



East Cambridgeshire
District Council

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

Stage 1 consultation
Report

October 2021

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Introduction

East Cambridgeshire District Council has commencing a Single Issue Review (SIR) of its adopted Local Plan.

The first consultation was undertaken under Regulation 18 of *The Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended), for just over 6 weeks. The consultation started on Friday 26th March, and ended at 23:59 on Friday 7th May 2021. Two further rounds of consultation are anticipated before the Plan proceeds to independent examination by an Inspector.

Any representations which fall outside of the scope of the consultation cannot 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.

Response to the Consultation

We received 29 emails in response to our first stage consultations. Most were from the development industry and some were from the neighbouring local authorities. Very limited volume of response from other parties, including individuals in the district, though this is not surprising due to the very narrow scope of the changes proposed, and the technical nature of such changes.

Below is a summary table, identifying the issues raised against the questions posed in the March 2021 Local Plan Single Issue Review document. Please note, these are a summary of responses received. A copy of the full representation is available on request.

1 Consultation Responses Summary

Question 1: Do you agree, in principle, that the six 'proposals' set out [in the consultation document] cover what is required for the proposed SIR, taking account of the decision made by the Council to only undertake a SIR on the housing requirement figure (and any consequential changes arising)?

Summary of issues raised

- By carrying out a Single Issue Review, the Council removes an important opportunity to meet crucial Climate Change objectives and address the true growth needs of the area in a comprehensive way.
- The level of housing required should be almost double what is currently planned for in current local plans, as identified in the Cambridgeshire and Peterborough Independent Economic Review (CPIER) 2018.
- The consultation document, would not be found sound because the plan period is too short and it appears that no adjustments to the local housing need figure derived from the standard method will be assessed.
- The second bullet point of Growth 1, which considers job growth, should also be considered in tandem, in order to ensure that there is sufficient employment in the district, alongside a suitable and deliverable supply of homes.
- As part of the review it is necessary to consider the context of the existing defined development limits in order to establish whether a review of those defined development limits is necessary.
- A legal requirement of the Strategic Environmental Assessment process is to identify and assess reasonable alternative policy options, but it appears that reasonable alternatives for some issues relevant to the SIR have already been rejected before the process has started.
- East Cambridge plays an important role within the Oxford-Cambridge Growth Arc and therefore must seek to build upon this to support economic growth with an aligned housing requirement figure.
- A SIR will not help meet economic or housing needs, it will not provide certainty and confidence to developers or infrastructure providers to make investments and it will not give certainty or confidence to communities regarding future development or the timely provision of supporting infrastructure.
- Very limited information has been provided within the consultation document to explain and justify why a review is not being undertaken in relation to job growth within the District, having regard to both office and retail floor space uses.
- An adjustment should be made to the housing figures (in this case the local housing need derived from the standard method) to enable a greater supply of affordable housing. This is just one example and demonstrates the Council is taking an arbitrary and highly selective approach to the review of the ECLP based on the matters it wants to address, rather than being led by the evidence available.
- **Huntingdonshire District Council** have no objections to the approach set out in East Cambridgeshire District Council's Single Issue Review at this stage in the review process.
- The fact that the volume of site commitments exceeds the housing requirement figure is not enough; these homes are not being delivered to the timetable. The recent short-term approach of putting considerable taxpayer resources into repeatedly defending the five-year housing supply is not addressing the problem. The slow delivery seen in the district over the past decade is not going to be addressed with a largely 'do nothing' approach as is proposed.

- Specifically, in respect of Proposal 4, we suggest that it will be important to liaise closely with Greater Cambridge (South Cambs. and the City) regarding housing need, given the scale of growth anticipated in Greater Cambridge together with Green Belt and heritage constraints in the area.
- I agree that the six proposals set out in the consultation document are appropriate.

ECDC Response

- We note the desire for a more comprehensive review of the Local Plan (such as to address climate change), but these are matters to be addressed in the next full Local Plan review. Please note the Council has recently adopted a supplementary planning document on climate change (and on the natural environment), which will help act as a bridge prior to the full local plan update.
- CPIER did not identify a housing requirement figure for districts to follow, and its economic recommendations were recommendations, with no legal status that they must be followed.
- We are not proposing to amend the end date of the Local Plan, as it will still have around 8 years remaining once the SIR is adopted, and this is only a very narrow update of the current Local Plan. A future full local plan update will extend the end date to 2036 or beyond.
- There is no evidence to indicate that the employment growth target is in need of updating, unlike the housing requirement figure for which there is clear evidence. The Council is confident that a sufficient supply of employment land still exists in the district, and spread over a good geographical area. Similarly, there is no evidence to suggest that a retail assessment update is needed: indeed, the evidence suggests that retaining what retail presence we have in the district would be a major achievement, when considering the fundamental change occurring in the retail sector (away from stores, and towards on-line delivery).
- In terms of employment and retail floorspace, it is also very hard to 'plan' for such floorspace in the context of the fundamental changes to permitted development rights and Use Classes over the last few years, meaning employment, retail and residential floorspace is largely becoming interchangeable without full planning consent.
- The Council is playing an active part in the Ox-Cam Framework preparation. A full East Cambs local plan update will take account of that Framework, once adopted.
- Affordability of homes is a major part of the local housing need method. To apply an additional uplift of homes to deliver more affordable housing, would be double counting the uplift.
- We agree some homes are 'not being delivered to timetable'. However, rather than approving more homes to compensate, we would like to see developers deliver the homes they have consent for in a more timely manner. We work closely with developers to try to make this happen.
- We liaise very closely with neighbouring districts in the preparation of the SIR.

Question 2: Do you agree that the plan period should remain 2011-31?

Summary of issues raised

- The Council's declared a climate emergency, as such it should carry out a comprehensive review of the Local Plan and an updating that extends beyond 2031.
- NPPF is clear at paragraph 22 that strategic policies should plan over a minimum 15 year period from adoption.

- We suggest the appropriate plan period should be up until the year 2041 to meet the requirements of the NPPF and to align ECDC's plan period with the proposed Greater Cambridge Local Plan.
- We consider it necessary for the Council to use a plan period of 2022/23 to 2037/38. This will have implications for other policies, particularly in terms of housing need / supply.
- It is noted that the neighbouring authorities within the housing market area that have started the review process for adopted development plan documents all propose indicative plan periods ending in 2040.
- The sole reason that the Council provides for not amending the plan period is that it would have wider implications, beyond the intention of the SIR. In essence, such an approach is akin to the Council using the likely consequences to constrain the scope of the review itself, rather than undertaking a review based on a well-reasoned and justifiable scope and attending to the consequences as necessary.
- It is suggested that the plan period for the reviewed / revised Local Plan should be 2021 to 2041, which will take account of the effects of prospective infrastructure improvements including the dualling of the A10; it will also align the review with the period of the Local Plan review in the Greater Cambridge area.
- By compromising on the plan period, this would inhibit future growth and as a result the Plan would be at risk of not been found sound and positively prepared.
- A longer-term horizon would enable water and power providers to plan better for the infrastructure needed in the 2030s and beyond.
- A wider review and updating of the local plan is necessary to enable policies to be put in place with regards Climate Change.
- A full review of the Local Plan would ensure that housing and employment growth in the medium to longer term (5 years plus) is directed in the most appropriate locations. By not taking the opportunity to review locations for growth now, there will be a discord between infrastructure planning and housing and employment delivery.
- It is agreed that the plan period should remain 2011-31 if this partial review is found to be appropriate.
- The single issue review should identify the level of housing growth required and whether the current figure should be amended. This does not prevent the Council from commencing preparation of a new Local Plan, in whole or part on matters at a later date if it is deemed necessary. However, the approach presented in the consultation paper will ensure that the current plan is up to date.
- I agree that the plan period should remain as 2011-2031.

ECDC Response

- The mixed response to this question is noted.
- See also responses to Q1
- While the Council understands the concerns expressed in the above comments, the broad underlying message of such concerns are that the plan period should be extended, and consequently a comprehensive update of the Plan would then be needed (new housing allocations, climate change policies etc). The Council rejects that approach, because it does not seek to prepare a full local plan update at this stage, and sees no fundamental evidence suggesting a need to do so. A full local plan update is the appropriate place to extend the end date (and bring forward the start date), and such a plan will be prepared in the context of a new planning system being brought in by Government.

Question 3: Do you agree with the method for how we intend to update the housing requirement figure for 2011-31?

Summary of issues raised

- The Standard Method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area.
- Our indicative housing projections are substantially higher than the Government's standard method and present exceptional circumstances to justify an alternative approach to the standard method.
- The housing requirement, as currently described in the SIR consultation document, does not make any reference to the circumstances where a higher housing need figure might be appropriate as set out in the 'housing and economic needs assessment' section of national guidance (Section Id.2a of the Planning Practice Guidance).
- If a replacement to Policy GROWTH 1 does not consider and assess whether adjustments to the local housing needs figure should be made e.g. for economic growth, strategic infrastructure, unmet housing needs, and affordable housing reasons, it would represent an unsound approach that is inconsistent with national guidance.
- The guidance is clear: "The standard method ... does not produce a housing requirement figure."; whereas the Council refers to "the national standard method for calculating a housing requirement", reinforcing this with clarification in para. 4.1 of its understanding that the term 'housing requirement' is the same as 'local housing need'. Simply, it is not, and the Council is incorrect in this regard.
- The 2020 Affordability Ratios were published on 25th March 2021. These show a Ratio for East Cambridgeshire of 11.13. Applying this Ratio, the 'uncapped' Standard Method Local Housing Need for East Cambridgeshire increases to 616 dpa (rounded up from 615.71 dpa). Over the ten-year period 2021-2031, this would equate to a need for 6,158 dwellings (rounded up).
- It is considered that the level of housing proposed in the consultation document fails to consider the implications and needs of the proposed economic growth strategy for the Oxford-Cambridge Arc.
- The Council should properly comply with the Duty-to-Cooperate and engage with all relevant authorities in determining whether there is any need to meet unmet need from other areas.
- The review should take account of the impact of the dynamic growth in employment and housing demand within the travel-to-work area which comprises much of East Cambridgeshire. A failure to recognise these needs in neighbouring areas and, in the course of the review, to take account of changing employment patterns post-pandemic.
- The level of housing delivery of 10,175 dwellings within the remaining plan period is significantly higher than the 5,922 required by the standard methodology, there is concern that development in East Cambridgeshire is not being "genuinely plan-led", which paragraph 15 of the National Planning Policy Framework states it should be.
- East Cambridgeshire can choose to accommodate demand from other authorities or lengthen delivery of the necessary number of homes over a longer plan-period. If such approaches are not taken, evidence of market absorption, phasing and alternative forms of infrastructure delivery will be necessary.
- The actual housing requirement should be informed by an up-to-date PPG compliant Housing Needs Assessment and other necessary evidence to provide a robust approach that ensures that the SIR can be found sound at examination.
- Business investment, exceeding both local and national targets and providing 26% more jobs in 2019 than at the same time in 2011. This impressive economic growth is being

sustained but is not being supported by an equal rate of housing growth, with only 6% more homes delivered during the same period.

- Calculating the Local Housing Need using the Standard Methodology inclusive of the current affordability ratio raises the local housing need figure to 616 dwellings per annum.
- To ensure the plan is future proofed and enough flexibility, choice and competition has been provided for in the housing market, in order to reflect government guidance, we consider that a 20% buffer in addition to the housing need figure, would provide this.
- The Council will need to be mindful that the Standard Method only identifies the baseline assessment of housing need and does not take into consideration other factors which affect demographic behaviour.
- The standard method used by the Council is incorrect. Through our analysis we believe that applying the standard method to establish the minimum housing need to be accommodated over the remaining 10 years of the Plan is a minimum net gain of 615.7 dwellings per annum.
- We would recommend that the allocations made in the 2015 Local Plan should be reviewed and sites allocated for extra care housing, in line with local need established through an older persons housing need assessment.
- If the level of economic growth in Cambridge is to be sustained it will be important that its neighbours, such as East Cambridgeshire, understand whether the wider impacts of this growth would require a higher level of housing than that arrived at using the standard method.
- Simply reviewing the housing requirement to 2031 using the Standard Method cannot be appropriate as it will not make provision for all historic under delivery – that can only be done by using a 15 year plan period.
- It is particularly important that East Cambridgeshire consider the housing and employment needs in the southern part of the District in context with employment and housing demand arising from Cambridge City.
- It would be appropriate to set a housing requirement in excess of the housing need including to support the necessary economic recovery, the increased demand for homes in rural areas that has arisen from the current pandemic, and the particular growth aspirations of the Government in the subregion.
- The Council cannot, at this stage, dismiss meeting the development needs of other areas and to do so would clearly constitute a failure of the duty to co-operate and its requirement to work actively and constructively to address cross boundary and strategic issues.
- If the level of economic growth in Cambridge is to be sustained it may be necessary for its neighbours, such as East Cambridgeshire, deliver a higher level of housing than that arrived at using the standard method.
- The Council's approach to updating the housing requirement, which seeks to apply an 'apples and pears' approach based on past delivery achieved between 2011 and 2021, and the local housing need standard method for the period 2021-2031 (no object in principle to the use of the standard method approach). The use of past delivery would simply build-in past failure to deliver the required number of homes in East Cambridgeshire since 2011 and therefore contrary to national policy objective of significantly boosting the supply of housing.
- The assumptions need to be tested to make sure that the Council is not limiting flexibility in the event that commitments do not deliver as anticipated or if commitments are no longer appropriate to deliver the housing required in the locations it is required.
- **Huntingdonshire District Council** has no objections to this approach as initial analysis within the Single Issue Review consultation paper anticipates with a high degree of confidence that existing commitments and allocations will comfortably exceed the new housing requirement figure.

- It is clear that exceptional circumstances exist in East Cambridgeshire – a growth area with significant new strategic investment planned. Economic growth should be factored into an additional uplift on the baseline LHN figure derived from the Standard Method.
- I agree with the method proposed for updating the housing requirement figure for 2011-2031.

ECDC Response

- The Council notes the large volume of representations on this question which, for the vast majority, appear to disagree with the method proposed by the Council to update the housing requirement figure and, on the whole, are seeking a higher housing requirement figure to be established than that proposed. The Council has considered these representations carefully, but disagrees with the suggestions. The approach taken by the Council is consistent with NPPF/NPPG, and exceptional circumstances (as set out in NPPF/NPPG) are not evidenced in East Cambridgeshire. There is also no evidence of any request by neighbouring authorities to seek to offload their need within East Cambs (indeed, we have evidence expressly confirming that is not being sought).
- Many of the representations appear to be making objections to the method set out by Government for calculating housing need / requirement. Of course, the Council must, first and foremost, be consistent with such policy unless there is exceptional reasons for not doing so.
- The precise LHN figure arising will be adjusted throughout the preparation of the SIR, as that is beyond the control of the Council.

Question 4: Do you have any suggestions as to how, if at all, we should update the guidance in relation to the identified Broad Areas for housing (these Areas only apply in Soham and Littleport)?

Summary of issues raised

- The scale at which housing pressures will likely grow in East Cambridgeshire and the constraints to growth within the wider Cambridge sub-region will place an increasing reliance on duty-to-co-operate to ensure the needs of the area are met in a long-term, sustainable manner.
- It is not clear what relevance the broad areas for housing at Soham and Littleport have with aim of the SIR and the proposed update to the housing requirement in Policy GROWTH1.
- The Council should update the guidance in relation to the identified Broad Areas for housing, other than to comment that if the status of the Broad Areas is to be 'elevated' then other potential development sites should also be considered.
- In order for sustainable growth to be delivered across the District at a level that is required, development within rural areas should also be considered and supported, as is demonstrated at Paragraph 3.3.3 of the East Cambridgeshire Local Plan 2015.
- The Broad Areas should be reconsidered in their entirety as part of a wider Local Plan Review, potentially altering where further site allocations may next be appropriate.
- We believe that a more comprehensive review of the objectively assessed need, needs to be undertaken, alongside a further assessment of the SHLAA and SHMA, which would then inform the housing requirement and distribution within the Council for the remaining 10 years of the Local Plan.
- It is clear that many of the sites that are allocations have not come forward in the way expected when the Local Plan was adopted. The delivery needed is at least 2 to 3 times

any of the figures achieved over the last 10 years, an unrealistic situation. The Council needs to ensure that there is sufficient flexibility in its plan to boost actual deliverability.

- We disagree with any proposal that seeks to remove references to the Broad Locations from the adopted ECLP. Their inclusion in the plan remains valid and provides an opportunity to ensure that the updated housing requirement can be met without the need for other new sites, as was the original intention and purpose of the BLs.
- This approach provides very little clarity as to how the Council will approach the Broad Areas for housing. It is not sensible or appropriate to divorce and hermetically seal off the housing requirement from provision, nor is it sensible or appropriate to consider changes to one element of the overall strategy for distributing and providing housing without considering the objectives and implications within a process which considers reasonable alternative options.
- **Huntingdonshire District Council** has no objections to the approach set out for Broad Areas. The need for review of the guidance in section 3.5.5-3.5.7 of the Local Plan, or to 'firm up these Broad Areas as formal allocations will only become apparent once a final housing figure has been established.
- (Soham)- the broad locations indicated on the diagram in the 2015 Plan do not include any designated heritage assets. However, the grade II* listed Northfield Windmill lies close to both of the broad locations for growth. Development in these locations could therefore have an impact on the setting of this listed building.
- It is suggest the addition in relation to new rail infrastructure at Soham, enabling reduction in car journeys and further enabling housing expansion for commuters.

ECDC Response

- Varied and mixed response on this issue. However, no strong evidence was provided to amend the approach or status of the Broad Areas for housing. The Council agrees, and therefore intends to keep the Broad Areas unaltered, albeit with slightly updated explanatory text.

Question 5: Do you have any other comments or suggestions on this consultation document or the proposed SIR?

Summary of issues raised

- It is requested that the housing requirement identified in replacement Policy GROWTH 1 should be set at a level that seeks to address affordable housing needs and any needs likely to arise during the plan period.
- Consequences of non-delivery or previously identified infrastructure improvements are assessed in SIR and the associated Strategic Environmental Assessment/Sustainability Appraisal, including for sustainability objectives 5.3 (improve the quantity and quality of publicly accessible open space) and 6.1 (improve the quality, range and accessibility of services and facilities e.g. health, transport, education, training, leisure opportunities).
- It is unclear from the Consultation Document the extent of discussion that has taken place with neighbouring authorities, if at all. Fenland, Greater Cambridge and West Suffolk are all at the early stages of commencing new Local Plans and have so far not identified whether they will look to neighbouring authorities, such as East Cambridgeshire, to assist with delivering their housing requirement. Should this be the case, then the unilateral actions of East Cambridgeshire will be prejudicial.
- Any such allocations should be reviewed as to whether they are truly deliverable or will realistically come forward in years 6-15.

- The housing needs for different groups to be assessed and reflected in planning policies, including for those with an affordable housing need, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. It is suggested that up to date evidence on the housing needs for all these groups should be gathered to inform SIR and a replacement to Policy GROWTH 1.
- it is recommended that the Council engage with its neighbours and prescribed bodies throughout the preparation of the Local Plan and any potential impact of unmet housing needs are considered in full.
- The SIR has misinterpreted paragraph 60 of the NPPF and does not support the Government's objective of significantly boosting the supply of homes.
- Natural England's advice is that guidance relating to protection and enhancement of the natural environment should focus on the relevant Local Plan policy requirements, amended to reflect updates in key legislation and national planning policy and any additional guidance and local objectives and targets.
- Concerned that your housing needs shows a need for 5,992 before 2031 but the plan currently shows 10,175 to be built during that period. Experience of other councils (for example Broxbourne Borough) would suggest that having a supply above the needs tends to spiral with the needs each time. Would therefore suggest that development phasing is specified within the plan such that those extensions at the edges of development areas (for example nearest to Chettisham Business Park for policy ELY1 are not permitted before 2028 at the earliest. Although this could still allow more houses to be built than needed it would reduce the over supply and therefore avoid overheating the demand for housing in 2031-41.
- The SIR fails to recognise that the major problem in the district is not identifying housing need: it is delivering enough homes to meet that need. Significant further work is needed in order to arrive at an appropriate housing need figure.

ECDC Response

- These additional comments have been carefully considered, responses to the majority are covered by responses to other questions.
- No significant issue has been identified in need of addressing in the SIR.

General Comments/ Issues not raised in questions above

Summary of Comments/ Issues raised

- The SIR also does not address the future recovery of town centres following Covid 19. This will require new policies to be put in place to enable town centres to adapt and plan their economic recovery and respond to the restructuring ongoing in retail.
- A legal requirement of the Strategic Environmental Assessment process is to identify and assess reasonable alternative policy options. If reasonable alternatives are not assessed it is very likely that SIR would not be compliant with Paragraph 14 of the SEA Directive (2001/42/EC) and Regulation 12(2)(b) of the Environmental Assessment of Plans and Programmes Regulations 2004.
- The conclusion of the Second Review was essentially that the housing requirement of 575 dpa was sufficiently different to the Standard Method LHN of 597 dpa (some 22 dpa, or 3.8% different) as to warrant a review of Policy GROWTH1. It is considered that, a variance of just 3.8% is insufficient to warrant such a review, and, if a review is to be undertaken, it should have a much broader scope.

- There is concern that the appropriate strategies may not be in place to address the cumulative, cross border impacts of development, which otherwise cannot be dealt with on a case-by-case basis. There is no proposal to update the evidence base to properly identify impacts at a strategic level and the appropriate mitigation.
- There are particular concerns for the A14 and Newmarket. The A14 is currently under pressure, particularly at Junction 37. Newmarket, needs to be very carefully considered with regards to cross boundary impacts, as it is mostly encircled by the East Cambridgeshire administrative area, despite administratively being part of Suffolk.
- The SIR provides the opportunity to update the relevant policies in the Local Plan in so far as they relate to matters covered by the recently adopted SPD's, including responding to the Council's declaration of a Climate Emergency.
- We support the Council's decision to undertake a review of the Local Plan in light of the change from the 2012 version of the NPPF approach to establishing an objectively assessed housing need, to incorporate the standard method for assessing housing need advocated in the 2019 NPPF.
- it is our view that changing the housing requirement may require changes to the strategy for jobs and shopping; in crude terms more homes means more jobs and more retail spend. The converse would be true for less homes, albeit this needs to be understood in the context of the Functional Economic and Housing Market Areas.
- The Council should recognise that the review should encompass the consideration of not only housing requirements but also the ability of existing provision to meet those requirements and deliver the spatial strategy as well as the potential need for new housing and employment allocations to meet housing needs overall or deliver spatial priorities.

ECDC Response

- The Council has carefully considered the above issues raised. In response, due to the scope of the Single-Issues Review, the majority of the suggestion are not appropriate to consider at this stage. However, they are valid remarks for consideration as and when the Council considers preparation of a full Local Plan update.
- In terms of SEA requirements, we will ensure full legal compliance is adhered to, as the plan progresses.

2 Next steps

- 2.1 After carefully considering issues raised from the first consultation, the Council will update the SIR document for a second round consultation.