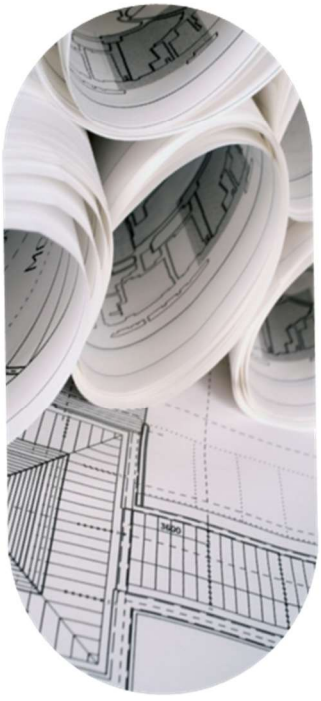
Representations

Greater Cambridge Local Plan Regulation 19 Consultation Publication Version

Land South of Shelford Road, Fulbourn

Submitted on behalf of Miller Homes
September 2026



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1. Overview

1.1. The following representations are made in response to the Greater Cambridge Local Plan (GCLP) Publication Version (Regulation 19) Consultation on behalf of Miller Homes, in respect of their land interests at **Land South of Shelford Road, Fulbourn.**

1.2. For clarity and ease of reference, these representations are structured to correspond with the format of the GCLP Publication Version and its chapter headings. Representations are provided against specific policies and site allocations, where applicable.

1.3. These representations should be read in conjunction with the accompanying supporting documents and plans identified in Appendix 1, all of which form part of this submission.

1.4. In summary, these representations contend that the Greater Cambridge Local Plan, in its current form, fails to meet the National Planning Policy Framework 2024 (NPPF) tests of soundness. The Plan is overly reliant on new settlements and strategic sites, which have long lead-in times and delivery risks, rendering the strategy ineffective contrary to NPPF Paragraph 36(c). The Plan also fails to provide for a mix of sites, as required by NPPF Paragraph 72. It does not adequately plan for a sustainable pattern of development due to the strategic sites' over reliance on vehicular transportation, nor does it adequately plan for the needs of rural communities in accordance with NPPF Paragraph 83.

1.5. The Plan should therefore be modified to address these issues of soundness. Miller Homes site at Fulbourn should be allocated as it can contribute to addressing the housing land supply in the first 5 years in a sustainable location, close to Cambridge, whilst supporting sustainable development in rural areas and with active travel links to the city.

2. Chapter 2: Development Strategy

Policy S/DS: Spatial Development Strategy

2.1. Miller Homes objects to Policy S/DS: Spatial Development Strategy on the grounds that it is not justified in relation to the approach taken to strategic sites (Part 2 of the Policy). NPPF Paragraph 36(b) requires plans to be justified through an appropriate strategy, informed by proportionate evidence and reasonable alternatives. Miller Homes considers the growth strategy is not appropriate due to its over reliance on new settlements and strategic growth locations. This is especially so given the other reasonable alternatives supported by the evidence base. The Plan is therefore not sound and this is considered further in the sections below.

Vision for Greater Cambridge

2.2. Miller Homes supports the underlining Vision for Greater Cambridge which places emphasis on decreasing impact on the climate and environment, through reducing reliance on the private car to create thriving neighbourhoods with a variety of jobs and homes and supporting infrastructure that is needed.

2.3. However, it is considered that the GCLP fails to fulfil the Vision. This is due to the over reliance on strategic scale sites, totalling 12,550 dwellings (91%) whilst smaller sites total 1,104 (9%) of the 13,654 new allocations. Through delivering housing across large strategic sites, there is an inherent lack of choice of housing choice across the greater Cambridge area. This is particularly relevant to rural areas such as Fulbourn, where maintenance of local vitality and economy is missed in favour of new settlements and large-scale strategic development contrary to paragraph 83 of the NPPF.

2.4. Furthermore, NPPF paragraphs 11a and 110 state that all plans should promote a sustainable pattern of development, in locations which are or can be made

sustainable. It is considered that the allocation of new housing on strategic sites that are outside Cambridge Centre and beyond the Green Belt, is not sustainable. This is due to the potential over reliance on the private vehicle to be able to access services, facilities and employment opportunities. The Sustainability Appraisal 2026 identifies this as a potential for concern of development 'jumping' the Green Belt, meaning some elements of development will be provided in locations that are less well related to existing services, facilities and jobs, which will result in disproportionate increases in vehicle travel. Therefore, the Development Strategy as proposed is not considered to meet the Plan's Vision and the NPPF's central premise of a sustainable pattern of development. The Plan is therefore unsound as it is not in accordance with national policy.

Reliance on New Settlements and Strategic Sites

2.5. NPPF Paragraph 36(c) requires plans to be effective and therefore deliverable over the plan period. Miller Homes considers the development strategy fails this test due to its reliance on new settlements and strategic sites, equating to an overdependence on long-term delivery and long lead in times. Whilst it is recognised that the Council has included these schemes to induce sustained growth beyond the initial 5-year housing supply period in accordance with paragraph 72(b) of the NPPF, it is a missed opportunity not to allocate smaller sites to increase headroom and produce a concrete supply regardless of the long lead times within the immediate 5-year period. Therefore, this approach fails to address the need for sustained growth across the plan period.

2.6. Within the new housing allocations, 12,550 are provided on five strategic sites varying in size from 1,000 to 3,950 dwellings. The evidence report Greater Cambridge Housing Development Strategy Topic paper Appendix 10: Housing trajectory (2026), outlines the lead-in times of strategic sites (200 dwellings and above) to be 6 years from allocation to first completions. Miller Homes considers these lead times to be overly ambitious and generalised and suggest

that more clarity is needed regarding the site-specific factors regarding lead times and build out rates. This approach should take account of the current lead times facing developers, irrespective of past performance, alongside current viability constraints facing developers nationwide. Furthermore, there are often delays on strategic sites of this scale due site-specific constraints or external factors like the Government's announcement that it will not be funding the Cambridge Waste Water Treatment Plant which has impacted the delivery of the North East Cambridge site.

2.7. Despite the Councils retaining confidence in this approach in the Housing Delivery Study (Addendum 2026 Update), more clarity is needed regarding the site-specific factors regarding build out rates and lead in times.

2.8. For instance, Cambridge East (Airport) is due to see first completions in 2032/33, on the Councils' average 6-year lead in time, this would mean a planning application is submitted within the next year. On this assumption, determination and a Section 106 agreement would have to be completed within 2 to 3 years, with infrastructure, land assembly, conditions discharge, pre-commencement works and reserved matters approvals all completed for a start on site in no later than 2031/32. This is considered ambitious for the scale of the site, noting the existing occupiers and given the current market.

2.9. Similarly, the delivery rate is very high at 350dpa from 2035/36 to 2044/45. Whilst the Councils' state that the 350dpa is a 'peak', this is contested given it is sustained for such a long period of time. The average over 13 years of delivery is still over 300dpa. It would be more appropriate to assume an average delivery rate based on evidence of past performance in Cambridgeshire.. For instance, Lichfield's Start to Finish Report 2024[1] details the considerable range in delivery rates in Cambridgeshire. Table 1 sets out the mean build out rate (DPA) for 8 established strategic sites, each with more than four years of build

[1] See page 12 | Start to Finish: how quickly do large scale housing sites deliver? | Third edition | insight March 2024

out data. These sites have progressed through a range of economic climates, including periods of abundancy alongside times of crisis and flux (e.g. the 2008 financial crisis and the 2020 coronavirus pandemic).

Site	Mean DPA
Great Kneighton (Clay Farm)	218.8
Cambourne (original new settlement)	188.0
Northstowe Phase 1	184.7
North West Cambridge	148.7
Upper Cambourne	105.6
Trumpington Meadows	96.4
Orchard Park	79.2
North Ely (Orchards Green)	62.3

Table 1: Mean build out rates across eight established strategic sites in Cambridgeshire[2]

2.10. To this end, this data provides a robust and justified evidence base for assessing realistic delivery performance. The data indicates that large strategic sites (urban extensions and new settlements) have been built out at an average rate of 135.5 dpa and no site exceeds a 220 dpa average well below the forecasted 300dpa for new settlements or 350dpa for urban extensions. Therefore, Miller consider the forecasted rates need to be recalculated using the average dpa across these entirety of these sites rather than the peak when calculating housing delivery, to avoid overestimating future completions, factor in economic flux and ensure that assumptions are deliverable and justified against previous performance.

[2] See footnote 1 pages 19-22

2.11. Therefore, Miller Homes does not support the paragraph 2 of Policy S/DS: Development Strategy in regard to overreliance on strategic sites. It is considered that this approach, fails to produce sufficient sites that can come forward both within the next 5 years and over the plan period. The plan is therefore, considered ineffective as it does not accord with paragraph 36(C) of the NPPF.

2.12. It is with this understanding that Miller Homes consider that additional sites should be allocated for the Plan to accord with the provision of deliverable and available sites as stipulated by NPPF Paragraph 72 and support a robust 5 year housing land supply position and guard against any potential delays that may arise with the strategic sites over the plan period.

Windfall allowance and the need for medium scale deliverable schemes

2.13. Paragraph 75 of the NPPF states that "where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply". The Greater Cambridge Housing Delivery Study Addendum Update (2026) utilises historic data from 2006-2024 to base future trends. This has identified a delivery of 425 windfall dwellings per annum. In the review of expected future trends, national policy changes in relation to developing brownfield sites has been identified to highlight how it will be easier to bring brownfield sites forward. However, the assumption that windfall sites will be delivered on mainly brownfield sites is questioned. This is due to there being fewer opportunities as many sites have already been utilised, with a potential decrease in brownfield churn. Furthermore, in the Main Viability Report produced by Aspinall Verdi (2026) small brownfield sites have been identified as being susceptible to fluctuations

and the potential of low viability meaning the Councils may have to take a more flexible approach to contributions[3]

2.14. Furthermore, the Plan currently starts making an allowance for windfalls from 2029/30. However, the Plan is anticipated to be adopted in 2028. Whilst the current base takes account of commitments up to March 2026, and thus there is a 3-year gap between windfalls and commitments, the Councils will need to ensure that this is rolled forward as the Plan progresses. There is otherwise a danger of double counting completions from existing commitments and windfalls. This could reduce the supply in the first 5 years and the plan period by as much as 850 homes. For a plan adoption of 2028, windfalls should not be considered as a source of supply until 2031/32.

2.15. For these reasons, therefore, the assessment of the windfall allowance is not sufficiently compelling that it will continue to be a reliable source of supply.

Rural centres and Minor Rural Centres

2.16. Miller Homes does not support the part 3(b) of Policy S/DS: Development Strategy due to the failure to include active and/ or sustainable transport as a factor when determining service provision. This addition would support the vision for Cambridge reducing vehicle reliance and promoting sustainable patterns of development in line with NPPF paragraph 73.

2.17. Miller Homes consider that the policy should be reworded to include active travel links such as greenways, cycle paths and public rights of way to support connectivity to Cambridge and the trains stations rather than solely referring to public transport.

[3] See page 101 Greater Cambridge Whole Plan Viability Testing | Greater Cambridge Shared Planning | Aspinall Verdi | July 2026 | Online at Greater Cambridge Local Plan Viability - Main Viability Report - Regulation 19 Stage

Housing and Landscape Evidence

2.18. It is noted that the Greater Cambridge Strategic Housing and Economic Land Availability Assessment (HELAA – October 2025) assessed the Land South of Shelford Road, Fulbourn (Reference: 40501 / 115137). The HELAA raised concerns about the development of the site impacting the landscape character of the area and on key views to and from the village of Fulbourn, this view is disputed. A review of the Landscape Sensitivity Assessment has been undertaken and is included in appended 'Representations (Landscape and Visual Issues)' (Appendix 2). This assessment includes a set of views of Land South of Shelford Road, Fulbourn from the local highways and PRoWs, as well as a Screened Zone of Theoretical Visibility plan. These assessments conclude that the overwhelming majority of the nearby visual receptors and those in the wider countryside would not be affected or effects would be limited were the site at Land South of Shelford Road, Fulbourn to be allocated. The landscape sensitivity assessment supports the site as an appropriate site for development.

2.19. The site is also assessed within the Greater Cambridge Landscape Sensitivity Assessment (November 2021) as part of a larger Assessment Unit FUL05 of medium sensitivity to residential and mix-use developments. This assessment identifies that with medium landscape sensitivity any landscape character effects of the development of Land South of Shelford Road, Fulbourn Site would be moderated and therefore appropriate for allocation as an Edge of Cambridge site.

2.20. Therefore, it is considered that Land South of Shelford Road, Fulbourn is an appropriate Edge of Cambridge allocation that would provide a variety and choice of housing in a sustainable location.

Changes to the Plan

2.21. The Local Plan should be modified in order to address the matters of soundness raise above. Additional allocations should be made sustainable peri-urban and rural locations that can come forward quickly and support the overall delivery of the plan. This should include further development at Fulbourn.

2.22. Sites such as Land South of Shelford Road, Fulbourn (the Site), which measures approximately 14ha and would deliver approximately 300 dwellings, should be allocated within the Plan to assist with providing a mix of house types and tenures (Appendix 1 - Site Location Plan). Miller Homes is committed to bringing it forward within the next five years thereby providing certainty of housing delivery, reducing reliance on windfall alongside strategic sites, and increasing headroom within the overall housing supply.

2.23. The Site benefits from being within a 12-minute walk to local facilities in Fulbourn village centre including pre-schools, primary school, pharmacy, heath centre, public houses, community centre and library.

2.24. Fulbourn also benefits frequent buses and the Fulbourn greenway which enables multiple forms of active travel (walking, cycling and riding) into Cambridge city centre. Land south of Shelford Road is technically unconstrainted, deliverable and developable and therefore provides Miller Homes an opportunity to maximise existing connectivity and the strong spatial relationship with Cambridge city centre by creating a benchmark project. That will adopt climate change and carbon neutral principles by 2050, directly in line with the Council's vision.

2.25. The Site can make an immediate contribution to addressing the housing land supply shortfall. As a well-established developer Miller Homes has a long history of delivering sites efficiently. The full range of benefits include:

- Provision of approximately 300 new dwellings, boosting the supply of homes
- Provision of up to 120 affordable homes (40%) in an area where there is significant need, addressing affordability concerns within the Plan area.
- Provision of public open space, with over half the site being green infrastructure with strong active travel connections to Fulbourn recreation ground via Dogget Lane.
- New active travel connections to Cambridge Road linking to Fulbourn Greenway into Cambridge City Centre including Fulbourn hospital and Peterhouse Technology Park to the west as well as links into Cambridge City supporting the Vision for Cambridge.
- Support and enhancement of local community facilities and village vitality, including the including a health centre, primary schools, pre-schools, library, and recreation ground in accordance with NPPF Paragraph 83.
- Provision of new green space for wildlife with Biodiversity Net Gain exceeding 10% across all metrics.
- Sustainable location within walking distance of the local community facilities including a health centre, primary schools, pre-schools, a food store, library, and recreation ground and public house alongside a regular bus service every 15 minutes into Cambridge City Centre.
- Economic benefits arising from jobs created during the construction phase, and the contribution of future residents towards local economic growth.

Policy S/SH: Settlement Hierarchy

The role of the settlement hierarchy

2.26. The Settlement Hierarchy groups settlements into categories that reflect their scale, characteristics and sustainability to ensure development is located in the most sustainable places.

2.27. Fulbourn is currently identified as a Minor Rural Centre, which limits residential development to schemes of up to 30 dwellings. Whilst this approach seeks to protect local character, in the case of Fulbourn it is contrary to the village's indicative neighbourhood plan housing requirement of 101 new homes. Fulbourn is a highly sustainable location, benefiting from strong sustainable transport links to Cambridge, including the improved cycleway, and a range of services and facilities within the village centre, including a health centre, primary schools, pre-schools, a food store, library, and recreation ground. These characteristics are comparable to those of settlements identified as Rural Centres, such as Great Shelford and Stapleford, Histon and Impington, and Sawston. As such, Fulbourn exhibits the attributes of a Rural Centre, and its settlement classification should therefore be amended.

2.28. Furthermore, Fulbourn has good access to a secondary school with links to The Netherall School; employment opportunities with Fulbourn hospital and Peterhouse Technology Park to the west as well as links into Cambridge City. Reclassifying Fulbourn as a Rural Centre would better reflect its sustainability credentials aligning with the vision for Cambridge, reflecting its status with comparable settlements and supporting rural vitality in accordance with paragraphs 72 and 83 of the NPPF.

2.29. The infrastructure of Fulbourn can accommodate new homes. The local primary school is at 80% capacity in the 25/26 academic year and is predicted to rise to 92% in 29/30 academic year as demonstrated in the 2025 primary pupil forecasts[4], making the settlement a sustainable choice from an education standpoint. In accordance with NPPF Paragraph 83, development that supports local services and enhances the vitality of rural communities should be identified in planning policies.

[4] See Fulbourn Primary School | Pupil forecasts

Policy S/GB: The Cambridge Greenbelt

2.30. Policy S/GB and supporting evidence in the Green Belt Assessment (2026), concludes that there is no requirement to release the Green Belt as it is considered that 'exceptional circumstances' are not in place.

2.31. Paragraph 148 of the NPPF states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate. However, the new site allocations, do not present sustainable patterns of development, due to the proposal to deliver new strategic sites beyond the Green Belt. This means that these sites will not be located near Cambridge Centre and have the potential to manufacture over reliance on the private car to access services, facilities and employment, therefore not being in compliance with paragraph 110 and 115 of the NPPF. This stance is supported by conclusions in the Sustainability Appraisal 2025, which identifies the potential impacts of development 'jumping' the Green Belt, as some elements of development will be provided in locations that are less well related to existing services, facilities and jobs, which may result in increases in vehicle travel.

Grey Belt assessment

2.32. The Greater Cambridge Greenbelt assessment review (2026) does not accord with national policy guidance. The methodology has gone beyond a reasonable interpretation of Purpose D, which is to preserve the setting and special character of historic towns. National planning guidance is clear that this refers to towns, not villages. Furthermore, in order to make a strong contribution it should be a *considerable contribution*. Whilst the list in the PPG is not exhaustive it suggests that this could be a result of being adjacent to, within or of significant visual importance to the *historic aspects* of the town.

2.33. It is therefore a significant over-extrapolation for the methodology to result in virtually all parcels in villages close to Cambridge making a *strong* contribution

to purpose D, especially given it should be relative to the *historic aspects* of the town and should have visual importance.

2.34. For instance, parcel FU16, purportedly makes a strong contribution to purpose D and would result in high levels of harm. However, Miller Homes considers under the definition of Grey Belt land and relevant national planning guidance, the site does not make a strong contribution to Green Belt purposes (a), (b) or (d). This is laid out below:

Purpose A – to check the unrestricted sprawl of large built-up areas

2.35. There are physical features in reasonable proximity that could contain development namely hedgerows, Shelford Road to the north-west and Babraham Road to the east and rather its development would help foster a natural settlement boundary to the village of Fulbourn.

Purpose B – to prevent neighbouring towns merging into one another

2.36. The Site does not form a substantial part of a gap between towns, and there would be no loss of visual separation of towns. This is supported by the initial Green Belt Assessment in 2021 which stated that the parcel made a limited/ no contribution to this aim.

Purpose D – to preserve the setting and special character of historic towns

2.37. The Site does not form part of the setting of a historic town as Fulbourn is a village. Furthermore, the Miller's land interests within FU16 show a Zone of Theoretical Visibility (see Appendix 2) that does not extend into the historic aspects of Cambridge.

3. Conclusion

3.1. Miller Homes considers that the Greater Cambridge Local Plan, in its current form, fails to meet the NPPF tests of soundness at Paragraph 36. Specifically:

- The Plan is not justified (NPPF Paragraph 36(b)) – the growth strategy relies on new settlements and strategic growth locations without adequate consideration of reasonable alternatives, including meeting the housing need in areas such as Fulbourn.
- The Plan is not effective (NPPF Paragraph 36(c)) – the reliance on new settlements and strategic sites with long lead-in times, supported by an assumption that lead times and build out will follow existing trends, creates an ineffective strategy that places the Councils' immediate five-year housing land supply at risk. The Plan also fails to provide for deliverability over the plan period.
- The Plan fails to accord with NPPF Paragraphs 72– by not providing for a mix of sites, including non-strategic sites that are essential for sustained growth and can come forward within the first five years of the plan period.
- The Plan fails to accord with NPPF Paragraph 83 – by neglecting the needs of rural communities and failing to allocate sites that will support and enhance the vitality of rural communities such as Fulbourn.

3.2. Accordingly, Miller Homes consider that, to address these soundness concerns, Land South of Shelford Road, Fulbourn be allocated within the Greater Cambridge Local Plan.

3.3. The site aligns closely with the Councils' Vision for Cambridge, occupies a sustainable location, close to Cambridge city and is capable of early delivery, and would maintain the vitality of Fulbourn. The Site would provide housing in a sustainable and suitable location supported by active travel, housing delivery and long-term place-making objectives.

3.4. Its allocation would increase flexibility within the housing strategy, strengthen the Plan's deliverability and make a meaningful contribution towards maintaining a robust five-year housing land supply upon adoption of the Local Plan.

3.5. NPPF paragraphs 82 and 83 state that planning policies should be responsive to local circumstances and support opportunities to bring forward rural sites to meet local need. Fulbourn is currently classified as a Minor Rural Centre and should it be upgraded to a Rural Centre given the range of services and facilities within the village and within close proximity in the city.

Appendices

1. Site Location Plan
2. Landscape and Visual Appraisal



Key

Site Location

Plans

Planning

Land South of Shelford Road, Fulbourn

Miller Homes

Site Location

14.37 HA

Scale : 1:3444@A3

Drawn By:	Checked By:	Date:
MB	MB	15/09/2026

0 10 20 30 40 50 m

Marrons

Draft Greater Cambridge Local Plan Regulation 18 Consultation (December 2025 – January 2026).

Representations (Landscape and Visual Issues).

Land South of Shelford Road, Fulbourn.

On behalf of Miller Homes.

Date: 30/01/2026 | Pegasus Ref: P25-3161EN

Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	28/01/2026	RC	RC	First Issue.
V2	30/01/2026	RC	RC	Client's comments.

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Appendix 1: Screened Zone of Theoretical Visibility Plan

1. Introduction

1.1. In 2021 Pegasus had been appointed by Miller Homes to provide a preliminary Landscape and Visual Appraisal and a Green Belt Review, with input into the Vision Document for the proposed residential development on land South of Shelford Road, Fulbourn ('the Site').

1.2. Following this, Miller Homes have commissioned Pegasus Group to prepare this Representation (Landscape and Visual Issues) in response to the recently published *Draft Greater Cambridge Local Plan Regulation 18 Consultation (December 2025 – January 2026),* hereafter referred to as the '*Local Plan Regulation 18 (2025 - 2026)*'.

1.3. The Council's on-line mapping 'Greater Cambridge Local Plan HELAA site assessments (published 1 December 2025)'[1] identifies the Site as 'Site 115715' and HELAA 'Site 51610' (dated 2023).

1.4. The Council's recently published *Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) 2025* (October 2025), pp 90 – 91, identifies the Site as 40501 and 115137.[2] The Council, however, has not assessed the Site with the justification stating: 'New contact details'.

2. Greater Cambridge Local Plan HELAA site assessments (published 1 December 2025)

2.1. The HELAA site assessment for the Site (Site 115715' and HELAA 'Site 51610') is informative and acknowledges that: ***"Development of the site has some potential policy constraints, but these could be overcome through the planning application process."*** Limited constraints within the Site are a compelling argument for the Site to be allocated. There are

[1] https://placemaker.greatercambridgeplanning.urbanintelligence.co.uk/p/document/5/?appid=fb3771f8fa0f42e2af8511978fd8ec62

[2] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-11/SDGCLPDGCHELAAARDec25.pdf

no statutory or non-statutory landscape designations within or around the Site that would be noted in the adopted[3] and emerging Local Plan, or on DEFRA's MAGIC on-line portal. Indeed, as illustrated by the Council's on-line 'Adopted Policies Map for Cambridge and South Cambridgeshire' the Site is segregated from the Fulbourn Conservation Area (protected through Policy NH/14) and the Protected Village Amenity Areas (under Policy NH/11) and apart from Green Belt, which is a spatial policy, there are no landscape and visual constraints to the Site.[4] This is confirmed in the HELAA site assessment.

2.2. It is noted that there are a number of assets located in the landscape south west and south of Fulbourn, such as nature conservation and heritage designations, a number of Public Rights of Way (PRoWs) including the E2 European Long Distance Route, and a County Wildlife Site and Local Nature Reserve at Gog Magog Hills, which coincides with the Wandlebury Country Park. These Assets, however, are located some distance away and had been appraised as part of Pegasus' earlier work evidencing the inconsequential visual effects upon these visual receptors. In other words, whilst important in their own right, these assets do not pose any constraints upon the Site's development from an LVIA point of view.

3 https://cambridgeonline.maps.arcgis.com/apps/instant/sidebar/index.html?appid=4c53eca43d384cde950d62a183ee108a

4 https://cambridgeonline.maps.arcgis.com/apps/instant/sidebar/index.html?appid=4c53eca43d384cde950d62a183ee108a

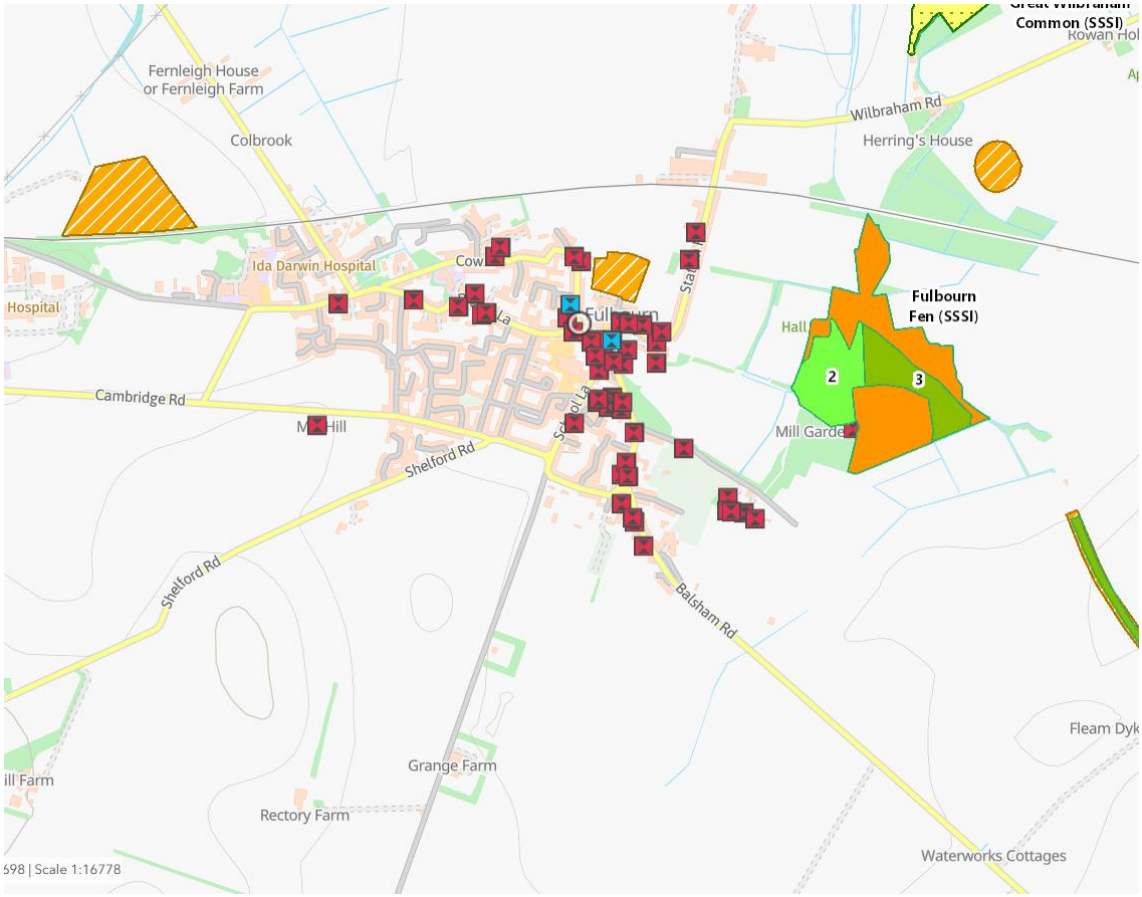


Plate 1 Designation within and around Fulbourn -extract from DEFRA's MAGIC mapping.[5]

2.3. The above HELAA site assessment goes on to say under the 'Final Landscape Summary 2023' sub-heading: ***"However, this site is very open and visible and would introduce a significant amount of development to the south of Shelford Road which currently forms a strong boundary to the village and prevents encroachment into the countryside. Therefore the site assessment remains red."*** Under the 'Final Landscape Summary 2021'

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https://magic.defra.gov.uk/MagicMap.html?chosenLayers=ntrailsIndex,natcycleIndex,pathrouteIndex,pathmarginIndex,VillgreenIndex,doorgreenPIndex,doorgreenIndex,millgreenIndex,millgreenPIndex,cparksprovPIndex,cparksprovIndex,commIndex,section15Index,crowIndex,aonbIndex,lnrPIndex,lnrIndex,nnrPIndex,nnrIndex,npkIndex,ramPIndex,ramIndex,proposedRamsarP,proposedRamsar,siteunitPIndex,siteunitIndex,sssiPIndex,sssiIndex,sacPIndex,sacIndex,sacPossibleP,sacPossible,spaPIndex,spaIndex,spaPotentialP,spaPotential,biosphPIndex,biosphIndex,moncPIndex,moncIndex,whsPIndex,whsIndex,lbuildIndex,batPIndex,batIndex,pagPIndex,pagIndex,comforIndex,lmiIndex,natforIndex,rspbgbPIndex,rspbgbIndex&box=548325:254182:554926:257493

sub-heading it concludes: ***"The site consists of the northern end of a large arable field on the southern edge of Fulbourn, within the Green Belt. The topography is gently undulating and there are extensive views to and from the village in this location. Development of the site would have a significant adverse impact on the landscape character of the area. Development would also impact on key views to and from the village. Even with a reduction in residential units, inclusion of a view gap and landscape mitigation measures, development would have a significant impact on the landscape character."***

2.4. The above is disputed. Whilst the earlier submission had included a masterplan, the landscape planning input into the associated Vision Document evidenced the limited visual effects of the potential development on Site.

2.5. This is discussed later in this Representation.

3. Local Plan Regulation 18 (2025 – 2026) - review

3.1. It is noted that the policies in the *Local Plan Regulation 18 (2025 - 2026)* do not allocate any development sites adjacent to the south of Fulbourn and the Site is not allocated. The 'Vision for Greater Cambridge' is clear: ***"New development must: minimise carbon emissions and reliance on the private car create thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure we need, increase our network of nature, wildlife and multi- functional green spaces, and safeguard our unique, locally distinctive heritage and landscapes."*** The development within the Site has the opportunity to provide the much needed housing within an area that is not constrained by any statutory or non-statutory nature conservation, heritage, or landscape designations. The character of the open countryside and Green Belt are the only constraints. The Site, however, is considered Grey Belt as evidenced in the Grey Belt Site Assessment (July 2025) prepared by Marrons on behalf of Miller Homes.

3.2. The *Greater Cambridge Landscape Sensitivity Assessment* (November 2021), published as part of the *Local Plan Regulation 18 (2025 – 2026)*, is informative in terms of landscape character and visual issues, and identifies the Site as forming part of a larger Assessment Unit FUL05 of medium sensitivity to residential developments – refer to Plate 2.

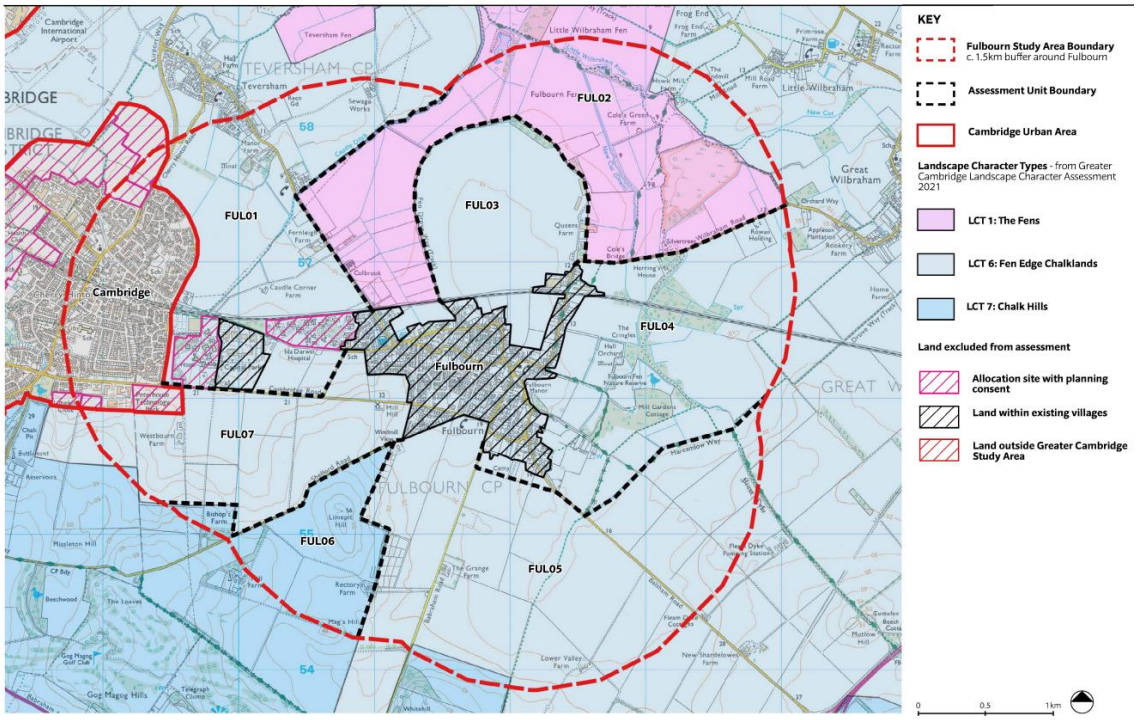


Plate 2 The Site falls within Assessment Unit FUL05 – extract from the Greater Cambridge Landscape Sensitivity Assessment (November 2021), Figure 3.17, p.411

3.3. Whilst the published assessment does not identify the capacity of the local landscape, nor are there any other documents that deal with the landscape capacity issue relevant to the Site, it is clear that with medium landscape sensitivity any landscape character effects of the development on Site would be moderated.

3.4. Indeed, the landscape character effects would be mitigated by the pattern of Fulbourn and its rather abrupt southern edge that exerts some adverse effects on the local landscape and is not being fully mitigated by any structural planting. This is acknowledged by the published assessment: ***"The southern edge of Fulbourn is well defined but harsh…"***.

3.5. It is acknowledged that the development within the Site would affect local views from the road and the nearest residential receptors, and that landscape character effects within the site itself would be at the higher end of the spectrum, but this is an inevitable consequence of any green field site, including the green field sites allocated by the emerging Local Plan.

3.6. In contrast, the development within the Site has the ability to provide new housing whilst ensuring the new settlement edge would be vegetated and effects mitigated, and in turn reducing the adverse influence of the existing dwellings that line the northern edge of Shelford Road. The proposed mitigation planting would help ensure the residual effects upon the surrouding countryside can be mitigated and reduced to an acceptable level. A Landscape and Visual Impact Assessment (LVIA) would support any subsequent planning application submitted by Miller Homes, evidencing the above assertion.

3.7. The Site does not contribute to the setting of Cambridge or its skyline and is partially enclosed by the existing settlement edge with Highfields Farm marking its western edge and coinciding with the western edge of Fulbourn. The development within the Site would form a logical extension to the settlement and would echo its historic evolution from a small

scale nucleated village concentrated around Fulbourn Manor in the late 19th Century to a larger village of a somewhat poly-focal pattern in the mind 20th Century. This then evolved through further development along the highway network and often either side of the roads, infilling land in between.[6]

3.8. The published assessment goes on to identify the following perceptual and aesthetic factors that make the landscape less susceptible to the development: ***"Limited scenic quality in the open, arable landscape"*** and this is true of the proposed Site and indeed its immediate adjacent fields. Whilst attractive in their own right, being open working countryside, the landscape is not of such quality that it warranted being designated or recognised in the adopted or emerging Local Plan, or indeed the *Fulbourn Village Design Guide Supplementary Planning Document* (January 2020). The Site does not fall within the 'Essential Visual Gap' identified in the *Village Design Guide* and falls on the very edge of the 'Fields with sensitive visual relationship with the Village' and on the periphery of the 'Key outwards views from the village'.[7]

3.9. To ascertain the potential effects and suitability of the Site for development, and to support the on-going site promotion by Miller Homes, Pegasus have carried out a site visit in late January 2026. The site visit confirmed the preliminary findings that apart from the close range views from the edge of Fulbourn the overwhelming majority of the nearby visual receptors and those in the wider countryside would not be affected or effects would be limited, confirming Pegasus' assertion that any landscape character effects would also be limited. To support the analysis Pegasus have prepared a screened Zone of Theoretical Visibility plan – refer to **Appendix 1**. It is important to note that the plan does not take into account hedgerows or tree belts or any other vegetation that is not mapped as part of the Ordnance Survey (OS) OpenMap data. This means that smaller areas of vegetation, including tall trees along Balsham Road and those along Babraham Road, leading south from

[6] *Fulbourn Village Design Guide Supplementary Planning Document* (January 2020), Figure 1 'Progression of development', p. 4, https://www.scambs.gov.uk/media/rzdmh3uh/fulbourn-village-design-guide-supplementary-planning-document-2020.pdf

[7] Figure 13 and Figure 17 of the *Fulbourn Village Design Guide Supplementary Planning Document* (January 2020).

Fulbourn to Grange Farm, are not taken into account. Thus, the plan represents a worst case scenario. This could be further evidenced in any subsequent LVIA.

3.10. To support the above conclusion a set of views have been included in this Representation with views taken from the local highways and PRoWs. Views on the approach along Shelford Road are screened or heavily interrupted – refer to Plate 3 and Plate 4 until one arrives at the edge of Fulbourn at which point the influence of the settlement edge is considerable. Views form Cambridge Road and around The Windmill are not affected due to the intervening roadside vegetation – refer to Plate 5 and Plate 6. As illustrated on the below Plate 7, Plate 8, Plate 9, and Plate 10 views from certain sections of Babraham Road will afford views of the scheme but the introduced dwellings would always be seen against the existing development in Fulbourn which acts to mitigate against the change. Views from the wider countryside: Balsham Road and Public Footpath leading south, are substantially restricted and increasingly distant to the point where the existing settlement edge becomes inconsequential. The same would be true of the development within the Site.



Plate 3 ***View 1****: View from Shelford Road (brow of the hill) as one descends towards Fulbourn. The Site is not discernible for a traveling road receptor.*



Plate 4 ***View 2****: View from Shelford Road (approaching Highfields Farm) as one approaches Fulbourn. The Site is screened by a roadside vegetation.*



Plate 5 ***View 3****: View from footway along Cambridge Road, eastern side of The Windmill. The Site is screened by a roadside hedgerow.*



Plate 6 ***View 4****: View from footway along Cambridge Road, eastern edge of Fulbourn. The Site is screened by a roadside hedgerow. Rooftops along Huntsmill are visible.*



Plate 7 ***View 5a****: View from the southern section of Babraham Road, near the Pumping Station. The Site is screened.*



Plate 8 ***View 5b****: View north along Babraham Road, near the Pumping Station, illustrating the associated hedgerows and trees that screen / restrict views out.*



Plate 9 ***View 6****: Incidental view from the central section of Babraham Road, opposite Grange Farm. The Site is c. 830 m away at its closest point and in front of the properties along Shelford Road.*



Plate 10 ***View 7****: View from the northern section of Babraham Road, near the Cheeky Monkeys Play Barn. The Site is c. 270 m away at its closest point and in front of the properties along Shelford Road.*

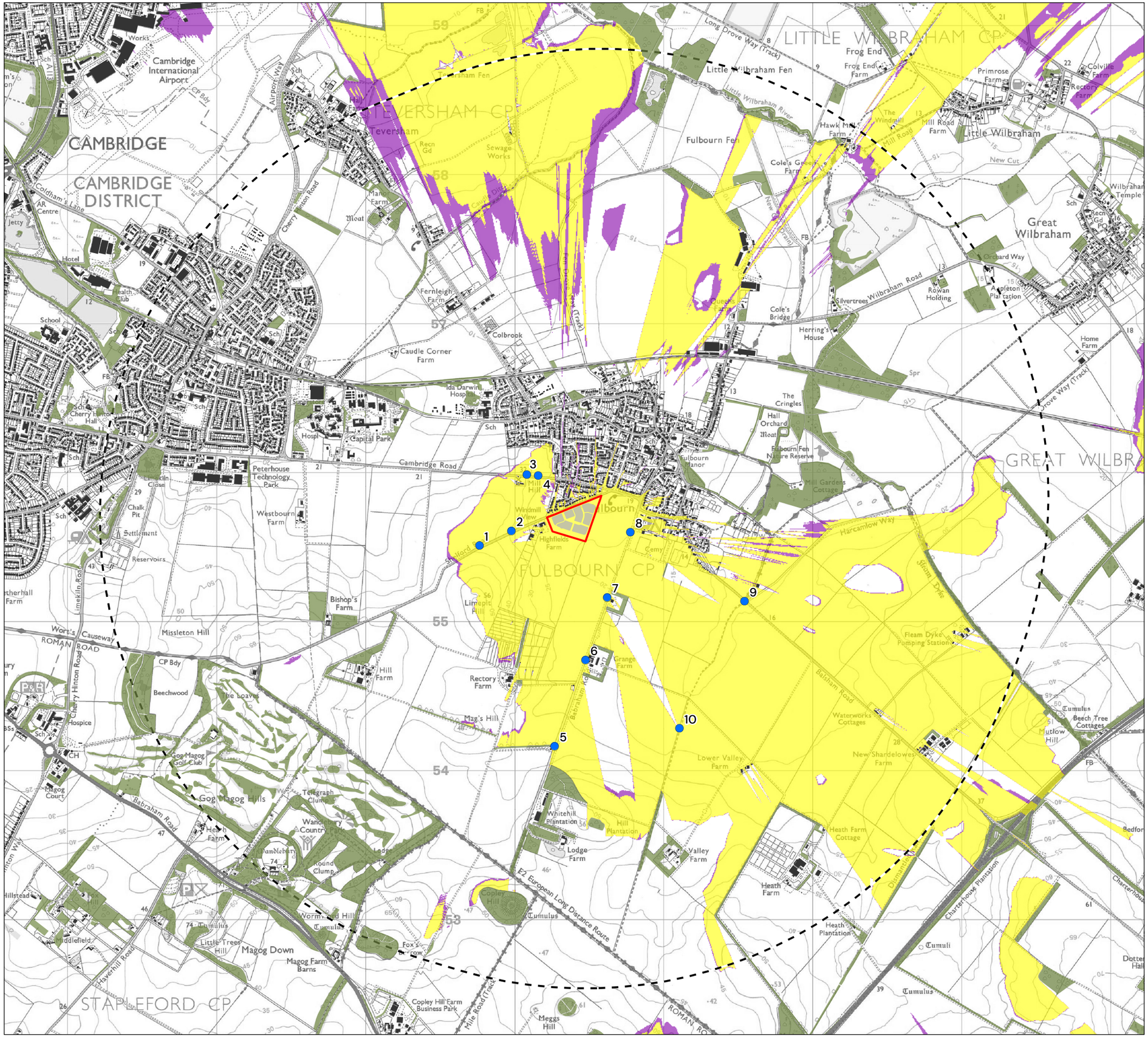


Plate 11 ***View 8****: View from the edge of Balsham Road and Public Footpath leading south. The Site is located c. 1.1 km away and is not easily discernible.*



Plate 12 ***View 9****: View from the southern section of Public Footpath leading south. The Site is located c. 1.1 km away and is not easily discernible*

Appendix 1: Screened Zone of Theoretical Visibility Plan



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KEY

- Site Boundary
- 3km Study Area
- Proposed Development Areas
- OS OpenMap Local Buildings
- OS OpenMap Local Woodland
- Screened Zone of Theoretical Visibility - 9m Development Height
- Screened Zone of Theoretical Visibility - Additional Visibility at 10.5m Development Height
- Viewpoint Locations

Screened ZTV Production Information -
- DTM data used in calculations is OS Terrain 5 that has been combined with OS Open Map Local data for woodland and buildings to create a Digital Surface Model (DSM).

- Indicative woodland and building heights are modelled at 15m and 8m respectively.
- Viewer height set at 1.7m (in accordance with para 6.11 of GLVIA Third Edition)
- Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the proposed development may be visible from, assuming 100% atmospheric visibility, and includes the screening effect from woodland and buildings, based on the assumptions stated above.

REV	DATE	DESCRIPTION
-	-	-

SCREENED ZONE OF THEORETICAL VISIBILITY PLAN

LAND SOUTH OF SHELFORD ROAD

MILLER HOMES

DATE	SCALE	DRAWN	APPROVED
29/01/2026	1:25,000@A3	CS	RC

SHEET	REV	N	0	0.5 KM
-	B			

DRAWING NUMBER
P25_3161_EN_01

PEGASUS GROUP

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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