



## **Gladman Developments Ltd**

### **East Cambridgeshire Local Plan Examination**

#### **Matter 13 – Development in the Countryside**

**Issue 1: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach towards development in the countryside?**

##### **Development in the Countryside**

**Q58. Is Policy LP31, and the approach to rural development, as set out in Parts A-H inclusive, justified, effective and consistent with national policy?**

As a general principle, development in the countryside should not be restricted on the sole basis of it being in the open countryside

Policy LP31 applies to proposals in the countryside and outlines a number of exceptions for development which would be supported outside of the development envelopes. This includes the following types of development in the countryside:

- CLT / Affordable exception sites
- Dwellings for rural workers
- Replacement, re-use and conversion
- Mobile homes
- Non-residential development
- Agricultural diversification

Whilst Gladman support the identification of the various exceptions listed above, as a general principle development in the countryside should not be restricted on the sole basis of it being in the open countryside. The national policy with regards to development in the countryside has changed dramatically in recent years, and open countryside is not protected in the same extensive manner as the old PPS7 approach.

Gladman reiterate objections to both this policy and LP3 (development envelopes) as the combined approach is too restrictive and not compliant with the Framework. What in effect the Council is proposing through Policy LP3 and LP31 is a blanket restriction policy, to which is then set within the policy framework of only very limited exceptions. The policy takes no account of the need to allow for and plan for sustainable development. Gladman consider the current approach proposed by LP3 and LP31 to be unsound.

The need for greater flexibility is further encapsulated by the Inspector’s interim findings issued on 30<sup>th</sup> July 2018 which have effectively put a stop to the proposed element of East Cambridgeshire housing need that was due to be delivered within Peterborough. This means these units now need to be delivered within the East Cambridgeshire authority boundary. Whilst Gladman note the Council’s response to the Inspector’s interim findings, and specifically how they are proposing to deal with the housing numbers no longer being exported to Peterborough (amending the Plan period and using a stepped housing requirement). The proposed modifications, are yet to be tested and Gladman object to these (further details of our concerns and objections to the proposed modifications is included in detail in our Matter 17 statement and a note submitted for the attention of the Inspector on 8<sup>th</sup> August 2018).

Further to the above general objections to Policy LP31, Gladman specifically object to Part H of the policy in relation to protecting the best and most versatile agricultural land. This part of the policy states:

*“With the exception of allocated sites, development affecting the best and most versatile agricultural land will only be permitted if:*

- i. There is insufficient lower grade land available at that settlement (unless development of such lower grade land would be inconsistent with other sustainability considerations)...”*

This would appear to require a sequential test to be undertaken in relation to BMV. This is not appropriate and may act to restrict otherwise sustainable development from coming forwards. There is no requirement in national policy for a sequential test to be applied to BMV. Part H of Policy LP31 therefore is not justified or consistent with national policy.

Q58a. Are the settlement boundaries appropriate and justified? Are any modifications required?

Gladman refer to our Matter 2 hearing statement in relation to Policy LP3 and the inclusion of development envelopes. The use of settlement limits such as this to arbitrarily restrict sustainable development from coming forward on the edge of sustainable settlements would not accord with the positive approach towards growth required by the Framework.

The PPG also advises that:

*“all settlements can play a role in delivering sustainable development in rural areas and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”* (PPG ID: 50-001-20160519)

The use of development envelopes, as per Policy LP3, appears to be based on the old PPS7 approach to countryside protection, which took a restrictive stance to development in rural areas by only permitting certain types of development. There is nothing in current national policy that states that development in the open countryside should be restricted in this extensive manner which the proposed policy suggests. Instead, Gladman would suggest that the policy should take a more permissive stance, which would allow for development in these edge of settlement locations.

Gladman do not consider the development envelopes and Policy LP3 are justified and consistent with national policy.

Q59. What is the justification for the parameters set out in Policy LP32? Are they consistent with national policy? How does the policy reflect local circumstances and is it sufficiently flexible so as to be effective?

Gladman have no comments to make in relation to Policy LP32.