

1. This representation to the East Cambridgeshire LDF Core Strategy Submission DPD and Proposals Map Submission DPD has been prepared by Cheffins on behalf of its client Allen Newport Ltd. It objects to the definition of the development envelope for Kennett (as shown on Proposals Map 19), to the east of Church Lane and proposes that the boundary be redrawn in accordance with the attached plan, such that land to the east of Church Lane is included within the development envelope and identified as being suitable for an affordable housing scheme. It considers that there is a case for a more positive approach to be adopted to the identification of "affordable housing exceptions" sites under Policy Area H4.
2. The representation is based on the contention that :
 - There is a very high demand for affordable housing in the district;
 - A more positive policy is required which allocates sites for affordable housing only;
 - The site at Kennett is appropriate for a small scale housing scheme.
3. Policy H4 recognises that in East Cambridgeshire there is a significant need for additional affordable housing (para. 3.2.4.1). The Housing Needs Study 2002-07 showed that the sub-areas in the south and east of the District have the highest shortfall in affordable housing as a proportion of existing households. Sub-area F, which includes Kennett, has one of the higher shortfalls representing 2% of existing households. Results from the housing needs analysis indicate a total requirement for new affordable housing over the next five years of 2,645 dwellings (529 per annum). The study concludes that: *"in the light of the large requirement shown, the Council will need to maximise the availability of affordable housing from all available sources (including new-build, acquisitions, conversions etc.)"*.
4. Registered Social Landlords (RSL's) confirm the high demand for shared ownership and rental properties in this part of the district and have successfully developed similar schemes in the District. We consider that a scheme on the site at Kennett would be viable and that, in principle, an RSL would wish to pursue such a scheme.
5. Policies H3 and H4 relate to the provision of affordable housing. The former provides a definition and level of provision in market housing schemes, while the latter indicates that affordable housing may be permitted as an exception on sites within or outside settlement boundaries where general market housing would not normally be permitted. It is considered that a further policy is required which allocates sites for affordable housing only. This would bring clarity, ensure locational criteria are met, and help to bring forward proposals for such development by according with the development strategies of Registered Social Landlords.
6. The Kennett site has been assessed against the locational criteria in Policy H4 as follows :
 - **Proposals outside settlement boundaries must be located adjoining or in close proximity to the main built up framework of a settlement** – the site lies

immediately adjacent to the built up area of the settlement on three sides adjoining existing properties along Church Lane and Station Road. In particular, it is immediately adjacent to the Kennett Primary School and has the potential to provide enhanced recreation space for the school.

- **Proposals must not cause significant harm to the character or setting of a settlement and the surrounding countryside** – the site would not harm the character of the existing settlement as it would allow a more complete urban form to be created in this northern part of the village. To the east, the former quarry provides a buffer between the area to be developed and the agricultural land. There is scope for this to be strengthened by incorporating an enhanced public recreation area in any housing scheme.
 - **The scale of a proposed scheme should be broadly related to the settlement hierarchy status of the settlement and the scale of identified local affordable housing need** – the site is larger than would normally be permitted in a “smaller village” settlement but is justified by the high level of need for affordable housing in the local area, and the fact that such development could be very sensitively located on the site with adequate space for structural landscaping. This would accord with Policy CS1 which allows for limited, small-scale development that supports local housing needs and the rural economy.
 - **The scheme should incorporate a range of dwelling sizes, types and tenures appropriate to the identified local need** – the involvement of an RSL in the detailed design of any scheme would ensure that a range of dwelling sizes, types and tenures would be provided based specifically on local need.
 - **The affordable housing provided is made available to people in local housing need at an affordable cost for the life of the property** – again, the involvement of an RSL would ensure that this criteria is fully met.
 - **It can be demonstrated that there is no land in a more suitable location that is available** – potential sites adjoining the settlement boundary of Kennett are constrained by their degree of openness to the surrounding countryside and the fact that they would exacerbate ribbon development along Station Road. The site that is the subject of these representations has substantial frontage to Church Lane, opposite existing housing and the primary school, and would be the most logical “rounding-off” of the settlement boundary. It also has the potential to offer other community benefits.
7. It is therefore considered that the site would meet all the appropriate criteria and that either it should be allocated as a site for affordable housing or the development envelope should be redrawn as shown on the attached plan, to facilitate future developments of that nature.
8. If allocated, it is intended that the scheme should be developed in a way which is integrated with the use of the former quarry and which provides for a range of uses which will be of benefit to the village, rather than simply providing additional housing. The former quarry provides habitat interest and offers an underutilised recreational and educational resource. Improved access to the area would be included as part of any scheme. This would provide both an informal recreation area and a site which could also be used by the nearby primary school which has

very limited space within its grounds. The relocation of the existing shooting club from the site would be to the benefit of local residents.

9. Accordingly, the allocation of this site for residential development (affordable housing) and a consequential amendment to the development envelope boundary for Kennett is therefore recommended.

Proposed affordable housing site, Kennett

