

EAST CAMBRIDGESHIRE LOCAL PLAN FURTHER DRAFT JANUARY 2017

To: Economy and Environment Committee

Meeting Date: 9th February 2017

From: Executive Director – Economy, Transport and Environment

Electoral division(s): Burwell, Ely North and East, Ely South and West, Haddenham, Littleport, Soham and Fordham, Sutton, Woodditton

Forward Plan ref: N/A **Key decision:** N/A

Purpose: To consider the key issues arising from the East Cambridgeshire Local Plan Further Draft consultation and to approve the County Council's response.

Recommendation: The Committee is requested to:

- a) Consider and approve the County Council's draft response to the East Cambridgeshire Local Plan (Further Draft) as set out in Appendix 1;
- b) Delegate to the Executive Director: Economy, Transport and Environment, in consultation with the Chairman and Vice-Chairman of the Economy and Environment Committee, the authority to make any minor textual changes to the consultation response prior to final submission.
- c) Delegate to the Executive Director: Economy, Transport and Environment the authority to conduct any further negotiations relevant to subsequent stages in the preparation of the East Cambridgeshire Local Plan.

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1. BACKGROUND

- 1.1 The current East Cambridgeshire Local Plan was adopted in April 2015, however, the District Council has commenced an early review of the Plan as a consequence of an appeal decision ruling that a five year supply of land for housing could not be demonstrated.
- 1.2 The new Local Plan will replace the adopted Local Plan and will include policies and proposals to 2036.

Preliminary Draft Local Plan

- 1.3 The Preliminary Draft Local Plan was published for public consultation for six weeks during February and March 2016. This set out the following:
 - A preliminary target for the total number of homes needed in East Cambridgeshire (12,800, between 2014 – 2036);
 - Options for how such growth could be spread across the district;
 - Sought suggestions for new land allocations (sometimes known as a 'call for sites');
 - Set out draft criteria based policies on a range of matters.
- 1.4 Whilst the Preliminary Draft set out the objectively assessed need for housing and presented a range of spatial strategy options for delivering this need, it did not include new land allocations beyond those already included in the adopted local plan.
- 1.5 The County Council made a response to a number of issues raised in the consultation, notably in relation to the broad distribution of growth, meeting local housing needs, maintaining and improving community facilities, the transport network and design excellence. The key emphasis of the response was to ensure that the pattern and scale of development across East Cambridgeshire is such that it supports the effective provision of infrastructure, including transport and community services and facilities. A summary of the Council's response is set out in Appendix 1.

2. KEY ISSUES

- 2.1 East Cambridgeshire District Council (ECDC) has approved the Further Draft Local Plan for public consultation during January and February 2017. The Further Draft contains the following:
 - The proposed number of homes needed in East Cambridgeshire (11,400, between 2014 – 2036) (Policy LP2);
 - A policy which confirms a broadly proportionate distribution of growth across the district, subject to deliverability and infrastructure capacity;

- A new set of village/town chapters, confirming the preferred site allocations together with any settlement specific policies, where required; and
- A full set of draft Policy Maps, which identify the specific allocations and other matters.

Response to Comments on Preliminary Draft

- 2.2 This section considers the response of ECDC to the comments submitted to the Preliminary Draft the extent these have been adequately addressed and whether there are significant implications for the County Council.
- 2.3 The County Council expressed a preference for a **distribution of growth** (Section 3.6) that concentrated growth in the main settlements where the proximity to existing infrastructure could be utilised and expanded and the scale of development on individual allocations could support on-site provision of infrastructure. In response to the consultation the District Council has decided on a strategy that distributes new development across all settlements on a broadly "pro-rata basis", based on a settlements' population. It is considered that this option would pose real challenges to managing the effective provision of infrastructure, particularly school places, to meet the additional demands of the new Plan.
- 2.4 The plan suggested a policy for the delivery of **dwelling with higher access standards** (Policy LP6) and consulted on an appropriate proportion of new housing that should meet adaptation standards for accessibility. The County Council proposed that this should be determined based on needs based evidence across the district to ensure that adequate provision of accessible and adaptable housing is available for the aging population. The scope of the policy should also be widened to include all forms of supported accommodation. The plan now proposes that all new homes should be adaptable to Category 2, however there is no obligation to provide Category 3 (wheelchair accessible and adaptable) on the basis of cost. It is considered that the amended Policy LP6 adequately addresses the issues raised.
- 2.5 Reference should be made in the Plan to the local transport policy framework to ensure that transport and spatial plans are properly aligned. It is also necessary that the cumulative impact of the plan in **East Cambridgeshire's transport network** (Policy LP17) are fully considered to enable a strategic overview on mitigation to be taken. The latest draft does not cross-reference with the Transport Strategy for East Cambridgeshire and the county-wide Local Transport Plan.
- 2.6 New community facilities should be designed flexibly to ensure they can be served and supported by a range of organisations and activities. Policy LP 19 has been expanded to provide support for the expansion and diversification of existing community facility but provides no similar guidance for new facilities.

County Council Response to the Further Draft Local Plan

- 2.7 This section summarises the key issues raised in the formal response of the County Council, which is at Appendix 2. The response is arranged around County Council service areas to ensure that the impacts of the Plan on these areas are raised and considered.

Minerals and Waste

- 2.8 Detailed comments have been provided on the site specific and policies and allocations where there are implications for the minerals and waste. These are generally informative comments ensuring that allocations take account of safeguarding areas for minerals extraction, waste management sites and wastewater treatment works identified in the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012).
- 2.9 Officers will review the submission draft of the plan to ensure that these comments have been appropriately actioned.

Children Families and Adults

- 2.10 These comments have been prepared in the context of the Council's functions for supporting vulnerable groups, particularly the relationship between the local plan and the Older Peoples Accommodation Strategy and the Supporting New Communities Strategy. The response makes comments and seeks clarity in respect to the distribution of growth, the role of community development, specialist housing and the implementation of the best practice set out in the Supporting New Communities Strategy when considering infrastructure and facilities provision in new developments.

Libraries and Lifelong Learning

- 2.11 This response includes two specific requests to include the expansion and improvement of libraries facilities to take account of the increased demand for such services as a consequence of the level of growth proposed at Burwell and Littleport.

Education

- 2.12 The adopted local plan proposes large scale development in the larger settlements of Soham, Ely and Littleport, and to a lesser scale in Burwell, and this strategy has continued into the draft local plan with the adopted allocations being rolled forward. This pattern of growth is already reflected in the County Council's plans prepared for new and expanded primary schools and the outcome of the East Cambridgeshire Secondary School Review with a number of these review recommendations now at the implementation stage.

- 2.13 The draft Plan, however, proposes to distribute further growth across the District with a range of settlements taking a proportionate share of the new development. There will be major implications for the delivery of school places as a consequence of the new spatial strategy.
- 2.14 For example, the total number of dwellings on allocated sites in 'Medium' settlements has increased from 50 in the adopted Plan to 757 in the draft Plan. Despite this including the Community Land Trust allocation of 500 dwellings at Kennett, it nonetheless represents a significant increase in many smaller and more remote settlements. Almost 90% of these additional dwellings are located within settlements (Cheveley, Kennett, Little Thetford, Mepal, Swaffham Bulbeck, Wilburton) whose catchment primary school has no potential for further expansion should additional places be required. In the case of 'Large' settlements (considered more sustainable), 50% of the additional allocated dwellings are located in Fordham, Isleham, Stretham and Witchford whose respective catchment schools also lack potential for expansion.
- 2.15 The challenges arising from this include the need to find suitable mitigation to new growth and increasing demand for school places especially in rural settlements where primary schools are generally smaller, older in construction and located on restricted sites, which makes adaptation and expansion technically and economically difficult. Consequently there are some primary schools which are not capable of expanding to accommodate new growth in some settlements. The limited scope for expansion coupled with increasing pupil roles may in certain settlements result in the need to travel further to access school places.
- 2.16 All secondary schools have the potential for limited expansion and based on the scale of development proposed in the local plan expansion will be needed by a further 4 forms of entry (4FE) at each of Ely and Soham and 2FE at Witchford. A new secondary school opens in Littleport in September 2017 which will increase capacity by 4FE or 600 places. The local plan may require further expansion of provision by a minimum of an additional 2FE. Together this poses a real challenge for the timely delivery of secondary places during the plan period both in terms of financial resources and the availability of a suitable site should expansion on existing sites not be feasible. Consequently the response to local plan seeks clarity on the situation relating section 106/CIL funding for secondary school projects and the potential for an allocation in the plan for a secondary school site.
- 2.17 The response makes further comments in relation to the settlement policies and site allocations.

Transport

- 2.18 The County Council is largely supportive of the approach to transport in the Local Plan which is broadly consistent with the Local Transport Plan and Transport Strategy for East Cambridgeshire.

- 2.19 The key transport issue is to ensure that the policies and proposals contained in the Plan are supported with an appropriate assessment of the strategic transport impacts. This is particularly necessary to understand the wider cumulative impact of development on the road network and to be able to consider realistic options for sustainable mitigation.

Public Health

- 2.20 The local plan has been reviewed against the Joint Strategic Needs Assessment (JSNA) to ensure that the policies conform and are aligned to the County Council's and other stakeholder's objectives for delivering healthy communities across Cambridgeshire.
- 2.21 This review highlights a number of gaps in the plan that it is recommended are considered prior to the plan proceeding to the submission stage. The main areas of concern relate to the policy on health impact assessments, raising the importance of health and wellbeing as a consideration for new developments; particularly design, the provision of open space and creating well connected developments. Finally the response raises issues around access to health facilities and concerns around health inequalities

3. NEXT STEPS

- 3.1 The current programme for the preparation of the Local Plan is:
- Public participation on Local Plan Further Draft: January/February 2017
 - Publication of submission version of the Local Plan: Spring 2017
 - Submission of the Local Plan to the Secretary of State: Summer 2017
 - Independent examination hearing: Late 2017/early 2018
 - Inspector's report: Spring 2018
 - Adoption of Local Plan: Spring 2018
- 3.2 The final response will be submitted to East Cambridgeshire District Council before the end of the current consultation period (20th February). Following this, further discussions take place prior to the East Cambridgeshire publishing the submission version to ensure that the issues raised in this response have been considered and addressed before the public examination commences.
- 3.3 As a consequence of the timescales involved, the Committee is being asked to approve the draft response whilst delegating to the Executive Director the authority to conduct subsequent negotiations on behalf of the County Council.

4. ALIGNMENT WITH CORPORATE PRIORITIES

Developing the local economy for the benefit of all

- 4.1 The implementation of the Local Plan policies and proposals will bring many benefits to the local economy including new housing and supporting infrastructure, business opportunities and improved transport links.

Helping people live healthy and independent lives

- 4.2 The Local Plan will help support healthy and independent lives through well planned new communities and supporting physical and social infrastructure.

Supporting and protecting vulnerable people

- 4.3 The Local Plan seeks to support vulnerable people by providing access to a range of housing, community facilities, recreation and employment opportunities to meet the needs of the whole population.

5. SIGNIFICANT IMPLICATIONS

Resource Implications

- 5.1 The County Council has identified that further work is needed to consider the impacts of growth proposed in the local plan, particularly in respect to planning for education provision but also other service areas. This will have immediate implications in terms of staff time across the Council. In the longer term the level of growth in the plan and the impact of future services will have significant capital and revenue implications for a range of Council service.

Statutory, Risk and Legal Implications

- 5.2 There are no significant implications for statutory, risk and legal.

Equality and Diversity Implications

- 5.3 There are no significant implications for equality and diversity.

Engagement and Consultation Implications

- 5.4 The local plan regulations place specific requirements on the local planning authority in respect to engagement and consultation.

Localism and Local Member Involvement

- 5.5 Members and the local community have a further opportunity to be involved in the preparation of the Local Plan at the Pre-submission consultation stage.

Public Health Implications

- 5.6 The inclusion of public health considerations forms part of the Council's response and would benefit the proposals as they move forward.

Implications	Officer Clearance
Have the resource implications been cleared by Finance?	Yes Name of Financial Officer: Sarah Heywood
Has the impact on Statutory, Legal and Risk implications been cleared by LGSS Law?	Yes Name of Legal Officer: Fiona McMillan
Are there any Equality and Diversity implications?	No Name of Officer: Tamar Oviatt-Ham
Have any engagement and communication implications been cleared by Communications?	Yes Name of Officer: Mark Miller
Are there any Localism and Local Member involvement issues?	No Name of Officer: Paul Tadd
Have any Public Health implications been cleared by Public Health	Yes Name of Officer: Iain Green

Source Documents	Location
East Cambridgeshire Local Plan Further Draft January 2017	Room 305, Shire Hall, Cambridge