



Mr Richard Kay
East Cambridgeshire District Council
The Grange
Nutholt Lane
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Cambridgeshire
CB7 4EE

Direct Dial: [REDACTED]

Our ref: PL00746202

8 June 2022

Dear Mr Kay

East Cambridgeshire Local Plan Single Issue Review Consultation May 2022

Thank you for consulting Historic England on the East Cambridgeshire Local Plan Single Issue Review Consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation document.

Having reviewed the consultation material, Historic England has the following comments to make.

Proposal 5 Broad Areas/Locations at Soham and Littleport.

In the 2015 Plan, broad locations for growth were suggested in these areas, on the basis that these sites would not be needed until later in the Plan period and could therefore be addressed during the Local Plan Review.

However, given that the previous Local Plan Review was aborted and now this is a single issue review, combined with the fact that we are now over half way through the Plan period, together with the recent appeal decision in relation to one of these sites, we understand that it is appropriate to reconsider the approach to these areas.

Taking each of these in turn:

A Soham

The three broad locations indicated on the diagram in the 2015 Plan do not include any designated heritage assets. However, the grade II* listed Northfield Windmill lies close to both of the broad locations for growth at the northern end of Soham.



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Development in these two locations could therefore have an impact on the setting of this listed building.

We appreciate that one of these sites, land to the North East of Broad Piece, has been granted permission on appeal.

We suggest that if there is still an intention for the other site to be developed then a Heritage Impact Assessment (HIA) should be prepared now as part of the Plan preparation process to consider the likely impact of development on the significance of the heritage asset (including its setting), the suitability of the site, and any implications in terms of capacity, mitigation and enhancement needed. If the site is brought forward, then reference should be made in the policy and supporting text to the heritage asset and any necessary mitigation identified through the HIA.

With respect to the broad location at the southern end of the village, the area is close to the Conservation Area and also the grade II* listed Downfield windmill. Again, we suggest that an HIA is undertaken to inform the suitability of the site for development and the other issues set out above.

B Littleport

There are no designated heritage assets within or near these broad locations for development and so we have no comments.

Paragraph 3.17 (iii)

We note that the Council is proposing the state in the supporting text that the 'principle of development coming forward of the Broad Areas is now established'. We would question this statement. Whilst we appreciate that an appeal has been allowed on one of these sites, that does not necessarily confer that the principle of development has been established on all broad location sites. Each site needs to be considered on its merits. And for at least two of the other sites there are heritage issues that need to be explored.

The fact that 5 broad locations had been identified that 'COULD be developed in the future' does not mean that they should or would be developed. Indeed, it would be possible to find that only, say, 4 were suitable but that the 1800 dwellings attributed to the broad locations in the housing supply table could be accommodated across a smaller number of locations.



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Recommendations

Therefore, we recommend the following:

- a) If you are minded to continue with these broad locations, then we suggest that you complete a brief, proportionate HIA for both Soham sites now to inform the suitability of the site per se in heritage terms, to consider the likely impact on heritage, any capacity issues and any necessary mitigation and enhancement.
- b) The findings of the HIAs should then be used to inform the revised wording in the SIR Plan.
- c) We recommend that you do not state that the principle of development has been established for all broad locations for the reasons set out above.

We would be happy to advise on the scope of the HIAs if that would be helpful.

We do not have any comments on the housing numbers, requirement or plan period.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours sincerely,

Debbie Mack
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