
East Cambridgeshire Local Plan Examination

Inspector: Louise Nurser BA (Hons) Dip UP MRTPI

Programme Officer: Hannah Charlish

30th July 2018

Dear Mr Kay

Examination of the East Cambridgeshire Local Plan:

Inspector's findings regarding Stage 1 hearings

Further to the hearing sessions held between the 19th and 28th of June 2018, I set out below my initial findings in respect of the legal compliance, including the duty to co-operate, and soundness in terms of the objectively assessed needs for housing and employment. I also explain the consequences for the examination.

The reasons for my conclusions will be contained within my final report. The conclusions set out below may not necessarily be my final conclusions on these matters. This is because they may change as a result of evidence that is presented during the rest of the Examination.

In addition, my report will also cover other matters which have arisen during the Examination and which may require Main Modifications.

Whilst I am seeking a response from the Council, I am not inviting comments from the Council or from others on the interim views which I have set out below.

Duty to co-operate (DTC)

There are a number of strategic matters which required co-operation during the preparation of the Local Plan. The overall provision for housing is of particular importance, as is its impact on the wider transport network. Having very carefully considered the evidence provided, including details of meetings which have taken place between East Cambridgeshire District Council and West Suffolk Councils (ED029) I am content that the DTC has been met.

Sustainability Appraisal

I have carefully considered the Sustainability Appraisal (SA) that accompanied the submission plan. However, the SA has not tested sites which benefit from planning permission and have been subsequently allocated within the

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development plan. Whilst I understand that such sites could be developed and have been considered as appropriate for development, in the interests of completeness these should be the subject of sustainability appraisal.

In addition, I share the concerns raised by Historic England relating to the limited evidence which has been used to inform the SA of sites at both Kennett and Swaffham Prior. As such, the Council should provide further clarification as to how the historic evidence has been used to inform their sustainability appraisal.

Objectively Assessed Needs for Housing and Employment Land

I conclude that it is a sound approach for the standard method to be used to set the OAN for housing within East Cambridgeshire at **a minimum of 11,960 dwellings between 2016 and 2036**. Indeed, in the context of a Strategic Housing Market Assessment (PE05) of considerable vintage (2013), which had already been used as the primary evidence base for the development strategy which is to be superseded by the Plan before me, it would not have been appropriate to update the evidence base in isolation of the wider HMA, so that it could be used a second time. Ideally, for the purposes of this plan, the housing needs of the wider Housing Market Area would have been thoroughly considered through a new Housing Market Assessment.

However, it is clear from the different stages in which the constituent plan making bodies find themselves that such a scenario would be unrealistic, particularly in the context of the clear indication from the recently published Framework that the standard method should be used in plan making in the future, and as a consequence, it is highly improbable that a completely new HMA would ever be commissioned.

I draw particular comfort from the fact that the annual dwelling requirement using the revised OAN figure of October 2016, for the district, which is based on the SHMA, is 586 dwellings per annum (PE06). This is comparable with the figure of 598 dwellings per annum, using the standard method (PE07). As such, the use of the standard method to determine East Cambridge's housing needs is an acceptable and a pragmatic approach to determining the district's needs. In coming to this conclusion, I must stress that my conclusions relate to the particular circumstances of East Cambridgeshire, which has already adopted a plan on the basis of the 2013 SHMA evidence.

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As set out above, I have concluded that the legal duties in relation to the Duty to Co-operate have been complied with. However, I am not convinced by the evidence before me, for the purposes of this examination, that it is appropriate to continue to attribute significant weight to the Cambridgeshire and Peterborough Memorandum of Co-operation (2013) (PE02) and the Joint HMA Statement on Housing Redistribution (2017) (PE04) and to continue to discount the district's housing figures.

This is particularly the case as the Council has chosen to submit a plan whose housing figures are predicated on the standard method which is calculated on a **district wide basis**, independent of the wider Housing Market Area, or any historic agreed sub-regional approach. Therefore, in the absence of any substantial constraints which would preclude East Cambridgeshire making provision for the requisite level of housing, or a spatial plan which takes a pan regional approach, its needs, as calculated by the standard method, should be catered for within East Cambridgeshire. This would increase the minimum housing requirement for East Cambridgeshire from **10,835 dwellings to 11,960** dwellings between 2016- 2036.

I have previously highlighted my concerns, and continue to have reservations about the Council's approach to the provision of sites on which caravans can be stationed. As the Framework is clear that plans should cater for the housing needs of all sections of the community the Council should set out how the Council intends to satisfy this national policy requirement.

Given that there is no clear link between the standard method of determining an appropriate housing OAN and employment figures, and that the forecasting of jobs growth is notoriously sensitive and variable, I conclude that the target of 6,000 jobs from 2014- 2016 is an appropriate target.

Evidence

As set out above, I am content that the legal provisions of the DTC have been complied with. Nonetheless, I continue to have reservations that the transport evidence (PE28a) sufficiently demonstrates that the cross boundary impacts of the proposed developments, to the south of the district, on the West Suffolk Councils, and Newmarket, in particular, have been adequately considered and that the evidence justifies the plan. These transport impacts, also have potential

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knock on effects on the multi million pound horse racing industry at Newmarket and the surrounding villages. Further evidence is required to demonstrate that the transport implications of the scale of development proposed can be adequately mitigated.

I note, other than the development at Kennett, that the levels of development proposed within the submitted plan are not substantially different to those of the existing adopted plan. However, this does not negate the need for the cumulative impacts of existing, and proposed development to be considered on the road network both within and outside the Borough, including J 37 of the A14. This is particularly the case given that transport patterns may be affected by the Ely southern bypass due to open in October 2018.

Next Steps

I intend to move forward to Stage 2 of the hearings as originally planned. However, prior to doing so, could you confirm that the Council is confident in terms of housing supply that it can provide for and deliver the increased housing requirement? Also, could you let me know, via the Programme Officer, if the Council is in the position to move forward to the next stage which I had originally envisaged to take place in mid- September? If this is the case I will need to send out the relevant paperwork in the very near future.

I would be grateful if you could confirm the Council's position via the Programme Officer, as soon as possible, and let me know, if there are any questions in relation to the practical procedural implications of this letter, together with a timetable setting out when you will be able to submit the additional Sustainability Appraisal material and transport evidence.

A copy of this letter should be placed on the Council's website and made available on request.

Yours sincerely

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INSPECTOR

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