

RPS

Proposed Submission Local Plan Examination Hearing Statement

In respect of

East Cambridgeshire Proposed
Submission Local Plan
Examination – Matter 1

On behalf of

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

RPS Ref: JCG22793

23 May 2018

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ADDING VALUE

QUALITY MANAGEMENT

Prepared by:	Robert Mackenzie-Grieve
Authorised by:	Mark Buxton
Date:	May 2018
Project Number/Document Reference:	JCG22793

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1 INTRODUCTION

- 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 **Appendix 1** and **Appendix 2** for ease of reference.
- 1.6 This Statement details our clients' responses to Matter 1 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

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 1. These responses are provided below.

Matter 1: Legal Compliance, including Duty to Co-operate

Sustainability Appraisal

Question 5

- 2.2 Question 5 asks whether the Sustainability Appraisal (SA) has appropriately assessed access to community infrastructure including education provision. We consider that the Sustainability Appraisal has not considered the educational impacts which will arise from the draft policies and site allocations.
- 2.3 The 'decision-making criteria' section of the Sustainability Appraisal seemingly does not consider the impact which the proposed housing numbers and draft policies will have on the existing primary and secondary school provision within East Cambridgeshire. Rather, education is only considered in passing in respect of economic activity. (**Appendix 3**).
- 2.4 The Sustainability Appraisal also fails to consider the Council's wider evidence base documents such as the East Cambridgeshire Growth Study. Paragraph 3.117 of the Growth Study promotes the expansion of the existing primary school within Witchford rather than the construction of a new Primary School based on the growth figures proposed in Policy LP15 (**Appendix 4**). However, this recommendation has not been assessed within the Sustainability Appraisal or its assessment of the draft policies.
- 2.5 Furthermore we note that education is not an SA Objective used for assessing the positive and negative impacts of the draft policies, draft settlement policies and site allocations. We consider that the exclusion of consideration of the impacts on education facilities is a striking omission by the Council and should be corrected for the Sustainability Appraisal to be considered sound.
- 2.6 We therefore consider the Sustainability Appraisal does not assess the impact which the draft housing allocations will have on the education provision throughout the District. Accordingly, it does not comply with Section 19 of the Planning and Compulsory Purchase Act 2004 and does not carry out a sufficiently robust sustainability appraisal of the policies and allocations in the draft Local Plan.

Question 7

- 2.7 Question 7 asks whether all reasonable alternatives have been considered in terms of both policies and sites within the SA. We do not consider that all reasonable alternatives have been considered particularly in relation to the education provision in the District and further, within Witchford.
- 2.8 As stated above, the SA Objectives do not assess education provision and therefore fail to consider the impact the proposed allocations will have on the existing education places and the potential need for additional places in the future. Policy Witchford2 specifically seeks the provision of additional primary education facilities within Witchford. However, the only alternative considered by the SA is to '*rely on national policy*'. In our opinion there are number of other alternative and potential policy options which should have been appraised to provide the Infrastructure and Community Facilities required in Witchford, rather than just referring to national policy.
- 2.9 At the very least we consider that additional scenarios should be tested and the policy option of expanding the existing primary school provision in Witchford should be assessed, particularly as this approach has been recommended within the East Cambridgeshire Growth Study.
- 2.10 We are also unable to find any justification for the reason why the Council has only considered relying on national policy as the only reasonable alternative. We recognise that relying on national policy is an alternative to the current draft Proposed Submission Local Plan policies. However, there are very few situations where national policy is the **only** alternative available to the Council. In the current SA, we note that national policy is provided as the only alternative for 19 of the 33 number of policies assessed.
- 2.11 Where the Council has only considered national policy as an alternative option we consider that this approach should be fully justified. Currently the Sustainability Appraisal does not provide this information.
- 2.12 We therefore submit that the Sustainability Appraisal does not consider sufficient alternatives in terms of policies and sites or provide reasonable justification for only considering national policy as a single alternative. We therefore consider that the Sustainability Appraisal does not comply with Environmental Assessment of Plans and Programmes Regulations 2004 and fails to demonstrate that the draft Local Plan promotes the most sustainable forms of development.

3 CONCLUSION

- 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 respond to Matter 1: Questions 5 and 7 identified in the Inspector's Matters, Issues and Questions document.
- 3.2 We consider that the draft Local Plan is unsound and has not been prepared positively. Furthermore the Sustainability Appraisal should assess the education provision including an additional standalone SA objective. Additional alternative policy options should be included in order to demonstrate that the proposed Local Plan is sustainable.

**APPENDIX 1 - LOCAL PLAN FURTHER DRAFT
CONSULTATION IN JANUARY 2017 REPRESENTATIONS**

Our Ref: 22793/MB

E-mail: mark.buxton@cgms.co.uk

Date: 22/02/2017

Local Plan Consultation
East Cambridgeshire District Council
The Grange
Nutholt Lane
Ely
Cambridgeshire
CB7 4EE

Sent via e-mail only to: planningpolicy@eastcamb.s.gov.uk

Dear Sir/Madam,

REPRESENTATIONS ON THE LOCAL PLAN FURTHER DRAFT JANUARY 2017

On behalf of our client, Abbey Properties Cambridgeshire Limited, Peter and Michael Seymour and Nicholas and Judith Holdsworth, please find below our representations to the East Cambridgeshire District Council Further Draft Local Plan Consultation January 2017 (“the Draft Local Plan”).

Principally we wish to object to the proposed allocations of housing sites within Witchford as we consider that a more suitable site, at land south of Main Street (the location of which is shown on the plan attached), is available for housing development of up to 55 dwellings. We also have a number of observations in relation to the draft planning policies. Our comments are provided below under suitable sub-headings.

Draft Policy LP3: The Settlement Hierarchy and the Countryside

We support the contention that Witchford is identified as a ‘Large Village’ for the purposes of planning policy. We however disagree with the manner in which the development envelope has been drawn around Witchford given that it excludes the site on land to the south of Main Street.

Draft Policy LP22: Achieving Design Excellence

It is noted that the amenity considerations section refers to a standard of amenity “which occupiers ... may reasonably expect”. It is not clear whether this level is above that of a ‘good’ standard which the National Planning Policy Framework identifies as being appropriate.

Draft Policy LP27: Conserving and Enhancing Heritage Assets

With regard to a proposal to demolish all or part of a heritage asset it may not always be necessary to comply with all of the suggested four criteria if the redevelopment scheme brings sufficient public benefits in any event.

Suggested Housing Allocation: Land off Main Street, Witchford

In accordance with paragraph 7.06 of the Draft Local Plan we wish to promote an additional or alternative housing allocation in Witchford. This proposed allocation was put forward in the Call for Sites. We have not been able to locate any detailed assessment of the site – it appears, based upon the report to Full Council which preceded the current consultation, that the District Council has effectively followed the views of the Parish Council having regard to their ranking of the sites that were put forward.

Whilst we acknowledge that local views and opinion are to be considered within the allocations process the rationale for the Parish Council's opposition to the development of this site is not, in our view, based upon sound planning grounds or evidence. Any planning merits relating to the desire to retain the open aspect and/or countryside views needs, in any event, to be balanced against the locational benefits of new housing in this location. In fact views of the countryside could still be provided by virtue of the public footpaths which would need to be retained or re-positioned as part of any development of the site.

The opposition to the site being developed for housing also suggests that the site should be allocated such that it can only be used to extend the adjacent Rackham Church of England Primary School. The Compulsory Purchase of this site is deemed unlikely and hence any benefits to the School are only likely to occur should development proceed (as land may be able to be gifted to the school). The development could, for example, provide a dedicated staff car park which would free up space and prevent vehicles manoeuvring on the site of the School. This would provide obvious social and environmental benefits.

The proposed site is in an excellent location in order to access local services and facilities. In this regard it is inherently better suited to sustainable development than any of the proposed housing allocations (even taking into account that proposed allocation WFD.H1 benefits from an extant planning permission) within the village.

The proposed site is therefore capable of being considered as an additional site for residential development of up to 55 dwellings.

With regard to site constraints these have already been considered by our professional team – a summary of each is set out below. Overall there are no substantive constraints which would prevent or delay housing development taking place at this site within the next 3 years.

Highways and Access: access is available from the public highway and adequate visibility is available to the east and west. A sufficiently wide access can be accommodated into the site. The scale of the development would not be such that any severe impacts would result on the local highway network. The inclusion, as part of the development, of a staff car parking area for the school could reduce highways impacts to some degree.

Heritage Assets: the site includes a Grade II Listed Barn but this is in a poor state of repair and is subject to a pending application for de-listing. If the barn is not de-listed then it is likely to remain with the host dwelling. The development of the site need not harm the setting of any of the local heritage assets.

Ecology: an initial survey of the site has identified the need for further surveys in relation to the potential of Great Crested Newts, reptiles and bats being present or utilising the site. If those species are found to be present then suitable mitigation could be put in place.

Connections to Utilities: all utilities are available within the local vicinity. Superfast broadband is available within the village.

Public Rights of Way: there are existing routes which traverse the site – some of these do not appear to be in regular use. The development would retain appropriate access across the site in order to link into the existing rights of way. Appropriate routes would need to be agreed and extinguishment/diversion applications would be made at the appropriate time.

Flood Risk/Drainage: the site is entirely within Flood Zone 1 having regard to the Environment Agency’s flood mapping. Site drainage can be controlled and managed in accordance with best practice.

The delivery of this housing site could be completed within 3 years in our view with the first completion likely by mid 2018 followed by around one completion per week until early 2020.

Conclusion

In conclusion, we consider that the site off Main Street, Witchford is an eminently suitable site to accommodate housing development. This could be in addition to the existing allocations or in place of all or part of proposed allocations WFD.H2 or WFD.H3. It is not considered appropriate in the circumstances to suggest that proposed allocation WFD.H1 is less suitable given that it already benefits from planning permission.

The assessment of the suitability of the proposed site to date within the Draft Local Plan has, in our view, been unreasonable and inadequate. There are a number of positive impacts which have not been considered and the Parish Council’s position does not seem to be robust or based upon any submitted evidence.

There are no known impediments to the delivery of the site for housing within the next 3 years.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss, this representation.

Yours Sincerely



Mark Buxton
Director

**APPENDIX 2 - PROPOSED SUBMISSION CONSULTATION
REPRESENTATIONS**



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

East Cambridgeshire Local Plan Proposed Submission Response Form (H)

PLEASE USE BLACK INK TO COMPLETE THIS FORM
Please refer to 'Guidance notes on completing the Representation Form'

From 8 November to 19 December 2017, you can make representations on the soundness and legal compliance of the proposed submission Local Plan. All comments must be received by 11:59pm on 19 December 2017. Responses made at this stage will be treated as formal representations and considered by an independent Planning Inspector: late submissions are unlikely to be considered by the Inspector.

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PART A: YOUR DETAILS

Data Protection and Freedom of Information All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments, including addresses, will also be available to view on request. By submitting this response you are agreeing to these conditions.	
Name: Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth	Agent (if applicable): Mark Buxton (RPS CgMs)
Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
Postcode:	Postcode: EC2Y 5DN
Email:	Email: mark.buxton@cgms.co.uk
Tel:	Tel: 02075836767
Signature:	Date:

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

- The Submission of the Local Plan for independent examination:
The Publication of the Inspector's Report:
The Adoption of the Local Plan:

√
√
√

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies**

If you need assistance please call 01353 665555
Please email completed forms to planningpolicy@eastcambs.gov.uk or post to:
Local Plan Consultation, East Cambs District Council, The Grange, Nutholt Lane, Ely, Cambs CB7 4EE

East Cambridgeshire Local Plan 2016-2036



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="LP2"/>	Policies Map	<input type="text"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy LP2 is unsound for the following reasons:

The total number of new dwellings proposed to be delivered in the district between 2016-2036 has been calculated using the Government figures set out in the September 2017 "Planning for the right homes in the right places" consultation document which is yet to be formally adopted. As the housing growth figures are yet to be confirmed by the Government, draft policy LP2 should recognise that the Objectively Assessed Need for East Cambridgeshire could change, and incorporate wording within the policy to allow for this.

Furthermore, we question whether it is suitable and robust to essentially mix methodologies for calculating housing need in the District. The draft national standard methodology identifies a need in East Cambridgeshire of 11,960 homes over a 20 year period (2016-2036). This is reduced by a rather arbitrary 1,125 homes to reflect an agreement reached across the SHMA authorities in 2013 to account for proximity to Peterborough. However the Government's methodology is based on Local Authority Areas, not Housing Market Areas, so we question whether any reduction is justified.

Draft policy LP2 also only provides a housing target for the plan period 2016-2036 while the Cambridge Strategic Housing Market Assessment (October 2016) covers the period of 2014-2036. It therefore appears that the years 2014 and 2015 have effectively been 'lost' from the plan period and the increased OAN required during these years excluded. We therefore consider that the Council have disregarded their requirement to provide the necessary number of new dwellings during this period. We consider this could be between 1172 – 1196 dwellings depending on whether the SHMA October 2016 figures or the emerging Government figures are used.

The Council is also inconsistent in carrying forward the committed dwellings detailed in the Authority's Monitoring Report but not the existing shortfall accumulated during this time. We consider that the Council should account for the existing shortfall within the District's Objectively Assessed Need. This shortfall should be addressed early in the Plan period and the Council should positively plan to provide the necessary number of dwellings to address this shortfall early in the Plan period.

THANK YOU FOR TAKING TIME TO RESPOND

If you need assistance please call 01353 665555

Please email forms to: planningpolicy@eastcambs.gov.uk
Or post to: Local Plan Consultation, East Cambs District Council, The Grange, Nutholt Lane, Ely, Cambs CB7 4EE

(Office only) Ref:.....



We also note that draft policy LP2 states that the Council will use the 'Liverpool method' for the purpose of updating their annual supply of deliverable sites rather than the 'Sedgefield method' which is considered preferable with Inspectors. We question the soundness of the Local Plan based on adopting the Liverpool Method for calculating their 5 year supply. The Liverpool method fails to plan positively for growth within the District over the short term instead relying on larger strategic sites coming forward and accommodating the shortfall which has been accumulated earlier in the plan period.

These reservations apply equally to the evidence base to the Local Plan, notably PE06 Objectively Assessed Housing Need Update (Oct 2016).

We consider it is unsustainable for the distribution of growth and investment to be led by the main towns within the District. This element of the draft policy fails to adequately support the growth of smaller settlements across the District and is therefore considered unsound.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

We consider that the following changes to Policy LP2 are necessary for the policy to be considered sound:

- Additional wording included within the policy and the supporting text recognising that the Government figures are yet to be finalised and could be subject to change;
- An acknowledgement that the housing requirements for the years 2014 and 2015 have been omitted from the current wording of the policy and for this to be corrected and any shortfall acknowledged;
- Recognise and address the existing shortfall in housing provision within the overall OAN figures;
- Use of the Sedgefield method for calculating the District's 5 year supply; and
- Recognition that growth and investment will be spread across the District.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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PART A: YOUR DETAILS

Data Protection and Freedom of Information	
All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments, including addresses, will also be available to view on request. By submitting this response you are agreeing to these conditions.	
Name: Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth	Agent (if applicable): Mark Buxton (RPS CgMs)
Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
Postcode:	Postcode: EC2Y 5DN
Email:	Email: mark.buxton@cgms.co.uk
Tel:	Tel: 02075836767
Signature:	Date:

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

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East Cambridgeshire Local Plan 2016-2036



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PART B: QUESTIONS

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Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="LP3"/>	Policies Map	<input type="text" value="Inset Map 49"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We support the identification of Witchford as a 'Large Village' for the purpose of planning policy. However we disagree with the manner in which the development envelope has been drawn around Witchford given that it excludes the site on Land to the South of Main Street ("Horse Meadow"). Furthermore the development envelope fails to allow for the expansion of the existing primary school adjacent to this site which we understand to be an aspiration of the County Council Education Department. Instead the development envelope is drawn close to the existing built up boundary. Following the removal of allocation WFD.M1 from the draft Local Plan the Witchford proposed development boundary fails to accommodate necessary growth required by paragraph 3.117 of the East Cambridgeshire Growth Study to expand the existing Primary School.

Furthermore, we consider that the restrictions on development to be permitted in the countryside are unsound and that they should include further development such as enabling development which will provide land or access to necessary infrastructure or allow improvements to infrastructure which benefits the community.

We also consider this level of protection of the countryside for its own sake is inconsistent with the more nuanced approach in the NPPF (eg Paragraph 55). The draft policy wording itself is also considered to be inconsistent in that LP3 refers to development within the development envelope being supported in principle but development in the countryside being restricted to certain limited criteria.

Finally, given Policy LP2 refers to a distribution of growth and investment which is 'main towns-led' we consider these should be defined somewhere in the draft Local Plan and/or clarification provided on how these relate to the 'main settlements' identified in LP3.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

THANK YOU FOR TAKING TIME TO RESPOND

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We consider that the following changes are required for the Policy LP3 to be considered sound:

- Amending the development envelope of Witchford to include the Land to South of Main Street;
- Acknowledging that development in the countryside could be acceptable for developments which enable and facilitate the expansion of existing, or development of new, infrastructure necessary to support the growth of settlements and to deliver the requirements of the Local Plan and meet the full objectively assessed housing needs.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
Postcode:	Postcode: EC2Y 5DN
Email:	Email: mark.buxton@cgms.co.uk
Tel:	Tel: 02075836767
Signature:	Date:

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

The Submission of the Local Plan for independent examination:
The Publication of the Inspector's Report:
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√
√
√

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Please email completed forms to planningpolicy@eastcambs.gov.uk or post to:
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East Cambridgeshire Local Plan 2016-2036



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph Policy Policies Map SA

Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy LP6: Affordable housing, is unsound. In addition to taking account of the financial viability of individual schemes, it should overtly recognise that other factors could also impact the provision of affordable housing. For example land gifts for the improvement of local facilities would reduce the overall site capacity and thus the scope to provide policy compliant affordable housing. This would result in a reduction in the percentage of affordable housing to be provided onsite.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For Policy LP6 to be considered sound the policy should include reference to the provision of alternative forms of onsite contributions which may reduce or replace the provision of affordable housing onsite.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination **Yes** I do wish to participate at the oral examination

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EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

East Cambridgeshire Local Plan Proposed Submission Response Form (H)

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PART A: YOUR DETAILS

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Name: Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth	Agent (if applicable): Mark Buxton (RPS CgMs)
Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
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East Cambridgeshire Local Plan 2016-2036



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PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph Policy Policies Map SA

Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy LP16 is unsound as it does not identify the provision of educational facilities as infrastructure which is needed to support growth, quality of life or economic prosperity in the District. Currently there is not a specific policy within the draft Local Plan which refers to the provision of facilities such as new schools, doctors' surgeries etc. within the District. Therefore we assume that provision of these types of facilities and the contributions thereto are sought through draft policy LP16.

We also consider that Policy LP16 should recognise that the provision of onsite infrastructure beyond those required through the Developer Contributions Supplementary Planning Document could lead to a reduction in other contributions normally required to be provided by the scheme.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For Policy LP16 to be considered sound the following changes are required to the policy:

- Direct reference towards the provision of land to support the provision of educational facilities as types of infrastructure developments;
- Recognition that payments in kind, through for example transfer of land or provision of infrastructure, are acceptable and may reduce the CIL liability or the amount sought through other contributions.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination **Yes** I do wish to participate at the oral examination

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PART A: YOUR DETAILS

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Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
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Do you wish to be notified of any of the following? (Please tick as appropriate)

The Submission of the Local Plan for independent examination:	<input checked="" type="checkbox"/>
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PART B: QUESTIONS

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Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph Policy Policies Map SA

Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy LP32 is unsound and fails to plan positively for development within the District. Draft policy LP32 imposes an unnecessary and unreasonable limit on the number of dwellings which comprise infill development. The policy and supporting text fails to provide any justification for a two dwelling limit. We consider that sites could be considered suitable for infill developments but are also appropriate for higher levels of growth.

Furthermore we consider that the current wording of Policy LP32 fails to include sites which are located along or on the edge of the Development Envelope and suitable for infill developments. These sites are likely to be more suitable for a high number of units due to their close proximity to existing settlements and services.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For Policy LP32 to be considered sound the following changes are required to the policy:

- Removal of the limit of two dwellings for infilling sites. Rather we consider that this should be determined on a site by site basis;
- Recognition that sites on the edge of the development envelope could be considered as suitable for larger number of dwellings but still be considered as infill development.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination **Yes** I do wish to participate at the oral examination

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East Cambridgeshire Local Plan 2016-2036



EAST CAMBRIDGESHIRE
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PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="Witchford1"/>	Policies Map	<input type="text" value="Inset 49"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy Witchford1: Proposals in Witchford is unsound as it fails to plan positively for the future growth of Witchford. Furthermore the draft policy appears to contradict its supporting text.

Paragraphs 7.47.1 – 7.47.3 demonstrate that Witchford is suitable to accommodate "significant growth". However draft Policy Witchford 1 only seeks to support development which "directly contribute[s] to maintaining and or expanding the community facilities present within the village".

The policy also seeks to protect open spaces and key views to the countryside however neither are identified within the draft Local Plan or Policies Map. Therefore it is unclear where these areas are and the impact their protection could have on development within Witchford. Furthermore national policy no longer advocates the protection of the countryside and open spaces for their own sake. We therefore consider that the blanket protection of these areas currently provided by Policy Witchford1 is not consistent with national policy.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For Policy Witchford1 to be considered sound the following changes are required:

- Acknowledgement that residential growth will be supported in Witchford in suitable locations;
- Removal of the blanket protection for open space;
- Specific indication of where the key views into the Countryside are located; and
- An indication of the total number of houses which would be supported within Witchford.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of

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East Cambridgeshire Local Plan 2016-2036



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the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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PART B: QUESTIONS

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Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="Witchford2"/>	Policies Map	<input type="text" value="Inset 49"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy Witchford2: Infrastructure and Community Facilities is unsound and is not justified by the Council's supporting evidence base. Draft Policy Witchford2 seeks the provision of additional primary education facilities. However the East Cambridgeshire Growth Study (PE11) seeks to expand the existing primary school in Witchford (paragraph 3.117) rather than the provision of a new primary school.

Furthermore since draft site allocation WFD.M1 has been removed there is no longer a site suitable for a new primary school within Witchford. However, draft Policy Witchford2 has not been amended to take account of removing the site allocation WFD.M1. It is evident that the residential site allocations currently proposed within Witchford would result in the need for new schooling provision particularly when considering the existing need for early years and primary educational facilities within Witchford. Paragraph 4.9 of the 'Policies for Witchford' evidence base document (PS.EVR.WFD) supports this position stating that Cambridgeshire County Council "*indicates that the cumulative impact of growth would require expansion to the provision of primary education in the village*". The paragraph continues that "*the provision of primary education in Witchford is a major constraint to growth*".

The fact that there is Section 106 funding from at least one consented development in Witchford towards pre-school and primary education also suggests there is an unmet need.

However, despite this evidence the draft Local Plan makes no provision for the expansion of primary education. We therefore consider that draft Policy Witchford2 should proactively plan for the expansion of the existing Rackham Church of England Primary School and the provision of additional land for the existing Primary School.

As part of this process we consider it is necessary to expand the Development Envelope of Witchford to include the land to the west of the primary school in order to facilitate the expansion of the primary school and enabling residential development.

Additionally we note that the Draft Local Plan is no longer consistent with Section 3 of the East Cambridgeshire Infrastructure Investment Plan (November 2017). The East Cambridgeshire Infrastructure Investment Plan assumes that a new primary school will be provided within Witchford. However, as draft site allocation WFD.M1 has been removed a new primary school is no longer being planned. The Council has seemingly not reviewed and revisited the

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evidence base or the draft policies to reflect this change in position.

- Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For Policy Witchford2 to be considered sound the following changes are required:

- Amend Point a to seek the expansion of the primary education facilities at Rackham Church of England Primary School;
- The Development Envelope for Witchford to be expanded to the west of the Primary School and south of Main Street in order to facilitate the school expansion and appropriate scale residential development.

- Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

THANK YOU FOR TAKING TIME TO RESPOND

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EAST CAMBRIDGESHIRE
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East Cambridgeshire Local Plan Proposed Submission Response Form (H)

PLEASE USE BLACK INK TO COMPLETE THIS FORM
Please refer to 'Guidance notes on completing the Representation Form'

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PART A: YOUR DETAILS

Data Protection and Freedom of Information	
All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments, including addresses, will also be available to view on request. By submitting this response you are agreeing to these conditions.	
Name: Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth	Agent (if applicable): Mark Buxton (RPS CgMs)
Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
Postcode:	Postcode: EC2Y 5DN
Email:	Email: mark.buxton@cgms.co.uk
Tel:	Tel: 02075836767
Signature:	Date:

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

The Submission of the Local Plan for independent examination:
The Publication of the Inspector's Report:
The Adoption of the Local Plan:

√
√
√

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East Cambridgeshire Local Plan 2016-2036



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for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="Witchford3"/>	Policies Map	<input type="text" value="Inset 49"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

We consider that Policy Witchford3 is unsound in allocating WFD.LGS7 Horse Meadow, Main Street, as Local Green Space. We consider that the site fails to meet the criteria for Local Green Space set out by the NPPF and NPPG.

Paragraph 77 of the NPPF states that the Local Green Space designation will not be appropriate for most green areas or open spaces and the designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and
- Where the green area concerned is local in character and not an extensive tract of land.

It is clear that the key criteria for a site to be considered as Local Green Space is that it is demonstrably special to a local community and holds a particular local significance.

As listed above the five criteria for a site to be considered as demonstrably special are the following:

- Beauty;
- Historic significance;
- Recreational value;
- Tranquillity; and
- Richness of Wildlife.

According to the East Cambridgeshire District Council Local Green Space Report November 2017, Horse Meadow, Main Street (referred to as Field to east of Millennium Wood) fulfils two (Beauty and Recreational Value) of the five key Local Green Space criteria. We agree with the Council's assessment that the site does not contain features of Historic significance, is not a Rich Wildlife and nor is it Tranquil. However, we strongly disagree that the site demonstrates the qualities of Beauty and contains Recreational value necessary for it to be allocated as Local Green

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Space. We have provided our reasons for this below:

Beauty: Neither the NPPF or NPPG provide a definition of beauty for identifying Local Green Space. However, the Council's Local Green Space Report November 2017 provides the following definition:

“enhances local character, adds to the setting of a building or groups of building”

We consider the site does not demonstrate any of these qualities. The site is currently used as a paddock with no distinctive landscaping or features which could be considered to enhance the local character or add to the setting of existing buildings. We consider that the promoter (understood to be the Parish Council) is incorrect to define the site as “a very attractive field”. Rather in our opinion the site is plain and typical of many paddocks and agricultural fields located across East Cambridgeshire.

Furthermore we note that relatively unique landscapes such as Millennium Wood which is also proposed to be allocated as a Local Green Space was not considered to meet the criteria of Beauty. This is despite it contributing far more to the local character of Witchford than Horse Meadow. The promoter's justification that the site meets the criteria of beauty appears to refer back to an Inspector's comments regarding the amenity value of the site due to views into the open countryside. However, the Inspector attached no amenity value to the site itself. The definition of beauty provided by the Council makes no reference to views, rather focusing on the qualities of the site. As stated above we do not consider that the site enhances the local character or adds to the setting of a building or groups of buildings.

Furthermore we highlight that the appeal decision referenced by the promoter (09/00025/REFAPP) was determined prior to the publication of the NPPF which provides a more nuanced approach to the protection of the countryside.

Recreational Value: The Council's Local Green Space Report November 2017 defines Recreational Value as the following:

“play area, allotments, informal spaces in housing estates, sports and playing fields (not already covered by a designation);”

As stated above the site is currently used a paddock and does not provide general access to members of the public for recreational activities. Public rights of way are located within the site. However as stated in the NPPG *“there is no need to designate linear corridors as Local Green Space simply to protect rights of way which are already protected under other legislation”*. Therefore it is clear that the site does not meet the Council's requirements for it to have recreational value nor is there a requirement to designate the site to protect the existing rights of way.

We also disagree with the Council's consideration that the site does not comprise *“an extensive tract of land”*. According to draft Policy Witchford3 the total area of the site comprises 1.7Ha resulting in it being the largest site allocated as Local Green Space within Witchford. Indeed, it is the second largest Local Green Space site in any of the settlements after the Old Recreation Ground, Sutton. However, we consider that as proposed Local Green Space allocations WFD.LGS2 Millennium Wood and WFD.LGS7 Horse Meadow, Main Street are connected they are effectively one allocation with a joint site area of 2.1ha. We consider that this effectively results in a blanket designation of a considerable area of open countryside to the south of Witchford which is contrary to NPPF paragraph 77.

In conclusion we consider that allocation WFD.LGS7 Horse Meadow, Main Street does not comply with paragraph 77 of the NPPF and therefore should be not allocated as Local Green Space. We consider that this conclusion was originally reached in East Cambridgeshire District Council Local Green Spaces Evidence Report January 2017 which stated the site:

“Does not fulfil criteria, currently no public access and is in use as a paddock”. Accordingly when the site was considered for Local Green Space designation in January 2017 it was dismissed. Indeed it was not considered to be demonstrably special against any of the five criteria.

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As set out above, we consider that there has been no change to the use or setting of the site which should result in a different conclusion from that reached in January 2017. We have also found no new evidence or a change to the Council's Local Green Space assessment criteria which could reasonably result in a different conclusion.

Additionally we consider that the site and further land to the east should be allocated for housing development in part to enable the expansion of Witchford Primary School. We have submitted separate representations in relation to draft policy Witchford2 which demonstrates the need to extend the existing Primary School and how this is supported within the Council's evidence base. A land gift to Cambridgeshire Country Council is proposed as part of the residential development of land south of Main Street. We therefore consider that the site should be allocated for 31 residential units with access provided from Main Street.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For Policy Witchford3 to be considered sound the following changes are required:

- The removal of Local Green Space allocation WFD.LGS7; and
- The addition of Land South of Main Street as a residential allocation for 31 dwellings.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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Name: Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth	Agent (if applicable): Mark Buxton (RPS CgMs)
Organisation (if applicable): n/a	Name:
Address: N/A	Address: 140 London Wall, London,
Postcode:	Postcode: EC2Y 5DN
Email:	Email: mark.buxton@cgms.co.uk
Tel:	Tel: 02075836767
Signature:	Date:

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for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>	SA	<input type="text" value="Sustainability Appraisal Framework"/>
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the Local Plan or SA.

The Sustainability Appraisal does not consider the educational impacts arising from the draft policies and site allocations of the Local Plan. The 'decision-making criteria' section of the Sustainability Appraisal framework only considers educational impacts in relation to employment. There is seemingly no consideration of how the policies or site allocations will impact the existing primary and secondary school provision within the District.

It is particularly important to assess the impact that the proposed growth will have in settlements such as Witchford where, according to evidence base documents such as the PS.EVR.WFD, new primary school provision is required but not provided for in either the draft policies or through site allocations. Therefore the Sustainability Framework does not assess the impact the draft housing allocations will have on the education provision within the District. This strongly suggests the future shortfall of school places, particularly within Witchford, has not been considered.

Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

For the Sustainability Appraisal to be considered legally compliant the following changes are required:

- Direct reference to the impact site allocations will have on the existing education provision within the District and whether there are sufficient existing primary and secondary school places to meet the number of dwellings proposed.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of

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the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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APPENDIX 3 – SUSTAINABILITY APPRAISAL EXTRACT



East Cambridgeshire
District Council

**Sustainability
Appraisal and
Strategic
Environmental
Assessment of the
Local Plan to 2036**

Proposed Submission
Local Plan

November 2017

SA Topic	SA Objective	Decision-making Criteria
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> Will it improve accessibility to key local services and facilities? Will it improve accessibility by means other than the car? Will it support and improve community and public transport?
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> Will it improve relations between people from different backgrounds or social groups? Will it reduce poverty and social exclusion in those areas most affected? Will it promote accessibility for all members of society?
	6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community? Will it reduce the number of unfit homes? Will it meet the needs of the travelling community?
	6.4 Encourage and enable the active involvement of local people in community activities	<ul style="list-style-type: none"> Will it increase the ability of people to influence decisions? Will it encourage community engagement?
7 Economic activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	<ul style="list-style-type: none"> Will it encourage business development? Will it improve the range of employment opportunities? Will it improve access to employment / access to employment by means other than the car? Will it encourage the rural economy and diversification?
	7.2 Support appropriate investment in people, places, communications and other infrastructure	<ul style="list-style-type: none"> Will it improve the level of investment in key community services and infrastructure? Will it support provision of key infrastructure? Will it improve access to education and training, and support provision of skilled employees?
	7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy	<ul style="list-style-type: none"> Will it improve business development and enhance competitiveness? Will it support Cambridgeshire's lead role in research and technology based industries, higher education and research? Will it support sustainable tourism? Will it protect the shopping hierarchy, supporting vitality and viability?

Table 4 – Key to appraisal symbols

Symbol	Likely effect upon the SA Objective
+++	Strong and significant beneficial impact
++	Potentially significant beneficial impact
+	Policy or proposal supports this objective although it may only have a minor beneficial impact
~	Policy or proposal has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
-	Policy or proposal appears to conflict with the objective and may result in adverse impacts
--	Potentially significant adverse impact
---	Strong and significant adverse impact

APPENDIX 4 – PE11 GROWTH STUDY EXTRACT

East Cambridgeshire Growth Study

Supplement to Sustainability Appraisal Report

Further Draft Local Plan January 2017

response to demographic growth is identified as being through the establishment of an 11-19 (years) school.

- 3.111. The vast majority of children with special educational needs will be educated in their local mainstream school with additional appropriate support from specialist units, usually co-located with mainstream schools. Those few children with the most complex and severe learning needs (approximately 1% of all Cambridgeshire children), attend one of the Council's Area Special Schools.

Education Infrastructure requirements

- 3.112. The IIP13's schedule of education infrastructure requirements is set out in table 5.

Early years provision

- 3.113. Early year's provision includes nurseries, pre-school playgroups aged up to five years, and are also supported by childminders (although not part of the assessment of provision). Most existing early years facilities are clustered around market towns and villages, with some provision in rural areas.

- 3.114. Based on Local Plan 2015 growth, the IIP13 indicates a cumulative need for 475 additional pre-school places and 297 nursery school places (note that not all places will be required at the same time throughout the plan period). These requirements are based on the County Council's standards and assume that 45.01% of 0-4 year olds will require childcare provision, and of these

- 50.86% will require pre-school places; and
- 31.76% will require nursery places.

- 3.115. The need for pre-school places, will be met through additional provision of pre-school education at a number of existing primary schools across the district, and through the provision of new primary schools at Ely, Soham, Littleport and Burwell. Based on the likely demand for nursery provision, the IIP13 indicates this need could be met through 2 new 50 place nurseries in Ely, and 1 new 50 place nursery in Soham, supported by the expansion of existing facilities across the district.

Primary school provision

- 3.116. East Cambridgeshire has a good spread of primary schools across urban and rural areas. It can be assumed that the primary aged population will increase in areas associated with significant housing growth and decline in other areas

- 3.117. Based on LP15 growth, the IIP13 indicates a need for:

- 2 x new 3FE primary schools in Ely;
- 1 x 3FE primary school at Soham (expansion of planned school at The Shade);
- 1 x 2FE primary school in Littleport;
- Expansion of existing primary schools in Littleport;
- Expansion of existing primary school in Burwell;
- Expansion of existing primary schools in Haddenham, Isleham, Little Downham, Stretham, Sutton, Wicken, Wilburton, Witchford;
- Expansion of existing primary schools in Bottisham; Fordham; Newmarket Fringe; Swaffham Prior.
- Additional primary places, location to be determined.

- 3.118. Since the IIP13 was prepared, development of a new primary school to support the growth at North Ely has been completed.

