

**LAND WEST OF HIGH
STREET, FOWLMERE
GREATER CAMBRIDGE
LOCAL PLAN – ISSUES
AND OPTIONS
CONSULTATION 2020**

Quality Assurance

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1.0 Introduction

- 1.1 These representations are made on behalf of Wates Developments (“Wates”) and in response to the Greater Cambridge Local Plan Issues and Options 2020 consultation. These responses set out the support of **Land to the West of High Street, Fowlmere** (hereafter “the Site”) for a sustainable extension of the existing settlement of the village.
- 1.2 The Site comprises two parcels of land totalling approximately 10 hectares:
- The northern parcel is 2.4 hectares and could accommodate approximately 40-50 dwellings.
 - The southern parcel is 7.6 hectares and could accommodate approximately 120-150 dwellings.
- 1.3 These representations follow those submitted in March 2019 as part of the ‘Call for Sites’ consultation and provide greater detail on the significant opportunity that the site presents.
- 1.4 The consultation document has been published by Cambridge City Council and South Cambridgeshire District Council as the first formal stage of consultation towards preparing the new joint Local Plan for Cambridge and South Cambridgeshire; the Greater Cambridge Local Plan. Consultation took place from 13 January 2020 to 24 February 2020.
- 1.5 The Greater Cambridge Local Plan is proposed to set out future land use and planning policies for the Greater Cambridge area to 2040 in respect of accommodating growth for new homes, jobs and infrastructure.
- 1.6 The consultation document explores four ‘big themes’ that will influence how homes, jobs and infrastructure are planned. The big themes are:
- **Climate change** – how the plan should contribute to achieving net zero carbon, and the mitigation and adaptation measures that should be required through developments;
 - **Biodiversity and green spaces** – how the plan can contribute to our ‘doubling nature’ vision, the improvement of existing green spaces and the creation of more;
 - **Wellbeing and social inclusion** – how the plan can help spread the benefits of growth, helping to create healthy and inclusive communities; and
 - **Great places** – how the plan can protect what is already great about the area, and design new developments to create special places and spaces.
- 1.7 Within the above four big themes, the consultation document then identifies what the Councils’ consider are the key issues and options for where future growth (jobs and homes) might go. We consider that a spatial strategy that includes dispersal to villages should form part of a hybrid spatial strategy. Development within villages is essential to support a prosperous rural economy and Fowlmere is a sustainable location to provide more homes.
- 1.8 Wates are at an early stage in considering potential development concepts for the Site. They are currently considering a proposed village extension to the west of Fowlmere for up to 200 market and affordable homes. Wates are keen to engage with the Council, stakeholders and the local

community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan.

1.9 The Site is not in the Green Belt. The Site is also well located to the village on the edge of the settlement boundary of Fowlmere, identified as a 'Group Village' in the adopted South Cambridgeshire Local Plan (2018). Whilst Fowlmere is considered within this hierarchy band, it does have a primary school and a reasonable amount of services and employment opportunities that are within reach of sustainable transport modes. Therefore, it is recognised that some development will help maintain services and facilities and provide for affordable housing to meet local needs.

1.10 The proposal will bring several benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:

- Delivery of high quality affordable and market housing;
- Locating residential development to support a rural area. The Site is located centrally to the village and within walking and cycling distance of the primary school;
- Supporting Fowlmere (and the outlying villages) local economy, including services; and,
- Incorporating green links across the Site to encourage ecological corridors, helping to increase bio-diversity.

2.0 Site Context and Background

Site Location

- 2.1 Fowlmere is a village in the district of South Cambridgeshire and located approximately nine miles to the south west of Cambridge and 5.5 miles north east of Royston. It is north of the major arterial road, the A505, which links Fowlmere and the surrounding towns and villages to the wider road network. Junction 10 of the M11 can be easily accessed via the A505. The village is also south of the A10 providing connections to Cambridge.
- 2.2 The northern land parcel has been previously developed for ancillary uses associated with a former airfield, RAF Fowlmere. Four buildings are present at the Site; two single storey wooden former chicken sheds located in the southwestern corner and a Nissen Hut style building and a square brick built single storey structure located in the centre. Elsewhere across the Site are the occasional remains of brick building foundations and concrete connecting paths. The southern land parcel is an agricultural field.
- 2.3 The primary school is a short walk from the Site allowing access by modes of travel other than the private car. Local amenities not provided in the village can be found in nearby villages including Thriplow, Melbourn and Foxton. A footpath connects Fowlmere with Thriplow and there is a public right of way to Foxton, from which the Foxton Railway Station is a short walk.
- 2.4 The nearest train station to the settlement is in Foxton, approximately 4km to the north. From Foxton Railway Station, you can travel to London and be there in just over an hour. An hourly service arrives at the station from Monday through to Sunday and heads for London Kings Cross; stops on this route also include Letchworth Garden City, Welwyn Garden City and Finsbury Park. Cambridge is just one stop away from Foxton train station, the journey time is around 10 minutes, and regular services are available daily.
- 2.5 Any supplementary facilities required are easily accessible via car or bus services to Cambridge to the north east and Royston to the south west. Additionally, the A505 provides a link to the M11 which connects Cambridgeshire with the national motorway network.

3.0 Development Proposals

Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.

- 3.1 The Site was submitted as part of the Call for Sites consultation in 2019 and Wates Developments are continuing to promote the Site for allocation in the Local Plan.
- 3.2 Wates Residential are submitting two parcels of land at Fowlmere for consideration and site allocation in the Greater Cambridge Local Plan. A Site location plan is included at **Appendix 1**. The sites include the following:
- The northern parcel is 2.4 hectares and could accommodate approximately 40-50 dwellings.
 - The southern parcel is 7.6 hectares and could accommodate approximately 120-150 dwellings.

The Opportunity

- 3.3 The Site lies outside but adjacent to the existing development framework and a residential allocation is sought through the emerging new Local Plan. The Site offers the potential to create a high quality and sustainable extension to Fowlmere through the provision of market and affordable new homes. Wates Residential is seeking to develop approximately 10ha of land.
- 3.4 Our proposal would seek to retain and enhance existing natural features including trees and hedgerow for the benefit of flora and fauna. The retention of trees and hedgerows provides mature planting with aesthetic value that helps to mitigate the visual impact of future development.
- 3.5 The site has the ability to provide new public open space and consolidate the character of the proposed development. New houses will have the ability to front onto the new public open space created for the new and existing community. The proposal could come forward in such a way to create views to the countryside, in doing so, helping to maintain the rural character of the village.
- 3.6 The site offers the opportunity to provide a landscape corridor connecting landscape assets. These landscape corridors provide conduits for local wildlife while also providing safe and attractive routes for pedestrians and cyclists.
- 3.7 The site can be allocated for new market and affordable homes with a variety of types and materials that blend well with the existing historic character of Fowlmere. A range of housing types allow for villagers with families or those who wish to downsize or get a foot onto the housing ladder as first-time buyers.
- 3.8 The principles can be summarised as following:
- Provide up to 200 homes (Inc. affordable housing);
 - Retain and enhance existing natural features for the benefit of flora and fauna;
 - Retention of trees and hedgerows provides mature planting with aesthetic value that helps to mitigate the visual impact of future development;

- Establish views through the Site providing connections with the open countryside helping to maintain the rural character of the village; and,
- Provision of green infrastructure to encourage ecological corridors and increase bio-diversity.

Responding to the Four Big Themes

3.9 The proposal responds to the four 'big themes' of the emerging Local Plan as follows:

- **Climate Change** – new dwellings will be providing improvements to energy efficiencies and the potential to include renewable energies. The Site is close to Foxton Railway Station providing alternatives to private car use for residents.
- **Biodiversity and Green Space** – the Site has potential of on-site green infrastructure and retaining and enhancing vegetation will create an ecological and recreational asset to be enjoyed by future and existing residents;
- **Wellbeing and Social Inclusion** – the proposals would incorporate a mix of housing sizes, types and tenures, to help meet the needs of the District and local community. The proposals would also promote healthy lifestyles and wellbeing through the provision of on-site recreation; and,
- **Great Places** – a landscape-led approach would ensure the design and layout of the scheme comes forward creating high quality residential dwellings.

Benefits to be delivered by the proposals

3.10 The Site has the potential to deliver sustainable development in accordance with the three dimensions of sustainable development identified at paragraph 7 of the NPPF, whilst also securing a number of benefits to both Fowlmere and the wider Greater Cambridge area, including the following:

Economic Benefits

- New jobs will be created through the construction phase of the development, both directly and through supply chains;
- New residents will help to sustain existing shops, services and facilities across a number of small villages due to higher footfall and patronage once the development is occupied;
- Unlike a series of smaller scale developments, a proposal of this size is likely to generate Section 106 contributions towards improving local infrastructure;
- Additional revenue will be generated through the New Homes Bonus.

Social Benefits

- The potential to deliver market and affordable new homes to assist Greater Cambridge in meeting their objectively assessed housing needs;
- The potential to deliver a range of dwelling size, type and tenure to meet locally identified housing need and creating a mixed and sustainable community;
- There is potential to create significant accessible open space. The provision of such a large area of open space is unlikely to be feasible on smaller scale or constrained brownfield sites;

- There is potential to deliver play facilities on the Site to meet an identified local need. Again, the provision of play facilities is unlikely to be feasible on smaller scale or constrained brownfield sites.

Environmental Benefits

- Despite the rural location, the Site is near Foxton Railway Station providing an alternative to car travel to Cambridge and beyond;
- The Site is not at risk of flooding;
- The majority of the existing tree and hedgerow planting around the periphery of the Site and along the internal field boundary can be retained and incorporated into the proposal;
- Significant additional tree planting can be incorporated throughout the Site. This will also contribute towards biodiversity enhancements;
- The Northern Site includes a series of former buildings and structures, the proposal would potentially improve the appearance of this Site, which is also in a Conservation area;
- The Site offers the potential for significant biodiversity net gain.

Deliverability

- 3.11 This Site is considered “deliverable” as defined by the NPPF (Glossary). Specifically, the Site is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the Site within five years of adoption of the plan.
- 3.12 The Site is located in a sustainable location, Fowlmere is a village with a primary school and has a range of services and facilities appropriate for its size and character. It is in close proximity with other small settlements which, together, offer a range of services and facilities that a thriving rural community requires.

4.0 General

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

- 4.1 Agree - The proposed Local Plan period up to 2040 is considered appropriate and to accord with the requirements set out within the NPPF for local authorities to identify a sufficient supply and mix of sites between years 1-15 of the plan (Para 67).
- 4.2 As recognised, Greater Cambridge falls at the crossroads of a number of key economic corridors, including the Oxford-Cambridge Arc, London-Stansted Corridor and the Cambridge-Norwich tech corridor. The Oxford-Cambridge Arc in particular is a key economic priority as recognised by Central Government. Further work on the delivery of these initiatives will take place including the need for cooperation between authorities and stakeholders.
- 4.3 It is imperative that the New Local Plan has flexibility to allow for additional growth to come forward to meet the needs of this important initiative as it develops through cross boundary and national discussions take place, potentially within the early/mid stages of the plan period.

5.0 Themes

Question 6. Do you agree with the potential big themes for the Local Plan?

- 5.1 The four big themes for the Local Plan are considered suitable and all are important in the consideration of the spatial distribution of growth in the district, and for the determination of planning applications.
- 5.2 The four big themes will generate a new way of planning, this may require a different way to make decisions; to allow other impacts to happen to achieve these four priorities. The Local Plan policy framework will need to allow for a clear planning balance to take place to assess and prioritise impacts.
- 5.3 The development proposals would contribute to the four big themes as outlined in question two.

Question 7. How do you think we should prioritise these big themes? Allocate 10 points across the following four themes:

- 5.4 The four big themes are all considered to be important aspects to achieving positive development. All four themes should be used to inform the spatial strategy within the Local Plan in terms of distributing growth and determining planning applications to deliver growth. It is therefore not considered necessary to rank the options in order of preference.

Theme 1 Climate Change

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- 5.5 The increased focus on climate change is welcomed. Climate change policy and good practice is changing quickly, and the plan will need to build in suitable flexibility to accommodate these changes within the lifetime of the plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes.
- 5.6 A needlessly stringent policy may inadvertently impede progress towards later years in the plan, or undermine results by not allowing for site-specific refinement. For example, policy for electric vehicle charging points should be sufficiently flexible to accommodate that quickly changing technology, as well the current grid challenges in implemented EV charging places. Energy policies should include flexibility for changing legislation, and technology, as well as the opportunity to refine a plan-wide policy for site specifics. As the Zero Carbon Futures Symposium Report (2019) submitted within the evidence base notes on page 10: where targets are too limited, and without consideration of project contexts, policy can drive dysfunctional behaviour such as photovoltaic solar panels being installed on North facing roofs merely to achieve policy compliance not to produce effective carbon reductions.
- 5.7 If the new Local Plan is to achieve its ambitious targets on climate change the Councils should consider new ways of achieving net zero. It should recognise that seeking to achieve net zero on all sites regardless of their location and site-specific factors may not be feasible. Linked initiatives such as an offsetting scheme, secured through S106 financial contributions, could be

an appropriate way of achieving net zero for small and medium developments. As recognised in the NPPF, small and medium developments, with their ability to be delivered early in the plan period at pace, will play an important role in meeting the Council's housing requirements and the needs of existing villages. Such sites may best secure net zero by contributing to an offsite initiative or other ways, which further reinforces the need for flexibility in the approach to applying policies.

- 5.8 The local plan Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate change scenarios will be of interest at examination. Lack of rigorous assessment of these scenarios in the SA could lead to the plan being found unsound.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

- 5.9 A policy approach with multiple options for delivering net zero carbon is likely to be most effective in delivering development, as well as carbon neutrality. A multi-pronged approach should allow different solutions for different developments, reflecting context. For example, for some developments, Passivhaus energy standards may be achievable (going well above and beyond minimums set out in the Building Regulations), but for others, Building Regulations may need to be followed but an offset solution, such as a green bond or offset fund, could be used to achieve a net carbon reduction. Possible options need to be worked up in more detail as the Plan progresses and must build in flexibility.

Theme 2 Biodiversity and Green Spaces

Question 12. How should the Local Plan help us improve the natural environment?

- 5.10 This Local Plan must deliver effective policy which protects and enhances natural capital. We support delivery of net gain for new development. Such policy must be flexible enough to enable creative and cost-effective solutions for the delivery of net gain and support the Vision for the Natural Future of Cambridgeshire in 2050 as outlined by Natural Cambridgeshire and affiliated organisations.
- 5.11 An off-site net gain solution should be clearly allowed for by policy. While it is a Local Plan priority as a part of one of the four big themes, the Local Plan policy must allow for a planning judgement and balanced decision to allow for site and development specific issues to be considered.
- 5.12 For reference as to how land west of High Street Fowlmere could improve the natural environment, please refer to Question 2. Development of the site will allow for existing vegetation to be retained and enhanced where appropriate, and together with new planting is likely to have a positive bio-diversity net gain.

Question 13. How do you think we should improve the green space network?

- 5.13 This should come through from an up-to-date base assessment of Greater Cambridge assets, which leads to a Local Plan wide (and beyond) strategy. Development proposals can then be shaped around the identified priorities. As part of a policy framework that allows for off-site

mitigation and off-site net gain enhancements can be used to improve the wider green space network.

Question 14. How do we achieve biodiversity net gain through new developments?

- 5.14 The new Local Plan must ensure that policy in this matter is sufficiently flexible to accommodate the required biodiversity net gain in the most effective and efficient way for each development, with both on-site and off-site solutions possible.
- 5.15 For reference as to how land west of High Street Fowlmere could improve the natural environment please refer to Question 2. Development of the site will allow for, retain and enhance existing natural features for the benefit of flora and fauna where appropriate. The retention of trees and hedgerows provides mature planting with aesthetic value that helps to mitigate the visual impact of future development.

Question 15. Do you agree that we should aim to increase tree cover across the area?

- 5.16 Yes, however, with the right trees, in the right areas. A policy framework to seek tree cover increase, but allows for a planning balance within decision-making to enable the benefits and impacts of each development to be assessed.
- 5.17 This could be part of an on-site/off-site solution, which could generate notable s106 funds to achieve significant, meaningful and long-term planted and ecological areas. Ecological outcomes rather than an unconditional focus on native species should be considered in new planting.
- 5.18 Wates Group selected The Conservation Volunteers (TCV) as Charity of the Year 2018-2020. Wates Group work in partnership with TCV to help raise funds to create healthier and happier communities for everyone, and transform even more precious green spaces. The partnership fits well with Wates Developments' ethos of sustainability and allows for employees of Wates to volunteer on projects across the country. We are currently looking to help the charity plant 15,000 native trees by 2022 as part of a 'Treeathlon'.

Theme 3 Wellbeing and Social Inclusion

Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

- 5.19 The Local Plan should deliver a spatial strategy that connects homes with accessibility to good quality public transport, facilities and services and high-quality green spaces.
- 5.20 Good growth that promotes wellbeing (including health) should be inclusive and include anti-poverty measures including:
- Energy efficient homes and employment space that deliver low energy and water bills;
 - Promotion of commercial development and job creation that offers the Living Wage and opportunities for those on lower incomes to increase wages to easily access jobs;

- Allow for a wide range of social infrastructure and open space in new developments that provide pathways to free (i.e. no charge to the user) opportunities for improved health outcomes;
- Promotion of low-cost housing proportionate to income in the area; and
- Promotion of 'fully accessible' social housing.

5.21 The Local plan should ensure a policy framework is developed that is based on empirical evidence of how good growth is delivered, rather than rely on policies based on perceived, and sometimes unproven, determinants of wellbeing and social inclusion. Policies should focus on what really makes a difference. Housing in rural areas should be part of the council's strategic response to the need for new homes.

6.0 Homes

Question 31. How should the Local Plan help to meet our needs for the amount and types of new homes?

- 6.1 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. It is important to identify a baseline housing need but there should be scope for further development to come forward if it meets a particular housing need. This would support the Government's objective of significantly boosting the supply of homes to ensure that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed (NPPF Para. 59).
- 6.2 The emerging GCLP will need to be consistent with national guidance on meeting housing needs. Paragraph 59 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 60 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 61 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters and self-builders. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method.
- 6.3 Paragraph 010 of Id.2a makes it clear that the standard method is the minimum starting point for determining local housing needs and acknowledges that there may be circumstances where actual housing need is higher than the standard method indicates. As set out in Paragraph 010, the circumstances where increases to housing need that exceed past trends are as follows: there is a growth strategy in place to promote and facilitate additional growth; strategic infrastructure improvements are likely to lead to an increase in the number of homes needed locally; and, an authority has agreed to accommodate unmet housing needs from a neighbouring area. The first two circumstances are relevant to Greater Cambridge. Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes. There is an urgent need to improve the affordability of housing and to boost affordable housing delivery in Greater Cambridge.
- 6.4 Therefore, the emerging GCLP should use the standard method to calculate the minimum local housing need, and then make appropriate adjustments taking into account the growth strategies and strategic infrastructure improvements identified for Greater Cambridge, and a further adjustment to ensure affordable housing needs are met
- 6.5 The emerging GCLP should use the standard method to calculate the minimum local housing need, and then make appropriate adjustments taking into account the growth strategies and strategic infrastructure improvements identified for Greater Cambridge, and a further adjustment to ensure affordable housing needs are met.
- 6.6 Wates Developments are proposing a sustainable village extension along the western side of the village. The housing need across the district is well established and delivering new homes in the rural area is considered an important part of the Council response to meeting this need. Fowlmere is a sustainable location for residential development, development will help support local services and help provide employment opportunities. In assessing sustainability of a rural

village, it is important to recognise the interconnection between villages and assess their suitability on this basis.

Question 32. Do you think we should provide for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

- 6.7 Greater Cambridge is an area with strong economic growth and with an aspiration to maintain that growth. The affordability of housing is also a major issue. The new Local Plan must be able to address both of these concerns.
- 6.8 To support the Government's objective of significantly boosting the supply of homes, a sufficient amount and variety of land needs to be identified to meeting housing needs within the Joint Local Plan area. The Cambridge and Peterborough Independent Economic Review (CPIER) (September 2018) suggests that higher housing target numbers are likely to be needed in Cambridgeshire if the potential for higher growth in employment is to be met. As is widely recognised, the economy of Cambridge is too important nationally for the Council to plan for the minimum number of homes required by the standard method.
- 6.9 The increased demand for housing arising from the economic success of Cambridge also makes the area increasingly unaffordable. In addition to being a concern to residents, affordability will impact upon the businesses looking to locate in the area. There is a danger that if there is an insufficient supply of housing the economic growth plans will not be realised. The role of housing in attracting and retaining skilled employees is widely recognised and should be adequately addressed in the Plan.
- 6.10 Housing requirements are minimums, not maximums to stay under at all costs. There is a well-evidenced affordability problem in Greater Cambridge; a greater supply of homes will be part of the solution. *"Too many of the people working in Cambridge have commutes that are difficult, long and growing: not out of choice, but necessity due to high housing costs."*¹

Question 33. What kind of housing do you think we should provide?

- 6.11 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites. Separate evidence-based housing needs assessments should be used to inform the appropriate size, type and tenure of housing needed for different sections of the community, as set out within the Greater Cambridge Housing Strategy 2019-2023. Flexibility will be key to a successful Local Plan; through market housing, low-cost and affordable housing.
- 6.12 The site Wates Developments are promoting provides the opportunity to deliver market and affordable homes of a range of size, type and tenures to meet needs of not only the local community but the wider district. The proposals would therefore respond adequately to the challenges and opportunities of the different components of the community.

¹ Cambridgeshire and Peterborough Industrial Strategy 2019, p13

Question 35. How should we ensure a high standard of housing is built in our area?

6.13

Local Plan policies can require a high standard of design for new residential development, leading from Government policy and guidance. Appropriately worded design policies should require a high-quality design for new dwellings. This could include sustainable design principles including measures to improve the energy efficiency of new homes, water saving measures, use of efficient insulation material and heating systems, the reduction and recycling of construction materials, provision of appropriate amenity space and accessibility. Policy should not be prescriptive for precisely how it will be accomplished, it can set a policy-level, but developers should be able to use a host of options to achieve the target. Wates Developments is committed to providing sustainable development that delivers positive outcomes for local communities.

7.0 Where to Build?

Question 40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?

- 7.1 The most effective approach to delivering the levels of development required is to ensure a wide variety of sites are allocated both in terms of size and location. This will ensure the consistent delivery across the plan period by not concentrating all development in a specific area or resulting in an over reliance on large strategic sites.
- 7.2 While a range of development scenarios are outlined, the Council should not rely on one strategy, a combination is required to ensure a sound plan. This should allow appropriate development outside of the settlement boundaries of villages, in particular, if development meets a particular local business or community need as set out within Para. 84 of the NPPF. Sustainable development in rural areas is also supported under Para. 78 of the NPPF, which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services.
- 7.3 Land west of High Street Fowlmere is considered a suitable location for a village extension. It will help support the local services of the village and importantly, the villages near it, to grow and thrive.

Question 41. Do you think the Local Plan should be more flexible about the size of developments allowed within village boundaries (frameworks), allowing more homes on sites that become available?

- 7.4 There should be more flexibility when considering the scale and size of developments that are permitted within village boundaries. The Local Plan currently restricts the amount of development that is permitted in Minor Rural Centres (Policy S/9) to 30 dwellings; in Group Villages (Policy S/10) to 8 dwellings and in exceptional circumstances to 15 dwellings; and in Infill Villages (Policy S/11) to 2 dwellings and in exceptional circumstances to 8 dwellings. These policies should not restrict development to a certain number of dwellings and should instead encourage an appropriate density depending on the context of the site that is being considered for development. Some sites might be capable of accommodating higher density development which can enable a more sustainable distribution of growth, particularly in the case of some villages within the district which are well connected in terms of being located on key transport corridors with access to rail, bus and cycleway links, thereby making them sustainable locations for development. A more flexible approach towards considering development in villages should therefore be used when allocating development sites and in the determination of planning applications.
- 7.5 There should also be more flexibility in terms of considering applications which are located outside village boundaries, provided the Site is suitable in other terms including its access to transport and village services and provided it is not overly constrained in terms of other environmental designations. The proposed village extension at Fowlmere is a suitable location for residential development and should therefore become a residential site allocation by extending the village boundary to include the Site location. The inclusion of the site would form an appropriate extension to the village.

Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)

- 7.6 It is recognised that no single solution will deliver a sound Local Plan; rather, a combination of approaches to the distribution of spatial growth will be necessary to establish the appropriate locations of new housing and employment development in the district.

Question 47. What do you think about growing our villages?

- 7.7 The Local Plan should seek to allocate a component of its housing needs towards growth at existing villages. Sustainable development in rural areas is supported under paragraph 78 of the NPPF, which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. Development within existing villages can help to sustain existing and deliver new facilities and infrastructure, support shops and business uses and meet both the market and affordable housing needs of the local community.

8.0 Sustainability Appraisal Scoping Report

- 8.1 In reviewing the documentation prepared by the Council, we recognise that this is an early stage in the plan's preparation and that an SA is an iterative process. At the outset, we would note that recent challenges at examination of local plans have included substantive criticisms of the SA which goes well beyond the legal tests and into professional planning judgement. For example, examiners in the North Uttlesford Local Plan, North Essex Local Plan and St Albans Local Plan have recently requested information on alternatives that goes beyond the legal position of "reasonable alternatives" selected by the local authority using broad questions of judgement.
- 8.2 The Issues and Options Report is assessed in a SA report dated November 2019. The Issues and Options Report is largely of general content without spatial or specific focus, and consequently much of the assessment is general commentary.
- 8.3 Six spatially discernible options are provided in the "Towards a Spatial Plan" Section, which are:
- Option 1: Densification;
 - Option 2: Edge of Cambridge – Outside the Green Belt;
 - Option 3: Edge of Cambridge – Green Belt;
 - Option 4: Dispersal – new settlements;
 - Option 5: Dispersal – villages;
 - Option 6: Public transport corridors.
- 8.4 With only high-level options assessed at this stage, there is substantial uncertainty over the outcomes of these options. As such, the conclusions of the SA also are substantially uncertain, and more assessment is required with specific details provided on the deliverable projects which will make up these options.
- 8.5 There is a possibility that a preferred option will be advanced with an equally valid alternative discarded at this early stage due to lack of information. Additional assessment should take place at another local plan stage, with full assessments within the SA Framework, before any options are fully dismissed. Without a full consideration of all these options which considers substantive detail of deliverable sites, there is a risk of the plan's selected alternative not being properly justified, and the plan being found unsound at examination.
- 8.6 The options assessed in the issues and options report will likely only be achievable in combination with other options (e.g. some density within existing development, with some expansion to villages, etc). For transparency, the extent to which these options are likely to be combined in ultimate implementation should be made explicit in any future local plan documents which discuss these strategic options.
- 8.7 The significant negative or positive effects given within the SA report are at this stage based on the limited information available, misleading due to assumptions used and uncertainty attendant with such high level options. The SA Report notes a large number of points of uncertainty, but still identifies a number of significant effects (both positive and negative). However, there are assumptions for the significant effects identified which aren't clearly explained and which can be questioned. For example, Option 5 (Dispersal – villages) is attributed a significant negative effect to SA Objective 6 (distinctiveness of landscapes) as it is assumed that expansion of these

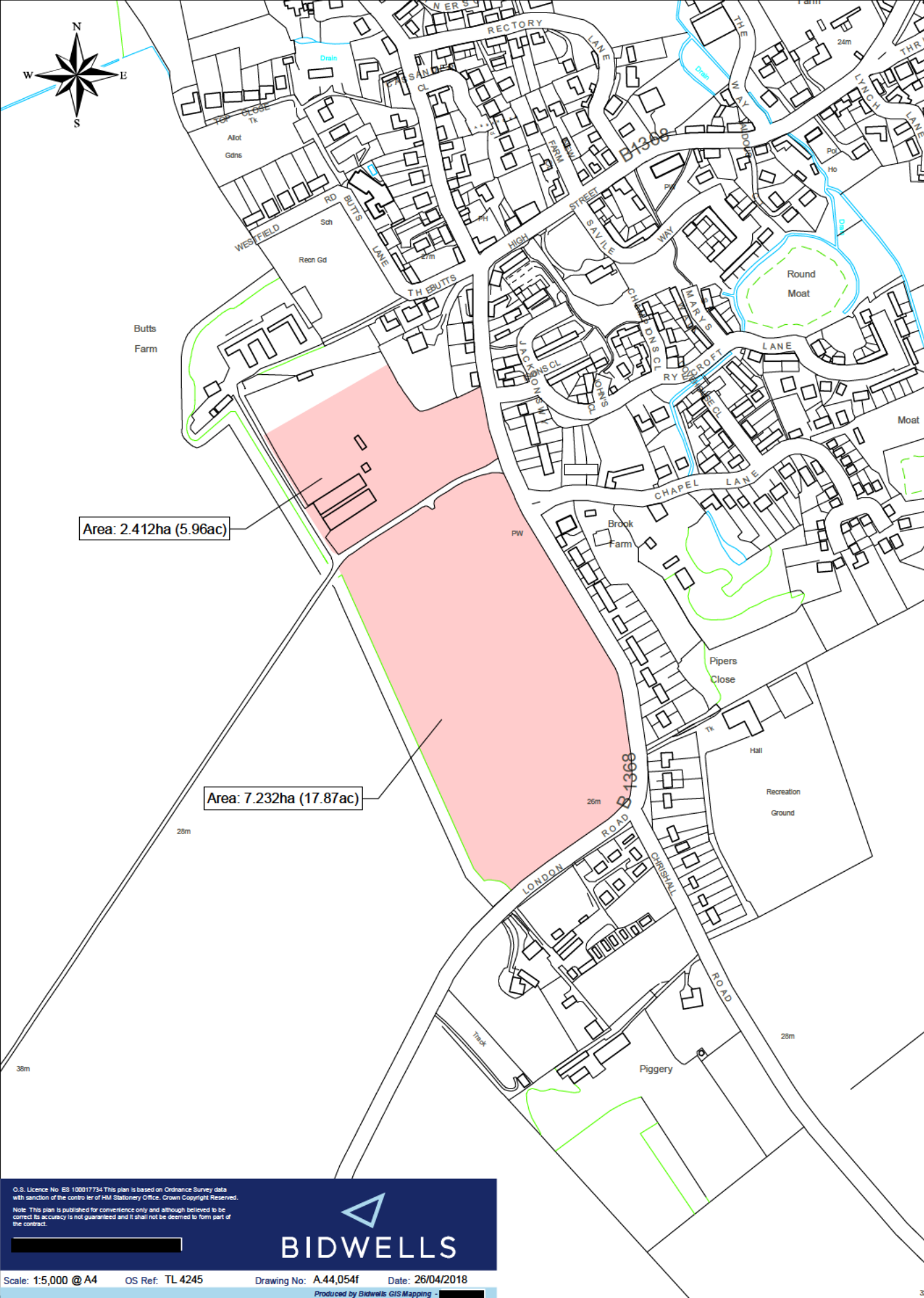
villages could have an adverse effect on the open countryside and landscape surrounding these villages, as well as village character. As recognised in paragraph 3.61 the actual effect will depend on the final design, scale and layout of the proposed development.

- 8.8 We recognise that SA is an iterative process which will evolve as a Local Plan progresses. More information should be provided on the approach to considering alternatives. The most substantive point we raise is that the options set out in the Issues and Options Report should all be taken forward to subsequent local plan stages, where deliverable options should be assessed in detail, and transparent and objective assessment of these options provided at a subsequent SA stage. This will help ensure the Local Plan process and SA would support a hybrid of development scenarios which would underpin all development proposals at this stage.

APPENDIX 1

SITE LOCATION PLAN

Land West of High Street, Fowlmere



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BIDWELLS

[REDACTED]