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Proposed Submission Greater Cambridge Local Plan : Consultation Response

Land at Long Lane, Fowlmere

25/09/2026 Revision VF

Validation

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1 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* ("the site").

1.2 These representations provide a response to the Council's Regulation 19 consultation on the draft Local Plan, focusing on whether the Plan complies with relevant legislation with regards to its 'soundness'. 'Soundness' in the context of Local Plan is based on four tests as defined within the National Planning Policy Framework (NPPF or "the Framework"). As the Plan is being progressed under the legacy system, the tests as per the December 2024 version of the NPPF apply. A plan is found to be 'sound' if it is:

a. ***Positively Prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreement with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

b. ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c. ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d. ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in [the] Framework and other statements of national planning policy, where relevant.*

1.3 Nevertheless, the 2026 NPPF remains an important material consideration insofar as its policies must be taken into account during decision-making from the day of its publication. At Annex A, the NPPF states that "Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight." Despite the Plan progressing under the transitional arrangements, it is considered necessary for any inconsistencies with the 2026 Framework identified throughout this consultation, to be addressed through appropriate amendments to avoid unnecessary burdens on the decision-maker later down the line.

1.4 This submission follows on from previous representations made to the Greater Cambridge Local Plan First Proposals in December 2021 and the Call for Sites consultations prior. The most recent site-specific representation made to the Plan was in January 2026, which reflected a reduced site size and quantum to approximately 65 dwellings. The previous HELAA reference number is 116484. An accompanying site representation based similarly on a reduced site size and quantum under HELAA reference number 115851 resulted in an overall RAG rating of Amber, which is an improvement in the site's wider assessment from a previous red RAG rating.

Croudace Homes

1.5 Croudace Homes is a well-established regional residential developer founded in 1946. To this day it remains a family-owned business.

1.6 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.

1.7 Croudace is proud to create homes of the highest quality, expertly designed by experienced professionals 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 Development Strategy

2.1 The overarching vision for Greater Cambridge is one that is supported, insofar as it sets the objective of delivering sufficient homes alongside supporting infrastructure growth, protecting environmental assets and promoting sustainable patterns of growth. The following considers whether the Development Strategy is positive, appropriate or effective in respect of its consideration for sustainable edge-of-settlement opportunities, capable of providing valuable contributions towards housing delivery during the Plan period.

2.2 The site represents a logical extension to the existing settlement, lying outside of the Green Belt capable of delivering approximately 65 homes. Pertinently, the Council's own assessment process demonstrates an improving assessment of the site's development potential in the context of its Local Plan assessment, moving the RAG rating from Red to Amber (115851). Although the site at this stage has not been taken forward as a consideration for allocation, the evidence published alongside the Plan has not clearly demonstrated the reasons for a site with an improvement assessment being excluded from the development strategy.

Positively Prepared

2.3 The draft Plan is clear in its vision for Greater Cambridge over the plan period, that new development must contribute to the creation of thriving neighbourhoods with the variety of homes and supported infrastructure that is needed. Amongst the seven strategic priorities for the plan is a directive to enhance wellbeing and social inclusion, to create great places and to plan for enough homes to meet all needs, inclusive of those affordable to rent or buy, ensuring that everyone benefits.

2.4 The site at Long Lane, Fowlmere would contribute directly to these stated objectives through the delivery of 65 homes. It is a scale commensurate with the scale of the village, sustainably located on the edge of the settlement, with the capacity to deliver affordable and specialist housing. As a modestly-sized site, it has the potential to be delivered independently of larger strategic sites reliant on major infrastructure upgrades, of which the Plan places a strong emphasis. This site can assist with a valuable contribution towards delivery while maintaining flexibility within the overall housing strategy.

2.5 Policy S/JH establishes the housing requirements for the Plan-period set against the proposed delivery of additional jobs. The Council seeks to provide an additional 73,300 jobs across the Plan, a significant number. This compares with an identified minimum requirement to deliver 48,069. As is stated, this is a minimum housing requirement and the Development Strategy should take a sufficiently flexible approach to account for housing needs above this minimum requirement.

2.6 Greater Cambridge is set to receive around £400 million public and private investment to deliver upon its ambitious economic growth strategy and the support for the knowledge intensive sectors. This aligns with the ambitious job growth numbers. The current identified number of 73,300 is an increase from the 66,000 jobs identified in previous calculations in 2024. This is set against a now-slightly reduced per annum housing requirement over a similar period. Whilst it is acknowledged that housing demographics change over time reflecting a variety of factors, such as an increased working age population, it also reflects a trend towards larger homes and household sizes. Often this is a result of housing unaffordability whereby younger working-age people are unable to leave the family home. The Plan should sufficiently account for this and the inevitable changes across the Plan-period and reflect job growth through a clear housing strategy that delivers an appropriate number of affordable homes.

2.7 For these reasons, it is not considered that the Development Strategy takes a sufficiently positive approach towards all suitable and sustainable opportunities capable of contributing towards identified housing needs.

Justified

2.8 For a plan to be justified, it should represent the most appropriate strategy when considered against the reasonable alternatives and based upon proportionate evidence.

2.9 The site has been assessed by the Council throughout the plan-making process and in its latest assessment, benefits from an improved assessment outcome. Given the site's progression in its overall assessment, its location outside of the Green Belt and its relationship with the existing settlement, it is considered to represent a reasonable alternative capable of contributing to the sustainable development objectives.

2.10 Despite this, the Plan and the associated supporting evidence, does not clearly explain why a site with demonstrated improvement in performance, has been excluded from the development strategy. In the absence of a clear and proportionate justification, it is difficult to conclude that the presented strategy is the most appropriate approach.

Effective

2.11 The effectiveness of the Development Strategy in this case relies upon the timely delivery of allocated sites and the maintenance of sufficient flexibility to respond to changing circumstances over the plan period.

2.12 A clear and robust strategy should comprise a range and choice of sites of varying scales and characteristic, across a range of locations and settlements. The Greater Cambridge Local Plan has been criticised throughout earlier consultations for its significant reliance upon larger strategic sites. When calculating this at Policy S/DS, it is clear that over 80% of new homes are to be delivered on sites of 1000 homes or more. This highlights a clear risk in the flexibility of the Plan, insofar as these sites are heavily reliant on substantial infrastructure upgrade and more susceptible to delays in delivery. It undermines the value and opportunity for smaller to medium sized sites and their capacity to be delivered quickly and earlier in the Plan-period, and the ability of such sites to respond effectively to unforeseen changes in circumstance.

2.13 Small to medium-sized sites are capable of contributing to housing delivery earlier in the plan period, encouraging a diverse supply and reduce reliance on the larger strategic allocated sites. The omission of sustainable and deliverable sites such as the site at Long Lane, potentially reduces the Plan's ability to respond to delays which may occur elsewhere through strategic allocations.

Consistency with National Planning Policy

2.14 The NPPF sets a clear and overwhelming objective to boost the supply of homes. The site represents a positive sustainable opportunity to contribute towards housing delivery in a location which adjoins the existing settlement, and in one that is outside the Green Belt, a constraint that affects a large area of the Greater Cambridge jurisdiction.

2.15 Further, the Framework acknowledges a requirement for Local Plans to accommodate needs not anticipated within the Plan period, encouraging sufficient flexibility to respond to changing circumstances. The draft Plan aligns with the broader national policy aims insofar as it sets clear objectives

to deliver sufficient housing at a strategic level, however the allocation would further support the wider objectives for plan-flexibility.

Conclusions

2.16 The overall objectives of the Plan's Development Strategy are supported, however the omission of the submitted site is not considered to be adequately justified in the context of its sustainable location adjacent to the existing settlement, its location outside of the Green Belt, the potential to deliver approximately 65 homes, the capacity to support the long-term vitality of the village, and its overall improved assessment within the Council's evidence base.

2.17 As such, the Development Strategy should be amended to reflect the role that this site can play in supporting housing delivery across the Local Authority area, and in achieving the Plan's overarching vision and strategic priorities.

3 Site Allocations

3.1 The overall approach to site allocations is supported insofar as it seeks to direct new development towards the areas considered to be most sustainable, and in doing so, protect the character and environmental value of more rural locations. However it is noted that the omission of the site from the allocation strategy does not appear wholly justified and raises some concerns around the effectiveness of the housing delivery strategy relied upon within the Plan.

3.2 The Plan is clear on its strategy for rural locations, stating at 3.5.1 that "*We wanted our rural villages to continue to thrive and sustain their local services, but we don't want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services, while in smaller villages, we propose that only small-scale infill development and affordable housing would be permitted. Any development in and around villages needs to be well-designed for the rural setting, with a strong relationship to landscape.*"

3.3 The broader intention to provide rural villages with the development that they require in order to continue to thrive, and to support local services and facilities is supported. However, the site submitted presents an opportunity to deliver housing growth that is consistent with these objectives.

Justified

3.4 The principal concerns relate to the inconsistency between the findings within the Council's evidence base. The site has been submitted at various points throughout the Local Plan preparation and therefore assessed on numerous occasions. In responding to earlier HELAA assessments, the size of the site and the quantum of homes were reduced and again, presented in various formats. Nevertheless, the smaller site size has recently been considered more favourably than previously concluded (note site with HELAA reference 40309) and should be regarded as a reasonable alternative within the site selection process.

3.5 Earlier assessments of the site scored the landscape impact of development as red, noting that the development of the site (in a larger capacity) would have a significant adverse impact on the settlement character due to high wide and local views and low lying nature of the open landscape. The assessment against HELAA reference 51059 specifically notes that "*A significantly reduced scheme may be acceptable subject to landscape mitigation and retention of PROW*". When assessing later submissions, the assessment concludes that "*The landscape impact of the proposed development would be minor adverse. Landscape mitigation needed and the form of development to reflect the existing settlement pattern and to have a rural approach*", acknowledging the capacity of the site to apply suitable and effective mitigation, moving the overall RAG rating to amber.

3.6 Despite the improvement in assessment scores, the evidence does not clearly explain the reasons for the continued exclusion of the site from the final allocation strategy and therefore the Plan does not demonstrate that the selected allocations represent the most appropriate strategy in the context of all reasonable alternatives.

Effective

3.7 The effectiveness of the Plan's strategy for allocated sites depends upon a heavy reliance on large strategic sites and new settlements. Despite the stated intentions to continue the support for the vitality

of rural settlements, very few new allocations have been committed to in such locations, with the vast majority proposed in a single settlement in Melbourn, a large village.

3.8 The Plan has been scrutinised throughout earlier consultations for its high reliance on large sites and the lack of consideration for unanticipated delays and the potential resultant issue that delivery stagnates in earlier stages of the plan period. An allocation strategy that seeks to deliver homes in a much more balanced manner is often seen as more resilient to unforeseen circumstances and delays. For this reason, smaller and medium-sized sites can make a significant contribution to housing supply due to the potential for them to come forward quickly without being overly dependent on complex infrastructure investment and improvements.

3.9 The submitted site represents this type of opportunity. An allocation of c.65 dwellings would strengthen the flexibility within housing supply and enable further confidence that housing needs can be met across the period.

Consistency with National Planning Policy

3.10 National planning policy requires all local plans to identify a sufficient number of sites available to meet development needs and to maintain a flexibility across the period to account for changes in circumstances. The submitted site is a sustainable, available and deliverable site that is capable of contributing towards housing requirements whilst being of a scale commensurate with the settlement and able to support the vitality of the village. The omission of the site, as such, is not clearly supported by the evidence currently presented.

Conclusions

3.11 The submitted site represents a clear reasonable and sustainable alternative that has not been shown demonstrably to be less appropriate than the preferred allocation strategy. The Council's evidence base has shown an improvement in its overall assessment however the rationale for its exclusions remains unclear and not suitably justified.

3.12 It is considered therefore that the Plan should be amended to allocate the site for residential development on the basis of its reduced scale and quantum.

4 Local Plan Themes

Wellbeing and Social Inclusion

4.1 The strategic priority identified within the draft Plan sets out the intention to "*Help improve equality of access and opportunities for people in Greater Cambridge to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs*." The development of 65 homes on the edge of the settlement of Fowlmere provides the opportunity for a range of housing types and tenures to be delivered that align with a specific local need. For a village with little to no further commitments within the draft Plan in terms of housing or wider development, it is vital that new and varied housing opportunities are presented to ensure the whole community benefits from options in which to remain within the settlement.

4.2 A development of approximately 65 homes would provide clear support for local services, increase housing choice and contribute towards meeting identified housing needs.

Great Places

4.3 The strategic priority to sustain the unique character and identity of Cambridgeshire settlements through well-design and distinctive development is strongly supported. Further, the emphasis placed on landscape integration, high quality design, accessibility, biodiversity and the creation of places where people want to live, work and visit is supported.

4.4 The submitted site presents an opportunity to deliver a development that aligns closely with these stated objectives through a carefully planned design that reinforces local character rather than detracts from it. The site is closely located to the village's edge and represents a logical and natural extension to the village. The development of the site has the potential to relate closely to the village's existing built form, enabling new housing to integrate appropriately within the existing community. The Council's own assessment of the site has specifically agreed that there is a suitable capacity of the site to apply appropriate and effective mitigations that would enable an attractive rural transition on the settlement's edge.

4.5 The site's location also presents an opportunity to create a high quality gateway into the village. Through a landscape-led approach, the development of the site could establish a carefully considered transition between the rural landscape and the built-up settlement edge, providing an attractive arrival point that contributes positively to local distinctiveness.

Homes

4.6 The strategic priority of the Plan and the policies relating to homes sets out the intention to plan for enough housing that meets all identified needs and includes for significant quantities of housing that is affordable to rent or buy, alongside a variety of homes to suit diverse communities. This is supported.

4.7 Land at Long Lane, Fowlmere, represents a sustainable and deliverable opportunity to contribute towards these objectives through the provision of approximately 65 homes, including a strong contribution to affordable housing and specialist housing types. The site would contribute towards a more diverse land portfolio, complementing rather than competing with the larger strategic allocations upon which the Plan is so heavily reliant.

4.8 The site's location immediately adjoining the existing settlement ensures that future residents would benefit from convenient access to the village's existing facilities and services, and the additional residents

would ensure continued support for these whilst increasing a demand for improvements or upgrades where necessary.

4.9 The Council's evidence base has demonstrated that an improvement to the site's assessment therefore highlighting that it represents a sustainable and deliverable housing opportunity that aligns with the wider strategic aims of the plan in meeting the needs for housing in the right locations. Accordingly, the omission of the site from the allocation strategy is not fully justified, particularly given its ability to deliver new market and affordable homes that strengthen housing support, provide flexibility across the plan period, support the vitality of the settlement and provide development of an appropriate scale in a sustainable location.

Infrastructure

4.10 The strategic priority for infrastructure within the draft Plan sets out the intention for transport, water, energy and digital networks, as well as health, education and cultural facilities to be provided in the right places and built at the right times to serve our existing and growing communities. This is supported.

4.11 This objective recognises a wider need for improvements to infrastructure to accommodate for a growing number of people and a significant growth in the planned number of jobs. The site represents a development opportunity that can come forward alongside existing infrastructure without a requirement for any significant works insofar as there are existing highway access opportunities, village facilities, existing utility networks and an availability of nearby public transport services. Growth within the village does not require significant strategic infrastructure upgrades nor is it reliant on the delivery of a strategic transport project.

4.12 In this sense, a small to medium scale site such as this can assist with housing delivery without being overly reliant on major infrastructure upgrades, which contrasts with the larger strategic allocations put forward.

5 Conclusion

5.1 The overall vision and strategic objectives of the Proposed Submission Local Plan are broadly supported however the omission of the submitted site at Long Lane, Fowlmere, means that the Plan has not been demonstrated to be entirely positively prepared, justified, effective or consistent with national planning policy.

5.2 The site represents a reasonable and suitable alternative capable of delivering approximately 65 homes, including affordable housing and a diverse range of types and sizes. Its scale is proportionate to the village and is accessible with regards to existing services and facilities. It has the capacity to support the continued vitality of the settlement without a reliance on major strategic infrastructure.

5.3 The Council's own evidence has demonstrated that the site's assessment has improved following a reduction in its extent and development quantum. The latest assessment recognises that the landscape impacts are capable of being overcome through appropriate mitigation, to a level which responds to local character and the settlement pattern. Notwithstanding this material improvement, the evidence does not clearly explain why the site has remained excluded from the allocation strategy.

5.4 The site, as a medium-scale development, would diversity the Plan's housing portfolio and provide a flexibility against the delivery of infrastructure-reliant strategic sites. Its allocation would provide a realistic opportunity for housing delivery earlier in the Plan-period whilst supporting the sustainable growth of rural settlements.

5.5 Accordingly, the omission of the site has not been adequately justified against the reasonable alternatives and its allocation would strengthen the soundness of the Plan by supporting a more positive, balanced, flexible and deliverable development strategy.

Main Modification Request

5.6 To amend the site allocation framework to include the site as a residential allocation capable of delivering approximately 65 dwellings during the Plan-period.

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