



East Cambridgeshire
District Council

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

Proposed Submission
Stage (Reg 19)
consultation

May 2022 to June 2022

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Introduction

East Cambridgeshire District Council is undertaking a narrowly focused Single Issue Review (SIR) of its adopted Local Plan. This document outlines the scope of the review, the proposals and how you can make representations on the proposals.

The purpose of the SIR is to partially replace a very small part of the Local Plan adopted in April 2015. The proposals set out in this document is for the vast majority of the Local Plan (2015) to remain unaltered and remain part of the development plan for East Cambridgeshire.

We consulted twice in 2021 on our initial proposals. After giving due consideration to the comments made at each stage, we have produced this final round consultation document.

How to make comments

This is a third and final opportunity for you to make your comments on the emerging SIR. Please note that we welcome comments, though please be aware that the scope of the proposals outlined is quite narrow and most aspects of the proposals are quite technical in nature.

The consultation document can be viewed at: <http://www.eastcambs.gov.uk/local-development-framework/local-plan-review> .

To respond, you can e-mail us at planningpolicy@eastcambs.gov.uk or post to:

Strategic Planning Team
East Cambridgeshire District Council
The Grange
Ely
Cambridgeshire
CB7 4EE

This is third and final consultation, undertaken under Regulation 19 of *The Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended), and will be for 6 weeks. The start date for making comments is 3 May 2022, and the **closing date for all comments is at 23:59 on 13 June 2022**. Any comments received after this date will not be considered. Once the consultation has closed, it is not the task of the Council to consider the representations you make. Instead, the Secretary of State will arrange for an independent Planning Inspector to examine the SIR document. The Inspector will consider the representations that are received alongside the submitted SIR. The Inspector will determine whether or not the changes being proposed by the SIR are legally compliant and sound, or whether alternative changes are needed.

Please note, your representations must fall within the scope of this consultation. Any representations which fall outside of the scope of the consultation will not be considered. For example, any representations seeking changes to policy wording of a Local Plan 2015 policy not being consulted upon will not likely be considered.

Please note that representations received cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. Please do not include any telephone numbers or signatures as we do not require this information.

The Council respects your privacy and is committed to protecting your personal data. Further details on the Privacy Notices is available on our website <https://www.eastcambs.gov.uk/notices/privacy-notice>

Further information can be obtained from:

Strategic Planning Team (see address above)

Telephone: 01353 665555

Email: planningpolicy@eastcambs.gov.uk

Policies Map

Any reference to the term Policies Map in this document relates to the adopted Policies Map which was primarily established as part of the adoption of the 2015 Local Plan, but has been amended since by any subsequently made Neighbourhood Plans, and the county-based 2021 Minerals and Waste Local Plan. At this stage no changes are proposed or anticipated to the Policies Map as a result of this SIR.

1. What stage are we at?

- 1.1 This is the third stage (third consultation) in a process of producing a Single Issue Review (SIR) of the Local Plan. The earlier stages (also sometimes known as 'Regulation 18' consultation stages) of the Local Plan captured the issues we intended to address and set a steer as to how we proposed to tackle those issues. This third and final consultation stage (a 'Regulation 19' Publication Draft or Proposed Submission Draft Plan) consultation, reflects on the comments made at the earlier stages, and provides the Council's final proposals it intends to progress.
- 1.2 As outlined in the timetable below, the SIR Local Plan process has a number of formal statutory stages which will take place over a few years.

No.	Stage	Description	Dates each stage is proposed to take place
1	Consult on a sustainability appraisal (SA) scoping report	The SA scoping report sets out the sustainability objectives proposed to be used to appraise the economic, social and environmental effects of the emerging Local Plan policies. The SA scoping report is subject to consultation.	December 2020 Completed
2	Public participation (Regulation 18)	Opportunity for interested parties and statutory consultees to consider the options for the plan before the final document is produced. This stage may involve one or more public consultation rounds, each for a minimum 6 weeks. We have undertaken two rounds for this Single Issue Review Local Plan.	March-May 2021 Completed
			December 2021-February 2022 Completed
3	Proposed-Submission Publication (Regulation 19)	The Council publishes the draft Local Plan (parts to be amended) which is followed with a 6-week period when formal representations can be made on the Local Plan (or, in this case, representations can be made in relation to the elements being proposed for change in the Single Issue Review).	May - June 2022 (six weeks in that window) This stage
4	Submission (Regulation 22)	The Council submits the Local Plan (parts to be amended) to the Secretary of State together with the representations received at Regulation 19 stage.	July 2022
5	Independent Examination (including likely Hearing sessions) and Inspector's Report	Held by a Planning Inspector into objections raised on the Local Plan. The Inspector's Report will determine whether the Plan is 'sound' or 'not sound'. The Inspector may make recommendations (including recommended modifications) to make the plan 'sound'	From date of Submission to December 2022* (*estimate: dates set by Inspector)
6	Adoption of DPD (Local Plan)	Final stage, the Council will formally need to adopt the Local Plan and it will then be used in making planning decisions.	January or February 2023* (*estimate: date depends on completion of stage 5)

2 Why is this Single Issue Review (SIR) needed?

- 2.1 The Council's current Local Plan remains its 2015 version, adopted in April 2015¹.
- 2.2 Being greater than five years old, it was necessary (by law) to regularly review its content to determine how 'up to date' it is. The Council undertook, and published, a second formal Review in April 2020². That Review, in summary, concluded that the:
- "...Local Plan 2015 does require to be revised, but only partially and only in respect of its strategic housing policies. Of those policies, Policy GROWTH1 needs to be revised, because it has an out of date housing requirement. Other strategic housing policies may also be updated during the course of updating GROWTH1, should that be necessary.*
- The rest of the Local Plan is considered to not, at the present time, be in need of updating, therefore a full update of the Local Plan is not considered necessary.*
- However, whilst only one policy has been identified in need of updating, this does not prevent the Council from commencing preparation of a new Local Plan, in whole or part, on matters as it sees fit."*
- 2.3 The Council has considered three subsequent options to address the above conclusions. The options were as follows:
- Option 1:** Do as the Review in April 2020 concluded, and limit any update of the Local Plan to the matters identified in the Review, namely GROWTH1 and its housing requirement, and possibly, consequentially, other policies if strictly necessary; or
- Option 2:** Go beyond what the Review in April 2020 concluded, and do a more comprehensive or full new Local Plan; or
- Option 3:** Do nothing at present, and await further progression of Government's Planning White Paper to see whether to progress Option 1, Option 2 or, instead, simply wait for the new planning system to commence (under the provisions of what the Planning White Paper proposes) and start a new Local Plan on that basis.
- 2.4 Option 1 was selected by the Council as the way forward. For the avoidance of doubt, we are not seeking any representations as to whether the Council was correct to proceed on the basis of Option 1.

3 The Proposed Changes

- 3.1 The Council proposed at the first consultation round to undertake the following six 'Proposals' as part of the SIR. Your views on these (which are available in a separate Consultation Report) have been carefully considered. Other than some minor adjustments, the Council has decided to maintain the 6 Proposals.

Proposal 1 – Scope of Changes

- 3.2 The Council intends, in line with its April 2020 formal review of its Local Plan referred to above, to focus the changes arising from the SIR to section 3.2 (Level of Growth) and 3.5 (Delivery of Growth) of the 2015 Local Plan, and specifically:
- Paragraphs 3.2.3 – 3.2.5, under the sub-heading 'Level of housing growth';
 - Policy Growth 1, but limited to the first bullet point of Growth 1 only (which relates to the housing requirement for the district); and
 - Paragraphs 3.5.5 – 3.5.7, under the sub-heading 'Housing delivery', this being necessary as a consequence of updating the above.

¹ See <https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015>

² See <https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015>

Proposal 2 – Plan Period

- 3.3 The Council does not intend to amend the overall 2015 Local Plan Period of 2011-31. To do so would likely have wider implications beyond the intention of the SIR.
- 3.4 We have considered the comments made by some representors at the two consultation stages, which sought an extension of the plan period beyond 2031. However, in response, extending the plan period beyond 2031 will have considerable implications and will result, in effect, in the need for a full Plan update (for example, it will require additional substantial work such as a call for new sites, and assessing and selecting such sites for allocation in the Local Plan. It will also have a knock-on effect on other issues such as, potentially, the need for more employment land, retail floorspace and other facilities to cater for increased population, and arguably other policy updates on matters such as climate change and the natural environment). This option has already been rejected by the Council. 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.

Proposal 3 – Site Allocations

- 3.5 The Council does not propose to provide any further allocations in its Local Plan as a consequence of this SIR. This is because the volume of existing housing site ‘commitments’ (such as sites with planning permissions and other sites which are allocated for development via the 2015 Local Plan or more recent Neighbourhood Plans) do, it considers, comfortably exceed the quantum of the new housing requirement figure arising from the SIR. Consequently, no new allocations are necessary. Further details on this are set out later in this document.
- 3.6 A number of respondents suggested we should review our site allocations and consider new sites to be allocated in the Local Plan. As discussed in paragraph 3.4, this would require a considerable work and would delay the review process significantly. That option is therefore rejected.

Proposal 4 – the Housing Requirement

- 3.7 The Council proposes to establish the new housing requirement in line with national policy (see section 4 in this document for an explanation of this). The Council is not deviating from the nationally derived housing need standard method, nor deviate from that need figure which arises to establish a different housing requirement. The Council is aware of the potential circumstances set out in national policy and guidance to create a housing requirement figure which is different from a standard method housing need figure, but sees no compelling evidence for doing so in this SIR. For example, it does not intend to seek to take any additional housing need or requirement from any other neighbouring district area, nor does it seek to ‘offload’ any housing need or requirement arising in East Cambridgeshire on to another neighbouring district area. Further, there are no fundamental economic or infrastructure investment planned for the district which could indicate a need to increase the housing requirement figure (particularly considering that the annual housing growth rate for East Cambridgeshire (as a % of existing housing stock), derived via the standard method, is already one of the highest in the country).
- 3.8 Some of the comments received at the consultation stages suggested that the national standard method for calculating housing need should be treated as a minimum, with the housing requirement set higher. Other factors, it was stated, should be considered such as economic growth and the impact of the Oxford-Cambridge Arc. Also, under the Duty-to-Cooperate with a neighbouring district, there may be a requirement for some of their housing need to be located in East Cambridgeshire. Taking these factors into account could considerably increase the housing needs for the district, representors suggested. We have carefully considered these comments, but the effect of the Oxford -Cambridge Arc is uncertain at present, does not appear to be progressing to the timetable it proposed, and its outcome (should it proceed at all) may not be known for some time. It would be unwise to delay this update to the Local Plan as a result. Also, we have not been approached by any of the neighbouring councils, who are preparing their Local Plans, seeking East Cambridgeshire to accommodate any of their housing need or requirement (indeed, to the contrary: engagement to date has confirmed no such mechanism is intended to be triggered). We are therefore confident that East Cambridgeshire will not be asked, at this final consultation stage, to take on additional housing to help meet the needs of neighbouring districts.

Proposal 5 – Broad Areas (sometimes referred to as Broad Locations)

- 3.9 At the first consultation stage, the Council said it would review the guidance in section 3.5.5-3.5.7 of the Local Plan in respect of the ‘*Broad Areas for housing*’ which the Local Plan refers to in supporting text (such Areas only being at Littleport and Soham). We acknowledge there was a mixed response to this Proposal at the first and second consultation stages, with the majority (but not unanimous) view appearing to support, in principle, leaving the Broad Areas position largely unaltered. Others sought the Broad Areas to be firmed up, whilst a few sought their deletion.
- 3.10 Following careful consideration of the representations, and following a review of the text in the Plan, the Council determined for the second consultation stage that there was no need to significantly amend the text at that stage, and therefore the ‘Broad Areas’ were proposed to remain in the Local Plan as currently set out in the adopted Local Plan: in simple terms, these are locations that indicatively “could be developed in the future” but currently with no policy status or Policies Map allocation.
- 3.11 However, the Council at that consultation stage removed any assumed supply from such sites for the period to 2031, primarily because the Council can already demonstrate a considerable excess of supply above the identified housing requirement, meaning a reliance on any supply from the Broad Areas in the period to 2031 is not necessary. Overall, the Council at the second consultation stage stated that it did not intend to ‘firm up’ such Broad Areas as formal allocations in this SIR.
- 3.12 As well as the representations received at the second SIR consultation stage, the Council has also very carefully considered the appeal decision received in February 2022 (i.e. after the second consultation period had closed) in respect of Land to the North East of Broad Piece, Soham (Appeal Ref: APP/V0510/W/21/3282449). That land falls within one of the Broad Areas for Soham, and the appeal was allowed by the Planning Inspector (M Boniface MSc MRTPI) appointed by the Secretary of State.
- 3.13 The Inspector in that case noted that:
- “Although broad locations are said to be indicative, supply is anticipated from these areas in the later part of the plan period. Indeed, some 1,800 dwellings contributing to the supply identified in the [East Cambridgeshire Local Plan] is expected at the broad locations. Therefore, the supporting text is an important consideration in this case that assists with interpretation of the policy.”*
- And
- “Furthermore, the appeal site falls within a broad location specifically identified and expected to deliver a significant quantum of development during the later part of the plan period.”*
- 3.14 The Council’s interpretation of the Inspector’s decision, when read as a whole, is that the Local Plan, when adopted in 2015 and as written, has a clear expectation that the Broad Areas (or Broad Locations as they are sometime known) will deliver housing units in the plan period to 2031. And, on the basis that the Local Plan is not undergoing a comprehensive site allocations update for this SIR, it follows that the Broad Areas should similarly be retained in the Plan. To significantly amend them now (either firmed up through site boundaries, or deleted) would be at odds with the approach elsewhere of this SIR, where the SIR is not adding new allocations or reconsidering existing allocations.
- 3.15 Thus, whilst the Council is not proposing to firm up the Broad Areas into specific allocations, it has reflected on the Inspector views which highlight the ‘expectation’ such Areas will deliver units in the plan period to 2031.
- 3.16 It is further worth pointing out that, of the five Broad Areas identified in the Local Plan (two are in Littleport, three in Soham), two of them already now have permission (one in Soham, one in Littleport). There is active interest, including applications, for the remaining three.
- 3.17 Taking all of this into account, and particularly reflecting on the appeal decision referred above, the Council is therefore proposing:
- (i) To retain the Broad Areas as identified in the supporting text in the Plan, but not ‘firm them up’ into specific allocations;

- (ii) Acknowledges the expectation of delivery from such Areas, in the plan period (which remains unaltered, at 2031);
- (iii) Updates the supporting text in the Local Plan, via this SIR, to acknowledge that the principle of development coming forward on the Broad Areas is now established.

3.18 For the avoidance of doubt, the Council is not relying on such sites to come forward in order to meet its housing requirement to the period to 2031, but should any do so this would add greater flexibility to facilitate its housing needs to be met in the period to 2031. A future Local Plan full update can revisit this position, and determine any appropriate allocations for such locations.

Proposal 6 – consequential changes

3.19 The Council at the earlier consultation stages stated that it intended to add any necessary, minor consequential changes to the plan such as brief text in section 1 of the Plan explaining the changes arising from this SIR, and the process of that SIR. No substantive comments were received on this Proposal, and the Council intends to progress it forward as originally stated.

4 What is the proposed new housing requirement figure (Proposal 4)?

4.1 Unlike in 2015 (when the current Local Plan was adopted), Government policy now prescribes how a local area determines its housing need (or 'local housing need'), under what is known as 'the standard method'³. Whilst it is possible for a local area to derive a different housing need figure using a different locally based method, national policy prescribes that such a local based method is only appropriate where "exceptional circumstances justify an alternative approach" (NPPF para 61). The Council does not consider there to be any such 'exceptional circumstances' which would apply in East Cambridgeshire.

4.2 The standard method involves a number of variables which are added into a formula to calculate the local housing need, which in turn can be converted into the starting point for a local housing requirement. The data for each variable is established by government (or associated body, such as ONS), so there is no discretion for a local area to determine what each variable is. However, each part of the formula requires the latest available evidence to be used, which can mean the actual local housing need figure can change a number of times over any year, though usually such changes result in relatively minor adjustments to the final outcome. The variables are:

- ONS forecast of household growth (which can change every 2 years, though the Government presently require the 2014 based forecasts to be used, despite more recent ones being available).
- The latest 'affordability ratio' in the local area, which is an assessment of how affordable homes are to buy, in comparison with local income in the area. This ratio is normally updated every March.
- What the 'current' or 'starting' year is. Thus, the variables may change slightly depending on the year being used as the baseline.

4.3 As at April 2022 (which now includes the March 2022 release of housing affordability ratio, which was not available at the time of the second round of consultation on this SIR), the Council understands that the latest (i.e. from 1 April 2022) local housing need for East Cambridgeshire is 599.78 dwellings per annum, which means a total of 5,398 dwellings are needed between 2022-31. The local housing need calculation is as follows (note: these steps and formula are set by Government):

Step 1: Household projections

For East Cambridgeshire, the 2014-based household projections forecast a household increase between 2022 (base year – 2022 – 39,503 households) and 2032 (year 10 – 2032 –

³ See <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

43,738) is 4,235 households **which equates to a 10 year annual average of 423.5 households.**

(source: [Live tables on household projections - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/live-tables-on-household-projections))

Step 2: affordability adjustment

The latest ratio of median house price to the median gross annual workplace- based earnings (table 5c – published 23 March 2022) is for the year 2021 and is established as being 10.66 for East Cambridgeshire.

Affordability adjustment factor (using national formula) = $((10.66 - 4)/4) \times 0.25 + 1 = 1.41625$

Step 3: calculate the local housing need

423.5 (Step 1) x 1.41625 (Step 2) = 599.78

For the purpose of the SIR, therefore, **the appropriate Local Housing Need figure for East Cambridgeshire is 599.78 dwellings per annum.**

- 4.4 To calculate the total housing requirement for the 'plan period' (2011-31), it is necessary to work 'backwards' (to the plan base date of 2011) and 'forwards' (to the plan end date of 2031).
- 4.5 To do this, it is proposed to split the calculations into two halves, first for the period 2011-2022, and second for the period 2022-2031.
- 4.6 The housing requirement for 2011-22 will be established as being the housing delivered between 2011-2022. This is consistent with the national method (see NPPG Reference ID: 68-031-20190722⁴, which explains that "*Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure*". See also NPPG Reference ID: 2a-011-20190220 which similarly states "*The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.*"
- 4.7 The quantum of housing delivered (net) between April 2011-March 2021 was 3,018, but at the time of writing we are uncertain of delivery in the final year of 2021/22. When known, this will be added to the total requirement figure. It will be known well before the SIR amendments are adopted.
- 4.8 This [3,018 + 2021/22 housing completions figure] is then added to the housing requirement for 2022-2031, in order to prepare the full requirement for the full plan period 2011-2031.
- 4.9 The 2022-31 housing requirement figure is proposed as matching the latest local housing need figure (there being no evidence to suggest it should be adjusted). This results in a housing requirement of 5,398 homes (i.e. 599.78 x 9).
- 4.10 Thus, in turn, this means the total housing requirement for 2011-2031 is [3,018 + 2021/22 housing completions figure + 5,398. *Indicatively, we expect that figure to be around or just under 9,000*]. It is proposed, therefore, that policy GROWTH1, as to be updated, will have a housing requirement figure to match this sum.
- 4.11 GROWTH1 will split this total housing requirement into two elements, first for the period 2011-22, and second for the period 2022-31. By doing so, this will be consistent with calculations associated with 'five year land supply' (see our website for details of our five year land supply reports⁵ as well as more information below).

⁴ See <https://www.gov.uk/guidance/housing-supply-and-delivery>

⁵ See <https://www.eastcambs.gov.uk/local-development-framework/monitoring-and-local-development-scheme>

5 Present Housing Supply

- 5.1 At least once a year, the Council publishes a Five Year Housing Land Supply report⁶. The latest version of that report is dated October 2021. A new one is not expected until summer 2022.
- 5.2 The October 2021 report identifies a total future supply (i.e. supply from 1 April 2021) of over 10,000 homes. Of this, 4,524 are believed deliverable in the period 2021-2026, and a total supply of over 8,179 in the period 2021-2031.
- 5.3 It is therefore evident to the Council that the new forward looking housing requirement (calculated as being 5,398 dwellings, 2022-2031) is far exceeded by the identified supply (of 8,179 dwellings), even allowing for a small element of that supply being used up in the year 2021/22; plus there is a further 2,008 supply beyond the plan period already identified (excluding any from the Broad Areas which are yet to have consent).
- 5.4 We are also aware of new planning permissions in 2021/22 which are not accounted for in the October 2021 Five Year Land Supply, or in the figures referred above, which would boost even further the supply going forward. For example, 175 homes at Broad Piece, Soham, that was granted consent on appeal, in February 2022.
- 5.5 It is for this reason that the Council concludes that there is no need to identify any further allocations as a consequence of this SIR, on the simple basis that supply already comfortably meets the requirement; indeed, supply (at c8,000 for the plan period, and a further c2,000 beyond the plan period) is well in excess of the requirement (c5,400 for the plan period). Put another way, there is c150% of known supply to meet the identified requirement, which provides ample headroom should any supply fail to come forward, or come forward more slowly and slip beyond 2031.
- 5.6 Indeed, if further allocations were to be made, the supply would be so great (i.e. more than 150% of need), and so considerably in excess of the identified housing requirement, that the Council would risk:
 - (i) Identifying sites in less sustainable locations;
 - (ii) Market saturation, which can actually lead to less delivery (due to depressed land values / sales) rather than greater delivery; and
 - (iii) Duty to Cooperate concerns, as the excess supply could result in need being met within East Cambridgeshire which ought to be met (and is planned to be met) in a neighbouring authority(s).
- 5.7 Any new allocations will, therefore, be a matter for a future full update of the Local Plan, alongside an update in the plan period (or, potentially, via any Neighbourhood Plans prepared in the district).

6 Consultation Arrangements

- 6.1 As a reminder, we are not seeking views on any other aspect of the 2015 Local Plan, and we are not seeking any suggested new allocation sites.
- 6.2 In Section 8 are the precise changes to the Local Plan we are proposing, each with a reference number ("Proposed Change Ref 1" etc). When responding to this consultation, please reference the proposed change you are commenting upon.

7 Next steps

- 7.1 Once representations have been received, the Council will proceed to 'submit' the SIR, the representations received and other supporting material to the Planning Inspectorate (whom acts on behalf of the Secretary of State). Anyone who has made representations will be notified in due course of the examination stage of the SIR, and how you may get involved in that examination stage. We anticipate that submission will occur in July or August 2022, with the examination commencing immediately thereafter for several months.

⁶ See <https://www.eastcambs.gov.uk/local-development-framework/monitoring-and-local-development-scheme>

8 Specific Proposed Changes to the Local Plan

8.1 The following boxes identify the precise changes being proposed to the Local Plan, using a series of crossed out text and bold italics new text.

Proposed Change ref:	Explanation	Local Plan Text (as proposed to be amended)
1	Front Cover amended by addition of the following under "April 2015"	<i>(as amended [add date of adoption])</i>
2	Text Box at top of Page 1 amended as follows	<div style="border: 1px solid black; padding: 10px;"> <p>This East Cambridgeshire Local Plan Development Plan Document was adopted at a full meeting of East Cambridgeshire District Council on 21 April 2015, <i>with the exception of Policy GROWTH 1 and some of its supporting text, and some supporting text associated with Policy GROWTH 4, all of which has been updated and adopted at a full meeting of the Council on xx xxxx 20xx.</i></p> </div>
3	Add new text after para 1.2.7 as follows	<p><i>1.2.8 Following consultation and independent examination over the period 2021-2023, a very limited updating of the Local Plan took place, which had the primary effect of updating the housing requirement figure in Policy GROWTH 1, together with some updating of the supporting text to Policies GROWTH 1 and GROWTH 4.</i></p> <p><i>1.2.9 Those limited updates were formally adopted by the Council on [add date of adoption], and incorporated into the Local Plan accordingly. For the avoidance of doubt, other than Policy GROWTH 1, no other Policy was updated and no new site allocations were made.</i></p>
4	Amend the supporting text 3.2.3-3.2.5 as follows	<p>Level of housing growth</p> <p>3.2.3 Following the abolition of Regional Spatial Strategies, the District Council is <i>was</i> responsible for identifying a housing 'target' in the 2015 Local Plan. The right level of housing can help to support economic growth, meet local housing needs, and facilitate the delivery of infrastructure. Having a housing target also allows a local authority to work with service providers and other organisations to ensure suitable infrastructure is provided to meet the needs of new development.</p> <p>3.2.4 The housing requirement for East Cambridgeshire <i>for the 2015 Local Plan needed</i> needs to be justified and based on an objective assessment of need (paragraph 47 in 2012 National Planning Policy Framework). This involves looking at housing needs and demands</p>

(including demographic evidence, affordability levels, jobs growth) – but also taking account of supply, delivery and strategic matters which may have an impact (including land availability, infrastructure capacity and market deliverability). It also involves co-ordination with the strategy of neighbouring authorities, and working together to ensure the needs of the housing market area are met. The District's Council's housing requirement has been informed by the following key evidence documents:

- 'Technical Report on Population, Housing and Employment' (May 2013) – commissioned jointly by Cambridgeshire authorities and Peterborough and undertaken by Cambridgeshire County Council.
- A new 'All Homes' chapter in the Strategic Housing Market Assessment (SHMA) (May 2013) – looking at objectively assessed need across the Cambridge Housing Market Area. The work was jointly commissioned by the Housing Board and the Strategic Planning Unit for Cambridgeshire and Peterborough.

3.2.5 The SHMA identifies a need for 13,000 dwellings in East Cambridgeshire between 2011 and 2031. However, under the 'duty to cooperate' the District Council has reached agreement with other Cambridgeshire authorities and Peterborough Council to deliver a total of 11,500 dwellings between 2011 and 2031. This agreement, involving a redistribution of housing between some of the authorities, is set out in the 'Memorandum of Cooperation between Cambridgeshire and Peterborough authorities' (May 2013). The Memorandum concludes that the target for East Cambridgeshire should be lower than 13,000 dwellings as the Council has 'made considerable progress to date with [its] local plan reviews, and therefore have established a good understanding of their areas' development opportunities and constraints. They have also taken account of the July 2012 joint statement by Peterborough and Cambridgeshire authorities which confirmed that the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough, and to other main centres of employment, whilst avoiding dispersed development.' The agreed target of 11,500 dwellings for East Cambridgeshire represents an annual rate of 575 dwellings per year. This rate is more than the previous Regional Strategy target for the district (430 per year) and is suitably challenging given the recent economic downturn and altered market conditions. Details regarding delivery are set out in Policy GROWTH 4 below. In summary, the evidence indicates that this level of housing growth:

- Will be sufficient to meet East Cambridgeshire's own housing needs, and is a coherent strategy in the context of neighbouring local authorities emerging Plans.
- Is a sustainable level of housing which should help to support the Council's strategic aim to provide a better balance between housing and employment and reduce levels of out-commuting.

		<ul style="list-style-type: none"> ● Will support the predicted growth in the local economy up to 2031. ● Can be accommodated on sufficient, suitable available sites within the district. ● Is deliverable, in terms of market supply and capacity. Will help to deliver the Council’s strategic aims of regenerating and expanding the district’s market towns, and supporting the maintenance and sustainability of villages (in the context of a declining and ageing population). ● Is consistent with the strategy for the Cambridge Sub-region (as set out in the Joint Planning Statement). ● Will be supported by appropriate levels of new infrastructure and services; and, ● Will help to facilitate the delivery of appropriate levels of affordable housing to meet local needs over the Plan period. <p>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 dwellings. Following consultation and testing of this figure, it has been determined that 5,398 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.</p> <p>*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.</p>
5	Amend Policy GROWTH 1 as follows:	<div style="border: 1px solid black; padding: 5px;"> <p><u>Policy GROWTH 1: Levels of housing, employment and retail growth</u></p> <p>In the period 2011 to 2031, the District Council will:</p> <ul style="list-style-type: none"> ● Make provision for the delivery of 11,500 xxxx* dwellings in East Cambridgeshire, comprised of a dwelling requirement of: </div>

		<ul style="list-style-type: none"> - [3,018 + 2021/22 housing completions] dwellings, for the eleven year period 2011-2022 - 5,398 dwellings for the nine year period 2022-2031 • 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. <p>In the period 2012 to 2031, the District Council will:</p> <ul style="list-style-type: none"> • Make provision for at least an additional 3,000m² (net) of convenience and 10,000m² (net) of comparison retail floorspace in the district. <p>-----</p> <p>* 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</p>
6	<p>Para 3.5.6 will be consequentially updated as follows:</p>	<p>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 11,500 xxxxx* dwellings, as set out in Policy GROWTH 1. The latest projections (as at October 2021 September 2014) indicate that an estimated 12,000 over 11,000 additional dwellings could come forward between 2011 and 2031, with a further identifiable supply of over 2,000 dwellings beyond the plan period (i.e. post 2031). It is estimated that approximately 6,500 of these dwellings will be on new allocations, mainly on the edge of existing towns and villages. The table also includes 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, and could be developed in the future two of which, out of the five identified, have recently received planning permission for development. The supply from this source is not not anticipated to be required in strategic terms until, as anticipated, therefore coming forward in the later part of the Plan period. Therefore, whilst the locations are broadly identified at this stage and it is intended that the specific site boundaries will be identified through the next Local Plan review, in the meantime the principle of development coming forward on the Broad Areas is now established. There is sufficient identified capacity on the edge of Soham and Littleport to enable this source of supply to be realised. The table also shows that the distribution of development accords with the locational strategy in Policy GROWTH 2, with significant new land allocations proposed on the edge of Ely, Soham and Littleport, and smaller amounts on the edge of villages where this is supported by the local community. A full list of allocation</p>

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

7

Para 3.5.7, and table 3.2, will be consequentially updated as follows

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 Annual 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.** ~~until the Local Plan is adopted, the latest housing trajectory for the Local Plan will be contained in a separate Background Paper on ‘Housing Supply’—see the Council’s website]. The housing trajectory in the Council’s ‘Housing Supply Paper’ September 2014 demonstrates that a five-year supply of specific deliverable sites incorporating an additional buffer of 5% can be identified in the district as required by Government. Further information on the tenure and type of dwellings is set out in Chapter 4 of this Local Plan.~~

~~Table 3.2 – Summary of estimated housing supply 2011-31~~

Location	Completions 2011/12 – 2012/13	Outstanding commitments as at 1.4.13	Large potential sites	Small windfall sites	Specific rural sites	Allocations	TOTAL
Market towns	458	950	315	241	0	5849	7782
Ely	95	145	56	68	0	3679	4043
Soham	260	256	40	114	0	1620	2290
Littleport	103	549	188	59	0	550	1449
Villages	200	321	276	421	70	659	1947
Rural windfall estimate	-	-	-	471	-	-	471
Broad locations	-	-	-	-	-	-	1,800
TOTAL	658	1271	560	1133	70	6508	12,000

Table 3.2 – Summary of estimated housing supply 2011-31*

*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

<i>Site Status at 01 April 2021</i>		<i>Total Delivered 2011-2021</i>	<i>Total Supply 2021-2026</i>	<i>Total Supply 2026-2031</i>	<i>Total Supply 2021-31</i>	<i>Total Supply Post 2031</i>
<i>Planning permission</i>			3,930	1,760	5,690	698
<i>Dwellings allocated in development plan, without consent at April 2021</i>			346	641	987	115
<i>Dwellings on unallocated sites and without consent at April 2021</i>			1	0	1	0
<i>Other supply</i>	<i>Dwellings with insufficient evidence that they will be delivered within first five year period</i>	3,018	0	1,004	1,004	1,195
	<i>Windfall allowance</i>		150	250	400	N/A
	<i>Older people's accommodation (C2)</i>		97	0	97	0
Totals		3,018	4,524	3,655	8,179	2,008
Grand Totals			11,197 <i>(Housing Supply 2011-2031)</i>			2,008 <i>(Housing Supply Post 2031)</i>