

**RPS**

## **Proposed Submission Local Plan Examination Hearing Statement**

In respect of

East Cambridgeshire Proposed  
Submission Local Plan  
Examination – Matter 2

On behalf of

Abbey Properties Cambridgeshire  
Limited & Peter and Michael  
Seymour and Nicholas and Judith  
Holdsworth

RPS Ref: JCG22793

23 May 2018

*Secure & Stable*  
ADDING VALUE

# QUALITY MANAGEMENT

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# 1 INTRODUCTION

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- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth, to submit Hearing Statements and appear at the Examination Stage 1 Hearings on their behalf in relation to the East Cambridgeshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to both the Local Plan Further Draft consultation in January 2017 and the Proposed Submission consultation in November 2017.
- 1.3 The representations to the Local Plan Further Draft raised objections to the proposed housing allocations within Witchford and a number of draft policies including the Settlement Hierarchy and the Countryside (Policy LP3), Achieving Design Excellence (Policy LP22) and Conserving and Enhancing Heritage Assets (Policy LP27).
- 1.4 The 2017 November representations to the Proposed Submission Local Plan raised further objections to the proposed allocation of housing sites within Witchford and a number of the draft policies including LP2, LP3, LP6, LP16, LP32, Witchford1, Witchford2, Witchford3 and the Sustainability Appraisal.
- 1.5 These representations are provided in Appendices to the Hearing Statements submitted for Matter 1.
- 1.6 This Statement details our clients' responses to Matter 2 of the Inspector's Matters, Issues and Questions for discussion at the Stage 1 Examination Hearing Sessions. Hearing Statements have also been prepared in respect of the other 3 Matters. We reserve our position to submit further Hearing Statements in relation to the Stage 2 Examination at the appropriate juncture.

## 2 RESPONSE TO THE INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT THE EXAMINATION HEARINGS

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2.1 The Inspector has posed a number of questions in respect of 4 Matters for the Stage 1 Examination. This Hearing Statement seeks to respond to questions of relevance to our clients' interest in respect of Matter 2. These responses are provided below.

### **Matter 2: Vision and Objectives and Development Strategy**

#### *Issue 2*

#### Question 18

2.2 Question 18 relates to whether the strategy and distribution of development in East Cambridgeshire District is justified, effective, positively prepared and consistent with national policy. We consider that the Plan has not been positively prepared for the reasons set out below and focuses development too heavily on large strategic sites within the Main Settlements in the District.

2.3 The settlement hierarchy in East Cambridgeshire is as follows:

- Main Settlements – City of Ely, Littleport, Soham
- Large Villages – e.g. Witchford
- Medium Villages
- Small Villages

2.4 We consider that the current strategy fails to plan positively for the growth of Large Villages and the majority of Medium Villages within East Cambridgeshire. A number of the Large Villages are in sustainable locations with strong links to the Main Settlements and employment areas. For example, Sedgeway Business Park is located just 1km from Witchford and the settlement benefits from a regular bus service to Cambridge and Ely.

2.5 A breakdown of the proposed housing numbers per settlement tier is provided below. We consider this table shows that the three main settlements within East Cambridgeshire will be required to provide c.75% of the total number of dwellings over the Plan period. Large Villages will provide less than 20% of the housing need. This is not considered to equate to positive and sustainable planning as it places an undue burden on main settlements and will not deliver a range of new housing opportunities across the District.

<b>Main Settlement</b>	<b>Large Villages</b>	<b>Medium Villages</b>	<b>Small Villages</b>
8,030	1,875	815	10

- 2.6 Furthermore, the majority of the District housing requirement is proposed to be concentrated on large strategic sites such as North Ely (3,000 units) and Land south of Grange Lane, Littleport (1,200 units). The Council's focus on these large strategic sites is contrary to national guidance with the Housing White Paper and the draft NPPF encouraging greater use of small sites to diversify opportunities for builders and increasing the number of schemes which can be built out quickly. We therefore do not consider that the draft Local Plan reflects the direction of travel of emerging national guidance.
- 2.7 The Proposed Submission version of the Local Plan was also amended by Members prior to submission for Examination. This resulted in the removal of the Strategic Allocation WFD.M1 from Policy Witchford2 meaning that there is no longer a suitable site for a new primary school within Witchford and further reducing the number of dwellings proposed within Large Villages. However, as this amendment was made so close to the submission for examination the Council's evidence base has seemingly not been updated to reflect this change nor has the Sustainability Appraisal considered its impact.
- 2.8 The draft Local Plan therefore does not plan positively for development across the whole of the District and does not comply with emerging national guidance. We consider that the draft Local Plan should seek to distribute growth across the District, particularly within the Large Villages identified within Policy LP3.

### 3 CONCLUSION

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- 3.1 On behalf of our clients, we have a number of concerns in relation to the soundness of the draft East Cambridgeshire Local Plan. This Hearing Statement has been produced to Matter 2: question 18 identified in the Inspector's Matters, Issues and Questions document.
- 3.2 The Plan has not been positively prepared for the Large Villages identified in policy LP3. Additional growth should be allocated to Large and Medium Villages within the settlement hierarchy to ensure sustainable growth across the East Cambridgeshire and a range of sites coming forward to meet the housing need.