South Cambridgeshire Hall Cambourne Business Park Cambourne Cambridge **CB23 6EA** 

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# RECEIVED SCDC

15 JUL 2013

DEVELOPMENT CONTROL



South **Cambridgeshire** District Council

Ms Jackie Wright, Fowlmere Parish Council 32, Chapel Lane Fowlmere **SG8 7SD** 

This letter (with no plans attached) has been emailed to the Parish Council prior to sending out in the post, and for information, to the Ward Members

Planning and New Communities

Contact: Paul Sexton

Direct Dial: 01954 713255

Fax: 01954 713152

Direct email: paul.sexton@scambs.gov.uk

Our Ref. S/1249/13/FL

Your Ref:

Date 14 June 2013

Dear Sir/Madam

Proposal:

New offices, research & production facilities with associated car

parking and landscaping

Location:

Land to the south of, The Butts Business Centre, THE BUTTS,

**FOWLMERE** 

Applicant:

Mr Duncan Johns, Ion Science

Attached is a copy of the above application for your retention.

Any comments that your Parish Council wishes to make should be made on this form and returned to the above address no later than 21 days from the date of this letter. (You should note that at the expiry of this period the District Council could determine the application without receipt of your comments.)

Comments of the Parish Council:-

pleane see attached letter

Recommendation of the Parish Council:- (please tick one box only)

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Clerk of the Parish Courcil of			i a maran di diberah di sebagai Kabupatèn Kabupatèn Maran		
	EXPLANATION OF A	PPLICATION SI	IFFIX		

OL **Outline** LD **Lawful Development Certificate** FL Full Prior Notification of Agricultural Development PA RM **Reserved Matters** PD **Prior Notification of Demolition Works Prior Notification of Telecommunications Development** LB **Listed Building Consent** PT CA **Conservation Area Consent** HZ **Hazardous Substance Consent** AD **Advertisement Consent** DC **Discharge of Conditions** 

/C Variation or Removal of Condition

Mrs Jackie Wright Fowlmere Parish Clerk c/o 32 Chapel Lane Fowlmere Royston Herts SG8 7SD

Mr Paul Sexton
South Cambridgeshire District Council Planning Dept
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

RECEIVED SCDC

15 JUL 2013

DEVELOPMENT CONTROL

10th July 2013

Dear Paul,

Planning Application Reference: S/1249/13/FL

# Land to the south of The Butts Business Centre, The Butts, Fowlmere

This letter urges South Cambridgeshire District Council to reject the above planning application. The reasons for this are set out below.

### Introductory

The Parish Council has supported Ion Science's plans to develop its business over many years, within the village envelope and within permitted development. In 2011, the company applied to double the height of its existing premises in order to accommodate a forecast increase in staff and activity. This application was unanimously supported by Fowlmere Parish Council. The application was subsequently approved by South Cambridgeshire District Council (SCDC). However, to date the planning permission has not been implemented.

## Established policy re development outside village envelope

Any development on the site that is the subject of this application is contrary to established SCDC policy (policy DP/7 in the approved South Cambridgeshire Local Plan). This has been confirmed to the applicant/agent in a letter from SCDC dated 13 March 2012 (included in document 1128462-453665 of the application) and confirmed in the shortly to be adopted new Local Development Framework (LDF), now in its final stages.

### Search for sites

In the same letter, SCDC's officer (Mr Hare) re-iterated the advice to Ion Science (1) to focus their search for a suitable site on those that were close to more sustainable centres in the district and (2) to have regard to the settlement hierarchy within the core strategy (para 3 of the letter referred to above).

In particular this search should focus on the identified 'Rural Settlements and Minor Rural Settlements'; group villages such as Fowlmere were <u>not</u> deemed suitable.

Seemingly Ion Science have chosen to disregard this advice and have instead focussed all their attention on this particular site on the edge of Fowlmere, which lies outside the village envelope.

The application documents include a Sequential Test Assessment (document 1128462-452453) purporting to prove that the applicant has carefully examined 28 other potential sites. The report reads as if the conclusion were pre-determined at the outset and in the view of the Parish Council the reasons given for dismissing many sites with appropriate planning status are bogus. We would in particular like to draw your attention to the Frederick Smart Seeds site located between Fowlmere and Foxton, now vacant and for sale, with all relevant planning approvals in place. The reasons for it being disregarded by Ion Science are "Outside village. No amenities/public transport." These objections apply equally and precisely to the application site.

A reason frequently put forward for dismissing sites in the report is that they are too expensive. We therefore conclude that this site is possibly being sold for a concessionary price. And therefore we consider that this is possibly because any approval on this particular piece of the land in breaching major SCDC policy would then be used as a precedent for further development on the rest of the field as is already indicated in "Representation 51627 on Local Plan Issues and Options 2 report: Part 2 - South Cambridgeshire Further Site Options by Messrs Sheldrick represented by Bidwells property Consultants - Adam Halford" (attached as an appendix for reference.)

Additionally, the terms upon which Ion Science would be able to acquire the land for the above application would specifically prevent them from objecting to any further development proposals on land adjacent to the proposed site. This was confirmed by the Managing Director of Ion Science at the Fowlmere Parish Council Planning Meeting held on 27 June 2013. If there were no intention to develop more plots of land next to the present application site such a condition would be unnecessary. The existence of this condition underlines the significance of this planning application for the future development ambitions of the landowner of the proposed site.

# Numbers and location of employees

The majority of employees has clearly been shown to come from outside the village - four only (10 per cent of the present workforce) being recorded as presently living in Fowlmere and the rest (90 per cent) coming from a greater distance, so therefore there can be no claim that this is a development which is sustainable in transport terms (information taken from the Transport Assessment prepared by EAS Transport Planning Ltd (EAS) in April 2013 – document 1128462-452454).

The importance of sustainability in relation to this proposal was stressed in the letter of 13 March 2012 from SCDC: "... justification will need to, at least in part, be focussed upon sustainability."

Para 2.3 of the EAS report quotes the National Planning Policy Framework (NPPF) (para 14) and the presumption in favour of sustainable development: "At the heart of the National Planning Policy Framework is a presumption infavour (sic) of sustainable development, which should be seen as a goldenthread (sic) running through both plan-making and decisiontaking (sic)."

Para 2.4 quotes NPPF para 17 about the need to plan to make fullest use of walking and cycling: "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Para 2.9 quotes SCDC Development Control Policies, including TR/b: "To reduce the need to travel, and where travel is unavoidable, to increase the use of sustainable modes."

Para 3.8 refers to the 31 bus service, and says: "Bus service 31 serves the village with 4 buses per hour Monday to Saturday in and out of Cambridge Bus Station". This is not true. A detailed timetable for the bus service is attached as Appendix C of the report. The timetable shows a frequency of four buses <u>per day</u> out of Cambridge, and four busses <u>per day</u> into Cambridge. It is hard to believe that the writer of the report actually consulted the attached timetable in compiling the

report. In the Framework Travel Plan, the percentage of staff planned to travel by bus is shown as zero for all the years 2013-2016. Since there are no busses at the start and end of the working day (arriving before 9am and leaving after 5pm) this is not surprising.

Para 3.9 refers to the survey that EAS, the consultants responsible for preparing the report, carried out on 15 March 2013. On that day only 33 of the 40 staff were present at the Ion Science offices. The survey showed that the mode share of travel to and from work for those present was as follows: walk 14% (4 people), cycle 6% (2), car driver 64% (21), and car passenger 17% (6). This means that 80% travelled by car. In the Framework Travel Plan proposed in the report, although total car travel is forecast to reduce to 73% of staff, with staff numbers at 70 by 2016, there will be a 60% increase in the number of staff travelling by car over the same period. The reduction of car travel to 73% will apparently be achieved by cycling increasing from 6% to 10% (7 staff) and walking increasing from 14% to 16% (11 staff). This is a massively improbable scenario (see the views of staff below on the perceived safety of local roads for cycling).

With four out of approximately 40 current employees actually living in FowImere, it is difficult to understand how the present percentage of people currently walking to work is apparently 14 per cent rather than 10 per cent.

Para 3.14 sets out the postcode mapping of employees' residence for those present on the survey day, and comments "5 staff live in Fowlmere, 9 live in Royston, 3 live in Cambridge and the rest are distributed across the wider area, generally within 15 miles of the site." The detail on the map attached as Appendix D to the report suggests that four people live in Fowlmere and eight in Royston. Adding the two 'missing' members of staff to the plots on the map gives only 30 staff rather than 33. What is clear from the map is the concentration of staff living to the west of Fowlmere.

If Ion Science were to choose to be based in Royston, there would be a very significant improvement in the sustainability of travel for staff. The Royston-based staff (9) would be able to walk or cycle in safety (para 3.15 of the report quotes staff as believing that "local roads to the village were not deemed to be particularly safe" for cycling.) Meldreth staff (3) would be able to travel to Royston by train, as would the Cambridge-based staff (3). Car use would fall from 80% to just over 60% in 2013, and would have a greater impact with larger staff numbers in future years. It would also give visitors a greater choice of mode of travel. Fowlmere staff (4) would be disadvantaged by this location, and would be likely to drive to Royston, given the staff view on the safety of the local roads.

The improbability of a significant growth in the proportion of staff travelling by cycle is addressed in para 4.12 of the report. The standard set out in SCDC Development Control Policy is for one secure cycle space to be provided for every 30 sq m of gross floor space. With a development of approximately 1,830 sq m, this would mean 61 secure cycle spaces. The report describes this as "well over the necessary requirement", and proposes 14 cycle spaces instead. This is comfortably in excess of the 11 staff expected to cycle in the Framework Travel Plan. The discrepancy between SCDC standards and what is expected and proposed emphasises the fundamental unsustainablity of Fowlmere for this business.

The report made great play about sustainable development at the outset. The information in the report makes clear that the Fowlmere location is very far from sustainable. Fowlmere has no rail link and no usable bus link as far as employees are concerned, and 90 per cent of staff live remotely. The mitigation measures described in relation to transport make clear that little can be done to make the location sustainable. The applicant is looking at the wrong location.

The Sequential Test Assessment prepared by RPS Planning & Development in May 2013 (document 1128462-452453) states in Para 2.4 "Because Ion Science has a long association with Fowlmere and has a loyal, local workforce, they want to remain in Fowlmere if at all possible, or alternatively to remain in the immediate local area, especially to avoid losing key employees with particular skills." There is no meaningful, long association between the company and Fowlmere and the very few actual village residents employed show that the firm is not primarily benefitting the local community.

There is no other way in which the firm is able to bring economic benefit to the village of Fowlmere. Leaving aside the employment of four Fowlmere residents, there is no financial or other tangible benefit to Fowlmere from the presence and activities of lon Science. The transport assessment makes it clear that some members of staff are prepared to travel significant distances to work: more people travel from Cambourne, Cambridge and Fulbourn than live in Fowlmere. Their use of the terminology 'key workers' in the report is inappropriate: in planning terminology "key workers" is used to signify professions providing essential services to the community such as health professionals/teachers etc.

# Important Countryside Frontage and rural character

The land on both sides of the track leading to this site from the B1368 is protected by being designated under SCDC agreed policies as Important Countryside Frontage. The reason for such designation has always been to protect this extremely important southern entry aspect to the village. Its rural and unspoilt character provides a rural vista that is possibly the most important one within Fowlmere's boundaries. To allow any breach of the area will undoubtedly cause huge visual harm and undermine the rural character and setting of the village.

There is no proven need for this site in terms of sustainability and the applicant has not shown any benefits or need that override the considerable harm that would result from this application. It will undermine both the public's confidence and the authority of the planning process at SCDC. This, at a time when they have formally published their final consultation version of the local plan, it is imperative that SCDC now confirm and abide by the decisions it has taken during the lengthy and expensive public exercise of revising the Local Development Framework, which covers development in the South Cambridgeshire District up to 2031.

The firm implies that their plans will give viability to village facilities. As most of the employees do not live in the village there is no explanation of how this will be achieved, and proper explanation is needed if the assertion is to be considered seriously. There is one public house open in the village at present.

Appendix B to the EAS report shows the architect's drawing of the proposed ground floor of the building. The drawing is dated 19/3/13, and on the eastern end shows a large break out area (151sq m) with eight tables and forty-eight chairs, with the words "kitchen" and "shower/w.c." shown. In the application documents, the same plan is dated 16/5/13, and the break out area is shown with the same tables and chairs, but the words "kitchen" and "shower/w.c." have been removed. It is possible that this has been done to make less obvious the company's previously-stated intention to have a cafeteria for staff on the site. The effect of providing a cafeteria would be virtually to eliminate any chance that members of staff might buy refreshments from a Fowlmere business.

# Neighbours' proximity and amenities

The proposal would bring this large commercial enterprise extremely close to an area of established residential properties, the closest of these being those at Butts View but also having the potential for traffic nuisance and noise for the wider range of housing at Long Close, Pipers Close and Appleacre Park who would all be affected by any large increase in traffic such a development would generate with movement on and off the site. The site itself would lead to a marked degeneration of the quality of life for our residents especially for those living in the nearest dwellings by way of on-site activities including car and other vehicle movements.

The plans include an open outside seating area which is seemingly going to be for employees to use as a relaxing venue for 80 people with the possibility of more considered in the future. This would without doubt lead to noise being generated that would be impossible to control and which householders should not be expected to have to tolerate.

There would inevitably be security and in-house lighting required for both the building and its surrounding outdoor space, and this would lead to a great deal of light pollution in what is at present an area untroubled by such. This would be extremely close to the nearest properties but would also cause a detrimental effect over a much wider area. Indeed in the winter months when darkness falls around 4pm would make the building stand out in a most inappropriate manner in a village where we generally enjoy a very low level of artificial lighting and hence little light pollution. Light pollution is now classified as a statutory nuisance, and cannot be ignored.

The trees are described as giving the site cover but fail to recognise that this is only during the summer months therefore that protection is gone for much of the year leaving the site eminently visible from a variety of views. The application shows a large and prominent building which would be impossible to disguise. This would be especially noticeable and detrimental when entering the village from a Southerly direction, as from the A505.

### Conclusion

Sustainability is one of the most important criteria in relocating the business. It is abundantly clear from the sequential site list that other sites in the general area are eminently more sustainable, suitable and currently available with appropriate planning permission.

Fowlmere Parish Council continues to support its local businesses in general and Ion Science in particular. However we consider that the present planning application is ill-advised and contrary to all relevant policies and therefore CANNOT be supported. This application is so contrary to SCDC policies that it would be deemed as a departure from the LDF. Indeed planning officers state that it would be classified as a "major departure" requiring a necessity to advertise it as such (SCDC letter of 13 March 2012, para 3).

This is so far removed from that which South Cambridgeshire District Council itself has indicated should be happening to Fowlmere for the next twenty years in the draft LDF that Fowlmere Parish Council wishes in the strongest possible terms to support and uphold both the LDF and the principles of sound and sustainable planning, and would therefore ask that the South Cambridgeshire District Council also confirm its intention to do likewise by an unequivocal refusal of this application.

Yours faithfully,

Jackie Wright

Fowlmere Parish Clerk - on behalf of Fowlmere Parish Council

Appendix:

REPRESENTATION ID SEARCH

Representation ID: 51627

OBJECT Messrs Sheldrick represented by Bidwells Property Consultants (Adam Halford)

Local Plan Issues and Options 2 Report: Part 2 - South Cambridgeshire Further Site Options -

Q1B: Please provide any comments.

Summary:

We object to the failure to account for adequate, up-to-date and relevant evidence about the

economic, social and environmental characteristics and prospects of the area, as required by

Paragraph 158 of the NPPF, and in specific relation to the village of Fowlmere.

Allocation of land west of High Street, Fowlmere (SHLAA Site 107) is essential in retaining in excess

of 40 jobs at Ion Science, and meeting the market and demonstrated affordable Housing Need, in

accordance with the NPPF.

These representations, and those of September 2012, demonstrate that there are no substantive

reasons why the site should not be allocated.

More details about Rep ID: 51627

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REPRESENTATION 51627 ON LOCAL PLAN ISSUES AND OPTIONS 2 REPORT: PART 2 - SOUTH CAMBRIDGESHIRE FURTHER SITE OPTIONS BY MESSRS SHELDRICK REPRESENTED BY BIDWELLS PROPERTY CONSULTANTS (ADAM HALFORD)

Support / Object:

**OBJECT** 

Document Link:

Local Plan Issues and Options 2 Report: Part 2 - South Cambridgeshire

Further Site Options - Question 1B, Q1B: Please provide any comments.

Representation:

We object to the failure to account for adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, as required by Paragraph 158 of the NPPF,

and in specific relation to the village of Fowlmere.

Allocation of land west of High Street, FowImere (SHLAA Site 107) is essential in retaining in excess of 40 jobs at Ion Science, and meeting the market and demonstrated affordable Housing Need, in accordance with the NPPF.

These representations, and those of September 2012, demonstrate that there are no substantive reasons why the site should not be allocated.

## Original submission

I write on behalf of my client, Messrs Sheldrick, owners of land to west of High Street, Fowlmere, identified as site 107 in the South Cambridgeshire District Council (SCDC) Strategic Housing Availability Assessment (SHLAA).

In response to the South Cambridgeshire District Council Local Plan Issues & Options 2 (Part 2) consultation of 7 January to 18 February 2013, we object to Chapter 2, Question 1B with regard to the limited scope of the current, and previous, development sites considered in the Issues and Options consultation.

Paragraph 158 of the National Planning Policy Framework (NPPF) requires that 'Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

The Local Plan Issues and Options consultation is considered to be inconsistent with paragraph 158 of the NPPF in at least three respects:

- 1. The Local Plan does not take account of up-to-date evidence of identified local Housing Need at the village of Fowlmere and its surrounding area which cannot be met through Affordable Exception Sites and Infill Development alone;
- 2. The Local Plan does not take account of relevant evidence of local Economic Need at the village of Fowlmere and surrounding area;

3. The Local Plan does not take account of Relevant Evidence of the Characteristics and Prospects of the Area and Site including the landscape and visual assessment and representations submitted to the Issues & Detions (Part 1) consultation on 28 September. This demonstrates the suitability of the land to west of High Street, Fowlmere for development and addresses the reasons for rejection of the SHLAA assessment of site 107.

To address the above issues it is considered that the land to west of High Street, Fowlmere, SHLAA Site 107 bounded in red on the enclosed plan, should be allocated for a mixed use development to meet the up-to-date and relevant evidence of Housing and Economic need and the relevant evidence of the site and area characteristics in accordance with Paragraph 158 of the NPPF.

### Housing Need

South Cambridgeshire District Council commissioned a Housing Needs Survey of Fowlmere Parish which identified a significant housing need of 23 affordable housing dwellings in the report of May 2007. Since this date no affordable housing has yet been delivered and there is presently only planning consent for 10 affordable housing dwellings (S/1487/10) to the eastern edge of the village. An application for 9 affordable housing dwellings (S/1043/11) to the southern edge of the village was refused by both South Cambridgeshire District Council and subsequently at Appeal by the planning inspector.

Subsequent to the above Housing Needs Survey the South Cambridgeshire District Council Housing Register Information, December 2012, identifies a current register of need within Fowlmere for 18 affordable dwellings.

Paragraph 55 of the NPPF promotes '... sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.'

To the same extent it is considered that development in one village may support the housing need of villages nearby. Within less than 3km of the proposed allocation site, connected by direct road links, are the settlements of Thriplow, Foxton and Shepreth. The Housing Register of December 2012 identifies an established need of 4, 20, and 24 affordable dwellings respectively to serve these settlements. There are no proposed allocation sites within these three close-by settlements and all respective SHLAA sites have been rejected.

See Table in attached Letter copy of Representations.

[South Cambridgeshire District Council Housing Register Information, December 2012]

The South Cambridgeshire District Council Housing Register Information, December 2012, indicates a current registered need for affordable housing of 3,362 dwellings across the District. This is based upon the registered need as of December 2012 and therefore does not include any future housing need predictions.

This register is broken down to identify Local Need as indicated in the excerpt table above, however, this local need equates to just 2,491 dwellings. Therefore there is a further 871 dwellings that must be found across the district where the need is not tied to a specific area. This equates to an additional 25.9% on top of the local need, therefore increasing the Fowlmere area requirement to 83 dwellings if it is to take its share of the wider District need.

The South Cambridgeshire District Council Housing New Build strategy 2012-2015 indicates that compared to the registered need, 'just 385 homes' were let in 2011/12 equating to less than 12% of the current identified need. This must be taken in the context of the last three years growth in Housing Register applications of 'between 500-600 new applications per year'. This has clearly outstripped previous lettings demonstrating that, rather than reducing, the current Registered Need is likely to grow in future years. This growth equates to between 115-215 additional applicants per year, the equivalent of a further 3.4-6.4% increase each year after lettings.

Based upon the above demonstrated up-to-date Housing Register it is considered that the true Housing Need for Fowlmere and its immediate surrounding area is presently between 66 and 83 affordable dwellings. At present there exist three Outline Planning Consents for the settlements of Fowlmere, Foxton and Shepreth for a combined total of just 29 affordable dwellings.

The existing three consents are for Outline approval only, none of which have yet received Reserved Matters consent, despite submissions dating from between 2004 and 2010, their deliverability therefore is not considered guaranteed. Further to this the expected increase in year on year unmet need across the District could add the equivalent of between 2-5 dwellings to the Fowlmere Register per year.

The above demonstrates that even if all existing planning consents are delivered they would remain between 37 and 54 dwellings short of the current registered Affordable Housing Need for the Fowlmere area. This could increase to a shortfall of between 41 and 64 dwellings after 2 years, the

minimum period of time likely to pass before such schemes could be delivered.

The nearest larger settlement of Melbourn is not considered suitable for meeting this need as the four settlements are in excess of 3km from the village centre and road links to Fowlmere and Thriplow in particular are in-direct, increasing travel distance to over 5km and over 7km respectively. Further to this the combined total of proposed housing allocations for Melbourn village is 207 dwellings with a current registered Housing Need for Melbourn and adjacent Meldreth of 150. This equates to over 72% of the dwellings being affordable and therefore considerably higher than the current and proposed Affordable Housing Policy of just 40%, therefore demonstrating that Melbourn cannot meet its own requirements let alone those of the outlying area. As these proposed allocations are at an early stage the real Housing Need at the point of any actual future delivery is again likely to have increased further.

Paragraph 54 of the NPPF requires local planning authorities to '... be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.'

It is clear that attempts to meet the Housing Needs of the Fowlmere area through Exception sites alone have not been successful with the considerable time of between 3 and 9 years already elapsed since application submissions were made, with none so far delivered, and the refusal of a site in Fowlmere to consider. It is also noted that the present consented Outline affordable housing scheme in Fowlmere (S/1487/10) has sought to renegotiate the mix of provision, reducing the scheme to only five rental properties with five shared ownership properties on the basis of viability.

The above is considered clear evidence that the Housing Needs of the area will not be met without being facilitated by market housing as supported by Paragraph 54 of the NPPF. This is recognised by the current engagement between the landowner and Hastoe Housing Association to work together on any delivery of this site, as evidenced by their letter accompanying these representations.

The village of Fowlmere has an enviable level of employment as well as excellent transport links with the A10, A505 and M11 and close-by train services to Cambridge in the north and both Liverpool Street and King's Cross in London to the South, via many large towns such as Royston, Letchworth, Stevenage, Welwyn Garden City, Hertford, Bishop's Stortford and Harlow many of which offer fast train connections to links further afield. For the above reasons the village remains a sustainable and sought after location for market housing which would therefore be considered to be viable, add to the

balance of growth in the community and assist deliverability through subsidising the affordable housing element and any necessary infrastructure and community contributions.

### Economic Need

As stated, the village of Fowlmere presently benefits from an enviable scale of employment opportunities which is further assisted by employment sites within a short commute at Melbourn Science Park and Duxford as well as Cambridge and the aforementioned large settlements that can be reached by rail and motorway.

A key local employer in Fowlmere village, Ion Science, has however identified a need for new premises to meet their future growth. Their present facility at The Way, Fowlmere is no longer sufficient to meet their future needs if they are to remain within the village, as demonstrated by the current use of temporary building accommodation, the consents for which expire on 31 January 2014 and 2015.

Ion Science currently employ 44 full-time and 6 part-time staff at the FowImere premises and require new purpose built accommodation to better meet their specific needs, and to allow for future growth. Ion Science would like to remain within the village of FowImere and have identified the proposed mixed use development of land to west of High Street, SHLAA site 107, as a viable relocation opportunity for them.

This proposed B1 use facility is considered appropriate as the northern part of the proposed allocation site is adjacent to the Butts Business Centre which includes an existing range of commercial/industrial B1 use buildings.

The nature of the Ion Science operation is not in itself considered to generate any undue noise or other nuisance, it is therefore considered ideal to form part of the proposed mixed use development, constituting no unreasonable harm to either the existing or proposed residential development on/adjacent to the proposed allocation site. It is also considered that by locating the new Ion Science premises to the north boundary of the site, it could form a visual and acoustic barrier between the existing adjacent Butts Business Centre uses and the residential dwellings therefore addressing the principal 'Physical Consideration' of noise, for which the site was rejected from the SHLAA.

The retention of employment in the village is considered to be an important aspect of the mixed use development for which the site should be allocated in accordance with Paragraph 28 which supports '... economic growth in rural areas in order to create jobs and prosperity by taking a positive approach

to sustainable development.'

Relevant Evidence of the Characteristics and Prospects of the Area and Site

We consider that the above demonstration of both Housing and Economic Need provides justification for a Mixed Use development allocation of land at Fowlmere village. The proposed allocation site, SHLAA site 107 has been demonstrated as suitable through the Landscape and Visual Assessment and Representations of 28 September 2012.

In particular the Landscape and Visual Assessment concluded that the site "... sits within a somewhat degraded landscape ..." and includes "... a number of semi-derelict buildings as well as foundations of previous buildings. It forms a distinct visual unit attached to the adjacent settlement development ... The site thus appears as part of the village, rather than separate from it."

"It is considered, therefore, that sensitive redevelopment on the site, along with the protection, retention and management of the existing landscape structure, will result in a site which makes positive contribution to the landscape and visual qualities of the area."

The opportunity is therefore considered to exist for development of land to the west of High Street, Fowlmere, SHLAA site 107, that would help to meet locally identified housing needs, market housing need and help to retain local employment.

It is believed that the site constraints and opportunities would allow for a mixed use development including provision of up to 68 new dwellings, of which 27 would be expected to be affordable housing to meet current policy requirements of 40%. The overall capacity of the site is subject to further assessment as part of the allocation process or application, based upon the mix of uses and provision of on-site open space and landscaping.

Both the provision of further housing and the retention and growth of employment are considered to be instrumental in retaining, and potentially enhancing, local services and facilities within the village. This would help to support the existing three public houses/restaurants as well as possibly provide an opportunity for improvements to existing facilities such the Fowlmere Primary School and Fowlmere Village Hall as well as provide opportunities for new amenities and facilities on-site as part of the mixed use development.

Recent announcements by the Planning Minister with respect to future development that incurs payments to the Community Infrastructure Levy (CIL) would allow for a percentage of such payments

to be retained by the Parish of between 15 - 25% depending on whether they choose to pursue an adopted Neighbourhood Plan. An opportunity for preparation of such could exist in parallel with work on a site allocation.

The South Cambridgeshire District Council Recreation and Open Space Study, July 2012, indicates that the village currently benefits from a surplus of Open Space including very good quality pitches and play space. It does however identify a need for extension and improvements to the sport pavilion and potentially the allotments.

Whilst the village of Fowlmere is considered to be well located for local transport links provision could be further improved through local initiatives such as the Royston & District Community Transport Scheme which presently serves a number of surrounding villages and offers a more flexible transport service to complement existing public transport, but does require funding for its administration.

Facility and amenity improvements of projects such as the Community Transport Scheme and Sport Pavilion could be supported by development either directly or through retained CIL payments by the community, providing valuable additional enhancements for both existing, and future, residents.

### Conclusion

We object to the failure to account for adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, as required by Paragraph 158 of the NPPF, and in specific relation to the village of Fowlmere.

Allocation of land west of High Street, Fowlmere (SHLAA Site 107) is essential in retaining in excess of 40 jobs at Ion Science, and meeting the market and demonstrated affordable Housing Need, in accordance with the NPPF.

These representations, and those of September 2012, demonstrate that there are no substantive reasons why the site should not be allocated.

We request formal acknowledgement of these representations and trust that the above, attached and previous representations and reports supporting this important site will be given due consideration in the further preparation of the Local Plan.