



EAST CAMBRIDGESHIRE DISTRICT COUNCIL

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Inspector P Lewis BA (Hons) MA MRTPI
(By email only, via the Programme Officer)

This matter is being dealt with by: Richard Kay

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My Ref:

Your ref

Date: 15 August 2022

Dear Inspector Lewis,

East Cambridgeshire Local Plan - Single Issue Review (of its 2015 Local Plan) – Update on Housing Statistics

I wrote to you earlier today, welcoming you to East Cambridgeshire and making a statutory request under section 20(7C) of the Act.

This second letter updates you on a publication made available on our website on 12th August as well as information relating to recently submitted Housing Flow Reconciliation form.

Housing Flows Reconciliation (HFR) form

As you will probably know, each local planning authority must return an annual HFR form to government, at around this time each year, which sets out housing completion statistics for the previous year.

I attach to this letter a copy of that form recently completed by ECDC. Whilst ordinarily such forms are not published on LPA websites, I think it would be useful in this instance to do so for the purpose of the examination of the SIR because it provides an up to date confirmation of housing completions for the year 2021/22. Such figures will, of course, be confirmed in the forthcoming Authority's Monitoring Report (AMR), but that is not due for publication for a few more weeks yet, hence the early publication of the HFR return to assist you.

There is only one real number of value in the HFR for the purpose of the SIR examination, and that being the net housing completions figure for 2021/22. **I can confirm these were 619 dwellings.** For context, this was a high figure for East Cambridgeshire, the highest in 14 years.

Now that we have such a figure, the text in the SIR document can be updated accordingly. At appendix A, I highlight such implications.

Five Year Land Supply Update

On Friday 12th August, the Council published its latest Five Year Land Supply Report, bringing forward the data to an April 1st 2022 basedate. Whilst it is available on our website here (<https://www.eastcambs.gov.uk/local-development-framework/monitoring-and-local-development-scheme>), I also attach for your convenience.

I appreciate that you have not been asked to determine whether or not the Council can demonstrate a five year land supply.

Nevertheless, the information contained within the publication is of relevance to the SIR examination, as it updates the evidence in terms of forecast supply:

- from year 1 (2022/23) to year 5 (2026/27) – i.e. the five year period
- from year 1 (2022/23) to year 9 (2030/31) – i.e. to then end of the plan period; and
- from year 1 (2022/23) to no fixed end date – i.e. all known supply, including beyond the plan period end date of 2031.

Broadly speaking, the forecasts are not a significant material change to those previously published (i.e. the October 2021 forecasts, which are referenced in the SIR). The same basic point applies as set out in the SIR, namely that, in the opinion of the district council, there is considerably more housing supply identified in the plan period to 2031 (plus more supply post 2031) than is needed to meet the updated housing requirement figure proposed by the Council in the SIR. Nevertheless, the text in the SIR could benefit from being updated accordingly with the latest forecasts. Again, these are incorporated in Appendix A to this letter.

Potential Modifications

As is always the case, new statistics and information inevitably arise during the course of a Local Plan examination. The above is an example of such. Whilst the above published information does not, in the Council's opinion, fundamentally change the positions as set out in the SIR, the Council considers that, should the SIR be overall found sound by the Inspector, it would be sensible for the latest statistics and information to be used when the Local Plan 2015 be updated to incorporate the SIR. Consequently, this would require modifications to the submitted SIR to be made, and we would welcome this.

Request to add material to the examination library

Once you have considered the contents of this letter, I would be grateful if you could confirm your agreement to add this letter, the attached HFR form and the latest Five Year Housing Land Supply Report (2022) to the examination library, thus bringing them to the attention of interested parties.

I look forward to hearing from you in due course.

Yours sincerely

Richard Kay
Strategic Planning Manager
East Cambridgeshire District Council

The following table provides proposed updated text to that contained in the submitted SIR.

SIR Proposed Change ref:	SIR Explanation	Local Plan Text (as proposed to be amended)
1	No change to that submitted	No change to that submitted
2	No change to that submitted	No change to that submitted
3	No change to that submitted	No change to that submitted
4	Amend the supporting text 3.2.3-3.2.5	<p>No change to that submitted except to proposed new para 3.2.5 which is further updated (with strikethrough and underline) as follows:</p> <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} <u>3,637</u> (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 <u>9,035</u> 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	<p>Proposed Change 5 to be further updated as follows (strikethrough and underline):</p> <div style="border: 1px solid black; padding: 10px;"> <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 <u>9,035</u> dwellings in East Cambridgeshire, comprised of a dwelling requirement of: <ul style="list-style-type: none"> - {3,018 + 2021/22 housing completions} <u>3,637</u> dwellings, for the eleven year period 2011-2022 </div>

		<ul style="list-style-type: none"> - 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	Para 3.5.6	<p>Propose Change 6 to be further slightly updated as follows (strikethrough and underline):</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 9,035 dwellings, as set out in Policy GROWTH 1. The latest projections (as at <u>August 2022</u> 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 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 sites is set out in Policy GROWTH 4 (with site-specific policies contained in Part 2 of this Local Plan).</p> <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>
7	Para 3.5.7, and table 3.2	<p>No change to that submitted for para 3.5.7, but Table 3.2 further updated, to reflect the August 2022 published Five Year Land Supply Report, as follows (i.e. table below replaces that as submitted):</p>

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~~

Site Status at 01 April 2022		Total Delivered 2011-2022	Total Supply 2022-2027	Total Supply 2027-2031	Total Supply 2022-31	Total Supply Post 2031
Planning permission		3,637	3,898	1,200	5,098	530
Dwellings allocated in development plan, without consent at April 2021			206	358	564	180
Dwellings on unallocated sites and without consent at April 2021			116	58	174	0
Other supply	Dwellings with insufficient evidence that they will be delivered within first five year period		0	1,088	1,088	1,615
	Windfall allowance		150	200	350	N/A
	Older people's accommodation (C2)		97	0	97	0
Totals		3,637	4,467	2,904	7,371	2,325
Grand Totals		11,008 (Housing Supply 2011-2031)				2,325 (Supply Post 2031)