



East Cambridgeshire
District Council

East Cambridgeshire Local Plan

Preliminary Draft Consultation:

Key Issues Raised

May 2016

Preliminary Draft Consultation: Report on Key Issues Raised

1. Introduction

1.1 Consultation on the Preliminary Draft version of the East Cambridgeshire Local Plan took place between 12 February – 24 March 2016. The timeframe for the production and adoption of the East Cambridgeshire Local Plan is scheduled to be as follows:

First Draft of Local Plan for consultation (the February 2016) 'Preliminary Draft Local Plan')	February – March 2016	
Second Draft of Local Plan for consultation (the November 2016 'Further Draft Local Plan')	November 2016	
Final Draft Local Plan for consultation (the 2017 'Proposed Submission Draft Local Plan')	Early-Mid 2017	
Examination of Local Plan	End 2017 – Early 2018	
Adoption of Local Plan	Early-Mid 2018	

- 1.2 The East Cambridgeshire Strategic Planning Team wishes to thank all those who took the time to comment during the consultation on the Preliminary Draft Local Plan.
- 1.3 All responses received during the consultation period have had an initial read through and will be considered in more detail and given due consideration as we prepare the next, and second, draft of the East Cambridgeshire Local Plan.
- 1.4 This report attempts to identify the key issues raised during the February – March 2016 consultation on the Preliminary Draft Local Plan. Not every detailed comment made is summarised in this report, but please rest assured that all comments will receive careful consideration. If you want to read every detailed comments made, then all comments received during the consultation on the Preliminary Draft Local Plan, including those submitted via post or email, are available to view in full on Objective (our online consultation portal): <http://eastcambs-consult.objective.co.uk/portal>.
- 1.5 The response to each of the key issues highlighted is not included in this report: all issues raised are still being carefully considered together with other relevant considerations, such as changes to national planning policy. In due course we will publish an Evidence Report for each of the Preliminary Draft Local Plan policies, which will be published on our website. These Evidence Reports will include detailed commentary on how we have considered your representations in finalising the next version of the Local Plan.
- 1.6 Please note that this 'Key Issues Raised' report does not summarise all sites suggested for allocation, or Local Green Space suggestions, or suggested Development Envelope boundary changes. Separate reports on those suggestions will be made available on our website shortly.

2. Summary of key issues raised during the Preliminary Draft consultation

Note: all references to section, paragraph and policy numbers are to those in the Preliminary Draft (February 2016) version of the East Cambridgeshire Local Plan.

Foreword and General Comments Made
Summary of issues raised
<ul style="list-style-type: none">• Various comments acknowledging that, despite a recent Local plan adoption (April 2015), things have moved on, and the new Local Plan will need to identify and address all those new issues eg flood modelling.• Acknowledgement that new national policy will need reflecting in the new Local Plan.• The plan needs to be far more positive and proactive than the current adopted plan.• Land is finite. Building more and more destroy ourselves. Other parts of the country need growth.• Natural England advises that the Plan's vision and emerging development strategy should identify impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. The plan should recognise that social and economic benefits can be delivered through environmental gains.

Chapter 1: Introduction
Summary of issues raised
<ul style="list-style-type: none">• Various comments on the need to amend (outwards) village envelopes to meet housing needs in villages eg Lode, Commercial End, Swaffham Bulbeck, Long Meadow, and Bottisham.• A number of comments support the current village envelopes and see no need to change these (eg Ashley, Reach).• Natural England consider that the draft Sustainability Appraisal (SA) Report (February 2016) provides a comprehensive assessment of the effects of the East Cambridgeshire Local Plan. We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations. The objectives used to assess the impacts of the Plan are appropriate and address key issues.• The comment regarding excluding land if it was previously part of "a very large garden" appears to be counter-intuitive and to suggest that the Council is trying to minimise amendments to development envelopes.• Some suggest housing should be dispersed through the District where it is needed and amend existing development envelopes where needed.

Chapter 2 – Introducing East Cambridgeshire
Summary of issues raised
<ul style="list-style-type: none">• General support for the clear vision, economic growth/strategy and reduction in out-

commuting.

- NO₂ particulates generated by diesel- traffic are the most serious pollution issue and should be mentioned specifically in topic note.
- The following could be added to biodiversity section - Declines in the extent of some habitats and populations of many species over the past century has resulted in many people have less contact with the natural world than in the past.
- Objective 1 in 'Land and water resources' should be reworded to read "1. Minimise the irreversible loss of the highest quality agricultural land and productive agricultural holdings."
- Disappointed that the built historic environment which characterises East Cambridgeshire is not referenced in the overview.
- Meeting housing need should be a key issue and objective more strongly referenced.

Chapter 3: A Growing East Cambridgeshire

Summary of issues raised

- Growth options should minimise impact and maximise enhancement opportunities for the natural environment,

Policy LP1: A Presumption in favour of Sustainable Development

Summary of issues raised

- Various comments broadly supporting the policy and sustainable development
- Objection to developing on farmland and at Ely

3.3: Level of Growth - Housing

Summary of issues raised

- Some representors support the approach to OAN and the redistribution of some growth elsewhere in the HMA
- The evidence base behind the section is lacking/weak/out of date, in particular various comments relating to the OAN methodology being based on the SHMA 2013, the redistribution to Peterborough of the need for 1500 dwellings
- Concern that the section is not in conformity with the NPPF, including not planning for the full identified need, not including a 20% buffer in addition to the OAN
- Concern that the section is not in conformity with the Duty to Cooperate requirements
- Various comments broadly supporting the section
- Comments relating to the potential impacts of identified level of growth.
- Burwell Parish Council wants no further allocations at Burwell.
- A14/A142 junction is a concern, and needs considering alongside growth options.

3.4: Level of Growth – Jobs/Employment

Summary of issues raised

- The evidence behind this section is lacking/weak, with the stated number of additional jobs likely to be optimistic. It is also not translated into land requirements.
- The Employment Land Study Update 2011 requires updating

3.6 - Broad Distribution of Growth – General comments

Summary of issues raised

- Large volume of detailed representations on the four options for distributing growth
- From an initial reading of all representations, no one option emerges as a clear favourite for future growth of East Cambridgeshire. Where a clear preference is expressed to an option (usually by a developer), this is frequently influenced by site or sites promoted by the developer that would fit in with that option.
- There was some support for hybrid of option 1 and option 2 titled 'proportionate infrastructure and accessibility led growth'. This suggestion was from an agent representing a number of developers.
- Where a clear preference for a growth option was expressed in the representation, the following results emerge:
 - Option 1 = 12 times
 - Option 2 = 6 times
 - Option 3 = 2 times
 - Option 4 = 1 time
 - Options 1 and 2 = 6 times
 - Options 3 and 4 = 2 times
 - Options 1 and 3 = 2times
 - Options 1, 2 and 4 = 1 timeThese results should be treated with caution as most of the preferences were expressed by developers with vested interest.
- Four parish councils that responded, two expressed support for option 1 and one for option 2 with a caveat and one parish council would like the growth strategy to be based on spare capacity of the school in the vicinity.
- Anglian Water has no preference to options provided.
- Cambridgeshire County Council expressed support for option 3 and for option 4 if based on primary school capacity.
- Church Commissioners for England supports development in and around Ely.
- Historic England concerned about Option 4 and the effect of the growth on Ely Cathedral and its setting.
- There is a need to work closely with neighbouring authorities to discuss any cumulative impacts of development on the transport infrastructure and how this can be acceptably mitigated
- CPRE – there is no final SA on the options. This supporting evidence is essential for an

informed discussion on the relative merits of the options.

Policy LP2: Level and Distribution of Growth

Summary of issues raised

- Various supporting statements relating to site submission forms
- Various comments relating to specific sites/locations (supporting and objecting)
- Various comments broadly supporting development in/close to Ely
- The evidence behind the policy is lacking/weak
- Various comments relating to proposed broad options for growth
- Various detailed suggestions, to improve clarity of policy wording
- Concern that policy is not in conformity with the NPPF

3.8 – Settlement Hierarchy and the Countryside – General comments

Summary of issues raised

- High volume of comments, with many in support for, the settlement hierarchy, in principle.
- Some concern about increased development will lead more flooding and more housing developments are imposed on local people by Central Government.
- Plan should make it clear that the presence of a primary school is not necessary for a village to be categorised as a medium village.
- A number of objections received to a proposed allocation in Sutton village.
- Various detailed comments on specific settlements, and their location (correctly or incorrectly) in the hierarchy.

Policy LP3 – The Settlement hierarchy and the Countryside

Summary of issues raised

- Support (mostly from developers) for the following villages in the settlement hierarchy; Bottisham, Burwell, Dullingham, Ely, Fordham, Haddenham, Isleham, Kennett, Littleport, Little Thetford, Lode, Soham, Sutton, Witchford, Wicken
- Developers supporting the hierarchy of a particular village usually are promoting sites within that village. So any support from developers should be treated with caution.
- Ashley Parish Council objects to Ashley as a “medium village” as there is no primary school or doctor’s surgery and employment opportunities are extremely limited.
- Witchford Parish Council objects to Witchford being place in “large village” category as it does not have the range of facilities required for a large village are concerned public transport will not be able to cope with increased development.
- Dullingham Parish Council would like Dullingham village to be downsized in the settlement hierarchy to a small village category rather than medium village category that it currently is due

to lack of facilities.

- Settlement hierarchy could lead to loss of green spaces and biodiversity as it will encourage more development in the villages.

Policy LP4: Green Belt

Summary of issues raised

- Various Comments suggesting the policy needs some rewording, especially in relation to Bottisham; to ensure high quality design.
- Comments suggesting a thorough Green Belt boundary review is needed, esp around Bottisham

Section 3: A Growing East Cambridgeshire

Summary of issues raised

- Various detailed comments relating to specific points the chapter as a whole should consider, such as impacts on protected ecological sites

3.5: Level of Growth - Retail

Summary of issues raised

- No significant issues raised
- A comment seeking to promote specific site in Ely

Chapter 4: – Delivering Homes and Jobs

Summary of issues raised – General Comments

- General comments on making housing more sustainable, energy efficient and affordable.
- General support for affordable housing and community-led development and developers should be made pay for these.
- Council should reintroduce “infill” policy to permit small amount of development in village locations to help deliver housing where they are needed.

Policy LP5: – Community-led Development

Summary of issues raised

- Considerable support this policy particularly in the villages where it can provide housing for local people and community facilities.
- Concern that policy would affect viability of a scheme (taking account of other policy requirements) and leaving land vacant for 10 years would not be in any ones interest.
- Do not fully understand how this policy would work in practice, require SPD.
- Policy should not be too prescriptive in terms of setting a quantum and is inconsistent with Para 174 of the NPPF titled 'ensuring viability and deliverability'.
- Concern that this policy allow development outside village envelope and this should only be permitted in exceptional circumstance to protect the countryside.
- An appropriate mechanism for community supported growth should be through the Neighbourhood Development Plans.
- A community-led development could provide a solution to the unmet need for affordable housing and could be provided in the Green Belt.
- Provision of / allowance for community-led development as part of residential development proposals must be considered alongside other requirements, including that for affordable housing.
- There should not be too much reliance on community-led development.

Policy LP6: – Meeting Local Housing Needs

Summary of issues raised

- Policy not consistent with current council practice 'Boosting Housing Supply' position paper
- Policy is premature as Government's housing agenda is not finalised.
- Policy not in accordance with Written Ministerial Statement (WMS) dated 25th March 2015 which confirms that: "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". The Council has not provided sufficient evidence to justify adoption of higher access standards.
- Concern about long delivery time for housing to be built in rural areas.
- Threshold/ requirements for affordable, self- build, higher access standards should be subject to robust viability testing taking account of other policy costs.
- It is suggested that residential care accommodation should include all supported housing accommodation for the elderly and provision should be based on needs assessment.
- Concern that policy requirement that all development proposals should set aside a proportion of the site (likely to be a minimum of 5% of the net developable area) for self-build plots. NPPF and Housing and Planning Bill do not stipulate any mandatory requirement.

Policy LP7: - Gypsies, Travellers and Travelling Showpeople Sites

Summary of issues raised

- Support for the policy in it approach to protect and enhance the natural environment, including biodiversity, landscape and Best and Most Versatile land.
- Gypsies and Travellers site on First Drove in Burwell should not be re-opened. It was never seen as suitable by either residents in Burwell or Travellers because of its position.

Policy LP8: – Delivering Prosperity and Jobs

Summary of issues raised

- Some support for this policy as it has potential to bring forward social, economic and environmental benefits to the District and its communities.
- The reference to "Enterprise Zone - Lancaster Way" is misleading as not all of the Lancaster Way Business Park Site forms part of the Enterprise Zone. Enterprise Zone - Lancaster Way Business Park - Extension: This area, defined on the Policies Map, is the major strategic employment area for the district.
- Ancillary uses should be permitted on Business Parks to complement B1, B2 and B8 uses.
- Employment Land Review should be undertaken to provide information on up- to- date employment land requirements.
- Some small employment allocations should be combined to provide a strategic employment allocation, capable of providing a range of uses within the B Class i.e Use Classes B1, B2 and B8, with further room for expansion.
- Some employment allocations should be reviewed especially if no employment development has taken place for some years despite marketing campaign.

Policy LP9: – Equine Development

Summary of issues raised

- General support for the policy but would welcome commitment to improving the safety of horses, riders and other road users.
- Policy aims should include protecting and promoting Newmarket's status as an international horse racing centre of excellence, whilst also meeting the needs of all residents and other economic sectors.

Policy LP10: – Development affecting the horse racing industry

Summary of issues raised

- Concern that this policy restricts other employment uses in favour of horse racing industry.

Policy LP11: – Tourist facilities and visitor attractions

Summary of issues raised

- Some support for general trust of the policy
- Concern that plan is light on waterways and navigation issues which is regards as a missed opportunity considering Ely is a thriving boating hub. There may be scope to allow for a more ambitious scale of river tourism development along the river corridor

- Policy should ensure that the potential effects of increased recreation pressure are fully considered.
- The policy should be revised to be more flexible enabling proposals in historic parks and gardens that make the continued maintenance and integrity of the heritage asset as well as to the local economy.

Policy LP12: – Tourist Accommodation (excluding holiday cottages)

Summary of issues raised

- Supports the policy that there should be no adverse impacts on natural assets arising from major tourism accommodation. Important in Ely as much of the river system and floodplain habitats are of significant biodiversity value and vulnerable to inappropriate development.
- Policy should ensure that the potential effects of increased recreation pressure are fully considered.
- The policy should be revised to be more flexible enabling proposals in historic parks and gardens that make the continued maintenance and integrity of the heritage asset as well as to the local economy.

Policy LP13: - Holiday Cottage Accommodation

Summary of issues raised

- Holiday cottage accommodation should not be so restrictive. Should be able to take advantage of recreation opportunities in countryside locations, such as adj to rivers, lakes, etc
- The policy should be revised to be more flexible enabling proposals in historic parks and gardens that make the continued maintenance and integrity of the heritage asset as well as to the local economy.
- Growth Policies which deliver design led sustainable development should be supported.

Policy LP14: - Location of retail and town centre uses

Summary of issues raised

- The policy seeks to set a floorspace threshold of 280 sqm net for retail impact assessments to be undertaken for retail developments outside the town centres of Ely, Soham and Littleport. This threshold is not proportionate and places an unnecessary burden on an applicant, contrary to the provisions of paragraph 21 of the NPPF. If the Council want to introduce a threshold below 2,500 sqm we suggest it should be 1,000 sqm.
- Policy should be revised to encourage appropriate scale retail outlets in villages and at tourist attractions to reduce vehicle trips to town centres.

Policy LP15 – Retail use in town centres

Summary of issues raised

- No Comments received.

Policy LP16: Infrastructure to Support Growth

Summary of issues raised

- General comments relating to: sports facilities at Burwell; transport infrastructure; Soham
- Various comments suggesting that policy needs substantial or significant rewording especially in relation to: impacts upon natural environment; securing developer contributions; cross county boundary impacts; school facilities and expansion; Ely leisure facilities
- The policy is too vague / unclear
- Settlement specific requirements (for section 7 from Kirtling and Upend)
- Various detailed suggestions to improve clarity of policy wording
- Comments broadly supporting elements of the policy

Policy LP17: Creating a sustainable, efficient and resilient transport network

Summary of issues raised

- The evidence behind the policy is weak
- Settlement specific requirements set out
- Various detailed suggestions to improve clarity of policy wording
- Various comments suggesting the policy needs substantial or significant rewording, especially in relation to including public transport issues and cross county boundary issues
- Various comments broadly supporting elements of the policy

Policy LP18: Improving Cycle Provision

Summary of issues raised

- Various comments broadly supporting the policy
- Comment suggesting that the policy needs substantial or significant rewording, in relation to cross county boundary sustainable travel

Policy LP19: Maintaining and improving community facilities

Summary of issues raised

- Detailed suggestions, to improve clarity of policy wording
- Various comments suggesting the policy needs substantial or significant rewording, especially in relation to: cultural facilities, sports facilities; public houses; cross county boundary impacts
- Comments broadly supporting elements of the policy
- Suggestion that the policy be split in two: protecting existing and new facilities

Policy LP20: Delivering Green Infrastructure
Summary of issues raised
<ul style="list-style-type: none"> • Comments broadly supporting the policy

Policy LP21: New Open Space
Summary of issues raised
<ul style="list-style-type: none"> • Comments broadly supporting the policy • Detailed suggestions to improve clarity of policy wording • Comments suggesting the policy needs substantial or significant rewording, especially in relation to: proposed standards; off-site provision

Chapter 6 : A fantastic place to live
Summary of issues raised
<ul style="list-style-type: none"> • General comments relating to specific aspects of the chapter, including flood risk, drainage and resource efficiencies (water, renewable energy and low carbon energy)

Policy LP22: Achieving design excellence
Summary of issues raised
<ul style="list-style-type: none"> • Various detailed suggestions, to improve clarity of policy wording, in particular relating to the requirement for masterplans and what constitutes a ‘major scheme’ • Concern that the policy as written would add a further cost burden on developers. Which could make development unviable, in particular comments relate to masterplans • Various comments suggesting the policy needs substantial or significant rewording, especially in relation to new developments respecting local architectural design and materials

Policy LP23: Water Efficiency

Summary of issues raised

- Comments broadly supporting elements of the policy such as the identification of the area as being under 'water stress'
- The policy is vague/unclear as it does not reference the justification for achieving the optional higher standard for water efficiency.

Policy LP24: Renewable and low carbon energy development

Summary of issues raised

- The policy is too vague/ unclear, as to whether it is targeted at all development, or just energy-related development
- Detailed suggestion, to improve clarity of policy wording in relation to the impacts on the natural and built and historic environment.
- Various comments broadly supporting the policy

Policy LP25: Managing Water Resources and Flood Risk

Summary of issues raised

- Various comments broadly supporting elements of the policy, particularly in relation to the identification of priority areas for investment; protection of the water environment and incorporation of SUDs
- The evidence behind the policy is weak, specifically in relation to: residual risk and how best to address this through the policy; consideration of the East marine plans
- Detailed comments relating to potential flooding on specific sites.

Policy LP26: Pollution and land contamination

Summary of issues raised

- The policy is too vague/ unclear, in particular: it is not clear how or where the tranquilly element of the policy will apply; what the threshold for cumulative impact is.
- The evidence behind the policy is lacking/weak in relation to air quality

Policy LP27: Conserving and enhancing heritage assets

Summary of issues raised

- Various detailed suggestions to improve clarity of policy wording, for example in relation to consistency of wording; the setting of assets; the inclusion of locally listed buildings; the level of detail required in supporting documents to proposals

Policy LP28: Landscape and townscape character, including Cathedral Views

Summary of issues raised

- Various comments that the policy is too vague/ unclear, particularly in respect of 'the general distinctiveness of Ely'; the tranquil areas of the district.
- Some comments saying the policy is too restrictive
- Various detailed suggestions to improve clarity of policy title
- Various comments broadly supporting the policy

Policy LP29: Conserving Local Green Spaces

Summary of issues raised

- Limited Comments, mostly supporting the policy
(Note: suggested 'Local Green Space' sites are to be summarised in a separate report_

Policy LP30: Conserving and enhancing Biodiversity and Geodiversity

Summary of issues raised

- Para 6.10.3 needs rewording (text given)
- Concern that the policy is not in conformity with the NPPF as the policy is not criteria based
- Various comments suggesting the policy needs substantial or significant rewording, particularly in relation to protection offered to sites in the context of the hierarchy of designated sites; biodiversity.
- Comments broadly supporting the policy

Policy LP31: Development in the Countryside

Summary of issues raised

- Detailed suggestions to improve clarity of policy wordings, eg reference to Historic parks and Gardens, concern about Part B and the need for 3RSLs, and additional criteria for Part C
- Comments broadly supporting the policy.

Section 7: Policies for places

Summary of issues raised

- Various comments suggesting specific sites/ locations are unsuitable for development, including Soham, Ely, Sutton and Ashley
- Comments supporting section and specifically site assessment criteria
- Settlement specific infrastructure requirements (for section 7.2 from Soham)

7.1: Call for Sites

Summary of issues raised

- Various supporting statements relating to site submission forms for a range of sites/locations
- Detailed suggestions to improve clarity of assessment methodology, especially in respect of heritage assets
- Comments suggesting specific sites/locations are unsuitable for development, including in Ashley
- General comments provided in relation to site assessment methodology, for example consideration of noise, and potential sources of noise, proximity to wildlife sites

7.2 : Policies for places example chapter

Summary of issues raised

- Suggested chapter wordings from a number of Parish Councils, including Cheveley, Reach, Burwell, Wicken and Fordham
- Various comments suggesting specific sites/ locations are unsuitable for development, including Ashley, Burwell and Sutton

7.3: Policies for Places

Summary of issues raised

- Various comments suggesting wording for section once drafted, especially in relation to community led development and other housing matters
- Comments suggesting specific sites/locations are unsuitable for development, including Sutton

Policy Appendix A: Open Space, sport and recreation standards

Summary of issues raised

- Suggestions of alternative standards that the Local Plan should adopt these are "Guidance for

Outdoor Sport and Play Beyond the Six Acre Standard”

Policy Appendix B: Parking Standards

Summary of issues raised

- Detailed suggestion for specific standards to ensure 2 car spaces per dwelling and good communal/visitor parking
- Comment broadly supporting standards

Appendix C: Glossary

Summary of issues raised

- Detailed suggestions of definitions that should be included, for example registered Parks and Gardens and locally listed buildings.