Boyer

LAND WEST OF LONDON ROAD, FOWLMERE

Greater Cambridge Draft Local Plan Reg 19 Consultation

Prepared on behalf of Wates Developments | September 26

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1. INTRODUCTION

1.1 These representations have been prepared by Boyer Planning on behalf of Wates Developments and the Landowners (Martin Frederick Sheldrick, James Nicholas Sheldrick, Christopher John Ralph Sheldrick, Barr Ellison Trust Corporation Ltd, Raywood Ash Ltd, Annette Margaret Sheldrick and Benjamin Charles Sheldrick) in response to the Greater Cambridge (Regulation 19) Consultation Document (hereafter referred to as the "Pre-Submission Local Plan").

1.2 The representations in this document specifically relate to land west of London Road, Fowlmere ("the Site"), which is being promoted for residential development. A Site Location Plan is included at **Appendix One**. The site at Fowlmere is located within South Cambridgeshire District.

1.3 Wates Developments Limited previously submitted representations to the 'First Conversation' consultation in February 2020 and the 'First Proposals' in November/December 2021. The Site was submitted to the Call for Sites at the same time, whilst updated information was also submitted to the more recent exercise in 2025. Representations have also been submitted for the Site at the more recent Regulation 18 Draft Local Plan stage, undertaken between December 2025 and January 2026. The emerging Local Plan has therefore been informed by several rounds of consultation and feedback in the form of representations from a range of stakeholders.

1.4 The Pre-Submission Local Plan proposes specific policies and site allocations, as Greater Cambridge moves further towards submission of the Local Plan for examination.

1.5 The consultation document identifies four themes that influence how homes, jobs, and infrastructure are planned (conveyed through the proposed development strategy) giving rise to a total of eight strategic priorities around which the Pre-Submission Local Plan document is structured, as follows:

- Development Strategy
- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion
- Great Places
- Homes
- Jobs
- Infrastructure.

1.6 These representations respond to relevant parts of the Pre-Submission Local Plan, in chronological order as they appear within the document, ordered in accordance with these strategic priorities.

1.7 Consideration has been given to whether the Pre-Submission policies meet the tests of soundness set out by paragraph 36 of the National Planning Policy Framework (NPPF, December 2024, hereafter referred to as NPPF24).

1.8 The NPPF24 tests specify that for a Plan to be sound, it must be:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements 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 reasonable alternatives, and is 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 this Framework and other statements of national planning policy, where relevant.

1.9 This is based on the assumption that the Plan is intended to be submitted for examination by the end of 2026, on which basis the tests specified in the previous Framework continue to be applicable, in accordance with the plan-making guidance on Implementation set out at Annex A, para. 8 of the August 2026 NPPF, hereafter referred to as NPPF26.

1.10 It is noted that the Pre-Submission Local Plan reached Regulation 19 consultation on 3 August 2026. Provided Greater Cambridge are able to submit their Local Plan for examination prior to 31 December 2026 then it is understood the emerging joint Local Plan can continue to progress under the legacy plan-making system and its soundness determined against NPPF24, in accordance with its transitional arrangements.

1.11 On this basis, we have made reference to the tests of soundness and other policy considerations as set out in NPPF24. In this regard it is also noted that para. 16 of the Framework establishes the framework for the preparation of Local Plans.

1.12 This sets out that plans should, inter alia, a) be prepared with the objective of contributing to the achievement of sustainable development; b) be aspirational but deliverable; d) contain policies that are clearly written and unambiguous; and f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

1.13 It is noted that para. 1.16 of the Pre-Submission Local Plan states that at the time of the plan's preparation the final new NPPF had not been published. It is assumed that this position will be amended prior to submission of the plan as a factual update.

1.14 Chapter 2 of these representations sets out comments on the proposed development strategy. Chapter 3 addresses the remaining strategic priorities (themes). Chapter 4 provides a brief summary of information on Land West of London Road, Fowlmere, further to coverage in previous representations (at Reg 18 stage).

1.15 The Site being promoted by Wates as the subject of these representations is located in Fowlmere which retains its status as a 'Group Village' within the emerging Pre-Submission Local Plan.

2. DEVELOPMENT STRATEGY

Development strategy

2.1 The proposed approach of a blended strategy which draws on a range of strategic principles to direct development to where it will limit climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live is broadly supported. We also consider the principle of this strategy to align with the NPPF and its key principles of achieving sustainable development. However, it is considered that application of this strategy has failed in certain respects, most notably in unduly restricting levels of growth within the Rest of the Rural Area, instead relying on a comparatively small number of strategic sites to deliver the majority of the housing requirement.

2.2 With regard to the strategy for the Rest of the Rural Area the Pre-Submission Local Plan states (at para. 3.5.1):

"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. 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."

2.3 This maintains the same wording from the Regulation 18 stage, but altered from the First Proposals stages, reflecting greater emphasis on access to transport links and services, rather than the size of the village, an approach which is supported.

2.4 The Site being promoted by Wates and which is the subject of these representations is located in Fowlmere which is identified as a 'Group Village' within the Pre-Submission Local Plan, which also maintains the adopted Local Plan position that minor development (maximum 8 dwellings) will be permitted within the development frameworks for these settlements. By exception, up to 15 dwellings may be proposed where this would make better use of a single brownfield plot.

2.5 Across the rural areas, owing to their location, communities are not usually served by public transport links that are as well connected or indeed frequent as urban areas. However, the reduced services should not be seen as a barrier or restriction to provision of growth as rural areas provide a variety of other services and facilities and work as a network, in tandem with other rural centres, to meet local needs. It should also be recognised that ensuring further growth at suitable villages in the rural area will inevitably support on-going investment in both new and existing services that will enhance accessibility.

2.6 Land West of London Road, Fowlmere, offers a sustainable location for development, which has scored positively in the Councils' HELAA assessment (Site ref: 40116). The Site benefits from good transport links, including bus services, which connect the Site to other settlements

benefitting from train stations. Further details are set out later in this statement, whilst a Vision Document and alternative HELAA assessment have accompanied previous (Reg 18) submissions.

Policy S/JH: New Jobs and Homes

2.7 Policy S/JH sets out the level of need for jobs and homes in Greater Cambridge for the plan period of 2024-2045, whilst the supporting text discusses the basis for these, having regard to topic papers and evidence base documents.

2.8 It specifies that the plan will make provision for an additional 73,300 jobs in support of Greater Cambridge's knowledge intensive sector, and a diverse range of local jobs more generally, and a minimum of 48,069 new homes to meet the needs for the total population, including affordable housing and specialist accommodation needs of specific groups.

2.9 Key matters to address are whether the plan period has been appropriately defined and, in turn, whether the quantum of both employment and housing development identified is sufficient to meet the objectively assessed needs for the Greater Cambridge area.

2.10 On the first of these points, it is noted that the plan period encompasses a total of 21 years, from 2024 through to 2045. Whilst, on the face of it, this appears to be a reasonable timeframe, it is important to consider whether this would meet the NPPF24 requirement (set out at para. 22) for strategic policies to look ahead over a minimum 15-year period from adoption, and for policies to be set within a vision that looks ahead at least 30 years, where larger scale developments such as new settlements and significant urban extensions are proposed.

2.11 The Pre-Submission Local Plan suggests that adoption may not be envisaged until 2028/29, meaning that whilst this would theoretically provide for 16 years post-adoption, any further delay to the plan-making and examination process would risk falling below the minimum 15-year timeframe, whilst arguably a longer period should be covered on account of the large sites included in the strategy in any event.

2.12 National planning policy sets out that Local Plans should provide for the objectively assessed needs for housing and other uses. Para. 2.8 of the Pre-Submission Local Plan outlines the interrelationship between jobs and housing provision, explaining that in addition to ensuring that minimum housing requirements arising from application of the mandatory standard methodology are met, regard should be had to the need to support economic growth and productivity. This is particularly relevant in the context of the importance of Greater Cambridge's continued economic growth on a national scale, a point which is also acknowledged at para. 2.8 of the Reg 19 Local Plan, as justification for exploring higher employment and related housing figures.

2.13 During evolution of the emerging Local Plan, the Government has published statements underlining this important role, including 'The Case for Cambridge' in March 2024 and 'Realising the Full Potential of Greater Cambridge' in October of the same year, which outline aspirations for delivery of 150,000 new homes by 2050 in order to support economic growth.

2.14 National planning policy provides information for local plans to support the Government's objective to boost the supply of homes, including the minimum provision of the number of homes informed by a local housing need assessment using the standard method in national planning guidance. Planning Practice Guidance notes that there will be times that the housing need is higher than indicated by the standard method. The Greater Cambridge economy is nationally important and therefore there is clear justification for higher employment and housing figures.

2.15 The Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU) identifies the Government's Standard Method for the calculation of the minimum housing need and notes that this increased significantly in 2024. The calculation was combined across Cambridge and South Cambridgeshire, and the assessed needs for homes applied together for the purposes of housing delivery including calculating housing land supply and the Housing Delivery Test.

2.16 With regard to jobs, the EHEU sets out a central scenario as the most likely outcome for employment growth, requiring an additional 73,248 jobs by 2045. However, it also identifies a higher scenario of 90,900 jobs that may be achievable. It goes on to conclude that application of the standard method requirements for housing would support 73,362 jobs (using its preferred 2011 commuting assumptions) and that the central scenario would therefore be achieved via the standard method derived housing growth levels.

2.17 Whilst the supporting text of the Pre-Submission Local Plan acknowledges that the EHEU recommended the need for flexibility to allow for potential achievement of higher job growth, so as not to restrict employment growth, it is unclear that this has been reflected in the wording of Policy S/JH itself, given application of the lower, central scenario and acceptance of the standard method on the basis that its housing levels would meet this.

2.18 As such there is a potential risk of restricting job growth and failing to meet the economic objective of sustainable development included in NPPF24 (para 8a). As set out in Paragraph 86a, planning policies should set out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth. As noted above, and acknowledged elsewhere in the Pre-Submission Local Plan, this is of particular importance given the aspirations to ensure the future economic growth potential of the Greater Cambridge sub-region is fully realised.

2.19 In order to provide flexibility to facilitate higher jobs growth, it will be necessary for the Greater Cambridge Local Plan to also provide flexibility in the delivery of additional homes to support any additional jobs and to reduce levels of in- and out-commuting to and from Greater Cambridge, and the resulting impacts this would have on climate change and congestion.

2.20 The latest standard method information (from May 2026) indicates a need for delivery of a minimum of 1,085 dwellings per annum in Cambridge City and 1,204 in South Cambridgeshire, equating to an annual figure of 2,289 across the joint plan area. Over the

21-year timeframe of the proposed plan period this therefore establishes a minimum requirement for 48,069 new homes, which is correctly identified in Policy S/JH.

2.21 Whilst the Councils propose allocation of enough sites to provide a buffer to enable flexibility to deal with unforeseen circumstances (under Policy S/DS, on which we provide separate comments), flexibility to support higher jobs growth should also be incorporated in the Local Plan.

2.22 To provide for appropriate flexibility for unforeseen economic growth, a range of additional contingency site allocations should be included within the housing trajectory. This will ensure the Local Plan is positively prepared, justified and effective in accordance with the NPPF24 tests of soundness. Land West of London Road, Fowlmere offers a sustainable location for development and is immediately available for development, therefore able to contribute to the Councils' short- to medium-term housing delivery rates.

2.23 In view of these assertions, it is considered that Policy S/JH is unsound, being neither positively prepared nor effective in meeting the economic growth aspirations for Greater Cambridge.

Policy S/DS: Development Strategy

2.24 It is noted that the 'Overview' section of the supporting text, at para. 2.53, refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported, although we have comments on the balance of supply from different sources, as well as on specific identified sites with regard to deliverability concerns.

2.25 It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and using appropriate forms which make best use of land whilst creating well-designed, characterful places. It is supported that sites should be developed at densities which make effective use of land (as specified at NPPF24 Para. 11a), alongside clarification that sensitivity to local context should also be applied.

Over-reliance on Large Sites and Existing Allocations

2.26 The proposed development strategy in the Pre-Submission Local Plan relies predominantly on large sites and existing allocations carried forward from the Adopted 2018 Local Plans and outstanding planning permissions, alongside a limited number of new sites, albeit noting that the number of new allocations has increased relative to those identified at the First Proposals stage.

2.27 The First Proposals document identified 13 'new' sites, totalling 11,640 homes, whereas the latest Reg 18 Draft Local Plan proposed a total of 19 'new' sites that were to deliver 13,463 dwellings within the plan period. The current, Pre-Submission Local Plan sets out that 19 'new' allocations will deliver 13,654 new homes, representing a slight increase in capacity across the same number of identified new sites.

2.28 Of these new sites, two sites (Eddington - North West Cambridge, and Cambridge East), are effectively existing allocations. An additional 2,500 homes are proposed to be provided through increased densities at Eddington (compared with 1,000 stated at an earlier consultation stage) and a further 3,950 new homes at Cambridge East (compared with 2,850 previously assumed).

2.29 Aside from these concerns, it should be noted, therefore, that only 17 of these 19 sites are strictly 'new'. Given the relative scale of the two sites noted above, in total the 17 sites will provide 7,204 dwellings (equating to approximately 13.85% of the total supply).

2.30 It is therefore clear that the Pre-Submission Local Plan continues to make provision for a very limited number of new sites. There is a heavy reliance on existing and previously identified sites rolled forward from the adopted Local Plans and many of these sites are on a large scale which also means they typically take longer to be brought forward.

2.31 To encourage a more reliable delivery rate across the plan area, and to ensure that this aspect of the Plan is both positively prepared and effective, we propose that additional sites are allocated to ensure the consistent delivery of dwellings to significantly boost the supply of homes as required by Paragraph 61 of NPPF24.

Additional Supply Buffer

2.32 At the First Proposals consultation stage it was indicated that there was an intention to include a 10% buffer to provide the flexibility to deal with unforeseen circumstances should any sites not be brought forward as planned. We asserted in representations at that stage that the heavy reliance on existing allocations and commitments is overly optimistic and along with the very limited number of new proposed site allocations, the 10% buffer was not considered sufficient, and consequently should be increased to a minimum of 20% alongside the allocation of further sites to ensure a robust strategy. It was noted that such an approach has been adopted in other local authority areas, including across Babergh and Mid Suffolk Local Authorities. We maintain this stance and this is reinforced by on-going concern over deliverability of the significant site allocations outlined above.

2.33 The Pre-Submission Local Plan illustrates within Table 3 that an 8.2% buffer, in excess of the minimum housing requirement, would be provided, which is clearly below the stated objective of achieving 10% headroom, and recognised best practice of ensuring between 10 and 20% contingency in this regard.

2.34 This is insufficient and therefore additional site allocations should be included at this stage in the plan-making process to ensure the plan is effective (deliverable over the plan period) as required by the NPPF.

Over-reliance on Windfall Sites

2.35 In addition, there are concerns regarding the heavy reliance on windfall sites within the development strategy, which comprises 6,600 dwellings and equates to almost 14% of the total minimum housing need. The NPPF24 definition of 'Windfall sites' is "Sites not

specifically identified in the development plan" whilst the Draft Local Plan document does not include a specific definition of the term.

2.36 The Greater Cambridge Housing Delivery Study Addendum (October 2025) reports that Greater Cambridge has historically achieved a high rate of windfall development and we have not sought to interrogate this evidence at this stage to confirm whether this conforms with NPPF24 Para. 75. It is noted that the above study has considered the appropriate rate to apply, having regard to assessment of data across a further four-year period, to 2023/24. Despite a reduction over this additional period it has been determined, on balance, that the previous mid-point rate of 425 dwellings per annum should be retained.

2.37 The windfall reliance is considered high (albeit noted that this has been slightly reduced compared with the final Reg 18 figure of 7,100), particularly in light of the Councils' apparent anticipation that these will mostly comprise previously developed sites. It is also noted that the defined settlement extents have been tightly drawn to the existing urban edges, which is unlikely to provide sufficient flexibility for (greenfield) windfall sites to come forward.

2.38 A more appropriate strategy is for the windfall requirement to be further reduced and a greater range of sites explicitly allocated, including for the lower order settlements where the current development strategy is for very limited development.

2.39 Through the positive allocation of sustainable sites at the lower order settlements, including Group Villages, this will ensure that the Greater Cambridge growth strategy is genuinely plan-led, as required by Paragraph 15 of the NPPF24 and ensure that such growth is supported by the appropriate infrastructure. In addition, by re-allocating a proportion of the anticipated windfall growth to specific sustainable sites, this will provide a greater level of certainty of the anticipated location of growth to the Councils, developers and the local community compared with the current proposed strategy that will inevitably see a range of speculative development within the rural areas.

Lack of Development within the Villages

2.40 At page 165 of the Development Strategy Topic Paper (2025), it is stated:

"Our evidence, Sustainability Appraisal and consultation responses above show that a strategy focussed on village development would be unsustainable, in particular regarding transport and associated carbon emissions, but also for supporting delivery of required infrastructure. As such we consider that villages should not be the primary focus for growth within the development strategy."

2.41 Whilst it is not disputed that villages should not be the primary focus for growth, the current strategy is too restrictive and cannot be supported. Appropriate village development can be sustainable in terms of transport and carbon emissions and provide the necessary infrastructure requirements, as would be the case for land West of London Road, Fowlmere.

2.42 In fact, the current development strategy with the high reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Councils have

control over ensuring village development is located where there is good access to a high-quality public transport network and provides the required infrastructure.

2.43 Overall, we have concerns regarding the robustness of the development strategy and its ability to bring sufficient land forward for development at a sufficient rate to address the objectively assessed need over the plan period as required by NPPF24 para. 23.

2.44 The Pre-Submission Local Plan should increase the distribution of development across the plan area ensuring that a wide range of sites are proposed for development by including a greater number of site allocations in sustainable rural areas with good access to public transport and facilities, such as Land West of London Road, Fowlmere.

2.45 As identified by Paragraph 73 of the NPPF24, small and medium sized sites (such as Land West of London Road, Fowlmere) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

2.46 As acknowledged by para. 83 of NPPF24, housing in rural areas can maintain the vitality of rural communities and provide opportunities for villages to grow and thrive, especially where this will support local services. The same passage also recognises how, where there are groups of villages, development in one may support services in other nearby villages.

2.47 A growth strategy which predominantly focuses on growth within large scale settlements will also prevent the organic growth of more rural areas, which is needed in order to maintain the vitality of rural communities and support for local services.

Policy S/SH: Settlement Hierarchy

2.48 Development should be assigned across the settlement hierarchy, with development proportionate to the provision of services and facilities and access to the public transport network. The proposed policy approach of S/SH relating to the settlement hierarchy includes restrictions on the indicative maximum scheme sizes that will comprise acceptable windfall development for each settlement tier below rural centres in the hierarchy. Coupled with the overall development strategy for only a small number of site allocations within the rural area, the ability for sustainable developments to come forward is overly restricted. The graphic at Figure 9 of the Pre-Submission Local Plan illustrates that residential development in the Rural Area, combining both allocations and anticipated windfall sites, will represent just 15% of the total supply, significantly reduced relative to the adopted Local Plans (at 23%), and slightly reduced relative to the level recorded in the latest Reg 18 consultation (at 16%).

2.49 Para. 009 (Reference ID: 67-009-20190722) of the Planning Practice Guidance (PPG) states “a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness”. We are unaware of any clear and robust evidence to demonstrate that the policy direction putting a limit on development in the rural areas is appropriate.

2.50 Applying restrictions on the maximum amount of development that is appropriate to any particular tier is not considered to be a justified approach, as the sustainability of settlements and the availability of suitable sites for development can vary between settlements within the same tier. A more appropriate strategy would be to make additional site allocations, considering the rural settlements on an individual basis. This would help meet the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed (NPPF24, para. 61).

2.51 It should be acknowledged that new development can increase the sustainability of an existing settlement through the provision of additional services and facilities, or through enhancing existing services and facilities. New development that is well related relative to the existing settlement can also have a positive impact upon the long-term viability of a place through indirect spending from future occupiers and through supporting rural schools and facilities.

Fowlmere (Group Village)

2.52 Fowlmere is identified in the Settlement Hierarchy as a "Group Village". In accordance with S/SH, the Group Villages can accommodate an indicative maximum scheme size of just 8 dwellings, and exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site.

2.53 Notwithstanding our fundamental concerns with regard to the lack of development allocated to the Villages and the overly prescriptive restrictions on the quantum of development to come forward within the various tiers of the settlement hierarchy, we are also concerned by the lack of assessment given to Fowlmere in terms of its ability to accommodate growth.

2.54 The Pre-Submission Local Plan evidence base document which underpins the definition of the proposed settlement hierarchy is the 'Settlement Hierarchy Study Update 2025' which forms an appendix to the Development Strategy Topic Paper (2025) (which makes clear that this should be read in conjunction with the earlier 'First Proposals Topic Paper - Development Strategy' (2021)). This appears to apply analysis which aligns with the previous Existing Transport Conditions Report (2020). We have significant concerns with regard to this approach which adopts a simplistic method of categorising settlements and their ability to accommodate development.

2.55 Those Group Villages identified as benefitting from very good existing or proposed sustainable transport links to Cambridge or other large settlements outside the district were subsequently assessed in terms of their position in the hierarchy. Whilst it is noted on Page 263 of the Development Strategy Topic Paper 2021 that all Group Villages were assessed using the points system, only those considered to have good existing or proposed sustainable transport links were assessed in further detail in terms of their ability to accommodate development.

2.56 Fowlmere was not further assessed as it was not considered to benefit from very good transport links. We disagree with this conclusion and consider this to be an omission in the Councils' assessment as a result of overlooking the full range of bus services within the settlement and in turn the access to train services that is also available, as discussed below.

2.57 The nearest bus stop to the site is located directly east of the site on London Road, and there are additional bus stops less than a 5-minute walk away. For a village of its size, Fowlmere is very well connected by bus, having three bus services (17, 26 and 7A), primarily connecting to Cambridge and Royston as well as towns and villages in between. Importantly, Foxton Railway Station is a 5-minute bus journey away from Fowlmere and offers half-hourly journeys to Cambridge centre in 12 minutes. Foxton also offers high-speed services to London King's Cross in less than an hour. These local public transport connections offer a real opportunity for commuting trips to be undertaken by bus and rail. A Transport Vision for the site would seek to capitalise on these connections and will include enhancement to bus services and/or infrastructure.

2.58 A number of the Group Villages that are considered to benefit from good transport links are only currently serviced by an hourly bus service into Cambridge, which is comparable to the service frequency at Fowlmere. Fowlmere is also located 2.6 miles from the train station in Foxton as noted above. It is therefore unclear why Fowlmere has not been included within the Group Villages considered to benefit from good transport links.

2.59 The Councils' Development Strategy Topic Paper 2021 (which the Settlement Hierarchy Study Update 2025 clarifies it should continue to be read in conjunction with) clearly states that only those sites that were tested in the HELAA and identified as potential development options in the better served villages were subsequently subject to site specific consideration for allocation and for sustainability appraisal.

2.60 It is strongly considered that the failure of the evidence base to consider all modes of transport and bus services within Fowlmere and its connectivity to the surrounding settlements represents a flaw in the overall settlement assessment. This has subsequently resulted in sites that are being promoted within Fowlmere not being properly considered for development and not being subject to an independent site assessment.

2.61 On this basis it is considered that the settlement hierarchy presented under Policy S/SH is unsound, being neither positively prepared, justified nor effective.

Policy S/DE: Defined Development Extents

2.62 The proposed policy based on defined development extents around settlements is supported in principle. Development extents play an important role in controlling development; however, they should not be used as a basis for preventing otherwise sustainable development from coming forward. It is noted that the Pre-Submission Local Plan states (at para. 2.129) that development extents have been defined to take into account the present extent of the built-up area and planned new development. However, the proposed development strategy to restrict the number of dwellings in certain tiers of the settlement hierarchy and the low

number of site allocations proposed for the rural areas will prevent sustainable development from being brought forward unless further sites are allocated for development and included within the settlement boundary.

2.63 Should the Councils wish to continue to apply a heavy reliance on windfall development to accommodate growth, the settlement boundaries will need to be drawn more loosely around existing settlements, particularly those beyond the outer Green Belt boundary, to allow for speculative development to come forward.

2.64 On this basis it is considered that the approach to definition of development extents is unsound, as it would be neither positively prepared nor effective.

S/GB: The Cambridge Green Belt

2.65 It is not clear what purpose this policy serves as it adds nothing to national policy. It simply repeats the purposes of Green Belt that are already set out in paragraph 143 of NPPF24. As such the policy is inconsistent with paragraph 16 of the NPPF which states that policies should avoid repetition of policies in the Framework.

2.66 Policy S/GB is unsound as it repeats national policy and as such is inconsistent with the NPPF. It should therefore be deleted.

Rest of the Rural Area

2.67 Policies within Section 3.5 set out the proposed policies for site allocations in the rest of the rural area on a site by site-basis (each pre-fixed with S/RRA or S/AMC with regard to identified areas of major change). Within the Draft Local Plan there are a total of just three new housing sites specifically proposed to be allocated within the rest of the rural area, excluding the rural southern cluster and areas of major change, demonstrating the restrictions of the proposed development strategy to development in the rural area.

2.68 It is noted that two of the allocation sites are located in Melbourn as follows:

S/RRA/ML – The Moor, Moor Lane, Melbourn – 1.08 hectares, approximately 20 dwellings

S/RRA/CR – Land to the west of Cambridge Road, Melbourn – 6.65 hectares, approximately 125 dwellings.

2.69 Fowlmere is located only 3.2 miles from Melbourn, which is recognised as a well-functioning place for residents and employment. Paragraph 8.68 of the Greater Cambridge Employment Land and Economic Development Evidence Study (2020) states:

2.70 "…the villages are able to play an ongoing role in ensuring viable and available industrial floorspace to meet the needs of the city and the wider Greater Cambridge area. Industrial demand for those locations with good connectivity and / or proximity to Cambridge is anticipated to remain moderately strong in the medium term."

2.71 Similar comments, which highlight the good transport connectivity at nearby Melbourn, are contained in the updated evidence base, with the Development Strategy Topic Paper (2025)

stating at para. 2.82 that “Melbourn is considered a good location for offices due to strong public transport and highways links and existing high-tech hubs. New industrial users expected to be attracted from Royston, Cambridge and wider by the good transport links.”

2.72 As set out within the accompanying Vision Document, Land West of London Road is located within 20 minutes of a range of local services and facilities to support daily needs. Fowlmere village centre is located less than a five-minute walk away, with the facilities, education and employment opportunities of Foxton, Melbourn and Cambridge all easily reachable by bike or public transport.

2.73 It is considered that the lack of identified allocations for residential development within the rest of the rural area is unsound, being neither positively prepared nor justified.

3. FURTHER PLAN THEMES

The Themes

3.1 The Pre-Submission Local Plan contains four themes and eight strategic priorities that will influence how homes, jobs, and infrastructure are planned within Greater Cambridge over the Plan Period, in addition to the Development Strategy addressed in the preceding section. These are:

- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion
- Great Places
- Homes
- Jobs
- Infrastructure.

3.2 We recognise the importance of these themes as they form key considerations and tangible outcomes of sustainable development across the plan area. Representations on a number of specific policies within these sections are set out below.

CC/NZ: Net Zero Carbon Buildings

3.3 National policy on this matter, the Planning and Energy Act 2008, the Written Ministerial Statement (WMS) on Local Energy Efficiency Standards and now PM13 in NPPF26 allow Councils to set standards that go beyond those established through building regulations where they are viable and deliverable.

3.4 However, in allowing local plans to establish improved targets the WMS and now PM13 establishes how these standards should be applied, stating that they should be expressed as a percentage of TER and calculated using a specified version of SAP. As such it is not considered that the use of targets based on space heating and energy use as set out in parts A and B, and the requirement for these to be achieved using CIBSE TM54 or Passivhaus Planning Package is consistent with national policy. Parts A and B will need to be deleted and replaced with a policy that is consistent with the WMS and NPPF26.

3.5 The WMS, and PM13 in NPPF26, requires any standard that goes beyond current building regulations to be robustly costed to ensure that they do not have an adverse impact on viability or deliverability. The implementation will also need to be considered against the Future Homes Standard and what is required above and beyond that standard in terms of how much additional cost is required. It is also not clear what robust evidence has been provided to show that these targets will not impact on the delivery of new homes within Greater Cambridge. Without more detailed evidence considering the deliverability of these

standards in relation to the allocated sites and the rate at which new homes are expected to come forward this policy cannot be considered to be sound.

3.6 Paragraph 8 under part D sets out that, where the standard cannot be achieved for viability or technical reasons, offsetting will be permitted after all attempts have been made to reduce space heating and energy consumption standards. However, it is suggested that where this policy in combination with other policies in the local plan make development unviable, the use of offsetting does not offer sufficient flexibility. Where meeting this level of energy performance is unviable then the standard should not be applied.

3.7 Finally, paragraph 10 under part D states that for reporting purposes all development over 50 homes should complete in-use energy monitoring. However, it is not clear from the policy how this data will be used and what action could be taken should energy use exceed that set out in the policy. This was a point considered by the Inspectors examining the Wokingham Local Plan who have stated in their post hearing letter that a similar clause must be deleted as it was not considered to be an effective policy.

3.8 On this basis it is considered that Policy CC/NZ is unsound as it is inconsistent with national policy, and that paragraph 10 should be deleted, as this aspect is ineffective.

CC/WE: Water efficiency in new developments

3.9 It is recognised that in areas where there are exceptional pressures on water supply that would inhibit the delivery of new development, the Government is supportive of introducing standards lower than those set out in Building Regulations. This was specifically noted in the Joint Statement on addressing water scarcity in Greater Cambridge with the draft NPPF also noting that there may be exceptional circumstances for introducing more stringent standards than those set out in Building Regulations. The standard being proposed in "Shared Standards in Water Efficiency for Local Plans" was for 85 litres per person per day (l/p/d) which would be achieved through a fittings-based approach. With regard to this ambitious standard there is concern that the customer experience will be negatively impacted, whilst over time there would be no effective practical means of preventing the owners of new homes from installing baths or different appliances once they are in occupation. This is noted by the Future Homes Hub in the 'Water Ready' Report which highlighted the perverse outcome of those moving into new homes scrapping perfectly serviceable washing machines, for example.

3.10 However, the Council are proposing that developments of over 100 dwellings will be required to meet an even more stringent standard of 80 l/p/d. This lower standard would require development to introduce water recycling or water reuse. As the Council's evidence base notes there are still some concerns as to the legal implications of using reclaimed water for domestic purposes and this is the reason why a standard below 85 l/p/d that can be achieved through a fixtures-led approach is being recommended in the shared standards report. These concerns are reflected in the 'Water Ready' report which notes in relation to water reuse systems that:

"… if they are not well designed and identified, they do increase the risk of cross contamination. There is therefore a need for a clearly defined standard approach to cover items such as layout options, differing pipework sizes or other mechanisms to readily identify these and prevent cross connections and materials; before any such systems can be mandated."

3.11 While the policy states that the use of water reuse/recycling is subject to amendments in relevant legislation, it is suggested that until there is clarity as to the legal position on such matters and that there are clear national standards and guidance for installation and maintenance arrangements the Council should not be seeking to require water reuse systems in order to achieve 80 l/p/d which is itself unjustified.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

3.12 Part 6a of the policy states that development must demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to support the whole development. This approach is considered to be unsound on the basis that water infrastructure providers have a legal requirement to provide the necessary infrastructure to meet the needs of Greater Cambridge's current and future population and that it should not be for house builders and other developers to address the failings of water companies to upgrade necessary infrastructure.

3.13 It is unnecessary, and therefore not sound, for the council to ask developers to demonstrate that there is capacity, as the capacity of the water supply infrastructure is not a land use planning matter for consideration on an application-by-application basis as water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

"S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker's water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director."

3.14 Consequently, it is inappropriate to include a policy in the local plan requiring applicants to assess the capacity or otherwise of the water company to provide connections as such a policy is an attempt to get applicants to do things for which they are not legally responsible. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans.

CC/CS: Supporting land-based carbon sequestration

3.15 Part 7 of this policy states that all major development proposals, including strategic sites, should seek opportunities to enhance the carbon sequestration potential of their proposals through green infrastructure and new habitat creation. It is not clear why this policy is necessary given that the Council already has policies with regard to urban greening, open space as well as development being required to deliver new and improved habitats as part of the requirement to deliver biodiversity net gains. It is therefore suggested that the first sentence of part 7 is deleted. The second sentence should also be amended to "The demonstration of meaningful carbon sequestration where there is a significant net gain within a proposal through nature-based solutions will be a material consideration and given significant weight in favour of development in the decision-making process." This ensures the policy will be used positively to support development. As currently drafted the policy is unsound as it is not effective.

Policy BG/BG: Biodiversity and geodiversity

3.16 Part 2 of Policy BG/BG states that all major development should achieve a net gain in biodiversity of 20% unless exempt under the Environment Act 2021. As the Council will be aware, NPPF26 indicates within Policy N1 that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to specific site allocations, and even then, only where this is clearly justified and deliverable. This is a clear direction of travel with regard to BNG that there should not be general requirements for development to deliver beyond the 10% required by the Environment Act.

3.17 Whilst it is recognised that this plan is being examined under the NPPF24, NPPF26 is still a material consideration given that applications will be determined under the latest Framework and policies that are inconsistent with NPPF26 should be given limited weight.

3.18 However, even if it is deemed that the 2026 policy reference set out above is not strictly applicable under the transitional arrangements the approach is not considered to be justified, having regard to para 74-006-20240214 of PPG which states that:

"… plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented".

3.19 This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified. There must be a very clear and robust justification that the area is significantly worse than the country as a whole and that this decline is directly related to the new development rather than, for example, the result of changes in agricultural practices or industrial pollution. It is not sufficiently robust to highlight declines in species that, whilst an important issue, are not necessarily as a result of new homes being built.

3.20 Due to the significant uncertainty over cost and the clear direction as to such policies in NPPF26 it is suggested that rather than seek to go beyond the statutory requirement the Council should be working with developers to ensure that 10% can be delivered in a manner that maximises the benefits for local people. Policy BG/BG is considered to be unsound as it is inconsistent with national policy.

Policy H/HM: Housing Mix

3.21 Whilst the provision of a specific housing mix could potentially be considered overly prescriptive and in danger of becoming out of date through the passage of time, it is noted that the further provisions of Policy H/HM provide welcome scope for a degree of deviation where this may be justified. It is similarly supported that these allow for consideration to be given to specific local circumstances, and changes over time, as well as to the relevance of scheme viability.

4. LAND WEST OF LONDON ROAD, FOWLMERE

Introduction

4.1 Wates Developments Ltd. are promoting Land West of London Road, Fowlmere. This Site was submitted to the Greater Cambridge Shared Planning Service (GCSP) in the context of their Housing and Economic Land Availability Assessment in February 2020.

4.2 The GCSP assessed the site against a range of criteria and allocated an overall amber rating in terms of suitability and a green rating in terms of availability and achievability.

4.3 As set out with representations at previous consultation stages, we disagree with this amber rating and we have reassessed the Site on receipt of site-specific technical evidence, on which basis the site is considered as having an overall green rating.

4.4 Wates are promoting two parcels of land, with the Manor Farm access providing the division. The full site is being promoted for approximately 145 dwellings.

Site Description

4.5 The land that is being promoted, is approximately 10.33ha in size and is bounded to the north by the Manor Farm Business Park, to the east and south by the B1368 and to the west by agricultural land. The site is of a greenfield nature, located outside the Green Belt. A Site Location Plan is included at **Appendix One.**

4.6 As noted, the site has been assessed through the Greater Cambridge Housing and Economic Land Availability Assessment as a potential site for development and allocated the reference 40116.

4.7 The site's location within Fowlmere provides a location with access to key amenities such as a primary school and bus services, whilst nearby towns and villages such as Shepreth, Melbourn and Royston provide a full range of jobs, services, leisure and cultural facilities.

4.8 The site is proposed to include considerable provision of public open space to enhance the quality of the site for new and existing Fowlmere residents. This is considered to be a key benefit to the future scheme and also meets the Councils' aspirations to deliver high-quality open space to new and existing residents of Greater Cambridge. It can also be brought forward in a manner which would safeguard the designated Important Countryside Frontage which runs along the eastern side of the site.

Summary

4.9 This site is considered to be suitable, deliverable and achievable, and there are no known significant constraints that should prevent development of the site.

4.10 With appropriate master-planning and design, the site is capable of delivering a sensitively designed but comprehensive and well-connected sustainable development that could contribute to the local development needs of the Greater Cambridge Shared Planning area.

5. SUMMARY AND CONCLUSIONS

5.1 The preceding representations raise a number of concerns regarding the soundness of the Pre-Submission Local Plan.

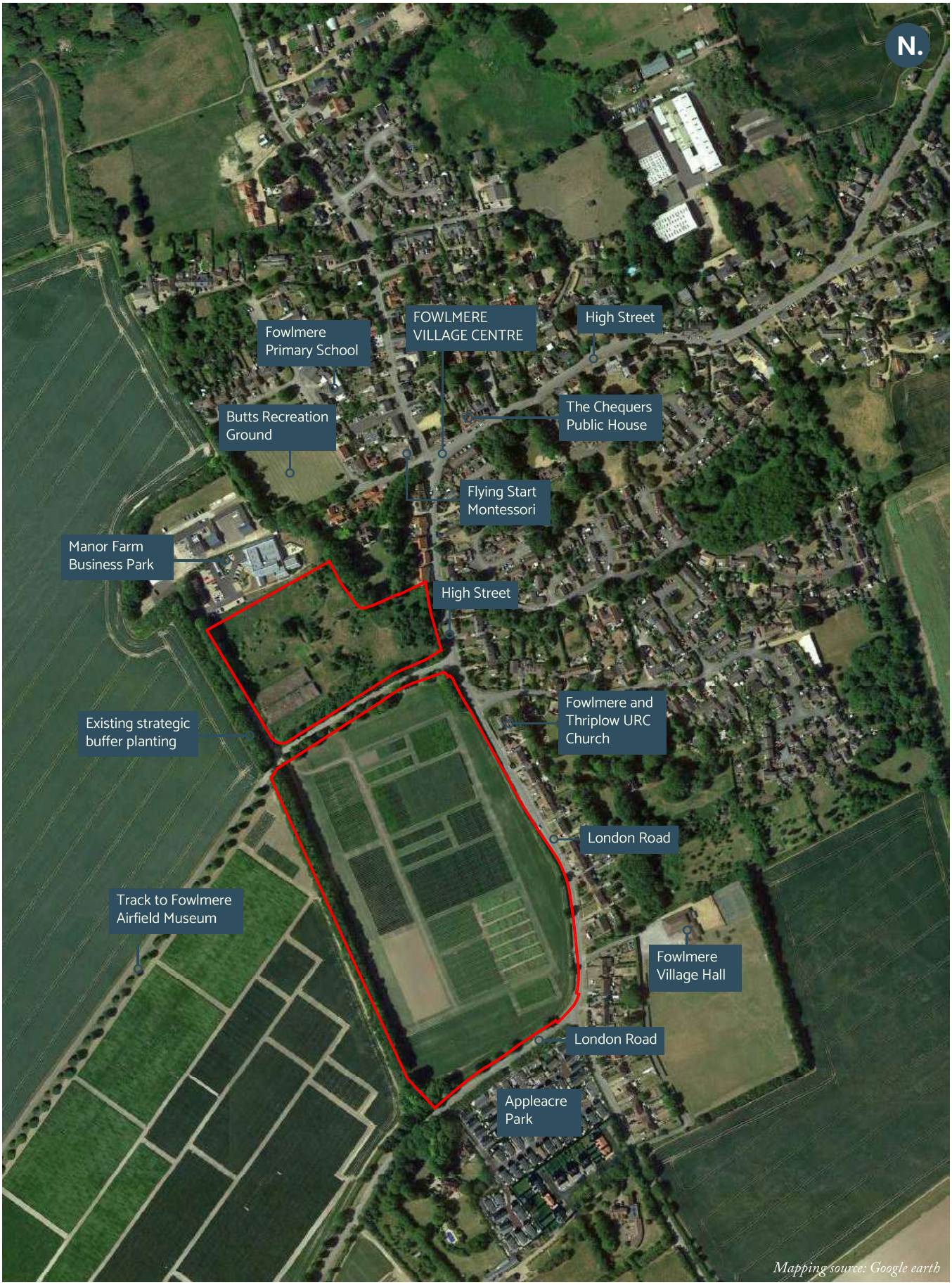
5.2 These relate to a range of aspects of the Local Plan including the Development Strategy and other relevant development management themes.

5.3 It is considered that additional allocations are required to ensure that the economic growth aspirations of the Greater Cambridge area can be realised whilst meeting the requirement to deliver the minimum housing requirements established by the Standard Method and significantly boosting the supply of housing.

5.4 It is suggested that an additional supply buffer is required, whilst greater distribution of growth within sustainable locations in the wider rural area would provide a more appropriate strategy under a more balanced approach that will ensure delivery.

5.5 In this regard, it is therefore requested that Land West of London Road, Fowlmere is allocated for residential development within the Submission Local Plan.

APPENDIX 1. SITE LOCATION PLAN



Site aerial in context with Fowlmere. NTS

Boyer

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