

EAST CAMBRIDGESHIRE DISTRICT COUNCIL LOCAL PLAN EXAMINATION IN PUBLIC

INSPECTOR'S MATTERS, ISSUES AND QUESTIONS – STAGE TWO

HEARING STATEMENT

ON BEHALF OF THE OWNERS OF LAND TO THE WEST
OF STATION ROAD, KENNETT



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 and 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?

KEN.M1 – Land to the West of Station Road

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

The land west of Station Road (the **Land**) was put forward for a mixed use, residential-led development by the landowners as part of the 'Call for Sites' consultation in 2016. The land was also promoted in the previous Core Strategy and Site Allocations consultations and East of England Plan Review 2009.

The Land was considered together with 7 other potential residential development sites within Kennett, as part of the preparation for the emerging Local Plan. The other sites that were considered by the Council are as follows:

- *Land to the east of Station Road – 1.26 hectares – 45 dwellings proposed*
- *Land to the south of Longstones Stud stable buildings – 1.68 hectares – 60 dwellings proposed*
- *Land to the rear of 42 Station Road – 0.78 hectares – 18 dwellings proposed*
- *Land north of Dane Hill Road – 6.7 hectares – 120 dwellings proposed*
- *Land west of Dane Hill Road – 1.4 hectares – 28 dwellings proposed*
- *Land east of Dane Hill Road – 1 hectares – 20 dwellings proposed*
- *Longstones Stud – 24.16 hectares – No. dwellings unknown*

The allocation of the Land is consistent with paragraph 72 of the new NPPF, where it states that large numbers of new homes can often be best achieved on developments such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

Furthermore, it states that with support from their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In addition, paragraph 83 (d) of the new NPPF requires development to promote the retention and development of accessible local services and community facilities in villages, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. We have addressed this in more detail at (f) below.

b) *How have the wider transport implications of the proposed development been considered?*

In November 2017, the Council issued an "Evidence Report on Strategic Transport - implications and related issues of the Proposed Submission Local Plan" (Ref PE28), the purpose of which was to provide an evidence base in support of the preparation and examination of the East Cambridgeshire

Local Plan. The Report was updated in May 2018 by "Supplementary Report - in relation to the November 2017 Evidence Report on Strategic Transport"¹ (the **Report**).

The Report concludes that with the exception of the implications arising from the Kennett site, the impact of the proposals set out in the submitted Local Plan are negligible on the strategic transport network. This conclusion is reached because the overall 'net gain' is so small (just 122 once Kennett removed), and localised 'net gains' and 'net losses' are so small, and mostly cancel each other out in a geographically linked location. For Kennett, it is acknowledged that this 'new' proposal will have the potential to impact on the wider strategic network. However, these impacts have been thoroughly investigated, technical and deliverable solutions are believed to be available (as will be confirmed in the planning application [...]), and detailed proposals will continue to be scrutinised through the planning application process.

In respect of Kennett, the Report finds inter alia, that "The implications of [proposals in respect of the Land] on the strategic highway network is quite unusual in that, in practical terms, it will have no likely significant impact on the strategic highway network of the district, but could, potentially, have an impact on the wider network. This is simply a reflection of its geography, to the far east of the district, set within a triangle bounded by the A11, the A14 and another district (Forest Heath)."

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

The Local Plan proposes a single large scale mixed-use site, developed as a community-led development scheme, providing much needed homes as well as transforming Kennett into a vibrant, village. (Indicative number of 500 dwellings).

d) *What is the basis for this and is it justified?*

The provision of 500 new dwellings would make a significant contribution towards meeting the District's current housing shortfall as well as the future provision of new housing in the south of the East Cambridgeshire District over the new Local Plan period. Kennett has been identified as a location for a strategic, housing-led Community Land Trust (CLT) scheme in the 'Devolution Deal' (Cambridgeshire – Peterborough Combined Authority). The stated intent to locate such a strategic scheme at Kennett justifies the allocation of Land to the West of Station Road for a mixed use, residential-led CLT scheme in the Proposed Submission Local Plan. As a 'medium village', Kennett is also considered to be a sustainable location for such development, which would benefit from the existing services and facilities in the village, including the railway station.

e) *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

An outline planning application for a 'sustainable garden village extension' to Kennett was submitted to East Cambs DC in June 2018. The consultation period for the application has now expired and it is expected that the application will be considered by the Council's Planning Committee towards the end of 2018 or early 2019. It is anticipated that housing construction could begin by late 2019 should planning permission be granted.

¹ http://www.eastcambs.gov.uk/sites/default/files/Strategic%20Transport%20Evidence%20Report%20-%20Supplementary%20Note%20-%20May%202018%20-%20Final_0.pdf

f) What are the benefits that the proposed development would bring?

The proposed development is considered to be capable of making a significant contribution towards the achievement of sustainable development, by delivering economic, social and environmental gains. It proposes to deliver the following benefits:

- 1) Open market housing** - East Cambridgeshire District Council is currently unable to demonstrate a five-year housing land supply. This proposal provides the opportunity to deliver up to 500 new dwellings over the next 10 years, which will include a significant part of the new Local Plan period;
- 2) Affordable housing** – The proposals include 30% affordable housing, in accordance with emerging planning policy, which would amount to up to 150 affordable dwellings. This provision will assist in meeting the local need for affordable housing and provide a greater mix of housing tenures in this part of East Cambridgeshire. Kennett Community Land Trust will take a lead role in the long-term management of a proportion of the affordable homes within the scheme;
- 3) New primary school, including early years facility** – 2.3 hectares of land would be provided for a 1 Form Entry Primary School (210 child places) and early years facility;
- 4) Community infrastructure** – New village green, dedicated play facilities for children and young people, and new community buildings (healthcare, food store and café), £5.6 million in Community Infrastructure Levy;
- 5) Opportunity for a net gain in biodiversity** – The development proposals for the site will retain all existing trees, and the majority of existing hedgerows, and provide significant areas of new green infrastructure, including 11ha of green space, which would be managed by the CLT for all Kennett residents to enjoy in perpetuity. Landscaping of the site, the introduction of SUDs features around the development, and the creation of habitat corridors will result in significant gains in biodiversity;
- 6) Job creation** – A significant number of jobs will be created during the construction phases of the development, and the proposed employment uses are likely to create up to 400 new jobs within the development itself;
- 7) Improved transport infrastructure** – New perimeter road to take HGVs and other traffic away from Station Road; junction improvement at the Bell Inn crossroad and further traffic calming along Station Road, enhanced hourly train service between Kennett, Cambridge and Ipswich from December 2019, and new carpark that would serve Kennett railway station; integrated and accessible public transport, with walking, cycling and public transport designed to be the most attractive forms of local transport. Kennett Station is on the main Cambridge-Ipswich railway line and provides a two-hourly service frequency to Cambridge via Newmarket (28 minutes) and Ipswich via Bury St Edmunds and Stowmarket (47 minutes), with additional morning and afternoon peak services to Cambridge and an additional afternoon peak service to Ipswich;
- 8) £140m worth of investment** - £23m in site infrastructure (roads, footpaths, cycleways and traffic calming measures, landscaping, drainage and utilities); £100m in new homes of all sizes and tenures; £2m in village centre buildings (healthcare/GP surgery, pharmacy and/or dentist, food store, café etc.); £11.6m in s106 and Community Infrastructure Payments (including a new £6.75m primary school); £6m in buildings for employment on the Enterprise Park;
- 9) Supporting services in nearby villages through promotion and retention/development of local services and community facilities** – Kennett immediately adjoins the village of Kentford. Residents of both villages use services in the neighbouring village and some are shared.

We note that benefits set out above are consistent with the core land-use planning principles set out in paragraph 17 of the NPPF.

g) How does the site relate to nearby uses?

The site immediately adjoins the existing built-up area of part of the village (which includes around 70-80 properties) along Station Road. It covers an area of approximately 40 hectares and is currently in agricultural use. Similar agricultural land adjoins the site to the west and north. To the south of the site is an area of light industrial buildings and warehousing. Immediately adjacent to this is Kennett Station and further south, the A14 runs alongside the railway, providing vehicular connections to Newmarket and Bury St Edmunds.

h) What are the potential adverse impacts of developing the sites, including heritage assets? How could they be mitigated?

- The site contains a *Scheduled Monument* (Howe Hill Bowl Barrow - a 'Tumulus'), which is located on the northern boundary of the site. This monument will require protection, enhancement and preservation of its setting as part of the design of the scheme. To that end, the proposals have incorporated a generous landscaped buffer around the monument (exceeding the size of that shown in the local plan) and a landscaped 'view corridor', which retains and protects views to/from Howe Hill Barrow. Advice has been sought from Historic England and discussions are still continuing to determine the appropriate size of buffer and view corridor required to sufficiently mitigate the impact of the development on the wider setting of the monument. The current illustrative masterplan is being reviewed in light of the advice given during discussions at a meeting (held on 26.07.18) with the developer Palace Green Homes and Historic England, any changes to the buffer and view corridor will be finalised and reviewed by Historic England accordingly.
- The site comprises 40 hectares of arable land which forms part of a single open agricultural farm, undivided by walls, hedges or fences, of around 90 hectares. Since the field is devoid of trees, hedges and ponds no landscape features will be lost. The only significant constraint is the need to preserve the setting of Howe Hill Barrow. However, the proposed development will entirely change the character of the field in which it is located, from open arable farm land to a garden village. This will adversely impact on the visual amenity of residents living within the 20 houses which face the site across Station Road and two properties adjacent to the village playing field. The proposed development will be clearly visible and their view of open farmland will be replaced with views of the garden village. The closest houses on the new development, however, will be set back considerably behind a green corridor. It is concluded that, despite the size of the site and its open nature, the surrounding landscape structure is such that the visual and landscape character effects will be restricted to a limited area around the site and none will be of a significance to cause concern.
- The development of the site will generate additional traffic onto the existing and nearby major highway junctions. The submitted Transport Assessment and work carried out for the Environmental Impact Assessment both identify the level of impact, capacity and potential mitigation on the following junctions:

1) Red Lodge Interchange Roundabout Junctions – Highways England (HE) have no issues with these junctions as there is sufficient capacity;

- 2) **J38 A14/A11** - HE have no issue with this junction, and considers it unreasonable to expect any reinforcement to capacity given the scale of development proposed;
- 3) **A11/B1085 Junction** - The existing capacity can be used up at peak times but mitigation will be required for any future additional traffic at the junction. The part-time traffic signals proposed are welcomed by Highways England, as it will give a level of comfort, but may not be required if predicted queues aren't substantial. HE have concluded, through discussions, that monitoring can be undertaken as suggested in the Transport Assessment, but more specifically during development (i.e. after certain number of houses are built). A threshold and trigger point mechanism will have to be put in place to ensure mitigation is carried out at correct timing and capacity.

i) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

The site is shown on the Environmental Agency web-based 'Flood Map for Planning' to lie within Flood Risk Zone 1 (low risk). The Flood Risk Assessment and Drainage Strategy submitted with the planning application concludes that the site is at 'low risk' of flooding from all sources.

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?

- An underground water pipeline runs north east through the site. The pipeline will require an 'easement' which prevents any buildings being built on the land that sits above the pipeline. A 12 metre wide easement on either side of the underground pipeline has been incorporated into the design.
- There is no capacity to accommodate the development's foul water drainage within the existing network in Kennett. Consultation with Anglian Water has identified that a direct connection to the Newmarket Sewage Treatment Works (STW) via a dedicated pumped rising main from the site, broadly following the A14 west to the STW, would provide sufficient capacity for the site.
- Kennett is not served by mains gas and therefore an alternative energy solution is required to serve the new development. All residential dwellings and commercial units will be designed to incorporate 'passivhaus' principles to minimise thermal heat loss and will be orientated to maximise solar gain. Additional heating and domestic electricity generation will be via dedicated air source / ground source heat pumps, photovoltaic panels and other renewable technologies. This alternative energy solution has been valued and added to the total infrastructure costs of the site.
- A new perimeter road has been incorporated into the design, which borders around the east and southern edge of the site. This has been incorporated to reduce the need for traffic to travel through the existing village along Station Road and past the existing Kennett Primary School. Traffic calming measures are also proposed along Station Road to further deter vehicles using this road to bypass traffic on the A14/A11. This has been a major concern for local residents and has had an impact

on their overall quality of everyday life, particularly when walking between different parts of the village along Station Road.

k) In particular is there an issue with waste water treatment capacity and how would any issues be resolved?

- See answer to (j) above

l) Is the site realistically viable and deliverable?

The site is available for development with an agreement in place between the landowners and the developer. The submission of a comprehensive outline planning application, which is the direct result and culmination of an 18 month consultation and engagement programme with the local community and key stakeholders, is evidence that on the balance, despite its low density and considerable benefits proposed, the development of 500 dwellings (including the policy requirement for 30% affordable homes i.e. 150 dwellings) on the Land is viable. It is considered viable and deliverable by the developer and therefore it will be brought forward and delivered within the first 5 years of the Local Plan. Phase 1 of the development is envisaged to commence in 2019 and cover the period to 2024. Kennett represents a suitable and sustainable location for housing, as evidenced by the allocation in the Submission Local Plan.

The development will be built out in several phases and the entire project will be built and controlled by the developer Palace Green Homes. It is intended that 50 houses per year will be built, taking completion to 2028.

m) What is the expected timescale and rate of development and is this realistic?

Outline Application Submission: May 2018

Outline Permission: Jan 2019

Reserved Matters Approval (Housing): July 2019

Housing Construction Start: late 2019

The development will be delivered in 4 Phases, the relevant phasing plan is enclosed for inspection

n) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

The boundary of the site is appropriate for a low density, mixed-use, residential-led development of 500 dwellings on a total 40ha.

o) Are the detailed policy requirements clear and unambiguous, effective, justified and consistent with national policy? Is it appropriate to defer within the policy to the 'principles established by consented schemes... '?

The detailed policy requirements for KEN.M1 are clear and unambiguous. KEN.M1 is regarded as a major strategic site and its policies are consistent with the new NPPF in paragraph 20, where it states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, make sufficient provision [in line with the presumption in favour of sustainable development] for:

- a) Housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk [...];
- c) Community facilities (such as health, education and cultural infrastructure); and
- d) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaption.

The policy requirements are effective and justified, see **answers to questions (f), (h) and (j)** for details on how the proposals submitted to the council have met each requirement.

p) Is the terminology used within the relevant site specific policy consistent and clear, for example, 'concept plan'?

The terminology used in KEN.M1 is consistent and clear; the outline proposals submitted to ECDC as part of the outline planning application demonstrate the adequacy of the policy in this regard by meeting all the requirements set out in the policy. Policy KEN.M1 also states both "...masterplan or concept plan", rather than one or the other so it is clear what is required.