

TITLE: **24/01135/OUM**

Committee: Planning Committee

Date: 5 February 2025

Author: Major Projects Planning Officer

Report No: Z172

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Site Address: **Land At Cambridge Road Stretham Cambridgeshire**

Proposal: **Outline planning application for the erection of up to 126 homes with associated access, parking and landscaping - all matters reserved except for Means of Access.**

Applicant: **Long Term Land Limited**

Parish: **Stretham**

Ward: **Stretham**

Ward Councillor/s: Bill Hunt
Caroline Shepherd (resigned as a councillor in March)

Date Received: **6 November 2024**

Expiry Date: **16 May 2025**

1.0 RECOMMENDATION

1.1 Members are recommended to REFUSE the application for the following reasons:

1. The proposed development seeks to introduce 126 affordable dwellings in the countryside on the edge of Stretham, where Policy GROWTH 2 of the East Cambridgeshire District Council Local Plan 2015 (as amended 2023) seeks to strictly control development, save for a limited number of exceptions. Policy HOU 4 (Affordable exception sites) is one such exception and provides in-principle support for affordable exception sites subject to several criteria. The proposed development is considered to fundamentally conflict with Policy HOU 4 as it seeks to deliver a scale of development that is not appropriate to the level of identified local need or its location, as well as resulting in significant adverse landscape and character effects. The proposed development is therefore considered to fundamentally conflict with

Policies GROWTH 2 and HOU 4 of the East Cambridgeshire District Council Local Plan 2015 (as amended 2023) and Paragraphs 8, 82 and 83 and of the National Planning Policy Framework (December 2024) as the need for the development of this scale has not been robustly justified in this location and considered to result in an unsustainable form of development.

2. The proposed development seeks to introduce a form of development that is considered to be harmful by virtue of its considerable scale and depth; physical separation from the main village of Stretham; expansion across lower elevations away from steeper slopes within the village; and position within wider open fenland, where mitigation may also give rise to its own detrimental effects. The proposed is therefore considered to result in significant long-term/permanent adverse landscape and character effects on the local area. On the above basis, the proposed development is considered to be in conflict with Policies ENV 1, HOU 4 and GROWTH 2 of the East Cambridgeshire District Council Local Plan 2015 (as amended 2023) and Paragraphs 135 and 187 of the National Planning Policy Framework (December 2024), for failing to create positive, complementary relationships with existing development and to protect, conserve, and where possible enhance landscape and settlement character of the area.
3. The application proposes a residential housing scheme which would require contributions towards education, open space as well as securing affordable housing as a rural exception site. However, the application is not supported by a legal agreement deemed necessary to secure this, contrary to policy GROWTH 3 and HOU 4 of the East Cambridgeshire Local Plan, 2015 (as amended 2023) and Paragraph 56 of the National Planning Policy Framework (December 2024).

- 1.2 The application is being heard by committee because it triggers the Council's Constitution in respect of outline applications for over 50 dwellings (Clause 5.4, Part 3(C)).

2.0 SUMMARY OF APPLICATION

- 2.1 The application seeks outline planning permission for the residential development of the site for up to 126 affordable dwellings. Only matters of access are committed, meaning that matters of layout, scale, appearance and landscaping are reserved for future consideration.
- 2.2 The Planning Statement supporting the application states that part of the application site is coming forwards as a Rural Exception Site (38 units) to meet local need, with the remaining 88 units proposed as affordable housing to meet the identified needs of the district with a mix of rented and intermediate tenures.
- 2.3 The application is supported by an access plan (2006314-ACE-XX-XX-DR-C-0501 Rev A) and footpath improvement plan (2006314-ACE-XX-00-DR-C-0502 Rev A) detailing how the access is proposed to be configured, which details an access directly from Cambridge Road (the A10 highway) into the site, with a general access arrangement also proposing amendments to Cambridge Road, in summary:

- Street lighting to be extended to include the new access;
- “Keep Clear” markings across the site’s proposed access;
- Puffin crossing (signal-controlled) across the A10;
- Widening of the western and eastern footpaths adjoining the A10 to 3-metres serving the site’s vehicular access, proposed Puffin crossing and Short Road junction;
- Infilling of “missing” section of footway in between No.42 and 44 Cambridge Road to enable access to the northern-bound bus stop along Cambridge Road;
- Widening of footpaths along Wilburton Road between Cambridge Road and Short Road and provision of tactile crossing point to serve north and south bound bus stops;
- Measures to encourage reduced vehicle speeds on Cambridge Road are also proposed, including:
 - creation of a “village gateway” (white gates either side of the road in the verges at the start of the 40mph limit) and “dragon’s teeth” road markings applied on the road;
 - 1m wide central hatched strip with red surfacing together with solid white lining 0.5m from the carriageway edges to reduce the running lanes to 2.85m wide (as requested by CCC);
 - “40” roundels on the carriageway and an additional “40” repeater sign

- 2.4 The majority of on/off-site highway works are to take place within the 40mph speed-restriction zone, with the exception of works along Wilburton Road to serve the bus stops, which is a 30mph speed restriction zone.
- 2.5 The application is accompanied by an illustrative layout plan and illustrative aerial layout plan to show how the quantum of dwellings could be arranged within the site, which shows a terrace of dwellings fronting the highway north of the access, with a looser planned development of dwellings behind, extending southwards behind No. 44 Cambridge Road and westward into the countryside, terminating at the westernmost field boundary. An area of open space is shown at the site’s frontage with Cambridge Road, with an indicative community orchard along the southern/western site boundary inclusive of play area. SuDS are shown indicatively predominantly along the site’s northern boundary, with a small area of SuDS shown along the southern boundary.
- 2.6 Whilst the detailed matters of the dwellings are not committed, the applicant has indicated that dwellings will be between 1 and 2 storeys in height, and passivhaus (‘passive house’) principles will be adopted for construction. However, this does mean that the proposed dwellings may not necessary be constructed to Passive House certification standards. A Design and Access Statement (DAS) has also been submitted with the proposals to provide an assessment of the site’s context, and the proposals are also supported by a Landscape Visual Impact Assessment (LVIA).
- 2.7 Further information relating to landscape visual impacts, highway and biodiversity impacts, as well as affordable housing need, were received by the Local Planning Authority during the course of the application and were appropriately consulted upon at the request of the Applicant. This has resulted in highway and biodiversity matters being resolved.

- 2.8 The full planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link [Simple Search](#).

3.0 PLANNING HISTORY

3.1 22/00180/OUM

Outline planning application for the erection of up to 19 Affordable Homes with associated access, parking and landscaping - all matters reserved except for Means of Access

Refused

17 November 2022

Allowed on appeal – 4th September 2023

23/00712/OUM

Outline planning application for the erection of up to 38 Affordable Homes with associated access, parking and landscaping - all matters reserved except for Means of Access

Approved

28 November 2023

23/01338/OUM

Outline planning application for the erection of up to 83 Affordable Homes with associated access, parking and landscaping - all matters reserved except for means of access

Approved

6 December 2024

4.0 THE SITE AND ITS ENVIRONMENT

- 4.1 The site comprises circa 8.26-hectares (c.20.4 acres) of agricultural land located to the southwest of Stretham, immediately adjoining the policy-defined settlement boundary to the north. This site area includes some of the off-site highway works, with the main body of the site measuring c.7.67-hectares (c.19 acres).
- 4.2 To the north of the site is a linear development of semi-detached properties and to the south is a loose knit arrangement of 3 dwellings, which the proposed development would partially sit behind. To the west of the application site is open countryside, and immediately opposite the site (to the east) beyond the A10 is paddock land enclosed in part by corrugated fencing along the A10 boundary. Cosy Kennels and Cattery lie further beyond the application site's southern boundary by some c.130-metres / 427 foot / 142 yards.
- 4.3 The site lies in Flood Zone 1 in respect of flooding from rivers and sea, and mainly at a low risk of flooding from surface water.
- 4.4 There are no nearby listed buildings or conservation areas that would be affected by the application proposals.

5.0 RESPONSES FROM CONSULTEES

- 5.1 Responses were received from the following consultees, and these are summarised below. The full responses are available on the Council's web site.

Littleport & Downham Internal Drainage Board – 18 November 2024

The Board have commented that the site is outside of and does not drain into the Board's drainage area, so there are no comments to make from a drainage point of view.

Designing Out Crime Officer – 22 November 2024

The Designing Out Crime Officer (DOCO) does not raise any objections to the proposed development. The DOCO considers the Stretham Ward to be of a medium to high risk to the vulnerability of crime based on statistics for the last two years. The DOCO is content that crime prevention and security have been considered within the layout of the scheme and mentioned in the Design and Access Statement. The proposed layout is considered to look acceptable.

The DOCO recommends that Officers consider the following matters in their assessment:

- External lighting of all adopted and un-adopted roads, private roads, shared drives, footpaths, open spaces, parking areas & courts;
- Certifications/specifications for doorsets;
- Confirmation of proposed number of apartments;
- Certifications/specifications for windows, roof windows and roof lights;
- Boundary treatments are recommended to be 1.8-metres high and all gates are to be fitted with a self-closer and lockable from both sides, with trellis to any rear gardens onto footpaths, green space, school grounds or roads to reduce opportunities for would-be offenders.
- Cycle storage to be provided within rear gardens and/or garages, and not to front of houses, and Fire Service and Building Control to be alerted by Developer/Developer's Agent should there be any electric bike or scooter charging and storage facilities.
- Gable end walls should not be windowless/blank as this may attract inappropriate loitering, graffiti and anti-social behaviour if located onto open/green spaces.
- Public open spaces, LEAPs and linked footpath should be well lit to ensure good surveillance and consideration given to the locations of any seating.
- Landscaping scheme should be designed to ensure that it does not aid climbing over fences and kept at a low height to enable clear views.
- Should and solar panels and EV charging points be proposed consultation should be undertaken with the Fire Service for more information on fire safety.
- Given the location of the development and high crime statistics for poaching, boundary treatments need to be carefully considered given that Cambridgeshire has a problem with hare coursing and this could increase the fear of crime.

Recommended Conditions: None

Cambridgeshire Fire and Rescue Service – 26 November 2024

The Fire and Rescue Service requests that should the Planning Authority grant approval, the Fire & Rescue Service will require a planning condition against this application, for the provision of fire hydrants to be installed, for the purposes of providing water for firefighting.

Recommended condition: scheme of fire hydrants

County Council Education, Library and Strategic Waste – 27 November 2024

Summary table of requested contribution requirements to mitigate the impacts of the proposed development:

Table 1: s106 contributions – summary table

	Contribution	Project	Indexation date	Trigger
Early Years	N/A	N/A	N/A	50% prior to commencement 50% prior to occupation of 50% of the scheme
Primary	N/A	N/A	N/A	
Secondary	To be calculated in accordance with Table 9	Expansion of Witchord Village College	1Q2024	
Libraries	£31,559	Enhanced provision at Ely Library	1Q2021	100% prior to occupation of 50% of the development
Strategic Waste	n/a			
Monitoring Fee	£400			

Table 9: Secondary School Detailed Mix Formula (£29,786/place)

Size	Tenure	Detailed Multiplier	Cost per dwelling
2 bed	Market & Intermediate	0.05	£1,489
	Affordable Rent	0.15	£4,468
3 bed	Market & Intermediate	0.15	£4,468
	Affordable Rent	0.6	£17,872
4+ bed	Market & Intermediate	0.3	£8,936
	Affordable Rent	0.9	£26,807

East of England Ambulance Service NHS Trust – 28 November 2024

The Trust requests a developer contribution to mitigate the impacts of this proposal and is calculated at £46,735, as set out within 'Table 2 Capital Cost' calculation of additional emergency ambulance health services arising from the development proposal

No Dwellings	Infrastructure Cost*	Total
126	£371	£46,735

**EEASTs baseline infrastructure cost calculation of £340 is based on 2.2 persons per dwelling adjusted pro-rata to £371 for 2.4 residents per dwellings*

The contribution is proposed to support one or more of the following:

- Support development of the new Cambridge Ambulance Hub including provision of new EV charging facilities for electric ambulance/rapid response vehicles or provision of additional response post to meet the increased local demand arising from the housing development
- Support expansion of the Ely Ambulance Station, built in 1971, if space permits
- Support provision of an additional ambulance to meet the population growth arising from this development. An ambulance costs in the region of £140,000 for 5 years.

Anglian Water Services – 02 December 2024

Anglian Water Services note that there are Anglian Water assets within or close to the development boundary of the site, which the layout should take into account. Anglian Water confirms that Stretham Water Recycling Centre (WRC) will have capacity for foul drainage from the development, and that the WRC is within acceptance parameters for dry weather flow and can accommodate flows from the proposed growth. It is confirmed that the sewerage system also has capacity for used water flows, and that whilst Anglian Water's preference is for sustainable drainage systems (SuDS), as the proposed development proposes three outfalls into local ditches, it does not relate to Anglian Water operated assets.

Lead Local Flood Authority (Second Response) – 16 December 2024

The Lead Local Flood Authority (LLFA) raise no objection in principle to the proposed development, removing earlier objection (03 December 2024).

The LLFA note that submitted documents demonstrate that surface water from the proposed development can be managed through the use of a series of three attenuation basins which take respective flows from three catchments via planted steps for treatment purposes, flow controls will restrict surface water discharge into the existing watercourses at 6.0, 3.3, and 0.5l/s respectively. Adequate maintenance clearance will be provided to both watercourses, additionally a maintenance plan has been provided. Water quality has also been adequately addressed within the proposals.

Recommended conditions:

- Pre-commencement requirement for the submission of a detailed surface water drainage scheme for the site;
- Pre-commencement requirement for the submission of a scheme to address surface water run-off during the construction of the development, including where necessary any collection, balancing and/or settlement systems for these flows.

ECDC Waste Team – 15 January 2025

The Waste Team note that they not enter private property to collect waste or recycling, therefore it should be the responsibility of private owners/residents to take sacks/bins to the public highway boundary. Distances for taking sacks/bins should be in accordance with RECAP guidance.

It is also noted that each new property requires a new set of receptacles, with the contribution currently set at £60.50 per set. It is recommended that the developer makes the contribution on behalf of the residents. The new proposals for the Waste Team in 2026, including food caddy, are also noted. Payment in advance of collection of waste is noted.

ECDC Housing Officer – 21 January 2025

Whilst in principle this application will support East Cambridgeshire District Council to address housing needs, the suggested scale of the latest application to supply 126 affordable homes as a rural exception site cannot be supported.

Rural exception sites are defined within the NPPF as small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

The current need demonstrated by the housing register is for 69 affordable rental units for those with a local connection to Stretham and Little Thetford. I note that the application mentions supporting the housing needs of the district, but this is not what the rural exception site policy is designed for. Policy indicates that the size and mix and tenure of the affordable dwellings should reflect the identified needs at the time of the proposal and in the locality. This proposal is for an additional 45% above the indicative need from the housing register for those with a local connection.

Should the application be granted permission, developers will be encouraged to bring forward proposals which will secure the affordable housing tenure as recommended by the most up to date SHMA at 77% rented and 23% intermediate housing.

Detailed discussions are recommended with the developer prior to submission of the reserved matters application in order to secure an affordable housing mix that meets the housing needs of the area. Early indications suggest that we will be requiring an affordable housing mix of one to five-bedroom homes on site.

Further recommendations are made regarding S106 requirements and Affordable Housing Provisions to be included within this agreement.

Environmental Services (Domestic) – 11 March 2025

The Environmental Health Officer (Domestic) raises no objection to the proposed development. No concerns are raised with means of noise mitigation proposed (Mechanical Ventilation Heat Recovery Systems (MVHR), the use of passive house principles in construction and 2-metre high close boarded fencing around private amenity spaces). It is recommended that Building Control are consulted to ensure the proposed MVHR used is acceptable, and the following conditions are requested:

Recommended Conditions:

- Construction Hours and Delivery Restrictions to the Council's standard hours as set out in the Council's 'Noise' guidance.
- Preparation of a Construction Environmental Management Plan (CEMP) to control pollution (inc. noise, dust and lighting) during the construction phase of the development.
- Preparation of a method statement for ground piling should this be required as part of the development proposals, or restriction against the use of ground piling if this is known to not be required at this stage.

Cambridgeshire Historic Environment Team – 14 March 2025

The Historic Environment Team raises no objections to the proposed development, but given the site lies within an area of archaeological potential, recommend a further programme of archaeological investigation to be secure via a planning condition.

Recommended Condition: Pre-commencement condition requiring a programme of archaeological work, following agreement of a Written Scheme of Investigation with the Local Planning Authority.

County Council Transport Assessment Team (Third Response) – 24 March 2025

After amendment, the Highway Authority raise no objections to the proposed development (removing earlier objections on 10 December 2024 and 12 March 2025) subject to recommended conditions.

The Highways Authority note that the transportation assessment for the proposed development on Cambridge Road, Stretham, includes the construction of up to 126 affordable dwellings and a community orchard. Key aspects of the proposed off-site highway works associated with the development include a priority T-junction off the A10, footway improvements, and a signalised puffin crossing. Car and cycle parking will adhere to local standards, and the development is expected to generate 85 two-way trips in the AM peak and 80 two-way trips in the PM peak. The traffic impact on the site access junction is deemed acceptable. Whilst the A10/A1123 roundabout is anticipated to operate at capacity in the future under both existing and future layouts, the impact of the development traffic at the roundabout associated with the 126 homes is not severe and acceptable to the Highways Authority. Mitigation measures include Welcome Travel Packs to promote sustainable travel and the above scheme of off-site highway works. The Highway Authority has no objections, provided the developer implements these mitigation measures prior to first occupation.

Recommended conditions:

- Provision and implementation of Welcome Travel Packs to promote sustainable travel, including bus or active travel vouchers.
- Provision of the proposed off-site improvements in accordance with the approved plans.

Local Highways Authority – 25 March 2025

On the basis of the information submitted, the Local Highways Authority raise no objection to the proposed development in principle. The revised drawings have addressed concerns regarding pedestrian crossing and footway arrangements and any potential conflict with the existing petrol filling statement.

Recommended conditions: all conditions previously imposed upon LPA Ref. 23/00712/OUM (38-unit scheme)

- Closure of existing agricultural access(es) on the A10 and reinstatement of footpath.
- No gates, fences or walls to be erected across the approved vehicular access.
- Construction of access and all hardstanding so that it drains away from the public highway and not onto it.

ECDC Senior Ecologist – 31 March 2025

Does not object to the application proposals.

With regard to ecology, the Preliminary Ecological Assessment (PEA) supporting the application proposals is out of date. The PEA makes recommendations for precautionary measures and enhancements, but these do not reflect current policies, requirements or guidelines. Notwithstanding, this is a matter that could be conditioned, as the habitats on site have not changed since assessment.

The Applicant has incorrectly stated that there are no trees or hedges on the application site, despite acknowledging this within their metric. An arboricultural impact assessment would be required, and the trees officer consulted.

An assessment of recreational pressure impacts on the Wicken Fen is required as established by Natural England advice.

With regard to mandatory Biodiversity Net Gain:

From the information provided the Senior Ecologist has reviewed this application and, as of 25/3/25 agrees the baseline habitat and believes that the mandatory requirement can be met in combination of onsite and offsite units

Recommended Conditions:

- Scheme of biodiversity improvements (pre-occupation)
- Construction Environmental Management Plan (CEMP) for biodiversity, including additional (rolling) surveys, risk assessments of potentially damaging construction activities, mitigation measures, habitat protection zone mapping, construction times and when an ecologist needs to be present (pre-commencement)
- Lighting design strategy for biodiversity (prior to occupation)
- Biodiversity Gain Plan including final metric and evidence of purchase of off-site units (mandatorily imposed upon all grants of consent under the Environment Act 2021)
- Habitat Management Monitoring Plan for 30-year management
- S106 agreement to secure on-site biodiversity net gain (and where necessary off-site gains).

Stretham Parish Council – 03 April 2025

The Council would like to re-affirm its objection (provided in 04 December 2024) to the proposal on the grounds of vehicular and pedestrian access. It was felt that the proposal would substantially increase traffic and pedestrian footfall and would result in increased pressure on the village GP surgery and primary school.

The increased traffic on the A10 and A1123 is also a concern, as is the number of pedestrians that would need to cross these busy roads to access village amenities. Infrastructure improvements would be vital to support such a scheme and it is not clear what supporting infrastructure would be included. Upgrading the existing pedestrian crossing on the A1123 to a lighted crossing would improve pedestrian safety and should be considered a necessary part of any infrastructure plans.

No Response Received

The following consultees were consulted, but no responses received:

- Environment Agency
- Middle Level Commissioners
- Ward Councillors

- 5.2 A site notice was displayed near the site on 20 November 2024 and a press advert was published in the Cambridge Evening News on 21 November 2024.

5.3 Neighbours – 141 neighbouring properties were notified and the concerns raised are summarised below, and consideration has been given to these in this report. A full copy of the responses is available on the Council's website.

- Affects a Right of Access
- Biodiversity
- Foul water drainage
- Groundwater issues
- Highway safety
- Overbearing
- Parking and Turning
- Residential amenity
- Contrary to Policy
- Pollution issues
- Distance of the site from local facilities
- Active travel should be encouraged including cycling to access facilities
- Concerns over vehicle speeds and adequacy of 40mph, with preference for 30mph expressed
- Concerns over narrowness of footpaths proposed.
- Concerns over particulates and exposure impacts to human health from traffic increases, which a lower speed limit is considered to improve
- General concerns that irrespective of concerns raised, the Local Planning Authority will allow the proposals

27 letters of support have also been received via the 'Just Build Homes' platform from properties in and around East Cambridgeshire.

During the course of the application, it has become apparent that several of the addresses from which supportive comments were received do not exist or were not accessible (i.e. boarded up). Post to three addresses has been returned to the Authority and marked as undelivered. A call from local a resident also confirmed that comments had been submitted on behalf of their address but had not been written by that occupier. This puts into question the legitimacy of these comments.

Notwithstanding, a general summary of the supportive comments are as follows, and consideration has been given to them within this report although limited weight is given to the volume:

- Support for affordable housing
- Need for affordable housing and for young people
- Extra houses are good for people who need a home
- Everyone needs somewhere to live
- Affordable homes needed to get people on the ladder
- Stretham has good levels of services
- Will help to address overcrowding or those in HMO living
- Need affordable housing for those on middle incomes not just the rich people
- East Cambridge is one of the best places to live in the country
- People will not be pushed out of the area and can live near to family and friends
- Improve social cohesion between the haves and have nots which is better for society

6.0 THE PLANNING POLICY CONTEXT

6.1 East Cambridgeshire Local Plan 2015 (as amended 2023)

GROWTH 1	Levels of housing, employment and retail growth
GROWTH 2	Locational strategy
GROWTH 3	Infrastructure requirements
GROWTH 4	Delivery of growth
GROWTH 5	Presumption in favour of sustainable development
HOU 1	Housing mix
HOU 2	Housing density
HOU 3	Affordable housing provision
HOU 4	Affordable housing exception sites
ENV 1	Landscape and settlement character
ENV 2	Design
ENV 4	Energy and water efficiency and renewable energy in construction
ENV 7	Biodiversity and geology
ENV 8	Flood risk
ENV 9	Pollution
ENV 14	Sites of archaeological interest
COM 7	Transport impact
COM 8	Parking provision

6.2 Supplementary Planning Documents

- Design Guide
- Flood and Water
- Contaminated Land
- Natural Environment
- Climate Change
- Hedgehog Design Guide
- Developer Contributions

6.3 National Planning Policy Framework (December 2024)

- 1 Introduction
- 2 Achieving sustainable development
- 3 Plan-making
- 4 Decision-making
- 5 Delivering a sufficient supply of homes
- 6 Building a strong competitive economy
- 8 Promoting healthy and safe communities
- 9 Promoting sustainable transport
- 11 Making effective use of land
- 12 Achieving well-designed places
- 14 Meeting the challenge of climate change, flooding and coastal change
- 15 Conserving and enhancing the natural environment
- 16 Conserving & enhancing the historic environment

6.4 Planning Practice Guidance

- Noise
- ProPG: Planning and Noise for New Residential Development, May 2017

Written Ministerial Statements (WMS) from Government

- Building the homes we need (30 July 2024)
- Social and Affordable Housing (28 October 2024)
- Building the homes we need (12 December 2024)

7.0 PLANNING MATERIAL CONSIDERATIONS AND COMMENTS

7.1 Principle of Development

7.2 The site is proposed to come forward as 100% affordable housing in the countryside, with a social housing provider, Stonewater Housing Association.

7.3 Policy GROWTH 2 of the Local Plan 2015 (as amended 2023) seeks to strictly control development outside of policy-defined development envelopes, with a few exceptions. It must therefore be considered whether any of these exceptions would support the provision of the proposed scheme of 100% affordable dwellings in the countryside.

7.4 One such exception is Policy HOU 4 of the Local Plan, which specifically supports Affordable Housing exception sites. The policy reads as follows:

“Affordable housing development on exception sites can make an important contribution to meeting local housing needs, and schemes may be permitted on sites outside settlement boundaries where:

- *There is an identified local need which cannot be met on available sites within the development envelope (including allocation sites), or sites which are part of community-led development.*
- *The site is well related to a village which offers a range of services and facilities, and there is good accessibility by foot/cycle to those facilities.*
- *No significant harm would be caused to the character or setting of the settlement and the surrounding countryside.*
- *The scale of the scheme is appropriate to the location and to the level of identified local affordable housing need.*
- *The scheme incorporates a range of dwelling sizes, types and tenures appropriate to the identified local need; and*
- *The affordable housing provided is made available to people in local housing need at an affordable cost for the life of the property.*

An element of open market housing will only be acceptable where there is insufficient grant available, and it is demonstrated through financial appraisal that the open market housing is essential to enable delivery of the site for primarily affordable housing, and does not significantly increase the land value above that which would be payable if sufficient grant were available to provide 100% affordable housing.”

- 7.5 Another exception is Policy GROWTH 6 of the Local Plan, which seeks to support community-led development, which can include affordable housing such as Community Land Trust developments. There is however no indication within the application submission that the proposed development is coming forwards as a community-led development, for example being proposed by a legitimate local community group such as a Parish Council or Community Land Trust, or that the scheme has general community support, with evidence of meaningful public engagement. On this basis this policy is of limited relevance to the assessment of the proposals.
- 7.6 There are no other policies that would support delivery of the proposed development outside of the defined settlement envelopes.
- 7.7 It is therefore considered that Policies GROWTH 2 and HOU 4 are the policies of most relevance when determining the principle of the proposed development. These policies are up to date on account of the Council's recent Single Issue Review of the Local Plan (2023), and their accord with the National Planning Policy Framework (2024) as to be set out within this report and should therefore be afforded full weight in the decision-making process. Based on a demonstrable 5-year housing land supply and 113% housing delivery test result (2024), the tilted balance is also not engaged in the decision-making process.
- 7.8 Members are advised that three consents have been allowed at appeal or granted within the application site for 19, 38 and 83 dwellings respectively since September 2023. All three schemes were assessed against Policy HOU 4 as 'rural exception sites', this being to meet local affordable housing needs of the village of Stretham and Little Thetford.
- 7.9 Turning to the current application itself, consideration must be given as to whether the proposed development for 126 dwellings and associated infrastructure complies with Policy HOU 4.
- 7.10 Policy HOU 4 requires that any development for affordable housing exception sites (otherwise known as Rural Exception Sites within the Local Plan) meets a locally identified need and is of an appropriate scale for the location and to the level of identified local affordable housing need. The need for 'Rural Exception Sites' to demonstrate an identified local need is further echoed at Paragraph 82 and in Annex 2 (Glossary) of the NPPF.
- 7.11 To evidence this local need, the application is supported by a Housing Needs Assessment (HNA) (January 2024) which considers the needs of the villages of Stretham and Little Thetford, both of which are in the Stretham ward. The inclusion of Stretham and Little Thetford as part of the HNA was agreed for all of the previous consents within the application site and has therefore been taken forwards under the current scheme.
- 7.12 The results of the HNA indicate a need for at least 44 affordable dwellings for the parishes of Stretham and Little Thetford in the immediate term, 14 affordable dwellings required to support close relatives or those employed within the parishes who currently live elsewhere, and 14 affordable dwellings to support family members who have had to move away due to difficulty finding an affordable home. This data is

based upon a survey undertaken in 2021. The Applicant's own identified need therefore ranges from c.44 to 72 dwellings within the villages of Stretham and Little Thetford.

- 7.13 The Applicant has sought to rely on the data from this survey to support applications for 19, 38, 83 and now 126 dwellings within the application site. Whilst the survey data is four years old, the Council's Housing Team has advised that as of February 2025, there are still 67 people on the housing register with a 'local connection' to Stretham and Little Thetford. In February 2024, this figure stood at 75, which was a previous rise from c.45 in January 2022. The findings of the survey are not therefore disputed.
- 7.14 On the basis of data available to both the Applicant and the LPA, it is considered that a local need for affordable housing for Stretham and Little Thetford has already been appropriately met by the consented 83-unit scheme. Indeed, the latest 83-unit scheme even allowed for a small degree of flexibility above the demonstrable need within the areas (75 dwellings at the time of determination), acknowledging that housing need is unlikely to be a static figure.
- 7.15 In terms of the Application proposals before Officers therefore, the Applicant's own HNA assessment, further supported by the Council's housing data, concludes that there is no robustly demonstrated locally identified need for the proposed development of up to 126 dwellings within the application site. This figure would significantly exceed the locally demonstrable need for affordable housing within Stretham and Little Thetford combined by almost double, a matter raised by the Council's Housing Officer in their formal comments in January 2025.
- 7.16 Within their Tetlow King report the Applicant now seeks to challenge the definition of 'local need', stating, *"The focus is on "the housing needs of the local community" and while a local housing needs survey is given as an example of how this might be demonstrated, the Local Plan is not prescriptive in this respect. Nor is the geographical extent of 'local' defined. As I go on to discuss below, the Council has considered these matters in its determination of the previous application at this site."*
- 7.17 Officers consider the Local Plan's objectives for rural exception sites to deliver housing for local people in the local village are clear; the Applicant's own Housing Needs Assessment prepared by RCA Regeneration also appears to have understood this definition, as it seeks to *"understand the specific housing requirements of the Combined Parish Areas, and inform future developments. Indeed, it could be used to inform proposals for housing a Rural Exception Site, which needs to be supported by robust housing need evidence"* (Page 1).
- 7.18 Whilst the geographical extent of the 'local' is not explicit in the policy, it is considered to be implicit by virtue of the assessment criteria listed within the policy. Policy HOU 4 requires that *"The scale of the scheme is appropriate to the location and to the level of identified local affordable housing need"*. This is considered to explicitly set a consideration of scale and proportionality in relation to both the size of the development and local housing need. A development site that encompasses the needs of a much wider area than its immediate locality will struggle to satisfy this test, as will be evidenced within this report. The pre-ambles to the policy to aid its interpretation is also clear that local housing need is village-specific.

- 7.19 It is therefore considered that to interpret 'local housing need' as encompassing a much broader or district-wide need in the context of a rural exception site policy is to over-interpret the policy itself, and indeed the NPPF's definition of these types of sites.
- 7.20 It is noted that the needs of Little Thetford were included in all three previous applications for 19, 38 and 83 units with the agreement of the Local Planning Authority and has been carried across into the assessment of this application and previous applications in the interests of consistency. Officer reports for 19 and 38-unit schemes are silent on Little Thetford's inclusion and therefore no assumptions are made as to why this village specifically was included. However, it can be said that the acceptance of including Little Thetford represented a pragmatic and flexible approach being taken by Officers to meet local affordable housing need within these two villages, at a time when no developments had come forward to fulfil this purpose or evidence of local need likely being met. However, to extend this need beyond these two villages is considered to be taking this pragmatism and flexibility beyond both the local and national understanding of the role of rural exception sites in being responsive to local circumstances and supporting housing developments that reflect local needs (Paragraph 82 of the NPPF).
- 7.21 For the above reasons, the scale of the proposed development is not therefore considered to be appropriate to the level of identified local need, as required by Policy HOU 4. Consideration must also be given as to whether the scale of the proposed development is appropriate to the location of the development (Stretham Parish).
- 7.22 The Council's Senior Strategic Planning Officer has provided specific advice on the proposed development (**Appendix 1**), which has been used to inform this assessment.
- 7.23 If delivered, the consented 83-unit scheme will already see an increase of households within Stretham (parish) by 9.2%. A further 43 units will see this increase by another 4.4% (totalling c.14% from 2021 census levels). If consented, the 126-unit scheme would also result in 19% of the households in the Stretham parish living in affordable/socially rented properties. Proportionally, the 126-unit scheme would therefore result in a concentration of affordable/socially rented properties notably higher than the local authority average (14.5%) and higher than averages in the three main settlements in the district Ely (14.3%), Soham (16.2%) and Littleport (18.1%).
- 7.24 These main settlements should be commanding the higher proportions of affordable/social rented properties, as they are the most sustainable places for development as set out in the Development Plan. As evidenced by the Council's Authority Monitoring Reports, the majority of affordable housing that is delivered in the district is delivered as part of open market developments, the requirement for which is triggered by Local Plan Policy HOU 3 (Affordable housing provision). This ensures that the overall quantity of affordable housing is delivered in line with the spatial strategy set out in the 2015 Local Plan as per Policy GROWTH 2 (Locational Strategy) thereby ensuring the housing is directed to the most sustainable places in the district; those providing a focus for jobs, shops, services and choices in terms of sustainable travel.

- 7.25 Rural exception sites on the contrary are intended to meet localised needs, proportionate to the village, where development would otherwise not be permitted; they are not intended to compete with or fulfil the functions of higher-order settlements. Whilst it is not disputed that the application site is well-related to the Stretham village, has services and facilities commensurate to a village of its size, good foot/cycle infrastructure facilitated by the proposed off-site highway works, and capacity to provide a range of dwelling sizes, types and tenures, Stretham cannot compete with the main settlements in terms of its sustainability. It is not therefore considered appropriate to direct increasing levels of district-wide affordable housing need to within its locality, where there is no such evidence of local need.
- 7.26 Furthermore, provision far in excess of the minimum of affordable housing in a rural community would, in practice, run the risk of future households who are in affordable housing need, potentially vulnerable households, being relocated away from more sustainable locations close to shops, services, schools, places of employment, and better public transport links.
- 7.27 The proposed development is not therefore considered to appropriate to the scale or location of Stretham. This matter of scale is a further compounded by the adverse landscape and visual impacts of the proposed development, which are considered to be significant as set out within the following section of this report; this is further in conflict with Policy HOU 4.
- 7.28 There is however no reason to believe that the scheme could not come forward as affordable housing in perpetuity. Whilst there is no S106 legal agreement before Officers, the Applicant had demonstrated under the three previous consents – and made a commitment within their supporting statements under this application – that affordability would be secured through the appropriate legal obligations.
- 7.29 On the above basis, the proposed development is considered to conflict with Policies HOU 4 and GROWTH 2 of the Local Plan and the objectives of the NPPF at Paragraphs 8, 82 and 83. The proposed development seeks to deliver a scale of development that is not appropriate to the level of identified local need or its location and is therefore considered to be unsustainable, and in fundamental conflict with the Development Plan.
- 7.30 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) however requires that consideration is given to any other material considerations that may warrant a departure from the Development Plan.
- 7.31 The Applicant seeks to justify the additional 43 affordable housing units (from the consented 83-unit baseline) on the basis of a “very significant need” for affordable housing within the district as a whole.
- 7.32 It is acknowledged that there is a significant need for affordable housing in East Cambridgeshire (paragraph 4.5.1 of the Local Plan) with an accepted under-delivery of sites in the plan period so far, and a growing housing register. This was accepted under all three previous consents on the site. Since 2020, the Applicant’s affordable housing statement (prepared by Tetlow King) highlights an accrued deficit of 470 affordable dwellings in the district against the Council’s annual target of 254 affordable dwellings (including affordable home ownership products). This target is

derived from the Council's 'Housing Needs of Specific Groups' report prepared by GL Hearn in 2021.

- 7.33 The Tetlow King report also points to historic under-delivery since 2011, the start of the plan period. On advice from the Council's Senior Strategic Planning Officer, this historic backlog was factored into the revised 254 figure within the GLHearn report, and therefore not considered material to the consideration of this scheme.
- 7.34 The matter of under-delivery is nevertheless compounded by median affordability ratios in the district being 10.6 times earnings as of 2023. This affordability ratio has increased more rapidly than the rest of England since 2011 (34% as opposed to 21%) but is generally comparable to the East of England in general.
- 7.35 Written Ministerial Statements (WMS) in July, October and December 2024 (as referenced above) also seek to boost the supply of housing nationally, including affordable housing. These aims have been given further impetus by 12th December 2024 NPPF, through the revised standard method for calculating housing need; this includes a much stronger affordability multiplier. These statements attract weight in the decision-making process, and it must be recognised that housing targets in general represent the floor and not the ceiling against which supply should be measured.
- 7.36 The Applicant further points to three 100% affordable appeals within their supporting Tetlow King statement, all allowed by the Planning Inspectorate. All three appeals are not considered to be relevant to the consideration of this application as the circumstances for their determination are not comparable. The appeals concern developments in Council areas unable to demonstrate a 5-year housing land supply, out of date local plans, significantly smaller development schemes or schemes that were not in conflict with the overarching spatial strategy in the Development Plan (i.e. infill). Notwithstanding, the sentiments of boosting overall housing supply within all three appeal are not disputed as has already been recognised.
- 7.37 However, it must also be noted that the district has seen the highest number of affordable housing completions between March 2021 and March 2024 compared with the rest of the plan period from 2011¹, demonstrating progress in addressing under-delivery. Delivery of affordable housing between 2011 to 2020 averaged 47 dwellings per annum (dpa) (median 54), whereas across 2020 to 2024 delivery averaged 137dpa (median 154). This is a substantial improvement, to the extent where the weighting afforded to the delivery of affordable dwellings warranted a downgrading from 'substantial' to 'significant' by a Planning Inspector when determining a major development scheme in Bottisham² in 2024.
- 7.38 The Council's 5 Year Housing Land Supply Report (December 2024) also shows a high number of affordable housing developments coming forwards over the next five years. As a cautious estimate, excluding the consents approved within the application site, approximately 500 affordable dwellings are expected to be delivered by 2029. This figure does not include any additionality of affordable housing that Officers are

¹ East Cambridgeshire Authority's Monitoring Report 2023 to 2024, [East cambridgeshire AMR 2023-24](#)

² 23/00205/OUM (Appeal Ref. APP/V0510/W/23/3324141) – allowed February 2024, comprising up to 170 extra care units including up to c.51 affordable homes as a 30% affordable housing requirement.

aware are coming forwards on many major open market development sites within the district, above and beyond policy-compliant levels. These estimations do not include applications currently pending for affordable housing, nor do they include the Applicant's multiple consents within the application site. The figure is therefore likely an underestimation of planned affordable housing stock.

- 7.39 It is also noted in recently published Government data³, East Cambridgeshire contains 222 vacant general needs dwellings under the control of private registered providers, with an addition 191 vacant dwellings under the control of private registered providers not currently available to let (for example due to repair). This points to a potential further supply of 413 affordable dwellings that are available or could become available for occupation to meet district-wide affordable housing need.
- 7.40 Noting all of the above matters, whilst improvements have been made and a reasonable level of affordable housing supply is planned, given the under-delivery and need for affordable housing within the district and Government direction of travel, the delivery of the proposed affordable housing is considered as a significant benefit of the scheme that attracts significant weight in the decision-making process, irrespective of policy-conflict.

7.41 LANDSCAPE AND VISUAL

- 7.42 Whilst layout is not a committed detail with this application, it is generally necessary for the applicant to demonstrate that the quantum of development could be satisfactorily accommodated within the site. In this respect, the applicant has submitted an indicative layout plan and an assessment of the scheme in the context of the wider Stretham village as set out within the Design and Access Statement (DAS).
- 7.43 The indicative layout demonstrates that the quantum could likely satisfactorily fit into the site and could achieve rear garden sizes and open space (inclusive of play space) compliant with standards expected within the adopted Design Guide and Developer Contributions SPDs.
- 7.44 In respect of policies GROWTH 2 and HOU 4 and the impact of the development on the countryside, the site is straddled by built form, but it is acknowledged that the development extends considerably beyond existing built form within the village. It is also acknowledged that views of the openness in this section would be lost through the development. This would need to be balanced against the benefits of delivering an affordable housing scheme where there is an identified need, and that the Local Plan accepts some loss of open countryside through rural exception sites.
- 7.45 For the 83-unit scheme, it was concluded that at a local scale at completion (taken to be Year 1), the proposed development could potentially result in development of a minor adverse landscape effect on the cusp of Significant and Not Significant. Officers concurred that the development at Year 1 and beyond, in the absence of any mitigation, would be clearly perceptible and would affect how the landscape/character of the area is appreciated, with the most perceptible impacts within the immediate locality of the site and its frontage to Cambridge Road. The

³ https://assets.publishing.service.gov.uk/media/67ee5052e9c76fa33048c6f8/Live_Table_615.ods

development at completion / Year 1 is therefore likely to result in moderate to high adverse impacts upon the immediate local landscape character, but these impacts quickly diminish with distance from the site, which is acknowledged itself to be adversely characterised by the A10 highway.

- 7.46 It was further agreed that to mitigate these potentially significant effects, mitigative planting to the south/west boundaries and reinforcement of existing eastern and northern boundaries would in the long-term result in Low Adverse Landscape Impact with a Negligible to Minor Landscape Effect/Not Significant/Long Term.
- 7.47 Under this application, the proposed development seeks to develop a c.7.67-hectare (18.95-acre) site, c.3-hectares (7.41-acres) larger than the site approved for the 83-unit scheme. The proposed development also seeks to increase the level of residential development within the site by c.52% since the 83-unit scheme.
- 7.48 To aid Officer assessment, a landscape architect (Alison Farmer Associates / AFA) was engaged to provide a review of the Applicant's Landscape Visual Impact Assessment (prepared by Harper Landscape Architecture LLP)(HLA LLP), with a particular focus on the differences between the 83-unit scheme and the 126-unit scheme now proposed. The landscape architect was not instructed to prepare their own LVIA, and therefore the assessment is limited to a review of the Applicant's submitted information. The review can be found in full at **Appendix 2** of this report.
- 7.49 The conclusions of this review can be summarised as follows.
- 7.50 With regard to landscape effects, the review concludes that the proposed development would have an adverse characterising effect on the local landscape, altering perceptions of settlement pattern on the fen islands and creating an urban extension which poorly relates to the existing settlement.
- 7.51 With regard to visual impacts, the review concludes the following will arise from the proposed development:
- When viewed from the north the development would be seen extending into open countryside on lower lying land, relative to the existing village.
 - The mitigation planting would not tie into existing vegetation structure given the openness of the landscape and would serve to create a harsh line of planting which would not create a characteristic edge to development, as seen on the existing margins of the village of Stretham.
 - The density and grain of development would not be in keeping with the linear development along the A10 and would not visually or physically relate to the existing village to the northeast.
 - In views from the west, the proposed development would appear to advance towards the viewer.
- 7.52 Overall, the review considers that HLA LLP LVIA has underestimated the effects of the proposed development. It concludes that the proposed development would give rise to adverse effects which would be significant (emphasis added), by virtue of:
- it's increased scale;
 - in-depth 'parcel' arrangement;
 - physical separation from the main village (located west of the busy A10);
 - lower elevation away from steeper slopes;

- position within wider open fenland (where mitigation may also give rise to effects).

7.53 While the site could accept some housing development (such as linear development along the A10 or some in depth development), the proposed scheme would extend into open arable farmland, would relate poorly to the village of Stretham, and would influence perceptions regarding the form and character of the village and its relationship with the fen island. This is considered to be contrary to Local Plan Policies ENV1, HOU 4 and GROWTH 2.

7.54 Specific consideration is given in the review to the differences between the consented 83-unit scheme and the proposed 126-unit scheme, with the following comments provided.

“In earlier consented schemes effects were considered to be acceptable where the development formed linear infill along the A10. Furthermore, the scheme for 83 dwellings, whilst creating in depth development on the site, included mitigation planting which tied into the existing hedgerow patterns both on the site and in the wider landscape to the north.

The current application by comparison is a c. 87% increase in development area and c. 46.5% increase in dwellings which would physically extend into wider countryside. By its very scale and location it is more difficult to mitigate, such that the proposed mitigation itself has characterising effects. This coupled with the location of the site away from the main village, separated by the busy A10 and on less distinct lower lying land, would result in adverse effects on perceived settlement pattern and landscape character.

These are material differences between the current application and previously consented schemes. It is concluded that the LVIA for the proposed scheme does not take these matters sufficiently into account when reaching judgements. The LVIA for 83 dwellings concluded landscape effects at a local scale would be Minor and would be ‘on the cusp of significant’ (para 7.1.1 of the relevant LVIA). The LVIA for the current scheme concluded that the landscape effects at a local scale would be Minor to Moderate but nevertheless it still concluded that the effects would be on the ‘cusp of significant’.

For the reasons set out above, taking account the increased visibility from the north, effects of mitigation planting and degree of fit with local character and settlement pattern, it is considered that landscape effects would be greater than predicted and significant overall.”

7.55 Whilst not requested, the Applicant subsequently provided a rebuttal to the AFA / Council’s review, as well as providing an updated LVIA prepared by HLA LLP and a new LVIA prepared by Pegasus Group.

7.56 The updated HLA LLP LVIA and new Pegasus Group LVIA address several of concerns raised in the AFA / Council’s review regarding methodological omissions, such as including an assessment from elevated viewpoints.

7.57 Notwithstanding, both the HLA LLP and Pegasus Group LVIAs conclude similar levels of long-term landscape and visual harm arising from the proposed 126-unit

development when compared to the 83-unit scheme. The Pegasus Group LVIA concludes specifically:

“When considered in the round, the additional units do not make a material change to the landscape assessment rankings at a Local, County or National level, and the residual level of harm at the Site level is predicted to reduce to acceptable levels over time.”

“There is no material difference between the findings of this LVIA (for the 126 unit scheme) and the previous LVIA (for the 83 unit scheme) in term of predicted visual effects. In both cases, the more important effects are limited to the immediate vicinity of the Site, and the limited visual envelope of the Proposed Development ensures that addition level of harm arising from the 126 unit scheme is not materially greater than that of the 83 unit scheme.”

7.58 Despite the revised / new LVIAs being provided, in further discussion with Alison Farmer Associates in response to the Applicant’s rebuttal, Officers consider the following matters are pertinent.

- By the Applicant’s own assessment, the development would result in a perceptible increase in scale and increase in harm. Is it therefore unclear how the resulting impacts of the development can be considered immaterially different to the previous and much smaller scheme.
- Caution should be given to the Applicant’s implication that the existing approval for 83-units reduces the susceptibility of the landscape to further development, otherwise this argument could be used to justify the continual expansion of developments into the countryside. It must also be noted that the 83-unit scheme mitigated its impacts, resulting in negligible to minor long-term effects. To use its incursion into the countryside to justify further expansion is considered to be questionable.
- The submitted LVIAs have not addressed the concerns regarding the impact of the development on the ridgeline settlement of Stretham. Whilst the consented development of 83-units is acknowledged the result in some conflict with this matter specifically, it is considerably lesser than the effect resulting from the 126-unit scheme.
- The proposed mitigation for the proposed scheme itself is considered to give rise to its own harmful effects, as it is not considered to create an appropriate edge to the settlement.

7.59 Officers are therefore content to rely on the conclusions of the AFA review and the further discussions held to inform assessment of the development proposals, whilst noting that a degree of errors or discrepancies have been addressed as noted above.

7.60 By both assessing the proposed development against the 83-unit baseline within the site and considering it on its own merits, the proposed development is considered to result in significant adverse landscape and character effects by virtue of its scale, location and proposed mitigation. On the above basis, the proposed development is considered to be in conflict with Policies ENV 1, HOU 4 and GROWTH 2 of the Local Plan and Paragraphs 135 and 187 of the NPPF, for failing to create positive,

complementary relationships with existing development and to protect, conserve, and where possible enhance landscape and settlement character of the area.

7.61 Residential Amenity

- 7.62 Whilst matters of precise layout, scale and appearance e.g., specific location of window positions, would be matters to be considered at future time, the indicative layout suggests it is unlikely that the development would result in any severe overlooking, overshadowing or overbearing impacts on existing residents. Furthermore, and as noted above, each property would likely achieve adequate garden sizes for future occupiers.
- 7.63 Whilst the construction of the development could cause some disruption to living conditions for existing residents, this could reasonably be managed through an agreed Construction Management Plan, for example to ensure that hours of construction, use of plant and machinery and dust and mud suppression is controlled appropriately. The plan could reasonably be secured through planning condition as recommended by the Council's Environmental Health team.
- 7.64 As noted, the Noise Impact Assessment (NIA) submitted by the applicant indicates that ambient noise levels across the site are dictated by constant road traffic noise from Cambridge Road adjacent, with some noise impacts from the Cosy Kennels to the south of the site also. These impacts, predominantly road traffic noise, would need to be carefully managed, with the NIA confirming that the proposed layout would fail to achieve acceptable internal noise levels (as defined by ProPG guidance) for a high number of units without some reliance on closed windows, upgraded glazing, and a Mechanical Ventilation and Heat and Recovery system (MVHR), as well as screening to rear gardens in selected locations.
- 7.65 The reliance on these forms of mitigation has been accepted by the Council when approving the latest 83-unit scheme within the application site, and it is considered reasonable that they be found acceptable under these current proposals for an increased number of dwellings; this is on the basis that significant weight should be afforded to these previous approvals within the application site, including one appeal whereby mechanical ventilation was found to be an acceptable means of acoustic mitigation.
- 7.66 Indicative plots 55-126 would be able to rely on openable windows to control overheating and for general amenity purposes whilst achieving reasonable internal noise levels. The plots closest to Cambridge Road would however be reliant upon mechanical ventilation as a means of managing overheating in the warmer months, as the opening of a window would likely result in unacceptable noise levels internally.
- 7.67 It is acknowledged that this approach would likely achieve adequate ventilation, in-line with passivhaus standards/principles which the NIA concludes will be applied across the site's construction, and is a recognised and sustainable means of building, effectively recycling and re-circulating air to maintain internal temperatures and clean air in an energy efficient way. It is also recognised that ProPG guidance identifies this method as an acceptable means to mitigate noise.

- 7.68 The Environmental Health Officer has raised no objections to this MVHR approach under this application, or the Noise Impact Assessment submitted.
- 7.69 With regard to noise from the kennels, the NIA concludes that the proposed glazing and MVHR strategy would ensure acceptable internal noise levels to address any noise interference from this nearby use, reducing its impact to 'present and not intrusive', requiring no further specific measures. The Council's Environmental Health Officer has not raised any concerns with this approach. It is also concluded on this basis that the presence of the development would not result in detrimental impacts upon the operation of the existing business.
- 7.70 With regard to external amenity areas of the development, noise levels are predicted to be acceptable and compliant with national guidance, provided that 2m high close-boarded timber fencing is used around all gardens. The Environmental Health Officer has raised no objections to this approach.
- 7.71 As such, it is concluded based on the design standards and mitigation proposed and in giving significant weight to the associated application history to the site, the development would achieve high standards of general amenity as required under NPPF Chapter 12 and Local Plan Policy ENV 2.
- 7.72 Highways and Access**
- 7.73 Policy COM 7 of the Local Plan requires that *"Development should be designed to reduce the need to travel, particularly by car, and should promote sustainable forms of transport appropriate to its particular location. Opportunities should be maximised for increased permeability and connectivity to existing networks."* Policy COM 7 also requires that development proposals ensure safe and convenient access to the highway network, as well as being supported by a Transport Assessment proportionate to the scale of development and extent of transport implications.
- 7.74 Policy COM 8 of the Local Plan requires that development proposals provide adequate levels of car and cycle parking for the uses proposed. In this instance, two car parking spaces per dwelling, 1 cycle space per dwelling, and up to 1 visitor parking space for every four dwellings/units.
- 7.75 Regarding parking, all matters are reserved apart from access, meaning that no details of layout or final quantum are for consideration. However, it is considered that the site provides sufficient opportunity for compliance with the standards set out under Policy COM 8.
- 7.76 With regard to means of vehicular access and associated off-site works, the proposed development largely replicates the highways scheme as approved under the consented 83-unit scheme within the site. This is shown on Drawing Refs. (2006314-ACE-XX-XX-DR-C-0501 Rev A) and footpath improvement plan (2006314-ACE-XX-00-DR-C-0502 Rev A), and includes a signalised puffin crossing across the A10, and a variety of localised improvement works to footpaths to improve connectivity to the wider village and bus stops along Wilburton Road. This highways scheme has been through a Stage 1 Road Safety Audit, which the Highways Authority has approved. Exact details of the off-site improvements are set out at Paragraph 2.3 of this report.

- 7.77 The highways scheme now proposed, and as approved for the 83-unit scheme, was developed by the Applicant following an independent review of the now-consented 83-unit scheme by Stantec, prepared on behalf of the LPA. This review was following a deferral at Planning Committee to address Member concerns regarding the suitability of the pedestrian crossing across the A10.
- 7.78 The Stantec report found that the previously proposed uncontrolled 'refuge' island would have excluded a high proportion of users, noting the potentially higher levels of child occupants and lower levels of car ownership due to the nature of the proposed development, factors which were considered likely to give rise to a higher dependence on walking, wheeling and/or cycling to and from the village. It was therefore resolved by Officers that a signalised pedestrian crossing would be the most appropriate means of crossing the A10, to ensure inclusive, safe and active travel to the wider Stretham village and its facilities.
- 7.79 In their consultation comments for this application, whilst the County Council's Transport Assessment Team raise concerns regarding the necessity of the puffin crossing in their earlier consultation comments, they have confirmed in their latest correspondence (March 2025) that they do not object to its inclusion in the scheme.
- 7.80 The previous consent for 83-units is a material consideration that attracts significant weight in the decision-making process. With even greater pedestrian movements predicted under the current proposals, it is considered that the need for the signalised pedestrian crossing is even more important to ensure an inclusive and safe means of crossing the A10.
- 7.81 In earlier consultation comments on this application The Transport Assessment Team raised concerns regarding the clarity of information provided for the off-site highway works, specifically footways and their delivery within the public highway. It was also recommended that additional improvements were required to further enhance the accessibility of the site to/from the rest of the village and its facilities; this includes widening the new proposed footpath around the Short Road junction and widening of the existing footpath along the eastern side of the A10, to improve connectivity from Short Road to Wilburton Road; this would include a new drop kerb crossing with tactile paving between the bus stops on Wilburton Road. Concerns were also raised regarding impacts upon the capacity of the A10/A1123 roundabout, which is understood to be already at capacity.
- 7.82 The requests of the Transport Assessment Team are considered to be reasonable. The scheme seeks to increase the quantum of the dwellings within the application site by over 50% from the 83-unit scheme, with an additional 16 two-way pedestrian trips and 13 two-way bus trips expected across the A10 throughout the day beyond the development already consented within the site. It is therefore implied from the data that existing footpaths and bus stops will be used more frequently, especially whereby these are for school travel.
- 7.83 Whilst it is not the responsibility of development to fix existing problems, for example sub-standard footpaths, it is considered the development itself will generate an increased need for these enhancement works and to ensure appropriate access to the primary school and limit means of sustainable travel that the village can offer.

- 7.84 The Applicant submitted a revised highways scheme for the consideration of the Highways Authority to address the outstanding comments and requests. Both the Local Highways Authority and the County Council Transport Assessment Team raise no objections to the revised programme of off-site highway works. Whilst it is noted that the A10/1123 roundabout will operate over capacity with the proposed development in both its existing and current arrangement (including planned works to the roundabout as part of the Waterbeach Barracks development), the impact upon the highway network is not considered to be severe when taking into account all reasonable future scenarios. This is the test as set out within the NPPF (2024) and the Highways Authority therefore does not object on this basis.
- 7.85 The conditions recommended by the Local Highways Authority and Transport Assessment Team are considered to be reasonable, and would need to be appended to any consent in the interests of highways safety. It was clarified with the Transport Assessment Team that, despite their recommended condition including the phrasing “*Details to be submitted to and agreed in writing with the Local Planning Authority*”, the Transport Assessment Team are not seeking any further plans or details than those submitted with the application. It is therefore considered that this element of the condition would need to be removed.
- 7.86 It is therefore considered that the revised highways scheme would ensure the safe crossing of the A10 and navigation of local routes for prospective occupiers of the proposed affordable housing development, as well as safe vehicular access and egress from the development itself. These measures are considered necessary to ensure that the development provides safe and convenient access to the highway network, whilst giving priority for active modes of travel.
- 7.87 The proposed development accords with the Development Plan on this basis, and Chapter 9 of the NPPF.
- 7.88 Ecology, Trees and Biodiversity**
- 7.89 Policy ENV 7 of the adopted Local Plan seeks to protect biodiversity and geological value of land and buildings and requires that through development management processes, management procedures and other positive initiatives, the council will among other criteria, promote the creation of an effective, functioning ecological network. The Council’s adopted Natural Environment SPD sets out that all development proposals would be expected to provide environmental enhancements proportionate to the scale and degree of the development proposed.
- 7.90 The application is supported by a preliminary ecological appraisal (PEA), comprising a Phase 1 habitat survey which formed consideration for the previous planning applications and assess the application site and the wider area for constraints and opportunities for biodiversity protection and enhancement. The PEA was undertaken in 2020 and is therefore out of date in accordance with CIEEM guidance, but it has nevertheless informed the three previous (extant) consents and provides a general overview of the site as follows.
- 7.91 The site features generally comprise arable bare ground with boundary hedgerow, perimeter scrubland and dry ditches. Whilst the site area has been extended further

with this latest application, the previous conclusions of the PEA (which captured a much wider site area in any case) can be generally relied upon and are proportionate to the nature and scale of the application and are sufficient to guide the Local Planning Authority in their statutory duties at this outline stage when considering the principle of development and access only.

- 7.92 It is noted that recommendations of the PEA include further pre-development surveys, such as for reptiles and badgers due to the transient nature of these species. Given the date of the PEA, it is also considered a future reserved matters submission would need to be supported by an up-to-date ecological appraisal of the site.
- 7.93 The Council's Senior Ecologist echoes these considerations, noting that whilst the PEA is a sufficient document, it lacks up to date recommendations for precautionary measures and mitigation; conditions are therefore recommended by the Senior Ecologist, requiring a detailed Construction Environmental Management Plan, lighting strategy and biodiversity enhancements to address the datedness of the report submitted. It is considered that all of these conditions are reasonable to ensure the development accords with Policy ENV 7 of the Local Plan, Natural Environment SPD and Hedgehog SPD, and in the interests of ensuring the protection of species and habitats during the construction and occupation of the proposed development. This approach is also consistent with the previous applications for residential development approved within the application site.
- 7.94 The Council's Senior Ecologist has not required a Habitats Regulation Assessment for this development.
- 7.95 With regard to tree impacts, for the previous three schemes within the application site, arboricultural impact assessments have not been requested by the LPA. There are several trees along the site's northern boundary where they border residential gardens and field margins, alongside which the development for the 83-dwellings has already been approved. It is not considered the proposed development would therefore justify additional tree assessments at this stage, and it appears that there is more than sufficient opportunity for detrimental impacts upon these trees to be avoided through site layout. The indicative plans and drainage documents show large swathes of SuDS and grassland to the north, providing a large buffer to these trees in which no development is likely to come forwards. Notwithstanding, further details of tree impacts could be secured under future reserved matters consents, should it be deemed necessary by virtue of the development's design.

Biodiversity Net Gain

- 7.96 Members are advised that the Application is subject to mandatory Biodiversity Net Gain as established by the Environment Act 2021, and the development proposals are therefore required to deliver a minimum of 10% net gain above baseline levels within the site. This is distinct from mitigation measures to mitigate impacts upon protected species, which are still required alongside net gain and have been addressed by the PEA.
- 7.97 The site is agricultural land with the main feature being the front and northern boundary hedge. It is considered that whilst at present the site likely yields low to modest biodiversity value, most likely in respect of invertebrates, and nesting/

foraging for birds and commuting/foraging bats through the hedge, there is sufficient opportunity for a scheme to come forward which would demonstrate biodiversity net gain through the retention of the hedge (with exception to where the access is proposed and highway visibility is necessary) and additional planting and habitat creation.

7.98 The Council's Senior Ecologist originally raised concerns regarding the baseline metric put forward, and the assumptions made regarding future condition scores. In simple terms, this means there was uncertainty as to the value of existing habitats on site, and how a 10% improvement on this baseline was to be achieved through the development. However, the Applicant clarified the baseline maps used to inform the metric, and this allayed the Senior Ecologist's concerns regarding any mismatch of baseline habitats. On this basis, the baseline metric is agreed.

7.99 Whilst concerns have been raised during the course of the application regarding post-development net gains on site and their achievability, Planning Practice Guidance sets out the following:

"The statutory framework for biodiversity net gain involves the discharge of the biodiversity gain condition following the grant of planning permission to ensure the objective of at least 10% net gain will be met for a development.

The determination of the Biodiversity Gain Plan under this condition is the mechanism to confirm whether the development meets the biodiversity gain objective. Development may not be begun until the Biodiversity Gain Plan is approved.

Given this, it would generally be inappropriate for decision makers, when determining a planning application for a development subject to biodiversity net gain, to refuse an application on the grounds that the biodiversity gain objective will not be met."

7.100 In discussion with the Council's Senior Ecologist, given the generally arable nature of the application site, it is considered that a net gain of 10% is achievable through a mixture of on-site and off-site units. These details could be secured via a Biodiversity Gain Plan as a condition of planning consent.

Recreational Pressure & Statutorily Protected Sites

7.101 Natural England were not consulted on the application proposals when considering consultation triggers in the General Development Management Procedural Order 2015 (as amended) and given that Statutory Advice was present for the development proposal when utilising Natural England's 'Impact Risk Zones for Sites of Special Scientific Interest'. This statutory advice requires an assessment of recreational pressure on SSSI likely to be affected by the development proposals.

7.102 The Council's Senior Ecologist also advised that recreational pressure impacts upon nearby SSSIs should be considered. The nearest SSSIs to the application site falling within the recreational pressure zones of influence / impact risk zones are Cam Washes SSSI and Upware Bridge/Pit SSSIs. Wicken Fen SSSI/RAMSAR and Fenland SAC lie beyond the 5km Zone of Influence for recreational pressure as

defined by Natural England Guidance and the Natural Environment SPD, but it is noted that Wicken Fen is subject of increasing recreational pressure, as defined by National Trust's 2019 survey. It is therefore acknowledged within Officer's assessment of the application.

- 7.103 Guidance to LPAs set out in Natural England's letter (dated 12 July 2019) and included within the LPA's Natural Environment SPD provides further guidance on recreational pressure impacts, and suitable alternative natural greenspace to mitigate these impacts. The advice is as follows:

"As a minimum, we advise that alternative accessible greenspace should include:

- High-quality, informal, semi-natural areas in accordance with SANG and ANGSt where possible;*
- Circular dog walking routes within the site and/or with links to surrounding public rights of way (PRoW) – the average requirement is ~ 2.7 km;*
- Dedicated 'dogs-off-lead' areas and dog waste bins;*
- On-site signage and/or information leaflets to promote these areas for recreation;*
- A commitment to the long term maintenance and management of these provisions.*

Green infrastructure / SANGS should be designed to absorb significant proportions of the day to day recreational needs of new residents, such as walking, dog-walking, jogging / exercise, children's play facilities, and other informal recreation including enjoyment of the countryside. It should also aim to provide a semi-natural character, with significant proportion of semi-natural grassland, woodland, scrub and wetland habitat. Dependent upon a range of factors, including the scale of development, consideration could be given to the provision of other amenities such as café / refreshment and toilet facilities."

- 7.104 East Cambridgeshire District Council does not operate a charging scheme to mitigate recreational pressure impacts, but instead assessments are made on a case-by-case basis as to what mitigation may be necessary.
- 7.105 This application has been submitted in outline form, and a fixed layout is not therefore for consideration at this stage. However, at its maximum capacity of 126 dwellings, the illustrative masterplan shows that more than 2-hectares (c.5 acres) of land could be allocated for open space, green/blue infrastructure and recreational uses. This includes a community orchard, large areas of open SuDS, woodland planting, an equipped play area and grassland areas. Scope for an extensive woodland buffer and internal planting is also illustrated. Whilst the indicative site layout plans does not appear to show sufficient open space to be policy compliant, it is considered the final layout of the proposed development could sufficiently accommodate policy-compliant levels of open space (c.8,200sqm / 0.82 hectares / c.2 acres) on top of additional green/blue infrastructure and the necessary biodiversity net gains given the site area proposed in accordance with Policy GROWTH 3.
- 7.106 With the benefit of the puffin crossing, the site is a short walk away from the existing recreational ground within Stretham and associated playpark, as well as a good variety of public rights of way in walking distance from the site providing circular routes.

- 7.107 It is therefore considered that the site will be able to appropriately absorb a large amount of the day-to-day needs of its prospective occupiers in terms of recreation. The site provides opportunities for circular routes, exercise, equipped play spaces, kickabout areas, open and wooded spaces, and open SuDS features to contribute to the recreational experience. It is also noted that the rear garden spaces for the properties are generous in most instances, significantly exceeding the 50sqm minimum. As a rural, edge-of-settlement site, the access to the public right of way network and the village facilities also acts as a further buffer to meet additional day-to-day needs.
- 7.108 It is also noted that at Paragraph 6.37 of the Council's Natural Environment SPD clarifies:
- "By applying Policy GROWTH3 of the Local Plan (which requires new infrastructure provision via development, including open space), most development is not likely to result in a significant increase in recreational pressure on designated sites, but it still could."*
- 7.109 The above comments are also made in the context of 83-dwellings already being approved in the application site.
- 7.110 On this basis, it is considered that the proposed development could appropriately absorb the day-to-day needs of its occupiers in terms of recreation and open space, to provide appropriate alternative greenspace and reduce recreational pressures upon the nearby SSSIs and statutorily designated sites.
- 7.111 On this basis, it is considered that the proposed development would satisfy Policies ENV 7 and GROWTH 3 of the Local Plan, the Natural Environment SPD and Chapter 15 of the NPPF, as it will protect, contribute to and enhance the natural and local environment. Officers are also content that the Biodiversity Net Gain condition could be reasonably discharged with a minimum of 10% net gain of the baseline levels achieved.
- 7.112 Flood Risk and Drainage**
- 7.113 The application site is generally agreed to be in an area at low risk of flooding (wholly within Flood Zone 1). The Flood Risk Assessment nevertheless suggests that the site is subject to surface water flooding, with the site frontage subject to a low risk of surface water flooding, and very small parts of the site at medium to high risk of surface water flooding (area already has planning approval).
- 7.114 Flood depths are predicted to be between 150mm to 300mm (c.6 to 12 inches) in the 'High' 1 in 30-year model (3.3% probability), and a maximum of 600mm (c. 24 inches) in the 'medium' (1:100 year) (1% probability) and 'low' (1:1000 year) (0.1% probability) events. Residential development should usually be considered as being in-situ for a minimum of 100-years, and there is no reason to consider this development as especially time-limited (i.e. no impacts of coastal change) to warrant a shorter flooding probability forecast.
- 7.115 In terms of alternative sites at a lower risk of surface water flooding, development of up-to 83 dwellings has been approved by the Council within the application site, including development within the areas of surface water flood risk. On this basis, it

is considered unreasonable for the LPA to conclude differently as to the acceptability of development within this portion of the application site, as now proposed under this application.

- 7.116 In terms of a site-specific sequential approach, the Applicant's Flood Risk Assessment puts forward a strategy for locating development, with the majority of residential development *indicatively* shown to avoid the majority of the low, medium and high surface water flood risk areas. Raised thresholds above finished floor levels of 300mm (12 inches) are recommended for the majority of the site within the FRA, with raised thresholds of 600mm (24 inches) for the parts of the site with the deepest flood depths, to mitigate the worst flooding impacts in a flood event (low risk). It is considered that at a detailed design stage, this strategy could be appropriately realised and a condition would need to be imposed to secure compliance of the detailed scheme with the recommendations of the FRA.
- 7.117 The Lead Local Flood Authority are also content that surface water from the proposed development can be managed through the use of a series of three attenuation basins which take respective flows from three catchments via planted steps for treatment purposes. Flow controls will also restrict surface water discharge into the existing (riparian) watercourses at 6.0, 3.3, and 0.5l/s respectively. Adequate maintenance clearance will also be provided to both watercourses, and a maintenance plan has been provided. Water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual. The LLFA therefore raise no objection to the outline drainage strategy, subject to conditions which are considered reasonable to ensure flood risks from the development's construction and occupation are appropriately managed.
- 7.118 Ultimately, the application is supported by a flood risk assessment which demonstrates that surface water can be adequately managed on site without causing flooding elsewhere, and that solutions are available to make the development safe for its lifetime. This would be subject to further demonstration a detailed design stage.
- 7.119 Matters of foul drainage would also need to be secured at detailed design stage (reserved matters) and there is nothing to indicate that solutions would not be available to the developer in achieving a satisfactory scheme in this regard, with Anglian Water confirming that the Stretham wastewater recycling centre has available capacity for the development.
- 7.120 On this basis, it is considered that the proposal complies at this stage with the aims of Local Plan Policy ENV 8 and Policy ENV 9 and the NPPF.
- 7.121 Other Material Matters**
- 7.122 Archaeology**
- 7.123 The County Council's Archaeology team has advised that the site lies in an area of potential interest and has sought a planning condition to secure a written scheme of investigation, in the interests of safeguarding archaeological assets. It's considered this would be necessary having regard to the aims of policy ENV 14 of the Local Plan and such a pre-commencement condition could be reasonably secured.

7.124 Community safety and security

- 7.125 The comments from the Local Policing team are noted and it would be for the developer to bring forward a detailed scheme which considers the recommendations as set out by the Police, in order to address security and the fear of crime in accordance with Local Plan policy ENV 2.

7.126 Infrastructure and S106 Planning Obligation

- 7.127 Policy GROWTH 3 of the East Cambridgeshire Local Plan, 2015 requires developments to mitigate their impacts through infrastructure provision, by way of planning conditions and / or S106 obligations – this includes where affordable housing, open space, sustainable drainage, and education contributions are to be secured.

- 7.128 As with the previous 38-unit and 83-unit consent, given the quantum of dwellings proposed it is considered that the education and library contributions sought by the County Council, the open space requirements (comprising on-site infrastructure inclusive of play-space and orchard), the sustainable drainage (SuDS), wheeled bin provision, and the affordable housing (which would include details of a nomination agreement and a guarantee of being retained as affordable housing and future transfer agreements), are necessary to mitigate the impacts of the development and meet the tests as set out under CIL 122 Regulations (necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development). These would need to be secured via a S106 legal agreement, as well as mandatory Biodiversity Net Gain given the size of the application site and net gain to be achieved in accordance with the Council's Senior Ecologist's recommendation.

- 7.129 The East of England Ambulance Service Trust (EEAST) have requested a contribution towards increasing the capacity of ambulance provision. This contribution has been accepted by a Planning Inspector elsewhere in the district and therefore it is considered reasonably necessary to mitigate the impacts of the development proposals.

- 7.130 With specific regard to the affordable housing obligations, the Applicant has indicated (in their Tetlow King report and Letter from Future Planning and Development) that the S106 legal agreement would include a cascade mechanism to ensure priority is first given to those with a local connection to Stretham and/or Little Thetford, with this then widening out to surrounding areas and then the wider district. It is noted that this is different from the Applicant's initial position, whereby only the 83-rural exception site units were to be controlled through a cascade. However, the Applicant's latest documents are considered the most up to date understanding of the proposals.

- 7.131 Under the 83-unit scheme it was considered pertinent to secure the cascade mechanism given the notable uplift in affordable units being proposed under the current scheme, and to ensure that the housing was genuinely meeting the local identified needs as per Policy HOU 4.

- 7.132 However, in the absence of a locally identified need for the additional 43 units, it is questionable as to whether a cascade mechanism would be appropriate, as it could potentially have the effect of giving priority to those in lesser housing need by virtue of local connection as opposed to banding.
- 7.133 It would be necessary to secure the above via S106 legal agreement to make the development acceptable and ensure it would accord with the requirements of policies GROWTH 3 and Paragraph 56 of the NPPF.
- 7.134 A S106 agreement or draft heads of terms have not been submitted with the application. This therefore forms a reason for refusal. Should the application be refused and an appeal progressed, it is considered likely that the Council would not defend this reason should a satisfactory legal agreement be presented with the appeal submissions. However, its absence at this time means that the Council could not secure mitigation to make the development acceptable.

7.135 Planning Balance

- 7.136 The proposed development seeks to deliver 126-units of 100% affordable housing on the edge of the Stretham parish. Considering the recently granted and extant consent of 83-units of 100% affordable housing within the application site, this is an increase of 43 affordable units.
- 7.137 Whilst considerable progress has been made in addressing affordable housing delivery within the district, and the Council has a good pipeline of affordable housing over the next five years, there is still a significant need for affordable housing within the district and an accrued undersupply. The matter is compounded by an affordability ratio of 10.6 throughout the district. It must be further recognised that affordable housing targets are not a ceiling, but a baseline target that should be met. This is emphasised by the Written Ministerial Statements seeking to boost housing delivery, including a strengthened support for affordable housing.
- 7.138 On this basis, the delivery of the additional 43 units of affordable housing is still considered to be a significant benefit of the scheme that would attract significant weight in the overall planning balance, including the social benefits that would stem from the scheme.
- 7.139 The scheme itself would also be built to higher sustainability standards, encompassing passive-house principles, thereby likely giving rise to high environmental benefits. The scheme would deliver on-site and off-site biodiversity net gain, albeit the gains beyond the 10% mandatory levels are minimal, and the benefits are therefore considered to be limited. Low to moderate economic benefits would also stem from the proposed development through the construction of the development itself and spend by future occupiers in the village, although as a rural settlement this is likely to be restricted.
- 7.140 Together with the delivery of the affordable housing, the environmental and economic benefits of the scheme are considered to attract substantial weight in the overall planning balance.
- 7.141 The proposed development provides opportunities for public open space and blue and green infrastructure on-site, as well as securing off-site highways improvements

to support the development proposals. Whilst there are likely very modest benefits for the wider population of Stretham, the scheme largely seeks to mitigate its own impacts. The location of the development and absence of any directional 'pull' also means residents within wider Stretham are unlikely to visit the site regularly to realise these benefits. These very modest benefits are considered to attract limited weight in the overall planning balance.

- 7.142 However, the proposed development is considered to conflict with the key strategic policies of the Development Plan (GROWTH 2 and HOU 4), by failing to deliver sustainable development in a suitable location and in the absence of an identified local need.
- 7.143 The fact that a general affordable housing need exists within the district does not necessarily translate to a local need in Stretham. Indeed, the Applicant has failed to demonstrate that this need exists within Stretham and Little Thetford combined through their HNA, and the Council's data supports this conclusion. By their nature rural exception sites are exceptions to the general policy of restraint regarding development in the countryside, as established by Policy GROWTH 2 and the NPPF, and they require robust justification. On the evidence before Officers, the Applicant has not robustly demonstrated a local need for the proposed quantum of development.
- 7.144 The Council can demonstrate a robust 5-year housing land supply and excellent Housing Delivery Test result, and with the outcomes of the Single Issue Review (2023), the policies within the Development Plan should be given full weight. To depart from this is considered to result in significant to substantial harm, as it undermines the plan-led system that the NPPF and Section 38(6) of the Planning and Compulsory Purchase Act 2004 enshrines, and within which the public place their trust.
- 7.145 It is considered that a plan-led solution has already delivered an acceptable 83-unit scheme within the application site that is considered to more than sufficiently meet the locally identified need.
- 7.146 Whilst it is acknowledged that the proposed 126-unit scheme would equate to more than 50% of the Council's annual minimum for affordable housing, it is not considered that this annual target or the district need in general is an appropriate means of calculating a rural exception site's planned capacity. It is also not considered acceptable to focus a large proportion of this affordable housing need away from the district's more sustainable settlements. This risks perpetuating residential development at an unsustainable location contrary to the Plan's overall spatial strategy
- 7.147 The proposed development is also considered to result in significant long-term/permanent adverse landscape and character effects by virtue of its scale, location and proposed mitigation. On this basis, the proposed development is considered to be in conflict with Policies ENV 1, HOU 4 and GROWTH 2 of the Local Plan, for failing to create positive, complementary relationships with existing development and to protect, conserve, and where possible enhance landscape and settlement character of the area. This is considered to attract high weight in the overall balance, and whilst there is recognition that this harm must be balanced

against need, local and national planning policy does not anticipate that housing needs are to be met at the expense of all other planning matters.

- 7.148 In the round, the scheme is therefore considered to fundamentally conflict with the Development Plan as a whole in failing to deliver sustainable development. This is considered to attract substantial weight.
- 7.149 In the overall planning balance, although considerable, the material considerations referred to above are not considered sufficient in this case to outweigh the totality of the harm identified and the fundamental conflicts with the Development Plan.
- 7.150 The application is therefore recommended for refusal on this basis.

Human Rights Act

The development has been assessed against the provisions of the Human Rights Act 1998, and in particular Article 8 (right to respect for private and family life) and Article 1 of the First Protocol (protection of property). Under the Act, it is unlawful for a public authority, such as East Cambridgeshire District Council, to act in a manner that is incompatible with the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance. The Council is also permitted to control the use of property in accordance with the general interest and the recommendation set out below is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

Equalities and Diversities

In considering this planning application due regard has been had to the public sector equality duty (PSED) under Section 149 of the Equality Act 2010, which means that the Council must have due regard to the need (in discharging its functions) to put an end to unlawful behaviour that is banned by the Equality Act, including discrimination, harassment and victimisation and to advance equality of opportunity and foster good relations between people who have a protected characteristic and those who do not. Account has been taken of the PSED and it is considered that the recommendation set out below would not undermine the objectives of the duty.

APPENDICES

Appendix 1 – Response from the Council's Senior Strategic Planning Officer

Appendix 2 – Alison Farm Associates Review of Harper Landscape Architecture
LLP Landscape Visual Impact Assessment (January 2025).

Relevant History

24/01135/OUM

22/00180/OUM

23/00712/OUM

23/01338/OUM

PLANS

The following plans are a selection of those submitted as part of the application and are provided to illustrate the proposed development. They may not be to scale. The full suite of plans and documents can be found on the Council's website.



Illustrative Site Layout Plan

