

Examination of the submission of the East Cambridgeshire Local Plan

Note from Inspector

Outline of potential main modifications needed for soundness.

General advice

- Main modifications. Please group main modification and any other consequential modifications under one parent reference.
- Policies Map: The Council must maintain an adopted policies map which geographically illustrates the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.

In the interests of fairness, these further changes to the policies map should be published for consultation alongside the MMs as a separate document.

SSM: East Cambridgeshire Local Plan, Schedule of ECDC Suggested Modifications, Version 3 Draft as at 6.11.18 (ED057).

Provide Main Modifications as set out below	
Throughout plan	Alter plan period to end at 2034. Remove all references to 2036.
LP1	Delete policy and all associated supporting text. Remove all references to the policy throughout the submitted plan.
Level of Growth Housing	Delete all references throughout the submitted Plan to the Memorandum of Co-operation. Delete reference to redistribution of need within the wider Cambridge and Peterborough Housing Market Areas: Alter housing requirement to take this into account. Amend housing requirement to be consistent with reduced plan period to 2034. Delete references to Community Land Trust allowance Make consequential amendments to the supporting text and to the tables on page 13 and page 73, and individual policies.
	Delete reference to Liverpool method from 3.3.11

LP2	Amend housing figure to ' <i>minimum of 10,764 new dwellings</i> ', alter plan period to 2034 for both housing and employment figures. Delete last paragraph of policy.
	Remove reference to the Liverpool method of calculating the five year land supply. Make consequential amendments to supporting text.
Level of growth:	Set out allowance to be made for the contribution of communal housing to the housing supply
3.8.2	Delete
LP3	Delete the four paragraphs after the bullet points which set out the hierarchy. Delete reference to Policy LP1. Replace ' <i>village</i> ' with ' <i>settlement</i> '. Rephrase, ' <i>will be restricted</i> ' with positive wording. Delete criteria a) and b). Include exception criteria set out in LP6.
LP4	Keep first sentence of policy. Delete rest.
LP5	Delete policy and supporting text.
LP6 4.3.6	Delete reference to higher access standards.
4.3.10	Amend text to refer to contribution of communal housing to 5 year housing land supply
4.3.14	Set out obligation to cater for all peoples of a nomadic lifestyle
LP6 policy	First paragraph. Expand list to include those resorting in caravans, houseboats and the build to rent sector.
	Second paragraph refer to specific housing needs. Delete reference to Cambridge Sub- Region housing market. Refer to latest evidence. Insert text in supporting text to commit Council to keeping the evidence up to date.
Affordable housing	As per SSM
Dwellings with Higher Access Standards	Delete
Self-build homes	Amend as per SSM
Homes for Older People	As per SSM. Include, ' <i>and any subsequent strategy</i> ' to criterion d)
	Delete last paragraph on page 23 ending with, ' <i>will not be supported.</i> '
Residential Care	Delete tier 1 or 2, replace with Main Settlement, or Large Village. Include ' <i>appropriate</i> ' before ' <i>range</i> '. Add ' <i>proven local</i> ' before ' <i>need</i> '.
	Add text as per SSM re contribution of such housing to 5 year housing land supply.
Homes for Permanent Caravan Dwellers/Park Homes	Make explicit that the caravan need not be of the mobile home/ park home variety.

New Policy	Require criteria based policy to provide for those of a nomadic lifestyle whose needs would not be provided for by Policy LP7
LP7	Rephrase paragraph 4.4.3 to be consistent with evidence base, in particular para 7.8 of PE9.
LP8	As per SSM
Other land in employment use	Insert, 'or was last used' after, 'but is currently'.
Criterion a)	Amend to be consistent with last paragraph of LP12 to ensure it is clear what specific measures applicants will be required to demonstrate.
LP10	Make reference to horse racing industry outside of district. Refer to cumulative impact of developments.
LP11	As per SSM
LP12	As per SSM
LP13	As per SSM
LP14	As per SSM
LP16	As per SSM. Make reference to infrastructure requirements outside of district. Make explicit reference to CIL Regulations.
	Add additional paragraph to ST referring to infrastructure requirements identified in the Policies for Places Chapter. Make reference to the role of the County Council and the ESFA vis a vis the provision of education.
LP17	As per SSM. Include 'Transport' between 'Travel and Assessment.'
	Replace 5.3.3 with the following, 'Where new development is expected to generate significant movements it will be necessary to prepare a Transport Assessment. This should set out the impacts of the development, including the cumulative impact of committed developments in East Cambridgeshire and neighbouring local planning authorities, how the volume of trips generated will be accommodated and how accessibility to the site will be achieved. Mitigation measures providing opportunities for use of sustainable transport modes should be included. In many cases a Travel Plan will also be required to set out what mitigation measures will be implemented and how, together with targets for modal shift.'
LP18	Delete criterion e) to g) inclusive. Include reference to cycle standards as additional criterion. Delete, 'as appropriate'.
LP19	Criterion h) delete, 'where applicable'. Criterion m) amend to ensure that the developer is not responsible for future governance arrangements or a business plan. Make clear that consistent with the CIL Regulations.
LP20	Include text to refer to neighbouring authorities. Require reference to be consistent with the CIL Regulations.
LP21	As SSM.
LP22	Make reference to being consistent with CIL Regulations.
	Ensure references to all SPDs are removed to the supporting text.

	Criterion d) replace ' <i>new buildings</i> ' with ' <i>the development</i> '.
	Criterion l) Make amendments to Appendix B. Single garage to internally measure as a minimum 3.2 m by 5.5 m. Delete 2 nd and 4 th paragraphs. 5 th paragraph to refer to 2.4 m x 5.5 m, add 0.5 m where bounded by wall, fence etc Amend last paragraph as per SSM.
	Amenity considerations, include additional text to make clear development proposals include open space etc.
LP24	As per SSM.
LP25	As per SSM.
LP26	Reword penultimate paragraph to set out in a positive manner.
	Delete last sentence beginning, ' <i>Mechanical ventilation of homes...</i> ' replace with, ' <i>Mechanical ventilation of homes should only be considered once other design and layout options have been considered and when it is demonstrated that the accommodation would provide good standards of acoustics, ventilation and thermal comfort without unduly compromising other aspects of the living environment</i> '.
LP27	As per SSM
	Require additional policy on heritage sites at risk.
LP28	As per SSM. Delete last sentence of penultimate paragraph.
6.10.4	As per SSM
LP29	Delete last sentence.
LP30	As per SSMs
L31	Delete first paragraph and remove reference to community led development. Amend A (ii) delete 'well related to' replace with ' <i>adjacent</i> '. Delete, ' <i>there is good...</i> ' Replace with , ' <i>there is safe and convenient access by foot/cycle or public transport to provide for day to day needs.</i> '
Part B	v) reword to make sense
Part F	Delete criterion ii)
Part H	As per SSM
LP32	As per SSM
	Criterion a) as per SSM but insert ' <i>around</i> ' before 200 m. Delete criteria d) and g).
LP33	As per SSM but delete criterion f)
Policies for Places	
7.0.6	In the absence of a density policy require text to set out that indicative figure for dwelling numbers is not prescriptive. It should not be considered to be a ceiling. However, it may be a useful proxy for the amount of development that may be suitable on the site. Nonetheless, the important issue is whether the scale and density of the proposed development satisfies the policies of the plan, including any site specific policy requirements. Therefore, the final dwelling figure which is

	realised will be dependent on site specific and development control matters.
	Text from 7.0.08 to 7.0.20 will require updating and revising in light of changes to housing requirement and plan period, the contribution from Community Land Trusts, together with my conclusions relating to individual site allocations and the housing trajectory (see below).
	Will require amended housing trajectory.
Applicable to all settlement policies	
Para 7.1.1 repeat for each subsequent settlement	Set out the classification of the settlement within the hierarchy. Then describe it.
Policy Aldreth1 repeat for each subsequent settlement.	Delete paragraph 7.1.2 and subsequent policy. Within the Supporting Text describe the character of the settlement and isolate aspects of particular significance consistent with paragraph 6.2.2 of the submitted Plan.
Para.7.1.3 repeat for each subsequent settlement	Add word ' <i>potential</i> ' before infrastructure. Insert additional sentence, ' <i>However the list below should not be considered as being exhaustive.</i> '
Policy Aldreth 2 repeat for each subsequent settlement	Add reference to consistency with CIL Regulations.
Applicable to all sites	Where all of site benefits from a live planning permission, development has commenced and is under construction, or has been completed delete from site allocation policy tables
Applicable to all sites	Delete any reference to previously approved applications from Site Specific Requirement column
Applicable to all sites	Where there is an extant planning permission but construction on the site has yet to begin, indicative no of dwellings is to be rounded up or down to a factor of 10. Do not use a specific figure which relates to a specific planning application. Make consequential amendment to any tables within the Plan. (For example, Policy LIT.H1 where indicative capacity is 50 but resolution to grant pp for 39 dwellings.)
Applicable to all sites	Delete any reference to ' <i>maxima</i> ', or ' <i>approximately</i> ' from policy text, or any other text that places a ceiling on the levels of housing to be constructed on the site. Replace with, ' <i>around</i> '.
Applicable to all sites	Remove reference to discussions with Parish Council from within policy text.
	Make following amendments to specific sites re housing numbers
	Ely H1 increase by 1 Add 1 dwelling to 5yhls Ely M2 increase by 40 Ely M3 increase by 15

	Ely M4 increase by 50 Ely M6 increase by 3 NB Ely M1 will reduce contribution due to reduction in plan period.
	LIT. H5 increase by 80 LIT.M1 increase by 150 LIT.M2 reduce figure of 600 to 450, to reflect reduced plan period. Keep capacity of site at 1,200 dwellings LIT.H4 reduce by 3 Reduce 5yhls by 3
	SOH.H5 increase by 30 Increase 5yhls by 30 SOH.H9 increase by 60 SOH.H10 increase by 75 SOH.M1 increase by 50 SOH.M3 reduce 5yhls by 50
	FRD.M1 increase 5yhls by 50 FRD.M2 increase by 1 FRD.H3 increase by 3
	ISL.H4 increase by 15
	SUT.H1 increase by 150 Increase by 50 SUT.H2 increase by 25 Increase 5yhls by 25
	MEP.H1 Increase 5 yhls by 17
	WFD.H1 increase by 42 Increase 5 yhls by 42 WFD.H3 increase by 4
	SWB.H1 increase by 2 Increase 5 yhls by 2 SWB.H2 increase by 2 Increase 5 yhls by 2 SWB.H3 increase by 10
	KEN.M1 delete site. Decrease housing figure by 500 Delete contribution from 5 yhls
	SWP.H1 delete site Delete contribution from 5 yhls
	Make consequential amendment to trajectory and to housing figures within supporting text
Bottisham 2	Delete criterion a)
BOT.E1	Amend wording to ensure that the adjoining public right of way is not adversely affected by the development.
Bottisham4	As per draft SSM
Burwell3	As per draft SSM re BUR.H1 and BUR.E1
Cheveley3	As per draft SSM
Dullingham3	As per draft SSM except second bullet point. Delete, 'where possible', and 'preserved'. Add 'integrated into the landscaping`.
Ely2	As per draft SSM
Ely3	As per draft SSM (1)
Ely3	As per draft SSM (2)
Ely4	As per draft SSM and delete 'possibly' from criterion a)
Ely5	As per draft SSM
Ely6	As per draft SSM
Ely7	As per draft SSM p50
Ely7 Criterion e	Delete 'limit' and replace with 'mitigate'. Delete 'significant' replace with 'appropriate'. Delete, 'open'.

Fordham3	FRD.H4 delete site specific requirement. Replace with, ' <i>Be of a design which is sensitive to the scale and massing of the immediate area.</i> '
Fordham3	As per draft SSM
Fordham4	Criterion h) should be reworded to be consistent with revised criterion d) of Ely7.
Fordham6	Criterion a) add full stop after uses. Delete rest of sentence.
Fordham6	As per SSM.
Haddenham3	As per SSM
Haddenham4	Delete reference to Community Led Development Scheme. Amend settlement envelope to include allocation
Haddenham4	As per SSM
Isleham2	As per SSM
Isleham3	As per SSM
Isleham4	As per SSM
Isleham4	Amend criterion a) to delete reference of land being gifted to the Parish Council. Delete criterion f).
Kennett3	Delete
Kennett4	Delete
Little Thetford4	As per SSM
Littleport3	As per SSM
Littleport4	As per SSM
Littleport4	As per SSM
Littleport4	Insert, ' <i>safe, direct and attractive</i> ' into criterion c).
Littleport5	Delete criteria b) and c).
Littleport5	Insert, ' <i>safe, direct and attractive</i> ' into criterion d). Delete last sentence of criterion d) Remove reference to ' <i>housing and employment elements</i> '.
Littleport5	Add additional text to criterion e) to avoid conflict with the safe operation of the neighbouring school.
Littleport5	Include additional criterion g) as per SSM
Littleport5	Include additional criterion h) as per SSM
Littleport6	Criteria f) and g) as per SSM
Littleport6	Criterion i) as per SSM
Littleport6	New criterion j) as per SSM
Littleport6	New criterion k) as per SSM
Littleport7	New criterion f) as per SSM
Littleport7	New criterion g) as per SSM
Mepal4	As per SSM. Extend site to include adjacent landscape buffer. Requires consequential amendment to Policies Map
REA.LGS1	Delete allocation as LGS. Make consequential amendment to Policies Map
Soham2	As per SSM
Soham3	SOH.H10 delete text in left hand column. Refer to site specific policy. Produce site specific policy. Include additional policy consistent with Policies 16 and 17. Do not require sole access from Kingfisher Drive. Masterplan to set out how

	<p>the allocation could be developed. This should include vehicular, pedestrian and cycle access off Kingfisher Drive. Masterplan should include all of the allocation which should be extended to boundary with Soham Water Recycling Centre.</p> <p>Amend SSM to refer to both '<i>occupiers and visitors</i>'. Be explicit as to what the potential harm would be, and how the operation of the WRC could be compromised.</p>
Soham3	As per SSM re SOH.12, 13 and 14.
Soham4	Include reference to housing figure
Soham4	As per SSM re criteria b) and d)
Soham4	As per SSM re criterion d)
Soham 5- 9 and 11	Where a site falls to be considered by Policy CS42 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy make explicit the need to consider this within the policy text.
Soham5	Delete penultimate bullet point. Replace with, ' <i>An appropriate buffer zone to address any potential air quality, noise and vibration matters, in accordance with LP26;</i> '
Soham7	As per SSM
Soham7	Delete criterion d)
Soham9	As per SSM
Soham10	As per SSM
Soham11	As per SSM
Soham13	As per SSM
Sutton4	As per SSM. Insert, ' <i>of the development</i> ' after, ' <i>impact</i> '.
Sutton5	Extend allocation to south to reflect proposed low density development. Make consequential amendment to Policies Map.
SwaffhamBulbeck3	As per SSM
SwaffhamBulbeck4	As per SSM
SwaffhamBulbeck5	As per SSM
SwaffhamBulbeck6	As per SSM
SwaffhamPrior3 and Swaffham Prior5	Delete allocation SWP.H1.
Wilburton3	As per SSM
Wilburton4	As per SSM.
Wilburton4	Delete criterion b)
Witcham3	As per SSM
Witchford3	Delete LGS7. Make consequential amendment to Policies Map.
Witchford3	As per SSM
Witchford4	Delete para 7.47.8 Delete criterion e) Make consequential amendment to Policies Map
Witchford5	As per SSM
Witchford5	Insert, ' <i>safe, direct and attractive</i> ' into criterion d).
Witchford6	Delete policy
Monitoring and Review	Add additional text committing Council to keeping plan under review. Cross refer to AMR.

