

# East Cambridgeshire Local Plan - Single Issue Review (of its 2015 Local Plan)

**Proposed Modifications Consultation** 

July 2023

#### **Proposed Modifications Consultation**

#### 1. Introduction

- 1.1 East Cambridgeshire District Council (the Council) is undertaking a narrowly focused Single Issue Review (SIR) of its adopted Local Plan.
- 1.2 The purpose of the SIR is to partially replace a very small part of the Local Plan adopted in April 2015. The vast majority of the Local Plan (2015) is proposed to remain unaltered and remain part of the development plan for East Cambridgeshire.
- 1.3 The Council consulted twice in 2021 on initial proposals, and then again in May 2022 with the final draft proposal. That final draft, and representations arising, were submitted to the Planning Inspectorate in July 2022.
- 1.4 The formal examination of the proposals commenced from July 2022, and is ongoing at the point of publishing this document.
- 1.5 Following two separate hearing sessions, the Inspector wrote a letter to the Council asking for a set of Proposed Modifications to be prepared and consulted upon. This document comprises such proposals.
- 1.6 For full details on the Local Plan SIR examination and the various Inspector letters, please see the examination webpage at the following address, which will be updated regularly:

https://www.eastcambs.gov.uk/local-development-framework/local-plan-review-examination

#### **2** Consultation Arrangements

- 2.1 The modifications set out in this document are subject to a period of consultation between **21 July and 31 August 2023**. The list should not be seen to prejudice the Inspector in his consideration of the soundness of the Submitted Local Plan, nor prejudice the Inspector from making alternative modifications in his final Inspector's Report.
- 2.2 To make a representation on the Proposed Modifications, it should be in writing and be by 31 August 2023:
  - via email to: planningpolicy@eastcambs.gov.uk; or
  - by post to: Strategic Planning Team, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely CB7 4EE

- 2.3 Once the consultation period has ended, the representations received will be considered by the Inspector.
- 2.4 East Cambridgeshire District Council will process the information you provide in a manner that is compatible with the General Data Protection Regulations (GDPR) and the Council's Privacy Notice, available on our website at <a href="https://www.eastcambs.gov.uk/notices/privacy-notice">https://www.eastcambs.gov.uk/notices/privacy-notice</a>.
- 2.5 Please be aware that all representations received by the Council will be made publicly available (in due course) on the Council's website. These will be identifiable by name and where applicable, organisation.

### 3 Schedule of Proposed Modifications

- 3.1 The table in the Appendix sets out the proposed modifications which could be made to the East Cambridgeshire Local Plan Single Issues Review (SIR).
- The table includes a brief explanation of the reason for the suggested modification. For a greater explanation of the reasons why the Council is supporting the proposed Modifications as set out, then please see Examination Document EX.LA11 in the examination library, or directly here: <a href="EX.LA11 ECDC Topic Paper February 2023">EX.LA11 ECDC Topic Paper February 2023</a> 0.pdf (eastcambs.gov.uk).
- 3.3 The proposed modifications in the table below are considered as MAIN modifications. It is important to stress, any changes which go to the heart of soundness can only be recommended by the Inspector. These are known as MAIN modifications.
- 3.4 Only the proposed modifications are subject to consultation. This is not an opportunity to raise comments on wider aspects of the Local Plan, or wider issues set out in the submitted SIR Local Plan.
- 4 Implications of the Proposed Modifications on Sustainability Appraisal and Habitat Regulations Assessment
- 4.1 As part of the submission documents for examination, the Council included the following two documents:

  <u>Sustainability Appraisal and Strategic Environmental Assessment of the Local Plan to 2031</u>, May 2022 (Ref CD06); and Habitats Regulation Assessment (Stage 1 Screening) of the East Cambridgeshire SIR Local Plan, May 2022 (Ref CD07).
- 4.2 The SA / SEA document assessed the implications of the policy proposals in the SIR, and set out an appraisal of 'reasonable alternatives' (Table 5, on page 24-25 of the document summarises and appraises those alternatives).

- 4.3 Option 1 within the document, which is the 'preferred option', is summarised as follows:
  - Option 1. Housing Requirement to match housing need, derived from Government Standard method. Consequently, no new allocations or additional growth arising compared with 2015 Local Plan.
- 4.4 Should the Proposed Modifications be implemented, then the above summary description remains valid as the 'preferred option'. Whilst the 'numbers' and dates as set out in Policy GROWTH1 would be different should the Proposed Modifications be taken forward, when compared with the 'numbers' and dates in the submitted Plan, those changes do not materially affect either the summary description of Option 1 tested in the SA, nor materially affect what is meant or being tested under Option 1. Fundamentally, the crucial aspect that Option 1 was testing was that the submitted Plan would not lead to any new allocations or growth arising in the district compared with the current adopted Plan. The Proposed Modifications would not alter that situation. There is, therefore, no reason to prepare or consult on an updated SA document at this stage of the Examination.
- 4.5 However, on adoption of the Plan, there is a requirement to publish a final SA document, and that will be the place to explain adjustments to the Plan as it progressed through examination to adoption, and will also confirm what is discussed in the paragraph above.
- 4.6 Turning to the HRA related document, the HRA screening report concluded "that the SIR Local Plan, alone or in combination with other plans and projects, is unlikely to have any significant effects on any of the applicable protected sites" and, in summary, it based such a conclusion on the fact that the SIR would not lead to additional growth or additional new site allocations, when compared with the existing situation (i.e. current adopted plan and any consented planning applications).
- 4.7 The Proposed Modifications, as set out in this consultation document, do not fundamental alter that position, and therefore there is no reason to suggest that, should the Proposed Modifications be implemented, the conclusions arising in the HRA screening report would no longer be valid.
- 4.8 Overall, therefore, in relation to SA / SEA / HRA, the Proposed Modifications have no material effect on what was assessed or the conclusions arising as set out in those submitted documents, and therefore there is no need to prepare any addendums or other updates to those documents for the purpose of consultation alongside the Proposed Modifications.

## **Appendix – Main Modifications**

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in italics.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Policy/ Paragraph	Main Modification
MM1	3.2.5	3.2.5 However, through periodic updates of the NPPF (latest version at time of writing is July 2021), Government has removed the requirement for a local planning authority to establish an 'objectively assessed need' for housing, and instead put in place a national standard method to determine a 'local housing need'. Applying that standard method for East Cambridgeshire, for the period 2022-2031, it is determined that the local housing need for East Cambridgeshire is 5,398 5,400 dwellings. Following consultation and testing of this figure, it has been determined that 5,398 5,400 also becomes the housing requirement for East Cambridgeshire, for the period 2022-31 (i.e. no adjustment was necessary in translating the identified housing need into the housing requirement figure). In order to complete the housing requirement for the full plan period 2011-2031, the housing requirement for 2011-2022 is, in accordance with national guidance, determined as being the housing delivered in that period. [3,018 + 2021/22 completions — figure to be included prior to plan adoption] (net) homes were delivered in East Cambridgeshire between 2011-22, therefore that becomes the housing requirement for that same period. Overall, therefore, the total housing requirement for the plan period, as updated by the single issue review of the Local Plan which concluded in 2023, is xxxx* new dwellings for the plan period 2011-31.
		*this figure will be included on adoption of the update of the Local Plan, and will be the sum of 3,018 + 2021/22 housing completions + 5,398. As an approximation, the figure will likely be around or just under 9,000.
MM2	GROWTH 1	Policy GROWTH 1: Levels of housing, employment and retail growth In the period 2011 to 2031, the District Council will:

	Make provision for the delivery of 11 500 yyyy* dwellings in East Combridgeshire, comprised of a
	<ul> <li>Make provision for the delivery of 11,500 xxxx* dwellings in East Cambridgeshire, comprised of a dwelling requirement of:</li> </ul>
	- [3,018 + 2021/22 housing completions] dwellings, for the eleven year period 2011-2022 - 5,398 dwellings for the nine year period 2022-2031
	<ul> <li>Maximise opportunities for jobs growth in the district, with the aim of achieving a minimum of 9,200 additional jobs in East Cambridgeshire. Part of this strategy will involve making provision for a deliverable supply of at least 179 ha of employment land for B1/B2/B8 uses, and providing for home working.</li> </ul>
	In the period 2022 to 2031, the District Council will:
	<ul> <li>Make provision for the delivery of 5,400 dwellings in East Cambridgeshire.</li> </ul>
	In the period 2012 to 2031, the District Council will:
	<ul> <li>Make provision for at least an additional 3,000m 2 (net) of convenience and 10,000m 2 (net) of comparison retail floorspace in the district.</li> </ul>
	* this figure will be included on adoption of the update of the Local Plan, and will be the sum of 3,018 + 2021/22 housing completions + 5,398. As an approximation, the figure will likely be around or just under 9,000
3.5.6	3.5.6 Table 3.2 summarises how and where housing is likely to be delivered in East Cambridgeshire over the Plan period. It identifies there will be sufficient overall supply of land to meet the district's housing requirement of <a href="xxxxx*">xxxx*</a> 5,400 dwellings, as set out in Policy GROWTH 1. The latest projections (as at October 2021August 2022) indicate that over 11,000 7,000 additional dwellings could come forward between 2011 2022 and 2031, with a further identifiable supply of over 2,000 dwellings beyond the plan period (i.e. post 2031). The table excludes reference to, or any assumed further supply from, 'broad locations', which are identified in the key diagrams below. The diagrams are indicative only and identify broad areas on the edge of Soham and Littleport which were identified as 'phase 2' sites in the Soham and Littleport Masterplans, two of which, out of the five identified, have recently received planning permission for development. The supply from this source is, as anticipated, therefore coming forward in the later part of the Plan period. Therefore, whilst the The locations are broadly identified and it is intended that the specific site boundaries will be identified through the next Local Plan review, in the
	3.5.6

		meantime the principle of development coming forward on the Broad Areas is now established. A full list of allocation sites is set out in Policy GROWTH 4 (with site-specific policies contained in Part 2 of this Local Plan).  * this figure will be included on adoption of the update of the Local Plan, and will be the sum of 3,018 + 2021/22 housing completions + 5,398. As an approximation, the figure will likely be around or just under 9,000
MM4	3.5.7	3.5.7 Further details of the various sources of housing delivered, housing supply, the breakdown by settlement, and predicted levels of supply year on year throughout the Plan period (the 'housing trajectory') is set out in the annual Authorities Monitoring Report and the regularly updated (at least once a year) Five Year Housing Land Supply Report, both of which are available on the Council's website. At the time of writing, the latest housing trajectory setting out the deliverable supply of housing per year is set out below:  [Insert housing trajectory diagram as below:]



Table 3.2 – Summary of estimated housing supply 20112022-31\*

\*note: this table will be updated prior to adoption, to incorporate housing completions for year 2021/22, and updated supply figures for the period to 2031

[Delete table 3.2 and replace with updated version as demonstrated below]

Site Status at 01 April 2021		Total Delivered 2011-2021	Total Supply 2021-2026	Total Supply 2026-2031	Total Supply 2021-31	Total Supply Post 2031
Planning permission			3,930	1,760	5,690	698
Dwellings allocated in development plan, without consent at April 2021			346	641	987	115
	Dwellings on unallocated sites and without consent at April 2021		1	θ	4	θ
	Dwellings with insufficient evidence that they will be delivered within first five year period	<del>3,018</del>	<del>-0</del>	1,004	1,004	1,195
<del>\langle</del>	Windfall allowance		<del>150</del>	<del>250</del>	400	N/A
Other supply	Older people's accommodation (C2)		97	θ	97	θ
<del>Totals</del>		3,018	4,524	<del>3,655</del>	<del>8,179</del>	2,008

Grand	<del>Totals</del>	11,197 (Housing Suppl	2,008 (Housing Supply Pos 2031)		
Site S	tatus at 01 April 2022	Total Supply 2022-2027	Total Supply 2027-2031	Total Supply 2022-31	Total Supply Post 2031
Plann	ing permission	3,898	1,200	5,098	530
devel	ings allocated in opment plan, without ont at April 2021	206	358	564	180
	ings on unallocated sites ithout consent at April	116	58	174	0
	Dwellings with insufficient evidence that they will be delivered within first five year period	0	1,088	1,088	1,615
Ndc	Windfall allowance	150	200	350	N/A
Other supply	Older people's accommodation (C2)	97	0	97	0
Totals	<u> </u>	4,467	2,904	7,371	2,325

End of schedule