



East Cambridgeshire
District Council

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

Second Consultation
Report

March 2022

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Introduction

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

The second consultation was undertaken under Regulation 18 of *The Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended), for just over 8 weeks. The consultation started on Tuesday 14th December 2021, and ended at 23:59 on Monday 7th February 2022. One further round of consultation (a Regulation 19 consultation) is 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 comments from 29 consultees in response to our second consultation. It is, coincidentally, the same number as we received during the first consultation (although some differing consultees). Most respondents were from the development industry and a few were from neighbouring local authorities. A very limited volume of response were 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.

From the comments received, some representors are relying on their original (first consultation) representations, perhaps expanding on few points. The First Consultation Report, containing a summary of such responses (and ECDC's response to them) remains on our website.

Below is a summary table, identifying the issues raised against the Single Issue Review Second Consultation Document (December 2021). Please note, these are a summary of responses received. You are able to view all the representations in full at our office, on request.

1 Consultation Responses Summary

Issue 1: Scope of Local Plan Review
Summary of issues raised by respondents
<ul style="list-style-type: none">• As set out in previous representations, the scope and content of the plan has been decided without any public consultation or involvement and the attempts to limit engagement are in danger of resulting in legal failure.• 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.• As stated in the response to the previous local plan consultation SCC support plan led growth. It is understood that the plan review is narrow, focussing only on the number of planned homes to 2031. SCC would reiterate the concerns it raised at the previous regulation 18 consultation in March 2021. This being, that without a full local plan review there is a lack of up-to-date strategies to provide the necessary infrastructure to support growth and mitigate cumulative cross boundary impacts. In particular, impacts on junctions of the A14 and the town of Newmarket.• The Council should review their position prior to the Regulation 19 Consultation and widen the matters for this SIR to review economic and housing growth holistically and over an extended Plan period to ensure that this review of the Local Plan is found sound and delivers the required jobs and housing for its residents.
ECDC Response
<ul style="list-style-type: none">• We note the desire by some respondents for a more comprehensive review of the Local Plan (such as to address employment needs and transport), but these are matters to be addressed in the next full Local Plan update. 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.• We do not have 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. However, this matter will be tested thoroughly as part of a future full Local Plan update.

Issue 2: Plan Period of Local Plan Review
Summary of issues raised by respondents
<ul style="list-style-type: none">• Policy GROWTH 1 should look ahead for a minimum 15 year period from adoption but it is proposed to have a timeframe of approximately 7 or 8 years, which would be inconsistent with national policy (NPPF para 22).• 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.• That there would likely be wider implications as a consequence of amending the plan period beyond 2031 is not, in itself, sufficient justification for not doing so.

- It is considered that the use of Standard Method to calculate housing need requires the ‘re-setting’ of the base date for the reviewed / revised Local Plan to 2021, with a plan period that will run for at least 15 years from adoption. In practice, this suggests that the plan period for the reviewed / revised Local Plan should be 2021 to 2041, such that at least 17 years remain following adoption.
- We suggest the appropriate plan period should be up until the year 2041 to meet the requirements of the NPPF and to align the East Cambridgeshire District Council (ECDC) plan period with the proposed Greater Cambridge Local Plan.
- Policy GROWTH1 must be, on the basis of paragraph 20 in the NPPF, considered a strategic policy. The consequence of this is that any amendments to this policy should look ahead for at least 15 years following the adoption of this policy.

ECDC Response

- While the Council understands the concerns expressed in the comments received, 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, employment, etc. allocations, climate change, transport provision 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 to 15 years following adoption (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.
- The Local Plan, as updated by the SIR, will still have around 8 years remaining once adopted, leaving ample time for a thorough update to take place, and extend the plan period well beyond 2031.

Issue 3: Site Allocations

Summary of issues raised by respondents

- The Council needs to provide evidence to establish how it intends to ensure that small and medium sized sites make an important contribution to meeting the housing requirement of the District. This includes the need to promote the development of a good mix of sites and to accommodate at least 10% of their housing requirement on sites no larger than one hectare (see NPPF Paragraph 69).
- Currently, the proposed plan does not provide a sufficient supply of housing to meet medium and long term needs, as is evident from the Council’s most recent housing trajectory. It also needs to tackle the historic undersupply of new homes that has occurred over the last 10 years.
- The Council will need to allocate additional land to meet its housing need over an extended plan period i.e. a minimum of 15 years from the point of adoption as opposed to relying on a plan period which will not cover a sufficient time horizon or to account for the previous shortfall as set out earlier.
- It would be unreasonable to change the allocations and general guidance of the Local Plan. This would undermine the certainty of the plan-led system and lead to an unfair and unbalanced review.

ECDC Response

- Our evidence indicates that there are ample allocations and other commitments (such as planning consents) to comfortably meet the housing requirement to 2031.
- We work closely with developers to try to facilitate more homes to come forward, on appropriate sites and in a timely manner happen.
- The NPPF request relating to small sites will be thoroughly addressed in a future full Local Plan review, but in any event, the Council has a strong track record of granting consent for small and medium sites (1-9 units), as evidenced in our latest (October 2021) Five Year Land Supply Report (appendix B), which demonstrates over the past 20 years we have averaged the delivery of 124 homes on sites of less than 9 units (which is nearly a third of all units delivered), and we have a pipeline of several hundred with planning consent on sites of less than 10 units. Thus, whilst we do not think this NPPF matter is relevant to this SIR, if an Inspector determines it is, we are very confident such a NPPF request is being met.

Issue 4: Housing Requirement

Summary of issues raised by respondents

- Paragraph 3.6 of the consultation (which states that a review of the site allocations is not possible as it involves considerable work and would delay the review process significantly) is not a robust defense for failing to undertake this essential part of the work necessary to demonstrate the appropriateness of the amendment you are seeking to the Plan.
- The Council has failed to consider the potential that economic growth might indicate the need to provide for a higher level of housing need, and is instead proposing that the housing requirement be set at the absolute minimum possible level, some 35 dpa lower than the previous OAHN. This is counter the Government's express desire to 'significantly boost' housing supply.
- The Council needs to provide evidence to demonstrate that the existing housing site commitments will ensure that the size, type and tenure of housing delivers against what is needed for different groups in the community. In this context how does the SIR consider the requirements in paragraph 65 of the NPPF?
- As detailed in our previous representations of the first consultation, the PPG identifies other factors which need to be considered when determining the housing requirement, which includes growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2A-010).
- We consider that a housing requirement uplift is necessary to support economic growth and that a 20% buffer above the uplift for economic growth would ensure that the plan is future-proofed and provides flexibility, choice and competition in the housing market, reflecting government guidance.
- The Standard Method figure provides a minimum starting point in determining the number of homes needed in an area. Having identified the starting point it is then necessary to determine whether that will meet needs. Economic circumstances and the need for all forms of housing must then be considered to arrive at the Full Objectively Assessed Need for plan making.
- We object to change 4, the amendments to 3.2.5. It is also telling that the proposed changes to 3.2.5 delete the bullets which state that the housing to be planned for "will be sufficient to meet East Cambridgeshire's own housing need..." and that it "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."
- There is a high likelihood that strategic growth sites will need to be allocated over the plan period in order to meet the growth needs of the area. The NPPF state that plans for new

settlements and major urban extensions will need to look over a longer time frame, of at least 30 years, to take into account the likely timescale for delivery.

- At the time the adopted East Cambridgeshire reached its 5th anniversary of adoption there was an outstanding under provision in excess of 2,500 that should then be applied to the calculation.
- A more appropriate housing requirement is in the region of 11,900 dwellings (11,907) over whole plan period.
- No objection to the use of the Standard Methodology. We do not propose to comment further on the published requirement at this stage.
- The SIR is too narrow and that, by isolating the need to update the basis for calculating housing need, it fails to address the current evidence of under-delivery. In this way it fails to be the aspirational and deliverable plan advocated by NPPF para 16(b).
- The rate of delivery in the first ten years of the plan is said to have been 302dpa (rounded up) totalling 3,018 new homes. The required rate of delivery in the second ten years of the plan is now forecast to be 615dpa, in order to meet the need for 6,157 new homes. There is no evidence of anything having happened or having been put in place to encourage a doubling of the delivery rate.
- 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.
- East Cambridgeshire will have a role in meeting the development needs identified for the Arc, and this should be assessed to determine whether an adjustment to the housing requirement is needed.
- The housing requirement in the SIR should assess whether an adjustment is required to reflect the commitment to double economic output contained in the Devolution Deal, and which applies to East Cambridgeshire.
- There are a number of transport projects identified in the Cambridgeshire and Peterborough Local Transport Plan that relate to East Cambridgeshire. These transport infrastructure projects should be assessed to determine whether an adjustment to the housing requirement is needed.
- At a minimum, the approach to the SIR is not considered to be justified, on the basis that the Council have not considered any reasonable alternatives, such as whether they need to review employment and retail needs as part of the Local Plan Review.
- Paragraph 60 (NPPF) – it is not clear how the Council contends that having a plan which essentially proposes a moratorium on new housing will 'significantly boosting the supply of homes'. The context of this requirement should also assess the roll that the Council will take in delivering new housing development as part of the Ox-Cam framework.
- One example of this is the current severe under provision of lab and office space that is limiting research and investment in the sub-region, especially in the life science sector. A comprehensive review of the local plan offers the opportunity for East Cambridgeshire to capitalise on these emerging technologies.
- 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 could render the resulting plan unsound.
- In order to provide the necessary clarity as to delivery expectations and supply across the plan period an annualised trajectory should be included as part of the review of the local plan.

- 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 and/or a longer time frame (beyond 2031) than that proposed. This is similar to the arguments at the first SIR consultation stage.
- The approach taken by the Council is consistent with NPPF/NPPG, and exceptional circumstances (such as economic growth) for setting the housing requirement different from the national standard method (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). The Council has considered these representations carefully, but disagrees with the suggestions.
- Some have suggested that the past under delivery of homes should be included to 'top up' the future housing requirement. The Council is following Government guidance which confirms this is not a requirement. (See *Step 2 of the standard method which 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. - Paragraph: 031 Reference ID: 68-031-20190722*)
- In response to the comment on how a doubling of delivery will be achieved, then our AMR published on our website already demonstrates that a doubling (indeed trebling) of delivery is possible. Our low point of 162 homes delivered in 2014/15 has now increased to rates of 514 (2019/20) and 405 (2020/21) even during a covid affected year, and we are confident that these rates can be extended further to meet the updated housing requirement of c600 per annum.
- 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. Nevertheless, a good number of employment sites remain with capacity in the 2015 Local Plan.
- The Council is playing an active part in the Ox-Cam Spatial Framework, albeit its preparation appears to have recently stalled by Government, and it is uncertain when (if at all) it will be progressed. It is certainly at a very early stage at present, and is not something which can be used to determine an alternative housing requirement for East Cambridgeshire. A full East Cambs Local Plan update will be the appropriate time to take account of that Framework, if/once adopted.
- The last bullet point is agreed with, and whilst such information is already provided (in our annual Five Year Land Supply Report publication), it is agreed that a simple graph could provide greater 'snapshot' clarity of that year on year forecast growth. It will be provided as part of the next round of consultation.

Issue 5: Broad Locations

Summary of issues raised by respondents

- It is noted that the reference to Broad Locations is to be left in the Plan but that the reliance on these for any supply is to be removed. This is a considerable oversight on the Council and means that it has neglected to capitalise on an opportunity to address the housing need issues for this district.
- We support the Council's conclusion that there is no need to (significantly) amend the Plan in relation to the 'Broad Areas', and also the decision to remove any assumed supply from these.
- The SIR provides the opportunity to review the Broad Areas and to remove these indicative areas and undertake a thorough review of deliverable sites that can be brought forward

within the extended Plan period to provide new homes and jobs in sustainable locations for local residents.

- I would like to suggest that the "broad location for future growth" to the West of Kingfisher Drive in Soham should be removed from the local plan altogether for a number of reasons (traffic; highway safety; flood risk; close to Sewage Treatment works; detrimental to local residents and not a sustainable location)

ECDC Response

- Varied and mixed response on this issue. However, no strong evidence was provided to significantly amend the approach or status of the Broad Areas for housing. The Council agrees, and therefore intends to keep the intent of the Broad Areas unaltered, albeit with slightly updated explanatory text.
- Some have suggested the Broad Areas should be removed. In response, whilst the Council is not relying on them to come forward (unless consent is already given for their development), the Council do not wish to remove Broad Areas in principle and consider them to continue to offer an option for further development.
- It should also be noted that the Council continues to carefully consider the implications of the recent appeal decision on a Broad Area at Broad Piece, Soham, February 2022 (which was issued post consultation on the second consultation SIR stage), and has taken that decision into account when updating the SIR for its final consultation.

Issue 6: Affordable Housing

Summary of issues raised by respondents

- Shortfall in affordable housing provision in this district that has been acknowledged by the Council in recent appeals. This alone is sufficient recent to review the effectiveness in adopting the standard method in addressing the housing needs of the District.
- There is a need to increase the supply and delivery of affordable housing in East Cambridgeshire. Upward adjustments are required to the housing figure derived from the standard methodology for East Cambridgeshire, and those adjustments should be applied to the housing requirement for SIR.
- The latest Annual Monitoring Report confirms that on average 47 affordable homes have been completed annually over the last 10 years. This equates to the affordable need being 4x more than supply. If 30% of all new homes provided were affordable, then in order to deliver the identified affordable housing need, the Council would need to plan for 717 dpa.
- We maintain that in the absence of a creation of a new Local Plan or a full review, at the very least, all areas of non-conformity with the NPPF should be considered and included in this review, an example being a review of Policy HOU 3, Affordable Housing.
- It appears that the council does not intend to plan for or meet affordable housing needs of the District, contrary to the NPPF and consequently the plan cannot be sound.

ECDC Response

- It is acknowledged that there is a need for more affordable housing, now, and almost certainly this will continue to be the case in the future. Delivery of new affordable housing is likely to be of significant weight when considering any development proposals. However, the current Local Plan policies provide a sound framework for delivery of such homes, and

there is no need for this narrow SIR to amend such policy. A comprehensive review of the housing policies, including affordable housing policy, is a matter for a full Local Plan update to consider.

Issue 7: Other comments and other issues raised

Summary of issues raised by respondents

- The fundamental issues raised on the first consultation remain valid and have not been addressed by this second consultation, by way of either amendment or justification for a lack of amendment.
- There are other matters that are not raised in this Stage 2 consultation, e.g. affordable housing delivery, other housing needs, infrastructure improvements, and the assessment of alternative options for SIR.
- The current Local Plan provides no requirement for new development to provide any electric vehicle charging spaces and also has no requirement to deliver biodiversity net gain. It is considered to be a missed opportunity to not review the Climate Change and Green Infrastructure policies as part of the current Local Plan Review.
- The Single Issue Review Second Consultation document continues to not accord with National Policy in regards to NPPF paragraphs 11, 20, 22, 26, 61 and 62 cannot be found 'sound' given its significant failures.
- Notwithstanding this attempt to dismiss the many concerns raised in a single sentence, it is clear and evident that the Council's proposed approach is directly contrary to the NPPF / PPG.
- As part of the review, it is important to consider the context of the existing defined development limits to help establish whether a review of those defined development limits is necessary.
- Wicken Parish Council supports the strategy and approve the criteria being used to ensure the Local Plan is maintained.
- The adopted Climate Change SPD can only supplement existing policies in the current adopted Local Plan 2015 and is therefore ineffective at dealing with the Climate Emergency declared by the Council in June 2020.
- In amending GROWTH1 the Council will need to state that the number of homes it is required to deliver is a minimum.
- We would suggest that the Council need to consider amendments to HOU3 to take account of the introduction of First Homes as set out in the Written Ministerial Statement published on the 24th of May. We would suggest that the Single Issue Review is the ideal opportunity for the Council to amend its current tenure mix requirements to take account of First Homes.
- The proposed amendments do not significantly affect the comments issued by Natural England in response to the Single Issue Housing Requirements consultation, in our response dated 6 May 2021 (ref. 348030). We therefore refer you to our previous response and have no further detailed comments to make.
- We are concerned that the proposed scope of changes do not result in a positive and proactive approach to plan making and believe that significant modifications are required to

ensure the Single Issue Review is compliant with national policy and takes account the growth ambitions of the wider area i.e. Oxford-Cambridge Growth Arc.

- It is clear the Council does not wish to deviate from its original course, which was clearly decided prior to any meaningful engagement with interested parties affected by its decision to progress a single policy review.
- It is noted that the East Cambridgeshire 5 year land supply expects large numbers of dwellings to be delivered in Soham, Fordham and Burwell. Where appropriate SCC may make requests for developer contributions where there is likely to be an impact on infrastructure in Suffolk, from development in East Cambridgeshire. This would most likely be transport infrastructure, however it is known that pupils and parents cross the boundary to access school and childcare. As such there may be circumstances where education contributions are required.

ECDC Response

- We note the desire for a more comprehensive review of the Local Plan (such as to address climate change and provision for electric vehicles), but these are matters to be addressed in the next full Local Plan update.
- Other comments have also been noted, many of which are addressed in other issues raised.

Issue 8: Sustainability Appraisal Report

Summary of issues raised by respondents

- 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.
- The SA should be revisited in respect of the conclusions drawn within Appendix B and the acknowledged positive impact of providing for a higher level of growth than the standard method.
- The SA has failed to assess the alternative of extending the Plan period to 15 years and the implications that this would have on the key sustainability issues.
- The Council's approach to identifying 'all reasonable alternatives' is inadequate and not soundly-based, and arguably does not meet the legal test with regards to the evaluation of reasonable alternatives as required in the regulations. There are other reasonable alternatives that have not been appraised as part of the SA.
- There are significant flaws in the Council's appraisal of significant effects of the options presented in the SA. Notably, there is an absence of any discernible appraisal of significant effects of the preferred option (option 1) and other options (Option 4).

ECDC Response

- In the SA documentation published, the Council has outlined its reasons for selecting the preferred option and reasons for rejecting other options including higher growth. Although higher growth does provide some positive benefits but it also has some negative effects.

- The SA has considered all reasonable alternatives, based on alternatives for achieving the purpose of the SIR. The SA cannot appraise options which are out of scope of the SIR (such as full Local Plan review)

Issue 9: Duty to Cooperate / Statement of Common Ground / Neighbouring Authorities

Summary of issues raised by respondents

- It is assumed in the SIR consultation documents that East Cambridgeshire will not be asked to accommodate unmet housing needs from neighbouring areas, but that will need to be discussed and agreed through the Duty to Cooperate process before it can be confirmed.
- It is surprising that the opportunity has not been taken to undertake a complete review of the Local Plan given the review currently being undertaken by the Greater Cambridge Combined Planning Authority, an area which has a significant influence on the District.
- The Single Issue Review Local Plan cannot be considered to be positively prepared given it has not been informed by agreements with other authorities to accommodate any unmet need. Rather, the receipt of no response from neighbouring authorities is considered to be sufficient evidence that no consideration of unmet need is required.
- To ensure that the examining Inspector can find this Plan sound, we would strongly suggest that the Council review their Duty to Co-operate processes immediately so that this legal requirement can be addressed prior to the submission of this Plan for examination.
- If there are unmet needs in a neighbouring area the Council must consider these as part of the plan making process and make reasoned judgements as to why it cannot support such a request, if it arises, rather than make such statements from the outset.
- It is of critical importance that the Council works alongside the other Cambridgeshire authorities to ensure that any wider cross boundary issues are addressed. It may be the case that these need to be addressed through SOCGs with the other LPAs. In addition, East Cambridgeshire 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.
- The Council is obliged to provide evidence of constructive, ongoing and active engagement on strategic matters affecting more than one planning area. This should come in the form of draft Statements of Common Ground (SOCGs) with the relevant prescribed bodies. However, at present, the Council has not prepared any draft or finalised SOCGs with its neighbours at this time. It is therefore unclear what, if any, effective engagement has occurred to date in relation to the SIR.
- Some specific matters were raised by prescribed bodies (Suffolk County Council) which would indicate that these constitute 'strategic matters' that would fall to be addressed under the Duty. However, the DTCS only provides a summary of the issues raised by SCC, but provides no clarity on how this issue has been or will be addressed, or whether they consider to be a 'strategic matter' in any event.
- Huntingdonshire District Council have no objections to the approach set out in East Cambridgeshire District Council's East Cambridgeshire Local Plan - Single Issue Review (of its 2015 Local Plan) Stage 1: Second consultation Dec 2021-Feb 2022. The single issue review identifies the level of housing growth required and ensures that the current plan is up to date; it 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. Huntingdonshire

District Council adopted Huntingdonshire's Local Plan to 2036 in May 2019 and can therefore confirm that they are not currently looking towards neighbouring authorities to assist in meeting their housing need.

- Thank you for consulting Cambridge City Council and South Cambridgeshire District Council. We don't consider that the East Cambridgeshire Single Issue Review has any implications for Greater Cambridge, and as such won't be making any comments to this consultation.

ECDC Response

- We have liaised closely with neighbouring districts in the preparation of the SIR.
- With the exception of Suffolk County Council, no objections from neighbouring authorities have been received, and no DtC concerns raised.
- In respect of Suffolk CC, whilst it does not raise any outright objections or concern from a DtC perspective, its brief representations raise the point that a more comprehensive plan update would be the opportunity to consider wider (cross-border) infrastructure requirements. ECDC agrees with this point, but also considers that this SIR is not the appropriate time for such a comprehensive infrastructure planning exercise (because no new sites are being allocated) – that can be completed alongside a full Local Plan update in due course.
- Overall, ECDC continues to expect to neither seek nor offload any housing need from or to its neighbours, and all responses and conversations to date with neighbouring authorities has indicated full agreement with this position.
- For the avoidance of doubt, ECDCs representations to emerging Local Plans of neighbouring authorities have also confirmed that ECDC is neither seeking to receive or to offload housing need in to their respective areas, and no such authority has sought to receive or offload housing need from its are to East Cambridgeshire as part of their emerging Local Plans.

2 Next steps

- 2.1 After carefully considering issues raised from the first and second consultations, the Council will update the SIR document for the proposed submission consultation.