

East Cambridgeshire District Council Local Plan examination

Stage 2 hearing sessions

Respondent reference number PS309-314

Matter 16: Proposed site allocations – Medium Villages.

Issue 1: Whether the proposed site allocations, excluding Local Green Spaces, for the defined Medium Villages of Ashley, Burrough Green/Burrough End, Cheveley, Dullingham, Kennett, Little Thetford, Lode with Long Meadow, Mepal, Newmarket Fringe, Stetchworth, Swaffham Bulbeck, Swaffham Prior, Wilburton are justified, based on up-to-date evidence, effective, viable, deliverable and consistent with national policy?

[Kennett / KEN.M1 / Land to the West of Station Road]

62. (a) What is the background to the site allocation? How was it identified and which options were considered?

The Local Plan identifies a single preferred allocation site in the village of Kennett (KEN.M1) which proposes the introduction of 500 new homes within a relatively small rural community. The village was first identified for strategic scale development in section 22(d) of the Cambridgeshire and Peterborough East Anglia Devolution Proposal (July 2016) before evidence studies or community engagement had justified the suitability of the village of Kennett to accommodate such strategic scale growth.

The lack of evidence to support site selection was acknowledged by the council in the further draft Local Plan (January 2017) which stated in section 7.18.4 that *'proposals for this site are still emerging, so the allocation is provisional at this stage, and is subject to satisfactory evidence of deliverability'*. This confirms that the site had been earmarked in section 22(d) for *'a new Community Land Trust Scheme in East Cambridgeshire (Kennett 500 – 1,000 new homes)'* long before evidence studies were in place to support the allocation.

However, the Devolution Deal holds no statutory status within the plan making process and the council have failed to justify the strategy which identifies the site as being suitable for strategic allocation. The retro-fitting of evidence in support of a pre-determined conclusion contravenes paragraph 14 of the Planning Practice Guidance which states that *'evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively'*.

Throughout the plan making process the council have been affording this non-statutory document 'considerable weight' as confirmed in section 2.7 (p.3) of the council's Policies for Kennett (November 2017) document. This states that *'on the basis that the Deal has been agreed by Government and all constituent authorities, considerable weight must be attached to what it states'*. Therefore, a non-statutory document has influenced the council's selection of a preferred allocation site within the village.

We therefore question whether such a strategic site allocation within the plan meets the tests of soundness set out within paragraph 182 of the NPPF 2012.

We also do not feel that reasonable alternative sites promoted through the Regulation 18 and 19 consultation process within the village of Kennett have been evaluated in a transparent and consistent manner. This is evident by the misrepresentation of our client's proposed development at Longstones Stud where 522 dwellings have been assessed within an area of 14.4ha as detailed within the council's Site Assessment Evidence Report (Final Report – November 2017). The details assessed do not match those provided during Regulation 18 and 19 consultations. Subsequent attempts to consult with the council to rectify the error pre-assessment were unsuccessful (correspondence attached in Appendix A).

We do not believe that reasonable alternative sites have been evaluated fairly based on proportionate evidence as required within paragraph 182 of the NPPF 2012 which brings us to question the soundness of such a preferred allocation. Clear inconsistencies in the comparisons between the preferred site and alternative sites promoted during Local Plan consultation, are detailed within the council's Site Assessment Evidence Report (Final Report – November 2017) and referenced within the Sustainability Appraisal and Strategic Environmental Assessment of the Local Plan to 2036 (November 2017). Alternative sites should be equally appraised to the same level as the preferred option, and this has not been coherently demonstrated by the council. Please refer to the Longstones Stud Position Statement (December 2017) for more detail (Appendix B).

This is also a requirement of the Sustainability Appraisal methodology under Section 2.3.6 (Stage C) where sites (including preferred allocations) are appraised against the Sustainability Appraisal Framework. The preferred allocation site within Kennett is of a strategic scale within the Local Plan, however site assessment fails to use proportionate evidence resulting in the council's preferred allocation site not being justified.

The plan can only be legally compliant and sound if a genuine and robust evidence base is prepared to justify the allocations made. This includes a robust evidence-based assessment (and public engagement) of all reasonable alternatives including development options at Longstones Stud. In our view, such an assessment would be likely to demonstrate the suitability of Longstones Stud for the scale of development and community benefit clearly identified and proposed.

62. (c) *What is the scale type/mix of uses proposed?*

We do not feel that the scale of development proposed within the KEN.M1 allocation is appropriate for the village of Kennett. The council's preferred allocation site within Kennett is described in detail within Kennett4 and proposes 500 new dwellings with employment provision, a new Primary School and a local centre providing retail and community facilities *'of a scale appropriate to the community created'*.

Policy Kennett4 therefore acknowledges that the facilities provided within the council's preferred strategic allocation will not be of a scale in keeping with the local character of the existing village but in keeping with the character introduced. This is contrary to the requirements of Policy Kennett1 (p.114) which states that *'proposals should respect the local character of the village, such as building height and materials'*.

62. (g) *How does the site relate to nearby uses?*

The character of the village will be altered significantly through the introduction KEN.M1. It will dominate the village rather than complement its existing character. We therefore do not feel it relates to nearby uses and will dominate the future shape and form of the village.

62. (j) What are the infrastructure requirements / costs and are there physical or other constraints to development? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development?

62. (l) Is the site realistically viable and deliverable?

A proposed physical constraint exists which may result in KEN.M1 being undeliverable in its current form. A review of the Kennett4 Draft Illustrative Masterplan (October 2017) has highlighted a proposed roundabout on Station Road which would restrict existing access movements into and out of Longstones Stud located on the opposite side of Station Road (attached). However, despite the Local Plan examination process being ongoing and undetermined, a planning application has already been submitted to ECDC for the preferred site allocation (18/00752/ESO 'Sustainable 'Garden Village' extension to Kennett). We feel this is premature given the uncertainties raised surrounding the soundness of the preferred allocation and the yet to be determined outcome of Local Plan examination.

Having reviewed the documentation submitted by the applicant, it is evident that the proposed access arrangements to serve the development on Station Road would severely and negatively impact our client's existing business. Parameter Plan 06: Access and Movement Plan (Drawing number 01229_PP06 Rev P1) illustrates a proposed perimeter road roundabout which is due to be located on Station Road opposite the existing access point for Longstones Stud. Large vehicles would no longer be able to turn right onto Station Road, potentially jeopardising the viability of our client's existing business which serves the Horse Racing Industry (HRI). A second point of concern being that access restrictions may force large vehicle movements towards and through Newmarket. We therefore do not accept that the KEN.M1 strategic allocation is deliverable in its current form.

The council's preferred allocation within Kennett is predicated on providing substantial new facilities and mitigation, particularly to the highways, in order to successfully accommodate the new homes and their impact. To ensure that the plan is effective it is necessary for there to be sufficient and proportionate evidence to confirm that the development is viable and deliverable. As a strategic allocation, for it not to be deliverable the plan would fail to meet its OAHN and this would therefore render the plan unsound.

Appendix A

From: [REDACTED]
Sent: 13 June 2017 11:30
To: [REDACTED]
Subject: RE: East Cambridgeshire District Council - Further Draft Local Plan Consultation

Dear Mike

I am obviously well aware of the need to consider all proposals fairly and equally, and follow all appropriate legislation. I can reassure you that this will be the case for all sites submitted to the Council, and no exception will be made in Kennett.

At present, I believe I have all the relevant information and evidence I need at this stage in order to continue my thinking towards making a recommendation to the Council in terms of which sites should go in the Local Plan. If at any point this changes, for any site, then I will contact the applicable agent/landowner, and seek more information. Exceptionally rarely, this may require a meeting.

As I am sure you appreciate, and in line with your repeated message of treating all sites fairly and equally, meeting some agents and not others, and receiving verbal information from such meeting rather than written, has a considerable risk of other parties making a claim that the council was not treating all fairly, equally and transparently. It is with that in mind that I repeat that meetings are undertaken exceptionally.

Regards

Richard

From: [REDACTED]
Sent: 07 June 2017 19:19
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: East Cambridgeshire District Council - Further Draft Local Plan Consultation

Dear Richard

I write to you to ask if you have yet had an opportunity to consider my response to your email attached below and whether or not you would agree, as suggested in my email of 3 April 2017 to meet with me in order to discuss what further evidence you might require to properly consider the Longstones Stud site as a reasonable alternative in accordance with para 182 of the NPPF. As you know, I am very concerned that you and your team have already mis-understood and misrepresented my client's earlier submission for 6.6 ha of residential land together with 14.4ha of country park. My concern is compounded by a public meeting I attended last night in the village and by the attached circular issued to the village by the CLT board. As you will see this continues to imply that my client's proposal is for 522 dwellings and that any other site would be in addition to the 500 homes identified on the currently preferred site to the west of Station Road. I am sure you will wish to make it clear that until the local plan has completed its due process the council has a legal duty to consider all reasonable alternatives with equal and proportionate evidence.

I reiterate to you, as I have done with the CLT board, that we are happy to discuss how the CLT might have appropriate involvement with our proposal and gain access to public benefits. If this continues to be denied until after the publication of the next iteration of the local plan and then only if

Longstones is identified for development and your council continue to consider the allocations in Kennett without full and equal evidence then I fail to see how you will be able to contend to an Inspector that all reasonable alternatives have been considered based on proportionate evidence. At last evening's public meeting there was a unanimous vote amongst those who attended that they would wish the CLT and ECDC to consider all reasonable alternatives and not accept that the allocation of any other site would necessarily be **in addition** to the 500 home site.

I sense that there is a good deal of misunderstanding amongst interested and community minded residents in the village and on the CLT board about the planning process. I cannot speak for the three other alternative proposals in the village put forward by others in your latest call for sites but I can confirm that my clients at Longstones have evidence to present and discuss with you which is relevant to your consideration of the site as a reasonable alternative.

I look forward to hearing from you.

Kind regards

Mike



CODE Development
Planners

Mike Carpenter BSc (Hons) MRTPI
Director

From: [REDACTED]

Sent: 26 May 2017 11:19

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]

Subject: FW: East Cambridgeshire District Council - Further Draft Local Plan Consultation

Dear Richard

Many thanks for your email to my colleague Grahame Stuteley in connection with the above. Our expectation would be that the delivery of the country park would be as part of the adjacent housing development. One would, therefore, anticipate that any grant of planning permission would be subject to a section 106 agreement with clauses designed to deliver a country park following the occupation of a specified number of dwellings together with a requirement to set out the park to an agreed specification and a financial contribution towards its maintenance/management.

At present we would anticipate the ownership of the land remaining with Longstones Stud with a long term lease at a peppercorn rent to a suitable body charged with maintaining and managing the park. On this latter point we are open to discussions. Commonly, such spaces elsewhere are maintained by a variety of alternative organisations such as parish councils, district councils, county councils, wildlife trusts or specific open space management companies or charities.

In the particular case of Kennett, a CLT has been established which might represent an additional alternative. I cannot comment on this until and unless we are able to discuss matters with the CLT.

There are many examples of local plan policy wording designed to secure a comprehensive package of benefits associated with developments. It would seem to me that the most appropriate approach would be to include reference in a site specific policy or, if the council plan to allocate more than one site in the village, include reference to a proportionate pooling of contributions towards the country park as a substantial village facility.

As you know, we arranged a public exhibition of our proposals on 17 May 2017. Despite the rain, we had a reasonable turn out with many positive and constructive comments. In order to inform your preparation of the plan and consideration of reasonable alternatives, we would be very happy to discuss with you the work we have carried out so far and the feedback we have received.

Perhaps I can also take this opportunity in corresponding with you to suggest that in considering the Longstones Stud site as a reasonable alternative you might sensibly include it in your discussions with Forest Heath Council in your duty to co-operate. This point obviously relates to the fact that part of the country park would be sited within Forest Heath's area, something FHDC would be unlikely to object to.

Finally, you will be interested to know that many of the residents who attended the exhibition were pleasantly surprised to find that the proposal was not in fact for 522 dwellings as stated in your documentation but was clearly for approximately 120 units together with 14.4ha of country park sited within the flood plain.

With kind regards

Mike



CODE Development
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Mike Carpenter BSc (Hons) MRTPI
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Appendix B



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LONGSTONES STUD STATION ROAD, KENNETT

POSITION STATEMENT

Further draft Local Plan consultation

January 2017

February 2017

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EXECUTIVE SUMMARY

This Position Statement seeks to explain two options for possible development on land at Longstones Stud.

Option 1 is a new option not previously promoted in the earlier call for sites exercise. It has emerged following the recognition that East Cambridgeshire District Council (ECDC) and the Kennett Community Land Trust (CLT) wish to consider the potential of the village to accommodate larger scale development, with appropriate community benefits, than might have been suggested by a strategy to limit development scale proportionate to the size of the existing village population.

ECDC and the community may wish to consider the two options presented either as alternatives or additional to the currently emerging proposal on land to the west of Station Road. The Local Plan process is designed to be the mechanism by which ECDC and the community can take control and influence the scale and nature of future development.

The extent of development in option 1 is carefully identified to limit the impact on adjacent residential properties fronting Station Road and to create the greatest possible access and linkage to existing and new community facilities. The area shown for possible residential use measures approximately 6.6ha with a new country park and riverside walk of approximately 14.4ha. The plan envisages generous green links through the residential area linking, if desired by the community, to a connection direct from the village playing field. There would also be opportunities to provide an extension to the playing field and a village store subject to further discussion with the community.

Option 2 is the same as one proposal submitted through the earlier call for sites exercise. The option would infill the gap along Station Road between the cluster of housing to the south and the village playing field to the north. Housing numbers would be limited to between 20 and 40.

The earlier option to develop housing to the rear of dwellings in Station Road is not being promoted further.

The owners of Longstones Stud are keen to present the proposals to the CLT and community and to seek to address any outstanding issues. Further work is required to assess the impact and possible proportionate mitigation measures for existing village facilities such as the school and highways.

An initial assessment of both options 1 and 2 using the same format as the council's Sustainability Appraisal demonstrates firstly some inconsistencies in the assessment of the previously submitted option 2 site and the currently preferred development on land to the west of Station Road. Using the same appraisal format and scoring, option 1 scores very favorably as a sustainable development providing benefit against most of the SA objectives.

1 INTRODUCTION

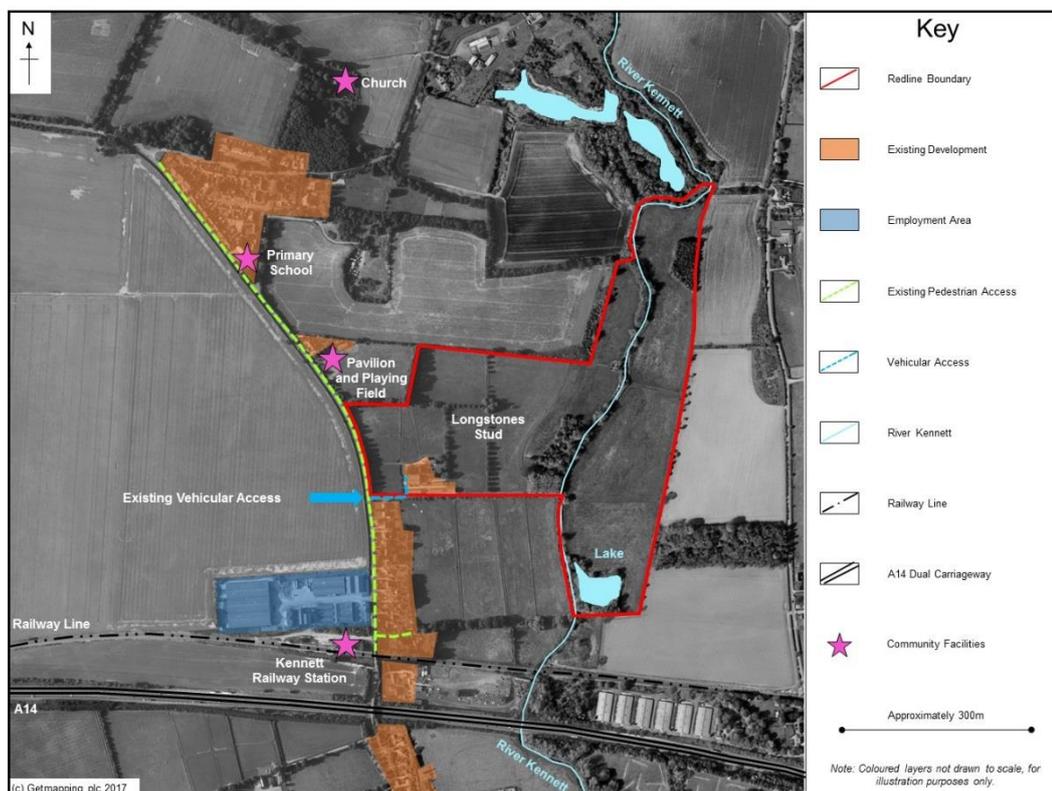
- 1.1 On behalf of the landowners at Longstones Stud, Kennett, CODE Development Planners Ltd have submitted various responses to relevant policies and paragraphs in the further Draft Local Plan Consultation January 2017.
- 1.2 In addition to those responses, we submit the following Position Statement to explain alternative site options amended since the call for sites exercise in February/March 2016. The Community Land Trust (CLT) and East Cambridgeshire District Council (ECDC) clearly wish to consider the potential of the village to accommodate larger scale development, with appropriate community benefits, than might have been suggested by a strategy to limit development scale proportionate to the size of the existing village.
- 1.3 We have, therefore, readdressed the opportunity provided by the Longstones Stud site to deliver housing and community benefit. We request that the council consider these proposals in the Draft Local Plan and associated Sustainability Assessment (SA) evidence as reasonable alternatives.
- 1.4 The CLT and ECDC may wish to consider the two options promoted either as alternatives or additional to the currently emerging proposal described in draft policy Kennett 4.

2 CONSULTATION

- 2.1 Since the call for sites exercise, CODE have presented to the parish council the two options submitted earlier in the call for sites exercise. We have not received any comment from the parish council.
- 2.2 During the presentation we were encouraged to present our proposals/options to the CLT. We have corresponded with the trust board who currently feel that a presentation would be premature. Appropriate correspondence is attached at Appendix 1. While we are disappointed not to have the opportunity to present to the CLT we do, of course, respect any views of the CLT membership.
- 2.3 There will, however, be a need for parties to consider all reasonable alternatives and we would continue to welcome the opportunity to explain the options and the community benefits which could accrue from development.
- 2.4 The need for further open and transparent consultation is emphasised by the very unique role of the CLT in the village of Kennett and the very real opportunities for the village to benefit substantially from being involved in the planning and design of development. It is essential that the scale and character of any new development strikes the right balance of meeting needs, enhancing village facilities and being able to be accommodated by existing roads and travel restrictions.

3 SITE LOCATION AND FEATURES

- 3.1 Longstones Stud is currently a quarantine stud accommodating visiting Australian horses. The frequency of those visits has greatly diminished over recent years and the occupancy rates at the stud are now minimal.
- 3.2 The stud has direct access to Station Road through an existing vehicular access between the existing houses in Station Road to the south and the village playing fields and pavilion further to the north. In addition to the undeveloped road frontage, the stud also owns the two dwellings directly adjacent to the existing access.
- 3.3 A footpath link to Station Road exists from the land and emerges onto Station Road directly opposite the station.
- 3.4 There is an existing footpath alongside Station Road for the length of the site to the station and Kentford to the south and to the playing field, school and larger cluster of existing village homes to the north.
- 3.5 The land ownership extends to immediately adjacent to the southern and eastern boundaries of the existing village playing field and to beyond the river further to the east. Also included in the ownership is an existing small lake. Approximately in the centre of the land there is existing development in the form of a dwelling, range of equine buildings and concrete hardstanding.
- 3.6 The existing features described above are shown in the diagram below:



4 DESCRIPTION OF OPTIONS

4.1 Option 1 (residential, country park, riverside walk and other community benefit) (Appendix 3)

4.1.1 Option 1 is shown on drawing number 029_001.1 and could include substantial community benefit, some of which is illustrated in the Concept Spatial Masterplan.

4.1.2 The extent of development is carefully identified to limit the impact on adjacent residential properties fronting Station Road and to create the greatest possible access and linkage to existing and new community facilities. The area shown for possible residential use measures approximately 6.6ha with a new country park and riverside walk of approximately 14.4ha. The plan envisages generous green links through the residential area linking, if desired by the community, to a connection direct from the village playing field.

4.1.3 The adjacency of the playing field and site also affords an opportunity to extend the playing field facility and provide easy access to a village store, if required by the community and viable.

4.1.4 The ultimate number of dwellings to be provided would be the subject of further design and viability discussions although it would be expected that in the interests of place making and landscape impact densities would reflect existing village character and would be lowest at that part of the site closest to countryside and new country park.

4.1.5 The extent of community benefits, including provision of a country park and riverside walk, access to the lake, provision of affordable housing, proportionate contributions to all village amenities and, if desired, extension of the playing field and provision of village store would be discussed with the CLT as explained in paragraphs 2.2 and 2.3 above.

4.2 Option 2 (20 – 40 dwellings) (Appendix 3)

4.2.1 Option 2 is shown on drawing number 029_001.2 and illustrates a smaller addition to the village of between 20 and 40 dwellings filling the currently undeveloped frontage between the cluster of existing houses fronting Station Road and the existing playing field.

4.2.2 The option envisages a single point of access serving a cluster of development sited behind the existing hedge-line along Station Road.

4.2.3 For clarity the third option submitted in the call for sites exercise which envisaged development to the rear of existing houses in Station Road is not being promoted further.

4.3 Sustainability Appraisal (SA)

4.3.1 The current stage of the Draft Local Plan process requires the preparation of a SA to run in parallel with the production of the Local Plan document. As confirmed in paragraph 2.3.3 of the council's SA document "this integration is fundamental to sound plan-making". The process at this stage requires the council to develop the Local Plan options including reasonable alternatives and to evaluate the likely effects of the Local Plan and alternatives.

4.3.2 The current further Draft Local Plan January 2017 considered only those sites promoted in the call for sites exercise. It is now necessary to update the appraisal by evaluating further options. It is important that the evaluation is transparent and consistent across all reasonable alternatives.

4.3.3 Before considering the new option for Longstones Stud (Option 1 described above) it is first necessary to understand the reasons for what appears to be inconsistencies in the assessments of site 14/03 (option 2 above) against 14/05 (suggestion in Policy Kennett 4 for allocation site). This relates to comments made on page 137 of the council's SA in its assessment of site 14/03:

- **"Located away from services"**. The site is located no further away from services than site 14/05. In fact site 14/03 is located directly adjacent to the existing playing field and pavilion, in close and safe walking distance to employment, the station and school. The site is also located on the same side of Station Road as the main cluster of existing village residences and facilities.
- **"Access to the site is difficult"**. Access to the site would be easily accommodated through the existing access to Longstones Stud.
- **Housing need – neutral effect**. The proposals would seek to provide a range of housing types and sizes to meet the identified needs of all sectors of the community both in market housing and affordable housing. This potential is no different to sites 14/04 and 14/05 which are assessed as "potentially significant beneficial impact" and "strong and significant beneficial impact" respectively.
- **Community involvement**. As detailed in paragraphs 2.1 and 2.2 above we have consulted with the parish council and attempted to consult with the CLT. The landowners continue to offer the opportunity for full community involvement. Reference in the assessment to "uncertain or insufficient information" can be addressed in a full and open consultation process.

4.3.4 In order to assist in the assessment of the new option presented in these representations (option 1 above) I attach at Appendix 2 a revised SA table in the same format as that used in the council's SA document at page 137. For clarity, the revised table also includes a revised view of site 14/03 (option 2 above) and a more objective and consistent assessment of site 14/05 (land west of Station Road).

- **SA Objective – Undeveloped land**: The site is partly developed with a dwelling, equine buildings and hard standing.

- **SA Objective – Biodiversity:** The provision of an extensive country park and riverside walk with the existing natural vegetation and water features would maintain and substantially enhance the range and viability of characteristic habitats and species.
- **SA Objective – Access to wildlife:** The provision of the country park and riverside walk would substantially improve opportunities for people to access and appreciate wildlife and countryside places.
- **SA Objective – Landscape/townscape character:** Although new homes constructed on existing horse paddocks would affect existing landscape, on balance the maintenance of frontage hedge-lines and provision of country park would greatly enhance landscape and open spaces.
- **SA Objective – Health:** The provision of the country park and riverside walk together with the potential to extend the playing field would help to encourage healthy lifestyles.
- **SA Objective – Open space:** The provision of the country park and riverside walk together with the potential to extend the playing field would greatly increase the quantity and quality of publicly accessible open space.
- **SA Objective – Housing need:** The proposals would seek to provide a range of housing types and sizes to meet the identified needs of all sectors of the community both in market housing and affordable housing. This potential is no different to the site to the west of Station Road which is assessed as having “strong and significant beneficial impact”.
- **SA Objective – Community involvement:** As detailed in paragraphs 2.1 and 2.2 above we have consulted with the parish council and attempted to consult with the CLT. The landowners continue to offer the opportunity for full community involvement.
- **SA Objective – Investment:** The proposals would give the opportunity to improve and support the investment and provision of community services and infrastructure in proportion to the scale of development. The development would in particular deliver substantial investment and improvement to recreational facilities within the village.

5 CONCLUSIONS

- 5.1 The owners of Longstones Stud have refreshed the proposed opportunities previously promoted in the earlier call for sites exercise. Appropriate development of the land could bring substantial benefit to the village of Kennett while at the same time help to meet the housing requirements for the district.
- 5.2 Options 1 and 2 have been carefully designed to give the community the opportunity to consider a potential development which would be proportionate to the scale of existing village form and character but at the same time deliver appropriate community benefit.

- 5.3 Additional work is required to assess precisely what community benefit is desired, required and appropriate but the owners are very keen and willing to work with the CLT in developing further detail on the options.



Appendix 1



029_001
13 December 2016



Mr Danks
Secretary to Kennett Community Land Trust
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66 Station Road
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Cambs
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Dear Mr Danks

Longstones Stud, Kennett

I am writing to you as secretary of the Kennett CLT. You may be aware that my clients, the owners of Longstones Stud, have put forward in the district council's call for sites process the possibility of allocating two sites either together or individually for housing development. I attach a plan showing their locations.

We have presented these very early ideas to the parish council on 15 November 2016 and we have become aware of the very interesting and exciting opportunities of the CLT. In making the original submissions to the district council in the due process of Local Plan preparation, we were unaware of the very real opportunities for helping to meet CLT objectives. I note from your membership and policy page on the website that your mission includes:

- the provision and management of housing (especially affordable housing);
- promotion of community development.

Helpfully, the website also explains how the Trust engages with local residents and works collaboratively with local owners and developers to secure land that can be held by CLT in perpetuity and developed for the benefit of the local community.

With the latter in mind, I should be grateful if you would let me know how you think it might be best for my clients to engage with the CLT in this regard.

The suggested sites are very much early in principle thoughts and I can imagine how residents and the CLT might appreciate a discussion on alternative forms of site and development. I am also conscious that the village is currently considering the very much larger proposal put forward by Palace Green Homes. The CLT membership may wish to discuss how development on parts of the Longstones Stud ownership might be an alternative or complementary form of development.

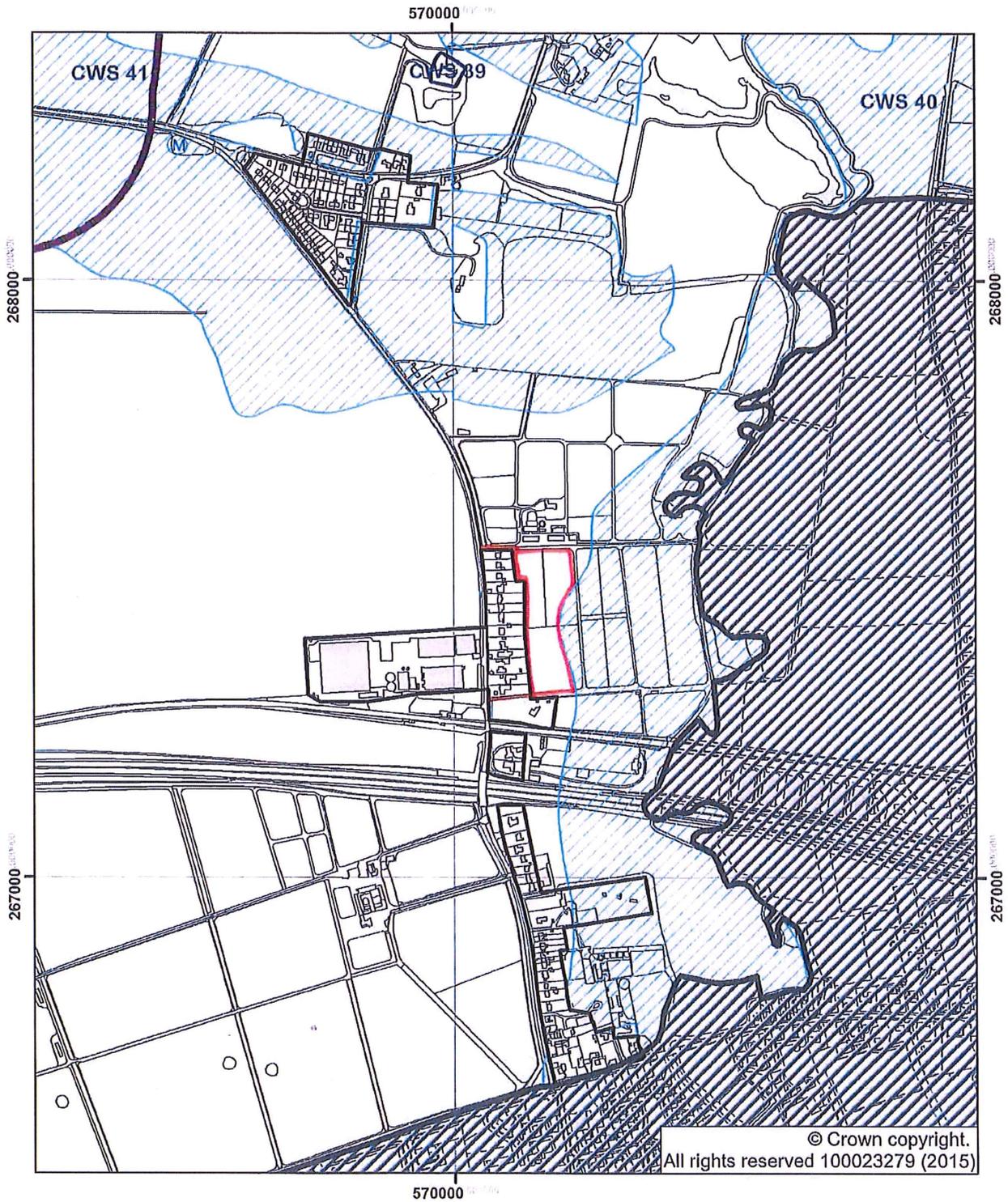
I look forward to hearing from you.

Yours sincerely



Mike Carpenter
Director

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Policies Map (April 2015) Kennett (Insert Map 8.20)

Key:

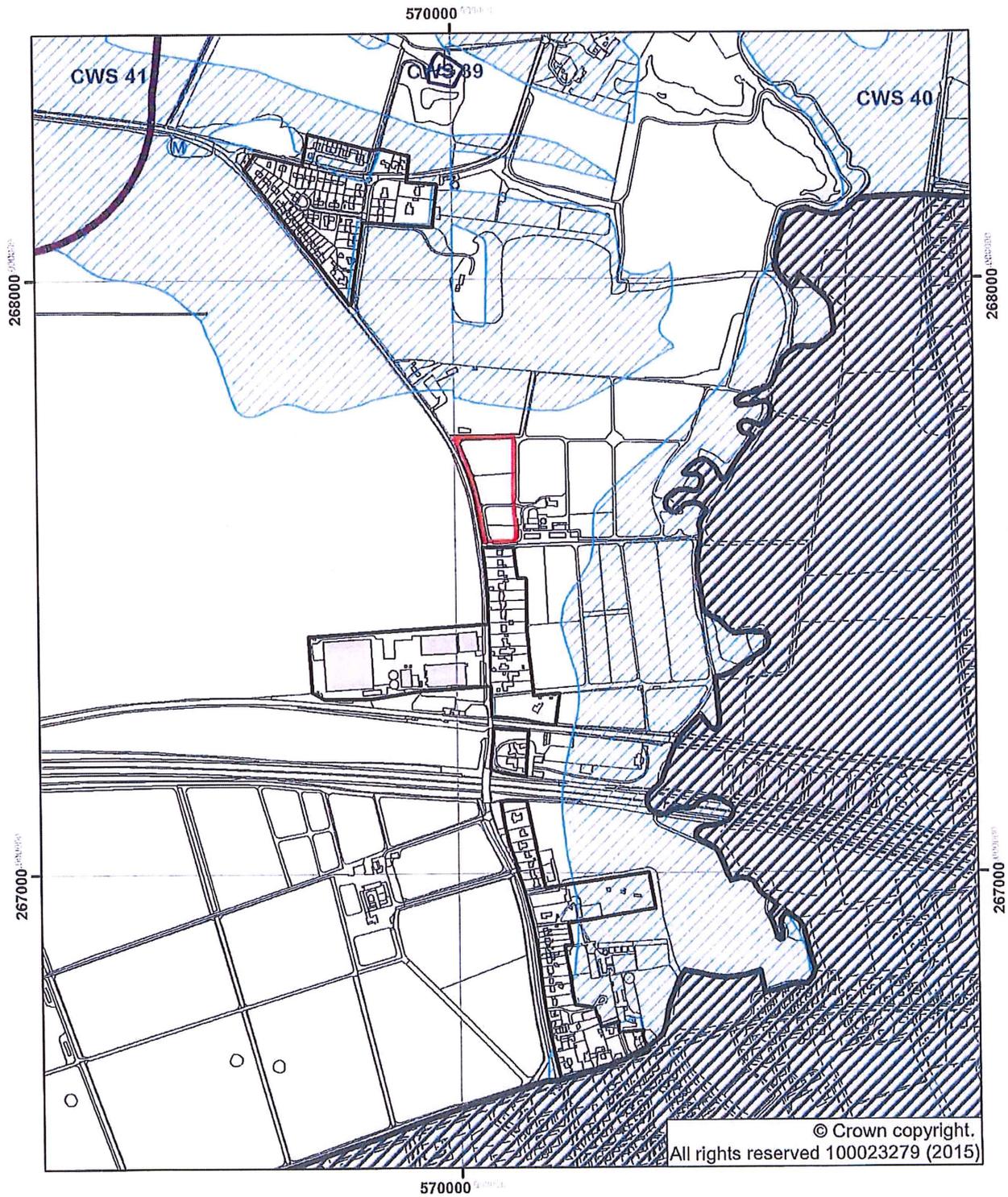
-  Scheduled Ancient Monument
-  Development Envelope
-  County Wildlife Site
-  Mineral Safeguarding Area
-  Mineral Consultation Area
-  Waste Consultation Area
-  Outside district



East Cambridgeshire
District Council



Not to scale



Policies Map (April 2015) Kennett (Insert Map 8.20)

Key:

-  Scheduled Ancient Monument
-  Development Envelope
-  County Wildlife Site
-  Mineral Safeguarding Area
-  Mineral Consultation Area
-  Waste Consultation Area
-  Outside district



East Cambridgeshire
District Council



Not to scale

f

66, Station Road
Kennett
CB8 7QF

Mr M Carpenter
CODE Development Planners
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16 December 2016

Longstones Stud, Kennett

Dear Mr Carpenter,

Thank you for your letter of 13th December advising your client's interest in the opportunities of working with the Kennett Community Land Trust.

Currently the Trust is in the process of engaging with Palace Green Homes and their proposal for a large development on Dane Hill Road. It will be necessary for any proposals for additional or alternative development to be discussed in depth by the Trustee Board. Should the board agree in principle, this could lead to the opportunity to explore potential development further.

I will include your communication to the Trustee Board Meeting agenda for initial consideration at the next Trustee Board meeting and advise the outcome. There may then be the opportunity to further explore the development possibilities,

Yours Sincerely,



Francis Danks

Secretary Kennett Community Land Trust

Kennett Community Land Trust

66, Station Road

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26.01.17

Mr M Carpenter

CODE Development Planners

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Longstones Stud, Kennett

Dear Mr Carpenter,

Further to my letter of 16th December 2016, at our Board Meeting on 19th January the Kennett Community Land Trust Board considered your letter of 13th December advising your client's interest in the opportunities of working with the Kennett Community Land Trust.

As you are aware the District Council Local Plan, which includes development in Kennett, is currently being reviewed and until there is an indication from ECDC of the approved extent of the development envelope, it is not possible for the CLT to commit to engagement with your client at this stage.

However should Longstones Stud be included in any revision of the plan, the opportunity to investigate potential development in conjunction with the CLT may then be viable. The Community Land Trust is keen to be involved in any potential development within Kennett Parish as such involvement provides mutual benefit to both the community and the developer.

Yours sincerely,

Francis Danks



Secretary Kennett Community Land Trust



Appendix 2



Revised SA Table

Settlement: Kennett

| | SA objective | 14/03 | Comment | 14/04 | 14/05 | Option1 | Comment |
|-----|-------------------------------|-------|---|-------|-------|---------|--|
| 1.1 | Undeveloped land | - | Site is partly developed with dwelling, equine buildings and hard standing. | ++ | -- | - | Site is partly developed with dwelling, equine buildings and hard standing. |
| 1.2 | Energy use | ? | | ? | ? | ? | |
| 1.3 | Water consumption | ? | | ? | ? | ? | |
| 2.1 | Nature sites and species | ~ | | ~ | ~ | ~ | |
| 2.2 | Biodiversity | ~ | | ~ | ~ | +++ | The provision of an extensive country park and riverside walk with the existing natural vegetation and water features would maintain and substantially enhance the range and viability of characteristic habitats and species. |
| 2.3 | Access to wildlife | ~ | | + | ~ | +++ | The provision of the country park and riverside walk would substantially improve opportunities for people to access and appreciate wildlife and countryside places. |
| 3.1 | Historical assets | ~ | | - | -- | ~ | There are no known historical assets located on the site. |
| 3.2 | Landscape/townscape character | ~ | Dwellings would be developed from existing single access filling gap in frontage and retaining existing hedge-line. | -- | -- | + | Although new homes constructed on existing horse paddocks would affect existing landscape, on balance the maintenance of frontage hedge-line and provision of country park would enhance landscape and open spaces. |
| 3.3 | Design and layout | ~ | | ~ | ~ | ++ | The site location and features affords a genuine opportunity to utilise existing landscape form and |



| | SA objective | 14/03 | Comment | 14/04 | 14/05 | Option1 | Comment |
|-----|-----------------------|-------|---|-------|-------|---------|---|
| | | | | | | | structure to create a place and spaces of high quality design. |
| 4.1 | Pollutants | ~ | | -- | ~ | ~ | |
| 4.2 | Waste production | ? | | ? | ? | ? | |
| 4.3 | Climate change | ~ | | ~ | ~ | ~ | |
| 5.1 | Health | ? | | ? | ? | + | The provision of the country park and riverside walk together with the potential to extend the playing field would help to encourage healthy lifestyles. |
| 5.2 | Crime | ~ | | ~ | ~ | ~ | |
| 5.3 | Open space | ? | | ~ | ? | +++ | The provision of the country park and riverside walk together with the potential to extend the playing field would greatly increase the quantity and quality of publicly accessible open space. |
| 6.1 | Accessibility | - | | -- | -- | ~ | |
| 6.2 | Inequalities | ~ | | ~ | ~ | ~ | |
| 6.3 | Housing need | ++ | | ++ | ++ | ++ | The proposals would seek to provide a range of housing types and sizes to meet the identified needs of all sectors of the community both in market housing and affordable housing. This potential is no different to the site to the west of Station Road which is assessed as having "strong and significant beneficial impact". |
| 6.4 | Community involvement | ? | As detailed in paragraphs 2.1 and 2.2 above we have consulted with the parish council and attempted to consult with the CLT. The landowners continue to offer the | ? | ++ | ? | As detailed in paragraphs 2.1 and 2.2 above we have consulted with the parish council and attempted to consult with the CLT. The landowners continue to offer the opportunity for community involvement. |



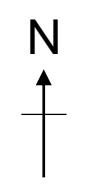
| | SA objective | 14/03 | Comment | 14/04 | 14/05 | Option1 | Comment |
|-----|----------------|-------|--|-------|-------|---------|--|
| | | | opportunity for community involvement. | | | | |
| 7.1 | Access to work | ~ | | -- | ~ | ~ | |
| 7.2 | Investment | + | | + | ++ | ++ | The proposals would give the opportunity to improve and support the investment and provision of community services and infrastructure in proportion to the scale of development. The development would in particular deliver substantial investment and improvement to recreational facilities within the village. |
| 7.3 | Local economy | + | | + | ++ | + | |





Appendix 3





Key

-  Redline Boundary
-  Existing Development
-  Potential Residential
-  Green Corridors and Landscaping
-  Country Park and Riverside Walk
-  Employment Area
-  Vehicular Access
-  Potential Pedestrian Access
-  Existing Pedestrian Access
-  River Kennett
-  Railway Line
-  A14 Dual Carriageway
-  Community Facilities

Approximately 300m



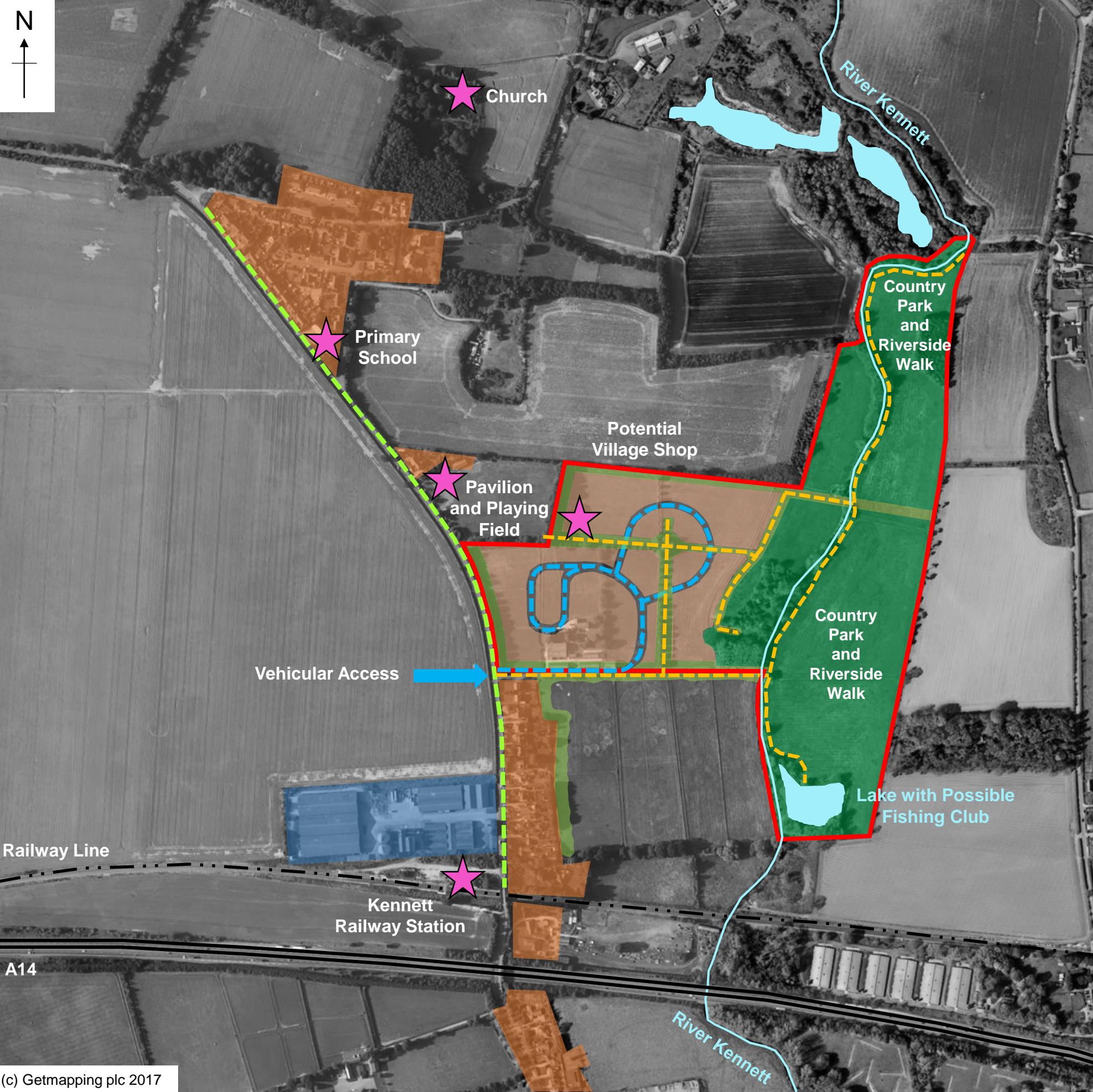
Note: Coloured layers not drawn to scale, for illustration purposes only.

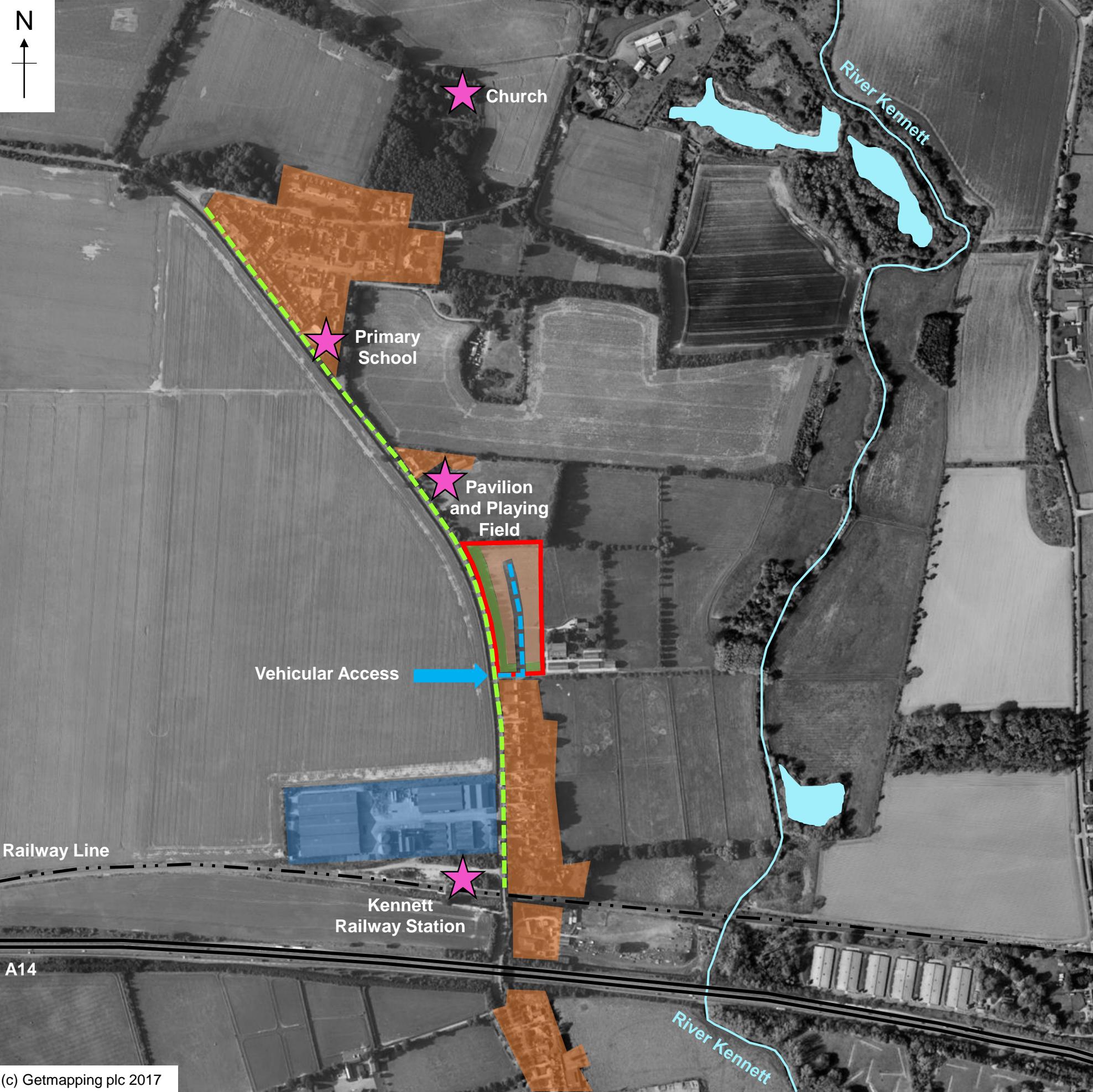
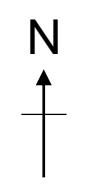
Drawing Title:
**Kennett Illustrative Concept
 Masterplan Option 1**

Project ID:
029_001

| | |
|------------------|-----------|
| Drawing ID: | 029_001.1 |
| Drawing Edition: | 3 |
| Date Prepared: | 20/2/17 |
| Drawn By: | GELS |
| Reviewed By: | MAC |

| | |
|--|---|
| <p>CODE Development Planners Ltd 17 Rosemary House Lanwades Business Park CB8 7PN E: info@codedp.co.uk W: www.codedp.co.uk</p> |  CODE Development Planners |
|--|---|





Key

-  Redline Boundary
-  Existing Development
-  Potential Residential
-  Green Corridors and Landscaping
-  Employment Area
-  Vehicular Access
-  Existing Pedestrian Access
-  River Kennett
-  Railway Line
-  A14 Dual Carriageway
-  Community Facilities
-  Approximately 300m

Note: Coloured layers not drawn to scale, for illustration purposes only.

Drawing Title:
**Kennett Illustrative Concept
 Masterplan Option 2**

Project ID:
029_001

| | |
|------------------|-----------|
| Drawing ID: | 029_001.2 |
| Drawing Edition: | 2 |
| Date Prepared: | 15/2/17 |
| Drawn By: | GELS |
| Reviewed By: | MAC |

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Appendix 4



From: [REDACTED]

Sent: 13 June 2017 11:30

To: [REDACTED]

Subject: RE: East Cambridgeshire District Council - Further Draft Local Plan Consultation

Dear Mike

I am obviously well aware of the need to consider all proposals fairly and equally, and follow all appropriate legislation. I can reassure you that this will be the case for all sites submitted to the Council, and no exception will be made in Kennett.

At present, I believe I have all the relevant information and evidence I need at this stage in order to continue my thinking towards making a recommendation to the Council in terms of which sites should go in the Local Plan. If at any point this changes, for any site, then I will contact the applicable agent/landowner, and seek more information. Exceptionally rarely, this may require a meeting.

As I am sure you appreciate, and in line with your repeated message of treating all sites fairly and equally, meeting some agents and not others, and receiving verbal information from such meeting rather than written, has a considerable risk of other parties making a claim that the council was not treating all fairly, equally and transparently. It is with that in mind that I repeat that meetings are undertaken exceptionally.

Regards

Richard

From: [REDACTED]

Sent: 07 June 2017 19:19

To: [REDACTED]

Cc: [REDACTED]

Subject: FW: East Cambridgeshire District Council - Further Draft Local Plan Consultation

Dear Richard

I write to you to ask if you have yet had an opportunity to consider my response to your email attached below and whether or not you would agree, as suggested in my email of 3 April 2017 to meet with me in order to discuss what further evidence you might require to properly consider the Longstones Stud site as a reasonable alternative in accordance with para 182 of the NPPF. As you know, I am very concerned that you and your team have already mis-understood and mis-represented my client's earlier submission for 6.6 ha of residential land together with 14.4ha of country park. My concern is compounded by a public meeting I attended last night in the village and by the attached circular issued to the village by the CLT board. As you will see this continues to imply that my client's proposal is for 522 dwellings and that any other site would be in addition to the 500 homes identified on the currently preferred site to the west of Station Road. I am sure you will wish to make it clear that until the local plan has completed its due process the council has a legal duty to consider all reasonable alternatives with equal and proportionate evidence.

I reiterate to you, as I have done with the CLT board, that we are happy to discuss how the CLT might have appropriate involvement with our proposal and gain access to public benefits. If this continues to be denied until after the publication of the next iteration of the local plan and then only if Longstones is identified for development and your council continue to consider the allocations in Kennett without full and equal evidence then I fail to see how you will be able to contend to an Inspector that all reasonable alternatives have been considered based on proportionate evidence. At last evening's public meeting there was a unanimous vote amongst those who attended that they would wish the CLT and ECDC to consider all reasonable alternatives and not accept that the allocation of any other site would necessarily be **in addition** to the 500 home site.

I sense that there is a good deal of misunderstanding amongst interested and community minded residents in the village and on the CLT board about the planning process. I cannot speak for the three other alternative proposals in the village put forward by others in your latest call for sites but I can confirm that my clients at Longstones have evidence to present and discuss with you which is relevant to your consideration of the site as a reasonable alternative.

I look forward to hearing from you.

Kind regards

Mike



Mike Carpenter BSc (Hons) MRTPI

Director

From: [REDACTED]

Sent: 26 May 2017 11:19

To: [REDACTED]

Cc: [REDACTED]

Subject: FW: East Cambridgeshire District Council - Further Draft Local Plan Consultation

Dear Richard

Many thanks for your email to my colleague Grahame Stuteley in connection with the above. Our expectation would be that the delivery of the country park would be as part of the adjacent housing development. One would, therefore, anticipate that any grant of planning permission would be subject to a section 106 agreement with clauses designed to deliver a country park following the occupation of a specified number of dwellings together with a requirement to set out the park to an agreed specification and a financial contribution towards its maintenance/management.

At present we would anticipate the ownership of the land remaining with Longstones Stud with a long term lease at a peppercorn rent to a suitable body charged with maintaining and managing the park. On this latter point we are open to discussions. Commonly, such spaces elsewhere are maintained by a variety of alternative organisations such as parish councils, district councils, county councils, wildlife trusts or specific open space management companies or charities.

In the particular case of Kennett, a CLT has been established which might represent an additional alternative. I cannot comment on this until and unless we are able to discuss matters with the CLT.

There are many examples of local plan policy wording designed to secure a comprehensive package of benefits associated with developments. It would seem to me that the most appropriate approach would be to include reference in a site specific policy or, if the council plan to allocate more than one site in the village, include reference to a proportionate pooling of contributions towards the country park as a substantial village facility.

As you know, we arranged a public exhibition of our proposals on 17 May 2017. Despite the rain, we had a reasonable turn out with many positive and constructive comments. In order to inform your preparation of the plan and consideration of reasonable alternatives, we would be very happy to discuss with you the work we have carried out so far and the feedback we have received.

Perhaps I can also take this opportunity in corresponding with you to suggest that in considering the Longstones Stud site as a reasonable alternative you might sensibly include it in your discussions with Forest Heath Council in your duty to co-operate. This point obviously relates to the fact that part of the country park would be sited within Forest Heath's area, something FHDC would be unlikely to object to.

Finally, you will be interested to know that many of the residents who attended the exhibition were pleasantly surprised to find that the proposal was not in fact for 522 dwellings as stated in your documentation but was clearly for approximately 120 units together with 14.4ha of country park sited within the flood plain.

With kind regards

Mike



Mike Carpenter BSc (Hons) MRTPI
Director



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