the setting of the Grade II listed building and the wider rural character of the approach to the Fowlmere Conservation Area. The proposal would fail to accord with Policy NH/14 of the South Cambridgeshire Local Plan 2018, Development Affecting Conservation Areas SPD 2009, Listed Building SPD 2009, and Paragraphs 194, 195, 197, 199, 200 and 202 of the National Planning Policy Framework.

6. The site lies within an area of very high archaeological potential, situated within an archaeological landscape of national importance. The site is located within 100m to the south of the scheduled monument 'Settlement site SE of West Hill' (National Heritage List for England reference 1004670), an extensive area of statutorily designated archaeological remains of an Iron Age rural settlement occupied from the 2nd century BC through to the Roman conquest (AD 50) and beyond. Cropmarks suggestive of a morphologically similar date are known to extend well beyond the scheduled area to the west and further cropmarks of ring-ditches are present to the south-east of the scheduled area. Insufficient information has been submitted with the application to demonstrate that the proposal would not result in harm to this area of very high archaeological potential. The proposal would fail to accord with Policy NH/14 of the South Cambridgeshire Local Plan 2018, Listed Buildings SPD 2009 and Paragraphs 194, 195, 199 and 200 of the National Planning Policy Framework.

7. Information has been submitted to demonstrate that the proposed development would not result in harm to highway safety. The application has failed to provide sufficient information

in terms of traffic data, trip rates and counts. Furthermore, the application has failed to provide sufficient transport information to demonstrate that the proposed development would not be prejudicial to the satisfactory functioning of the public highway. The proposal is therefore contrary to Policies HQ/1 and TI/2 of the South Cambridgeshire Local Plan 2018 and paragraphs 110 and 112 of the National Planning Policy Framework 2021 that seeks to ensure development would not have in unacceptable impact on highway safety.

8. Insufficient information has been submitted with the application to demonstrate that the proposed development would not result in harm to biodiversity. The application has failed to provide sufficient information in terms of breeding bird surveys, bat transects, impact to commuting and foraging bats along Long Lane from lighting, provision of sufficient bird and bat boxes, monitoring of biodiversity net gain, buffering distances and management details for the existing hedges and broadleaf woodland and the impact on the river habitat biodiversity. The proposal is therefore contrary to Policy NH/4 of the South Cambridgeshire Local Plan 2018 and paragraphs 174 and 180 of the National Planning Policy Framework 2021 which require development to maintain, enhance, restore or add to biodiversity and Greater Cambridge Biodiversity SPD 2022.

Responding to the Reasons for Refusal

- 3.3 The submission as put forward seeks to significantly reduce the quantum of development to approximately 65 dwellings, which represents a 48% reduction from the originally proposed 125 dwellings. This is a direct response to the engagement with the Local Planning Authority, as well as local residents and the Parish Council, to stated issues with the scale of the development relative to the size of Fowlmere as a settlement. The development of the site is a proportionate addition to the existing settlement.
- 3.4 The reduction in the quantum of development similarly softens the impact on nearby heritage assets. The reduced number of homes would provide a reduced density and one that is more akin to the characteristics of a rural village edge. As previously proposed, the development of this site has the potential to deliver significant landscaping enhancements that would further reflect the village's rural approach. This reduction in housing numbers would in turn reduce the effect on existing trees and hedgerows, with strong levels of retention that contribute to the site's offering as a rural transition into the village.
- 3.5 Fowlmere is entirely covered by a Grade 2 Agricultural Land Classification and the wider Greater Cambridgeshire district comprises a significant proportion of best and most versatile agricultural land, of Grades 1 and 2. It is inevitable that the council will have to utilise areas of good quality agricultural land in order to meet the ever-increasing housing targets, and for a council area that contains a substantial proportion of such land, the loss of Grade 2 AL is not considered to outweigh the benefits to high-quality housing development.
- 3.6 In the time since the application was determined, delivering a 10% biodiversity net gain (BNG) has become a mandatory requirement for all development proposals. As above, the reduced quantum of development potentially allows for a greater area of biodiversity retention and enhancement on the site and as such, subject to the additional information being prepared, there are no obvious hurdles to a future development achieving a strong BNG position.

- 3.7 Additional information is similarly required to address reasons 6 and 7, which relate to archaeology and highways. Any forthcoming proposal or allocation would be supported by the relevant information to ensure that these issues could be suitably resolved.

The Need for Homes and Land Supply

- 3.8 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. It contains two Universities and a significant cluster of high-tech industries, research and development and life sciences. These factors have contributed to the Greater Cambridge authority seeking to deliver at least 48,195 additional homes between 2024 and 2045 – equating to 2,295 per year.
- 3.9 The existing plans, adopted in 2018, set out a requirement to deliver 37,865 homes by 2045, through establishing new settlements at Northstowe and Waterbeach. The new Plan seeks to add to this by a further 13,460 homes. The additional requirement for homes aligns with the Government’s wider and reaffirmed commitment to building 1.5 million homes over the next five-year period. Accompanying planning reforms seeks to support this target by simplifying barriers and prioritising sustainable growth.
- 3.10 Greater Cambridge sets out a development strategy of directing development to where active and public transport is the natural choice, where green infrastructure can be delivered, and where jobs, services and facilities can be located near to where people live. The Plan similarly recognises the importance of the Green Belt and seeks to ensure that future supplies of development land do not rely on further Green Belt release. Fowlmere, as a rural settlement outside of the Green Belt, requires proportionate growth to ensure continued support for local facilities and services, and to ensure it remains a thriving location within the district.
- 3.11 The new Local Plan coincides more fundamental reforms of the planning system at a national level which have been brought forward by the new Government. These proposals have sought to re-establish the emphasis on significantly increasing housing delivery and pledging to build 1.5 million homes over its term. This similarly coincides with proposed change to the NPPF, which has been out for consultation since December 2025. As the current Local Plan process is at an advanced stage, it is recognised that it will continue to be examined under the 2024 version of the NPPF, however the Council may be required to have due regard to proposed Framework amendments to ensure its policies remain consistent upon the Plan’s adoption.
- 3.12 The new Plan continues to rely heavily on larger strategic sites to deliver significant proportions of housing growth, which can be more vulnerable to delays due to infrastructure deliveries and phasing complexities. Where elements of this projected housing growth are back-loaded, delays can mean housing it pushed beyond the plan-period and in the more immediate term, the Council’s five-year housing land supply position becomes threatened and as such, the Council becomes vulnerable to speculative housing developments which may not deliver the more acute levels of housing need. The Plan should therefore build in a greater level of contingency in order to avoid such scenarios.

4.0 Long Lane, Fowlmere – Potential Development

Proposal

- 4.1 The size of the site has been significantly reduced in comparison to previous schemes, with it now contained to the south and east, abutting the settlement edge. It is proposed that the site is able to accommodate the development of approximately 65 dwellings. This represents a reduced quantum of development as a direct response to earlier engagements with the Local Planning Authority through applications and consultations.
- 4.2 It is envisaged that the development would comprise a varied mix of market and affordable homes, comprised of different types and tenures that would be reflective of an identified housing need and results of the most up-to-date Strategic Housing Market Assessment. This submission is supported by a revised concept plan which indicatively presents where housing could be located, alongside new areas of open space, landscaping and connectivity.
- 4.3 The development seeks to retain, where possible, existing vegetation, including the areas towards the northeastern part of the site and along the adjacent stream. This has been a key consideration in the context of earlier refusal reasons, which related to the loss of trees and hedgerows. There remains opportunity within the site to enhance landscaping, through sensitive planting, to ensure the retention of a rural transition on approach to the village. It is further envisaged that the opportunities for enhanced landscaping will align with the wider aims of achieving a strong Biodiversity Net Gain.
- 4.4 The reduced scheme seeks to improve the post-development relationship with nearby heritage assets. A softer and less-dense scheme, which incorporates opportunities for buffering and gentle transitions to built form is better-reflective of the rural context and seeks to protect the historic significance of such assets.
- 4.5 It is recognised that part of the site's northern edge is within Flood Zones 2 and 3, however it has been demonstrated through previous engagements, that the appropriate mitigations and design considerations can be incorporated to minimise risk of adverse impacts. It is noted that the Environment Agency has reviewed Flood Zones since the submission of the application on this site, which have reduced the sites risk of flooding.
- 4.6 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 surrounding areas. In addition to this, the nearby villages of Medreth and Shepreth provide direct rail links into Cambridge and London.
- 4.7 A desire for village locations to thrive and sustain local services is recognised in the emerging Greater Cambridge Local Plan. The council therefore needs to ensure a proactive approach to delivering housing across rural areas of the district, including Fowlmere. This is ever important

in light of the government's housing delivery targets and the joint authority's requirement to provide sufficient housing land.

- 4.8 The proposed development of Long Lane, Fowlmere will bring new residents to the village that can enable a continued contribution towards community services. Fowlmere primary school, for example, is operating below capacity at around 70%, according to the Government's website. New homes in the village will help contribute towards the continued viability of the local school, which is a valued village asset. Delivering extensions to existing communities is vital in the progress towards achieving healthier and more sustainable settlements. Limiting housing growth to larger settlements within the district presents risk in creating disparity between settlements that has the potential to leave smaller rural areas such as Fowlmere with stagnated growth and poor support for local facilities.

5.0 Representations

- 5.1 This section sets out the specific representation in the context of the draft Local Plan, its proposed policies and the relevant supporting documents.
- 5.2 We support the Plan's development strategy in a general sense, insofar as there is enhanced prioritisation on the delivery of new homes, aligning with the district's strong strategic regional positioning and its performance in the delivery of job opportunities. This extends to a general support of the key themes:
- Climate change
 - Biodiversity and green spaces
 - Wellbeing and social inclusion
 - Great places
 - Jobs
 - Homes
 - Infrastructure

Policy S/DS: Development Strategy

- 5.3 The principle of a spatial strategy that prioritises the delivery of new homes in sustainable development locations, such as within the Cambridge Urban Area and on its edge, as well as through planned new settlements, is supported. However, the Development Strategy should place a clearer emphasis on the role of proportionate growth within rural settlements, to supplement strategic sites and new settlements.
- 5.4 Whilst it is anticipated that the strategic sites and urban extensions will contribute to a significant quantum of housing, delivering much of the identified housing need over the Plan-period, the importance of enabling plan-led and organic growth in village locations should not be understated, where development can support the long-term vitality of rural communities, sustain existing services and facilities, and contribute to the delivery of local housing needs, particularly with regards to affordable homes and other specialist housing types.
- 5.5 The recognition within the Plan to account for a need for jobs and homes within rural areas (both in Rural Centres and Minor Rural Centres) is supported, however there should be further and more explicit direction. It is clear from the Illustrative Map, which shows locations of proposed new housing development in the Council area, that very little growth is directed towards the south and southeast of Cambridge. The development of approximately 65 dwellings in a sustainable rural settlement represents a modest and proportionate expansion of the village, which contributes valuably towards housing need and aligns with national policy objectives in supporting thriving communities.

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

Policy S/SH: Settlement Hierarchy

- 5.6 Fowlmere is identified as a Group Village of which its continued identification as such is generally supported, given its range of services and facilities. It remains unclear through the Draft Plan why the level of housing that is able to come forward in such locations is limited to 8 dwellings (or exceptionally 15), where opportunities may exist for increased numbers to be delivered.
- 5.7 Whilst the Settlement Hierarchy provides support for the wider Development Strategy within the Draft Plan and as such, a framework for directing development towards the most sustainable locations, it should not be applied in an overly restrictive manner that limits appropriate and proportionate growth within the rural settlements.
- 5.8 Group Villages play a hugely important role in the social and economic fabric of Greater Cambridge and it is vital that a level of proportionate growth is explicitly supported through policy that enables long-term vitality. Moreover, it avoids risk of stagnating the growth of smaller settlements, which could lead to declines in local services and facilities and an increased necessity for residents to travel and rely on larger settlements for day-to-day needs.

Recommendation: Support subject to modifications. This policy should allow for the development in Group Villages without a limitation on scale, where it can be demonstrated that development is able to support and enhance such settlements.

Policy S/DE: Defined Development Extents

- 5.9 We support the use of Defined Development Extents as settlement boundaries and acknowledge the requirement to identify a means of providing clarity in plan-making. It should however be acknowledged within the policy, that such a boundary reflects only a small snapshot in time and restricts flexibility outside of the plan-making process to enable logical and sustainable village extensions.
- 5.10 Such rigid application of this policy risks adding further constraint to otherwise sustainable development opportunities which further direct any level of organic growth away from village locations that are capable of accommodating proportionate housing development, and furthermore where it should be greater encouraged.

Recommendation: Support subject to modifications. This policy should provide explicit flexibility and set out clear criteria for supporting development where it can be demonstrated that it offers benefit to village locations, based also on a site's respective merits.

Site Allocations: Rest of the Rural Area

- 5.11 The Draft Plan states clearly 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.” Whilst the broader aims of this statement are supported, the Plan should be far more explicitly proactive in allocating some anticipated growth within the region to village locations.
- 5.12 It is appreciated that some rural settlements will be less-sustainably connected with regards to transportation and that mode of transportation is an important consideration, though should not be the sole consideration. It should be recognised that village locations have access to bus services which should be attributed due consideration, alongside the evolving accessibility and availability of EVs, which, although still private transport modes, can help reduce the overall resultant impact on greenhouse gas emissions.
- 5.13 The development of around 65 homes in Fowlmere represents a scale that can be successfully integrated into the settlement, providing a strong village gateway that can help contribute to the longer-term support for local services, facilities and social infrastructure.

Recommendation: The Greater Cambridge Local Plan should ensure that rural settlements are proportionately represented in terms of housing allocation, to ensure that there remains a plan-led and strategically aligned approach to sustainable growth across the region, without an over-reliance on new settlements and larger extensions.

Policy CC/DC: Designing for a Changing Climate and Policy CC/NZ: Net Zero Carbon New Buildings

- 5.14 These policies are supported insofar as they seek to encourage a reduction in energy demands through sustainable building methods and practices. Croudace Homes supports such initiatives.
- 5.15 These, and other environmental policies demonstrate that development should not be promoted on the basis of its connection to existing transport links alone. Wider regard should be had to the scope for the development to achieve the highest sustainability standards in terms of energy efficiency, access to and promotion of renewable energy sources and the sensitivity to the immediate environment.

Recommendation: Support, with comment.

Policy BG/BG: Biodiversity and Geodiversity

- 5.16 The policy requirement for major developments within Greater Cambridge to provide a minimum of a 20% Biodiversity Net Gain is considered excessive and without sound basis for inclusion.

5.17 Currently, the mandatory requirement set at Government level is for 10%, which is seen as a sufficient post-development biodiversity gain to ensure positive impacts and mitigations on habitats. The requirement to deliver a 20% gain is likely to bring with it substantial additional constraint to development schemes and risks creating delay and uncertainty in housing delivery.

Recommendation: It is strongly recommended that this policy is revised to require no greater than a 10% Biodiversity Net Gain, as per the established approach through the Environment Act.