

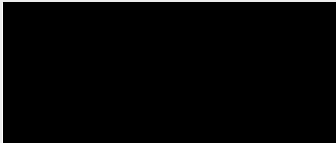

EAST CAMBRIDGESHIRE LOCAL PLAN – SINGLE ISSUE REVIEW

Response to Proposed Modifications Consultation (July 2023)

Prepared by Strutt & Parker on behalf of TURNSTONE (CAMBRIDGE) LTD

August 2023

Report: East Cambridgeshire Local Plan – Single Issue Review

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<i>Type of Report:</i>	Examination Hearing Statement	
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1. INTRODUCTION

- 1.1 This response has been prepared by Strutt & Parker on behalf of Turnstone Estates in relation to the proposed Main Modifications by the Council in respect of the Single Issue Review (SIR) of the East Cambridgeshire Adopted Local Plan (2015). It follows consultation responses that were submitted to the first and second rounds of consultations on the SIR in May 2021 and February 2022 respectively, and to the Hearing Statements submitted for the Examination Hearings held on 8 November 2022 and 28 March 2023.

2. RESPONSE TO MAIN MODIFICATIONS

- 2.1 It is not considered that the proposed Main Modifications will result in a sound Local Plan. As set out in our previous submissions to the SIR and in our Hearing Statements, the SIR does not meet the four tests of soundness as identified at paragraph 35 of the National Planning Policy Framework (NPPF) (2021). This response to the Main Modifications does not repeat our previous arguments as to why the Plan is unsound, and consequently it should be read alongside our previous submissions.
- 2.2 The urgency to ensure a sound Local Plan is in place has been further brought to the forefront following a speech by Michael Gove on 24th July in which he set out the Government’s vision for a Britain with ‘many more homes’ that will underpin economic recovery. As discussed in further detail below, Cambridge and its surrounding area will be at the forefront of achieving these ambitions and it is not considered this SIR makes sufficient provision to meet its housing and consequently economic needs.

Requirement for an early review of the Plan

- 2.3 If the Inspector is minded to find the SIR sound, it is essential the Council include a commitment to an early review of its Local Plan. This commitment is not currently included in the draft SIR (2022) or the proposed Main Modifications.
- 2.4 The issues identified during the course of this Examination, including the inconsistencies with national policy (acknowledged by the Inspector in his letter dated 24th May 2023) and concerns surrounding past under delivery, would indicate an early review is essential to ensure the Council continue to meet its development needs whilst also capitalising on its proximity to Cambridge (discussed in further detail below).
- 2.5 The Council note in the Regulation 19 and Submitted Plan (CD03) that a “*comprehensive update of the Local Plan will be undertaken once clarity is available in respect of a forthcoming Planning Act. Commencing a comprehensive review ahead of such changes could lead to considerable resource expenditure and the potential of such a Plan not being completed.*”
- 2.6 Whilst it is acknowledged there is currently some uncertainty surrounding proposed changes to the NPPF and the Levelling Up and Regeneration Bill, this is not a suitable reason to delay the preparation of a Local Plan as continually expressed by the Chief Planner, Joanna Averley. Given the length of time it takes to prepare and adopt a Local Plan (this SIR to review a single policy has already taken 3 years), it would be prudent to start to prepare a new Local Plan as soon as possible.

Precedence

- 2.7 In his letter dated 31st January 2023, the Inspector asked the Council to provide an explanation as to why it considers that the Plan so amended should be found sound despite amended strategic policy GROWTH1 not looking ahead over a minimum 15 year period from adoption. The Council’s response is set out in its Examination Topic Paper (February 2023) and draws on its previous responses to the Regulation 19 and Submitted Plan (CD03) and its response to the relevant part of Q6 of the Inspector’s Initial Questions.

- 2.8 The Council identify two local planning authorities – neighbouring Forest Heath District Council and Bath & North East Somerset (B&NES) Council – as examples where Local Plans were found sound but do not comply with the 15 year period ‘rule’ set out at paragraph 61 of the NPPF.
- 2.9 The Forest Heath Single Issue Review of Core Strategy Policy CS7 (adopted in 2019) included the commitment to “*commencing a review of the Plan in 2018, which will include a review of the spatial strategy, including settlement boundaries, to take account of any change in circumstances.*” This clause was included primarily to address the fact that the Review did not look ahead over a 15 year period.
- 2.10 The circumstances surrounding the B&NES Local Plan Review are arguably more complex than this SIR, and the review was submitted for Examination (December 2021) in the context of the West England Combined Authority preparing a Spatial Development Strategy to provide the strategic planning framework. However, in May 2022 work on this Joint Local Plan stopped, with the issue of housing need to be addressed through individual local plans.
- 2.11 B&NES Council acknowledged the need to update the whole Local Plan¹, and have commenced work on this, and thus there was no need to include a requirement for an early review in the Local Plan Partial Update (January 2023).
- 2.12 Other examples where Local Plans do not provide 15 years’ worth of housing in accordance with the NPPF include the adopted Eastleigh Local Plan (April 2022) and the emerging Welwyn Hatfield Local Plan (Main Modifications, July 2023) and Bedford Local Plan 2030 (January 2020) . In all instances, the Inspectors concluded an early review of the Local Plans would be necessary in order to make the plans sound.
- 2.13 Thus, whilst a precedence might have been set for Local Plans not having to strictly comply with the requirement to have a 15 year supply of housing, the local planning authorities identified above have all committed to an early review of their Plans suggesting a similar commitment should be included in Policy Growth 1.

Local Circumstances

- 2.14 Commitment to an early review of the Local Plan will also provide opportunities for East Cambridgeshire to capitalise on its proximity to Cambridge.
- 2.15 In a speech delivered on 24 July 2023, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) sets out the Government’s ambition to supercharge Cambridge as Europe’s ‘science capital’. This includes establishing the ‘Cambridge Delivery Group’ to take forward a vision for Cambridge to be delivered by 2040. This, along with other growth initiatives for the area including East/West Rail, the City Deal and the creation of the Cambridge and Peterborough Combined Authority, further confirms the Government’s commitment to the growth of the region.

¹ Bath and North East Somerset Local Plan 2022 to 2024: Launch Document (October 2022)

- 2.16 The Greater Cambridgeshire City Deal between Cambridge City Council and South Cambridgeshire District Council will:
- create an infrastructure investment fund;
 - speed up the development of 33,480 planned homes and allow 1,000 extra new homes to be built;
 - create more than 400 new apprenticeships for young people;
 - provide £1 billion of local and national public sector investment, enabling an estimated £4 billion of private sector investment in the Greater Cambridge area;
 - create 45,000 new jobs; and
 - create a governance arrangement for joint decision making between the local councils.
- 2.17 Through the City Deal, the Councils committed to an early review of their Local Plans (adopted in 2018) which is currently progressing as a single joint Local Plan. This is in order to establish what impact the anticipated changed infrastructure and economic growth in the area might have on housing need and other aspects of spatial and transport planning. As an adjoining authority, it is inevitable this growth will impact and provide opportunities for East Cambridgeshire and an early review of the plan will ensure the District is able to respond proactively rather than reactively to these.
- 2.18 East Cambridgeshire District Council also forms one of six local planning authorities which comprise the Cambridge and Peterborough Combined Authority (CPCA) created in March 2017 after the adoption of the East Cambridgeshire Local Plan (2015). The ambitions of the CPCA include:
- doubling the size of the local economy;
 - delivering outstanding and much needed connectivity in terms of transport and digital links;
 - providing the UK's most technically skilled workforce;
 - growing international recognition for our knowledge based economy; and
 - improving the quality of life by tackling areas suffering from deprivation
- 2.19 With the exception of East Cambridgeshire, all local planning authorities within the CPCA are currently preparing new (full) Local Plans. With the exception of Fenland, all authorities have current local plans which were adopted after East Cambridgeshire's.
- 2.20 The East Cambridgeshire Local Plan has not been updated in the context of recent growth plans for Cambridge and the wider region, and consequently it does not reflect the ambitions of the CPCA.
- 2.21 National and local ambitions for Cambridge and its wider area clearly suggest it is appropriate to plan for a higher housing need figure than the standard method indicates. As set out in the PPG (ID ID: 2a-010-20201216), the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. An early review of the Plan will therefore ensure the housing need for the area is thoroughly considered.

Conclusions

2.22 In conclusion, it is considered Policy Growth 1 should be amended to include text requiring the Council to commit to an early review of its Local Plan for reasons including:

- To review housing and employment growth targets, taking into account latest information;
- To make sure there is a robust and flexible housing supply of at least 15 years, and of the right quality and types, and in the right places;
- To ensure the identification of employment land for a range and choice of employment opportunities reflecting demand and investment in the area;
- A review of the Local Plan offers the opportunity to consider whether new policies or allocations are needed to reflect changing circumstances, national policy and opportunities that were not incorporated in the adopted Local Plan, such as climate change and biodiversity net gain (BNG);
- To reflect the Cambridgeshire and Peterborough Combined Authority's (CPCA) ambitious proposals relating to growth, infrastructure and the environment.
- To align the preparation of a new Local Plan with other authorities and to capitalise and adapt to growth initiatives in the area.