

**East Cambridgeshire Local Plan Examination**  
**Hearing Statement**  
**on behalf of**  
**Unex Group Holdings Limited**

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

**Issue 1: Whether the Spatial Vision for East Cambridgeshire is justified, effective, consistent with national policy and positively prepared?**

**17. Are the local plan issues and objectives which have been identified relevant; justified; and consistent with National Policy?**

Response:

The local plan issues and objectives which have been identified are not consistent with national policy. The National Planning Policy Framework “NPPF” sets out in Section 3, paragraph 28 that “planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”.

The paragraph goes on to state that, in order to promote a strong rural economy, local plans should;

- a) ”support the sustainable growth and expansion of all types of businesses and enterprises in rural areas, both through conversion of existing buildings and well designed new buildings”
- b) ”promote the development and diversification of agriculture and other land-based rural businesses”
- c) “support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identifiable needs are not met by existing facilities in rural service centres”.
- d) “promote the retention and development of local services and community facilities in villages such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship”

Not one of the Local Plan’s key issues is entitled “the rural economy”. The only passing references are under the key issue of “inclusive communities” where it is noted that broadband in rural areas can be poor (albeit there is no matching objective to remedy this) and where it states that the retention of local services is a key issue given the “dispersed rural nature of the district”.

Paragraph 2.1.1 of the Local Plan notes that “East Cambridgeshire is a predominantly rural district” and therefore it is particularly surprising that the issues and objectives do not focus on rural issues and completely fail to accord with paragraph 28 of the NPPF.

In July it will be 10 years since Matthew Taylor MP published his report to government entitled “Living Working Countryside” which saw the government’s response in March 2009 state in paragraph 7 that a principal policy consideration was “the need to develop ways to encourage sustainable economic growth in rural areas”. Despite the NPPF taking forward this commitment, and East Cambridgeshire being a predominantly rural district, the Local Plan’s key issues and objectives are surprisingly lacking in support for issues such as rural tourism and leisure, rural diversification and rural enterprises.

**Issue 2: Does the overarching development strategy for the Plan present a positive framework which is consistent with national policy, justified and effective, and will contribute to the achievement of sustainable development within the District?**

**18. Nearly half of housing requirement set out within the submitted Local Plan is proposed to be delivered on strategic sites at Ely, Kennet, Littleport and Soham. Is the strategy and distribution of development justified, effective, positively prepared and consistent with the particular circumstances of East Cambridgeshire District?**

Response:

The overall development strategy of the Local Plan is focused too much on the strategic sites at Ely, Kennet, Littleport and Soham. Although it is accepted that these are the district's largest towns (other than Kennett which is defined in Policy LP3 as a medium village) it means that the growth is not distributed across the district and in particular the west and the south of the district are largely overlooked.

**19. Will the development strategy achieve the Council's vision and strategic objectives and deliver sustainable development for East Cambridgeshire? Does Policy LP3 clearly set out the distribution of development and is the settlement hierarchy justified? Does the evidence suggest that some settlements should be placed at different levels within the hierarchy? If so, what implications would this have, if any, on the development strategy?**

Response:

The vision and strategic objectives will not deliver sustainable development to the *whole* of East Cambridgeshire. As noted above, the strategic objectives fail to promote the rural economy and in the vision the only references (after having reiterated that the district is "a predominantly rural area") are about access to the countryside and rather grudgingly allowing "appropriate development...where this meets local needs".

Policy LP3 does clearly set out the distribution of development, and the settlement hierarchy is probably justified in terms of the current size of the various places and their current level of services etc., but it is again noticeable that there is no support for the rural economy as LP3 confirms that no allocations have been made in any of the small villages.

Policy LP3 is also too restrictive in relation to its approach to sites which are outside the development envelopes and which are consequently defined as being in the countryside. Despite leisure being one of the Council's Strategic Priorities and Equine Development and Tourism being listed as Strategic Policies, Policy LP3 makes no provision for tourism related activities in the countryside. In addition, although the Policy cross-refers to Policy LP9 on equine related development, Policy LP9 is similarly too restrictive and too narrowly drafted.

In the list of development in the countryside which will be permitted, tourism should be specifically added including tourist accommodation. The list should also refer to equine sports villages where small groups of 10-12 houses are grouped around equestrian facilities such as indoor and outdoor equestrian arenas, stables, exercise tracks, gallops and paddocks.

### **Matter 3: Objectively Assessed Needs for Housing and Employment Land**

**Issue 1: Whether the Council's approach to calculating its full, objectively assessed need is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?**

#### **Employment:**

**21. Is the objectively assessed need for economic development based on an appropriately defined functional economic market area?**

Response:

The objectively assessed need for economic development is not based on an appropriately defined functional economic market area because it fails to properly take account of the variety of acceptable types of economic development in the countryside.

Paragraph 158 of the NPPF states that local planning authorities should ensure that “the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

As currently drafted the Local Plan does not take account of “the characteristics and prospects of the area” in forming a strategy for employment because, although the district is a predominantly rural area, the objectively assessed need appears to be focused on traditional and mainstream forms of B1,B2 and B8 forms of employment with little or no recognition of the alternative employment needs of the rural economy.

Policy LP8 is too restrictive and too narrowly drafted in its definition of acceptable types of employment in the countryside. As presently drafted it only permits B1,B2 and B8 types of employment development. This completely ignores the equestrian sector which is a major and important provider of jobs for local people. Because of the space requirements for large paddocks and riding arenas and exercise tracks etc. these types of facilities predominantly need to be located in the countryside. As these types of facilities provide many local jobs, the Policy should recognise equestrian employment as an acceptable type of employment development in the countryside. Similarly tourism and tourist accommodation are significant providers of employment and many such types of tourist developments would be best placed if located in the countryside.

Equestrian related development should be added to Policy LP8 as an acceptable type of employment development in the countryside. Tourism development and tourist accommodation should also be added to Policy LP8 as acceptable types of employment in the countryside.

**Housing:**

**28. What assessment has taken place of the needs of particular groups, by household size, type and tenure, including self-build and custom housebuilding? What assumptions have been made to calculate the need for specialist housing types, for example, housing for older people and students, and for households with specific needs, to ensure that the appropriate level of need is made explicit within the plan to enable provision and delivery of the required levels and type of housing? Does the housing figure require any amendment to cater for these needs?**

Response:

No assessment appears to have taken place into the housing needs of people who own horses and who wish to live on site near or adjacent to where their horses are stabled. Policy LP6 is too restrictive and too narrowly defined in relation to the types of accommodation which are described as being required to meet housing needs. Although the Policy makes provision for affordable housing, higher-access needs housing, self-build homes, homes for older people, residential care accommodation, permanent caravan dwellers and houseboats, it makes no provision at all for people who want to live near their horses on sites which have the space and facilities to provide access to stabling, riding arenas, gallops, exercise tracks and paddocks. There is a growing trend for equine villages, which are popular in Europe and America and for which there is a growing interest / demand in this country . Because of

the nature of this type of accommodation and the space requirements for the paddocks and gallops etc. it is primarily sites which are in the countryside which are needed. This type of accommodation is not provided for in Policy LP9 either, in relation to equine development, which is also too restrictive and too narrowly defined. This is also the case in respect of Policies LP12, LP13 and LP31.

Policies LP6, LP9, LP12, LP13 and LP31 should be amended to include equestrian village accommodation within the range of acceptable types of housing / accommodation. The Policies should note that many people want to live in the countryside or close to existing settlements on sites where groups of 10-12 houses share a range of equestrian facilities such as indoor and outdoor riding arenas, stables, exercise tracks, gallops and paddocks etc.