



EAST CAMBRIDGESHIRE DISTRICT COUNCIL

THE GRANGE, NUTHOLT LANE,
ELY, CAMBRIDGESHIRE CB7 4EE

Telephone: Ely (01353) 665555
DX41001 ELY Fax: (01353) 665240
www.eastcambs.gov.uk

*This matter is being dealt with by: Richard Kay,
Strategic Planning Manager*

Telephone: 01353 616263

E-mail: richard.kay@eastcambs.gov.uk

My Ref: /WitchfordNP/Publication

Your Ref:

Date: 22 November 2019

RE: Publication of Draft Witchford Neighbourhood Plan 2019-31

This letter sets out East Cambridgeshire District Council's (ECDC) response to the Draft Witchford Neighbourhood Plan, which was submitted to the Council in October 2019.

Housing requirement for the Neighbourhood Area

The National Planning Policy Framework (NPPF) places a duty on local planning authorities to set out a housing requirement for designated Neighbourhood Areas through its strategic policies. The Local Plan 2015 pre-dates the current NPPF and therefore does not set housing requirements for the district's Neighbourhood Areas. In such scenarios, the NPPF¹ requires local planning authorities to provide an *indicative* housing requirement figure, if requested to do so by the neighbourhood planning body. Witchford Parish Council requested ECDC to set an indicative housing requirement figure for the Witchford Neighbourhood Area and ECDC duly provided a figure of 252 dwellings for the period 2018 to 2031.

The draft Witchford Neighbourhood Plan includes draft policies and site allocations which will provide development at a rate which exceeds the indicative housing requirement. ECDC commends Witchford Parish Council's recognition of the need to deliver housing development.

Policy WNP SS1 – A Spatial Strategy for Witchford

The draft Witchford Neighbourhood Plan proposes changes to the current Witchford Development Envelope (i.e. the current boundary is set by the 2015 Local Plan); the boundary is proposed to be extended to include site allocations, thereby providing sufficient land to meet (or exceed) the indicative housing requirement.

It may be helpful to applicants and decision-makers to highlight this change, within the supporting text of the Neighbourhood Plan, to ensure that, once the plan is formally made, the Witchford Neighbourhood Plan's Development Envelope for Witchford village is treated by future decision takers as up-to-date, replacing the Development Envelope set by the Local Plan 2015.

Policy WNP H1 – Housing Mix

The policy requires new development to meet the optional technical housing standard M4(2) for accessible and adaptable dwellings. The government's Planning Practice Guidance requires optional technical standards to be justified by evidence of likely future need for housing for older and disabled people and the overall impact on viability. The Council has assisted the Parish Council by preparing the 'Witchford Housing Standards Evidence Report', which demonstrates a need for accessible and adaptable dwellings and concludes that the policy requirement for the M4(2) standard is not likely to adversely affect development viability.

¹ Para. 66

Conformity with strategic policies

Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Plan. At present strategic policies are set out in the Local Plan 2015, although that plan does not explicitly define which policies are strategic and non-strategic.

The amount of housing growth identified by the draft Neighbourhood Plan exceeds the Local Plan 2015, instead responding to the indicative housing requirement set by ECDC. It is accepted practice that Neighbourhood Plans can promote more development than a Local Plan.

For other (non-housing) matters, the draft Neighbourhood Plan policies appear to be broadly aligned with the strategic policies contained within the Local Plan 2015 and national policy.

The District Council is therefore satisfied that the draft Neighbourhood Plan does not undermine wider East Cambridgeshire strategic policies and is capable of meeting the requirement for 'general conformity'.

Other obligations

ECDC has undertaken a Strategic Environmental Assessment and Habitats Regulation Assessment screening exercise of the draft Neighbourhood Plan on Witchford Parish Council's behalf and has issued a SEA Determination Statement. As a result of the screening exercise, the District Council considers that the draft Neighbourhood Plan has satisfied the requirements of relevant EU obligations, namely the 'SEA Directive' and 'Habitats Directive'.

In conclusion, the Council considers that (subject to considering the points raised in this letter), the Witchford Neighbourhood Plan is capable of satisfying the basic conditions and other relevant legal obligations.

Yours faithfully

Richard Kay
Strategic Planning Manager
East Cambridgeshire District Council