



**Document Reference**  
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East Cambridgeshire  
District Council

## **Policies for Kennett**

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# 1. Introduction and Policy Context

## Introduction

- 1.1 East Cambridgeshire District Council is reviewing its Local Plan, which was last adopted in April 2015. The new Local Plan, which is hoped to be adopted in 2018, will provide a framework for development in the district until 2036 and beyond.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policies relating specifically to the village of Kennett, including:
  - Kennett1: Kennett's Local Character and Facilities
  - Kennett2: Infrastructure and Community Facilities
  - Kennett3: Preferred allocation sites
- 1.3 The purpose of this report is to provide justification for the inclusion of specific policies relating to an individual settlement, and should be read alongside other Local Plan evidence documents. For example, a detailed reasoning of the settlement's position in the Settlement Hierarchy is contained in the Settlement Hierarchy report. For the findings of the assessment of individual sites, please refer to the Site Assessment Evidence Report Update 2017.
- 1.4 Collectively, the policies attempt to provide a coherent strategy for the settlement, over the plan period, which meets the area's needs and reflects the views of the community.

## National policy

- 1.5 The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance.
- 1.6 Through its Core Planning Principles, the NPPF indicates that planning should:

*"...take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it..."*
- 1.7 The emerging Local Plan recognises the differing roles and characters of different areas through providing a suite of bespoke policies, specific to each settlement in the district. These policies are set out in individual settlement chapters, in Section 7: Policies for Places.
- 1.8 In paragraph 157, the NPPF sets out a series of requirements which Local Plans should fulfil. The following requirements are considered relevant to the settlement chapters contained within Section 7:

"...Crucially, Local Plans should:

...be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area...

...not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives...

...plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework...

...be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date...

...allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate...”

- 1.9 In response to these requirements, Section 7 proposes the inclusion of policies relating to each settlement’s local character, infrastructure and facilities. Site allocations for a range of land uses are proposed for many settlements.

## 2 Kennett in context

- 2.1 Kennett is located 2.5 miles north east of Newmarket. Due to its population size and good range of services, the Settlement Hierarchy identifies Kennett as a ‘medium’ village.
- 2.2 As a medium Village, it is considered that Kennett offers the potential to accommodate growth, thereby contributing to meeting the development needs of the area. The overall scale of growth is influenced by the village’s position in the Settlement Hierarchy, the availability of suitable sites, and the presence of environmental and/or infrastructure constraints. However, exclusively for Kennett, it is a settlement which is specifically referred to in the Cambridgeshire-Peterborough Devolution Deal (March 2017).
- 2.3 In a nutshell, the link between the Kennett site and the devolution process is as follows:
- 2.4 On 17 June 2016 – Devolution Proposal published (and subsequently consulted upon), which stated at para 22 that:  
*“... the Combined Authority and Government agree to...Work with local areas’ ambitions for new housing settlements. This includes ... a new Community Land Trust Scheme in East Cambridgeshire (Kennett 500 – 1,000 new homes).”*
- 2.5 On 16 March 2017 – following consultation and negotiations, the SoS announced, alongside various statutory instruments, the final Devolution Deal, which was, in its entirety, very similar to the June 2016 Proposal. The above quotation remained untouched, and therefore is included in the final Deal.
- 2.6 In terms of the Devolution Deal, the East Cambridgeshire District Council agreed the final Devolution Deal on 16 November 2016, having previously agreed the draft Deal (28 June

2016). Both the Draft and the Final Deal, as agreed by Council, obviously included reference to delivering a 500-1,000 CLT scheme at Kennett.

- 2.7 Thus, in favour of allocating a large strategic site at Kennett is undoubtedly the wording in the Devolution Deal and, on the basis that the Deal has been agreed by Government and all constituent authorities, considerable weight must be attached to what it states.
- 2.8 In having Kennett mentioned at all (and there are very limited number of site specific proposals within the Deal which are specifically mentioned), Government, the constituent authorities and now the Combined Authority have all clearly signalled its support, in principle, for a strategic scheme to be delivered in Kennett.
- 2.9 Therefore, in principle, considerable weight in favour of allocating a strategic site in Kennett should be attached to the Deal, and to the support, in principle, to which the Deal makes for a large scale development scheme in Kennett. However, for completeness, it is recognised that the 'Devolution Deal' is not a statutory 'plan', and therefore only if a satisfactory site can be found should an allocation be made in the Local Plan.

### 3 Local Plan Policy: Further Draft

- 3.1 A Call for Sites exercise was held as part of the Preliminary Draft Local Plan consultation, during which a number of site submissions were received for Kennett. The site submissions were assessed and sites considered suitable for development were proposed for allocation. The Further Draft Local Plan was prepared and consulted upon between the Devolution Proposal being published and the final Deal being issued.
- 3.2 The Kennett chapter of the Further Draft Local Plan proposed four draft policies:
- 3.3 Policy *Kennett1: Kennett's Local Character and Facilities* seeks to ensure development proposals maintain Kennett's built character and maintain the village's facilities expanding on them where possible.
- 3.4 Policy *Kennett2: Infrastructure and Community Facilities* sets out the settlement's priorities in terms of infrastructure and facilities.
- 3.5 The content of the policies was informed by the Local Plan 2015, engagement with the Parish Council (in 2016), and responses to the Preliminary Draft Local Plan consultation (where applicable).
- 3.6 Policy *Kennett3: Preferred Allocation Sites* identified one site allocation:
- KEN.M1 – Land to West of Station Road
- 3.7 Policy *Kennett4* gave a greater deal of policy framework for the above allocation.
- 3.8 A number of other site submissions were assessed, but each was found to be not suitable for allocation. The results of the site assessment are presented in the *Site Assessment Report Update 2017*.

3.9 Kennett has a Development Envelope to define the boundary of the built up area and extent of the countryside.

3.10 In summary, the following comments were received during the Further Draft Local Plan consultation (January – February 2017) in response to Kennett draft policies:

#### Overarching Issues/Concerns

- Kennett is a small village (population 340) – scale of development proposed is a massive over development
- Newmarket should take growth, not Kennett / Kentford
- Concern with scale of growth which surpasses that of all large villages, especially on education provision and sustainable transport implications.
- Lack of cross-border working.
- Number of dwellings at Kennett needs to be more proportionate

#### Infrastructure and Other constraints

- Object to increased traffic / HGVs / accidents (2 recent fatalities).
- Railway Bridge has 20T limit (not properly enforced).
- Currently 4,500 cars per day, each way, through the village – 500 homes will increase this by 1,000 (25-30%).
- A14/A11 Link Road needs building first.
- A14-A11 Link Road should be removed from Kennett2 – not needed / deliverable (KEN.E1 promoters)
- Problem at The Bell crossroads will get worse
- Object to increased air / light / noise pollution
- Education provision (including cross border provision) needs resolving with any development. 1 FE entry primary school required for 500 dwellings, plus possible expansion of Soham VC secondary school.
- Pavilion on sports field currently being extended, as a joint provision with Kentford. Kennett2 needs updating: 'provision' needs replacing with 'improvements to the'.
- Kennett is not on the mains sewerage system
- Kennett has no gas – only (more polluting) oil
- Lack of any meaningful retail shops in Kennett
- Impact on operation of Studs in locality – especially due to increased traffic.
- Impact on horse-racing industry, due to more cars (from Kennett to Newmarket)

#### Site Specific Comments

##### **KEN.M1 Land to the west of Station Road**

All the following relate to Site KEN.M1 (*Note: there was a very high volume of objections to this site, covering a wide range of issues. The following attempts to capture frequent or particularly pertinent points*):

- Objections (or very strongly expressed reservations) from the following councils: Cambridgeshire County; West Suffolk; Kennett Parish; Kentford Parish; Moulton Parish; Newmarket Town.
- Allocation not suitable regarding its anticipated impacts on the wider area singularly or cumulatively with the emerging Forest Heath Local Plan. Joint working with Suffolk Heath Council should have been done, under the Duty to Cooperate.
- Petition (signed approx 200) against the proposal received.

- Site within 2km of Breckland Farmland SSSI, a component of Breckland SPA. Development therefore poses a potential risk to Stone Curlews. Evidence needed in SA and HRA to demonstrate no adverse effect on Stone Curlews (Natural England)
- Scale of development poses recreational risk pressure on Chippenham Fen NNR (part of Fenland SAC), Breckland SPA, SAC, Breckland SSSI and Red Lodge Heath SSSI. Policy needs requirement for ecological assessment to enable project level HRA. Policy also needs requirement for a GI Strategy (Natural England).
- Net gain in biodiversity needed.
- Object to the lack of protection of the Historic Asset of a scheduled monument (Howe Hill Bowl Barrow). Site allocation should be reduced to remove the monument from the allocation and/or large buffer zone.
- Site must deliver all infrastructure, including doctor's surgery – Newmarket must not be relied upon.
- If there is a lack of evidence regarding deliverability (see 7.18.4), the allocation is questioned. Not enough evidence to suggest the site is the most suitable and sustainable option
- Allocation contrary to CLT Policy LP5. The proposal is not a CLT development.
- Kennett CLT: withholds support for the proposal until four issues are negotiated: (a) number of homes; (b) relief road / downgrading of B1085; (c) future development of south / west parts of allocation beyond 2036; (d) infrastructure.
- Loss of biodiversity (deer, hares, birds)
- Will not contribute to five year land supply – smaller sites at Kennett would.
- Site falls within Mineral Safeguarding and Consultation Areas, and Waste Consultation Area – we support these references in the policy.
- Site has no defensible western boundary.
- Site not viable
- Loss of agricultural land
- South-east part of site is within a Groundwater Protection Zone
- Profound impact on landscape, and on settlement pattern in the area.
- Air quality assessment should be required
- Significant concern that the beneficiaries of this site are ECDC corporate objectives and finances. Potential Conflict of Interest.
- Devolution Deal, upon which this proposal rests, has no status in the plan led system. It has not been subject to necessary rigours of consultation.
- Development should be carefully limited (with particular concern for traffic)
- Support the policy where it aims to preserve and enhance the special qualities of the village
- Support the policy for 500, we need new housing - and welcomed the planning weekend.
- Comments from promoter (brief summary):
  - Other than A14/A11 Link Rd (which should be deleted), the scheme will assist delivery of Kennett2 items
  - Site area should be reduced to about 40ha (map provided)
  - Masterplan, not concept plan, should be prepared. Draft masterplan has been prepared.
  - 500 dwellings is acceptable
  - Employment provision should be subject to demand / viability. B2 and B8 reference should be removed.
  - Requirement for joint pre-school and primary school too inflexible – might be better split.
  - Level of local centre provision should be subject to demand / viability.

- Reference to high proportion of Community led development is unnecessary, too vague and should be deleted in favour of a cross reference to LP5.
- Transport assessment work underway.
- Trial pits indicate gravel deposits not high enough % to make it a viable mineral for extracting.

Comments relating to other (non-preferred) sites:

- Other sites have been deleted for political reasons, not technical reasons
- Reasonable alternative sites have not been considered appropriately, as they should have been under SA legislation.
- Reasonable alternatives to less growth at Kennett have not been considered appropriately, as they should have been under SA legislation.

#### New Site(s) suggested

- Site/14/06 Land to the north of Dane Hill Road
- Site/14/07 Land west of Dane Hill Road
- Site/14/08 Land east of Dane Hill Road
- Site/14/09 Land to the west of Station Road
- Site/14/10 Longstones Stud

## 4 Local Plan Policy: Proposed Submission

- 4.1 Policy Kennett2 has been amended for the Proposed Submission Local Plan by removing the reference to the A11/A14 link road – this is not seen as deliverable or a priority major highway scheme. Other parts of the policy also updated.
- 4.2 Policy Kennett3 is unaltered, other than a reduction in geographical area, reflecting the reduced area to be allocated:
- 4.3 Policy Kennett4 is more substantially amended, predominantly in response to representations received and the outcome of wider evidence (such as SA and HRA work). Of particular note are the following changes:
- Strengthening the link to LP5 and the need for the site to be ‘community-led’. This ensures greater link to the wording of the devolution deal.
  - Greater emphasis on biodiversity and safeguarding designated nature conservation sites
  - More flexible approach to the quantum of employment land, reflecting the wider district evidence that supply is already high.
- 4.4 All comments relating to new and previously rejected sites were carefully considered, with full details as to the assessment of such sites available in the Site Assessment Report.

## 5 Alternative Reasonable Options

- 5.1 Option 1 is the preferred policy approach for Kennett, comprising the five policies as set out.

- 5.2 Option 2 would be to not include either Policies Kennett1 or 2, but these are rejected on the basis that they both give locally specific policy matters for the settlement, which would be lacking without such a policy.
- 5.3 Option 3 would be to include alternative site allocations. Such alternatives are assessed in both the Sustainability Appraisal report and the Site Assessment Report.
- 5.4 One further option would be to not include a strategic site at Kennett. This is rejected, as to do so would be contrary to the Devolution Deal. It can be demonstrated that a suitable site exists to meet the Deal. In principle, therefore, it is not a reasonable option to not include a strategic site.

## 6 Conclusion

- 6.1 This Evidence Report demonstrates the rationale for the proposed Kennett related policies as contained in the Proposed Submission Draft Local Plan (November 2017). It is hoped that this report helps demonstrate how we have responded to comments received during the previous Draft consultations, as well as how the latest evidence and national guidance has been taken into account.