



East Cambridgeshire  
District Council

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

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Examination Topic Paper:  
*A suggested way forward  
by ECDC*

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February 2023

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# Examination Topic Paper: A suggested way forward by ECDC

## 1. Introduction

- 1.1 East Cambridgeshire District Council (the Council) is undertaking a narrowly focused Single Issue Review (SIR) of its adopted Local Plan.
- 1.2 The purpose of the SIR is to partially replace a very small part of the Local Plan adopted in April 2015. The vast majority of the Local Plan (2015) is proposed to remain unaltered and remain part of the development plan for East Cambridgeshire.
- 1.3 The Council consulted twice in 2021 on initial proposals, and then again in May 2022 with the final draft proposal. That final draft, and representations arising, were submitted to the Planning Inspectorate in July 2022.
- 1.4 The formal examination of the proposals commenced from July 2022, and included a hearing session on 8 November 2022.
- 1.5 Following that hearing session, an exchange of letters between the Inspector and the Council took place in January 2023, which are available on the examination pages of the Council's website.
- 1.6 In the letter by the Inspector dated 31 January 2023, the Inspector asks for a 'topic paper' to be produced which expands on the proposals raised in the Council's letter of 17 January 2023.
- 1.7 This document is the requested 'topic paper' sought by the Inspector.
- 1.8 For next steps after the preparation of this topic paper, please see the examination webpage at the following address, which will be updated regularly:

<https://www.eastcambs.gov.uk/local-development-framework/local-plan-review-examination>

## 2 The Inspector's request

- 2.1 In the letter of 31 January 2023, the Inspector asks for the following:

*"I invite the Council to prepare a topic paper setting out why its suggested approach [in its letter of 17 January] is sound, and I will hold a further hearing session on this matter.*

*The topic paper should include:*

  - *The detailed calculation of local housing need using the standard method consistent with the guidance set out in national Planning Policy Guidance;*
  - *The rationale for setting the dwelling requirement derived from the minimum local housing need as established by the standard method;*
  - *An explanation of why the Council considers that the Plan so amended should be found sound despite amended strategic policy GROWTH1 not looking ahead over a minimum 15 year period from adoption in respect of housing as per paragraph 22 of the National Planning Policy Framework;*
  - *A consideration of the implications, if any, for the sustainability appraisal and Habitats Regulations Assessment of the Plan; and*
  - *A schedule of suggested main modifications necessary to make the submitted Plan sound. Those should also include those relating to broad areas of search and the housing trajectory as set out in my post hearings advice, along with the update of paragraph 3.5.7 and table 3.2 following the update of housing statistics as set out in EX.LA02.*
- 2.2 This topic paper is broadly structured around the above 'ask'.

### 3 Why the Council's suggested approach is considered sound

- 3.1 In the Inspector's letter of 31 January, the Inspector expresses concern that the Council is suggesting "what would be a significant change to the submitted plan". The Council disagrees. Indeed, the Council considers that the suggested change is certainly far less significant than the one proposed by the Inspector in his earlier preliminary findings letter. The reason for this opinion is as follows.
- 3.2 The Council's suggested modification would have virtually no material effect to those tasked with implementing the Plan, when compared with the submitted plan. As the purpose of the Plan is primarily for the subsequent users of the Plan making decisions on planning applications, the fact that the Council's suggested change would have no material effect on how those decision makers should react is, by definition, therefore not a significant change to the Plan.
- 3.3 To illustrate this point, the submitted Plan proposed a simple housing requirement of 600 dwellings per annum, from 2022 onwards, with no complications arising from the degree of homes delivered historically. The suggested modification would have the identical outcome. The housing requirement will remain 600 dwellings per annum, and there will again be no complications arising from the degree of homes delivered historically. In fact, arguably, the suggested modification is merely an alternative way of expressing what the submitted Plan says – it does not change the numbers, the housing requirement or the way the Plan will be implemented by decision makers. Hence, in the Council's view, the change is merely one which expresses the same proposal in the submitted Plan, but, some might say, expresses it in a more effective and national policy compliant way.
- 3.4 The alternative option put forward by the Inspector in his preliminary findings would be a far more significant change, fundamentally altering how decision makers must react when determining planning applications. Specifically, it would establish a housing requirement for the plan period to be undeliverable and consequently render several, and important, policies of the development plan out of date (and quite likely policies in neighbourhood plans as well). It would lead to widespread, speculative proposals coming forward, and these would have to be determined in a non-plan led way. It appears inevitable that East Cambridgeshire would exit a plan led system and enter a planning by appeal system, and such a system would exist for many years. It is therefore the Council's strong opinion that the Inspector's proposed changes would have wide reaching implications and be a far more significant change to the Plan than that now proposed by the Council.
- 3.5 Nevertheless, the Council accepts that if the submitted Plan is not considered sound (that being the Inspector's preliminary finding), then any suggested modifications put forward by the Council must be capable of being found sound.
- 3.6 What the Council proposes is a simple solution, requiring very little modification to the submitted Plan, and of no material consequence to those whom will implement the Plan. The Council proposes that the Plan, for housing requirement purposes, be rebased to April 2022. By doing so:
- This approach would remove any 'hybrid' approach the Inspector has concerns with, and avoids introduction of an alternative hybrid approach. The Council would simply adopt the standard method for the entire plan period. Such an approach would pass all four tests of soundness.
  - It would address past under-delivery concerns. The standard method directly addresses under-delivery. By rebasing the plan, and only relying on the standard method, there is also no double counting of past under-delivery to be concerned about;
  - It would continue (like the submitted Plan) to provide a realistic and deliverable housing requirement, namely c5,400 homes for the period 2022-31, which is still a significant boost to housing delivery compared with recent past (2,981 homes were delivered in the past nine years, so 5,400 would be close to doubling that rate), and would deliver a very high annual growth rate of over 1.5% on existing dwelling stock (a figure rarely matched anywhere in the country);

- It would avoid the need to reopen Duty to Cooperate conversations and avoid the need for widespread updates to HRA and SEA evidence, and the unknown implications of such; and
- It would, ultimately, put in place a plan-led system for East Cambridgeshire, one which is consistent with NPPF para 16, with ample time for a full update of the Local Plan to take place well before the end date of the Plan.

## 4 Detailed calculation of local housing need

- 4.1 The submitted Plan sets out in detail the method and calculation of the 'local housing need' (LHN) using a method consistent with national policy (see section 4 of CD03). For ease of reference, that calculation is set out below, but for the avoidance of doubt this topic paper makes no attempt to change the method, the inputted variables or the resultant LHN figure arising.
- 4.2 The resultant LHN figure therefore remains 599.78 dwellings per year. This was the submitted figure, and (in accordance with NPPG advice Reference ID: 2a-008-20190220), can be relied upon for 2 years from submission.
- 4.3 It is also worth noting that there were no substantive objections to the calculations raised during the consultation period.
- 4.4 Nevertheless, for ease of reference, the calculations are repeated below:

### 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 – 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 \(www.gov.uk\)](http://www.gov.uk))

### 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

$423.5 \text{ (Step 1)} \times 1.41625 \text{ (Step 2)} = 599.78$

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

- 4.5 For the further avoidance of doubt, should any variable be updated prior to adoption of the Plan (such as an update to the affordability adjustment), the Council is not seeking to adjust the calculation as set out above, and instead will rely on the submitted figure.

## Rationale for setting the dwelling requirement derived from the minimum local housing need

- 4.6 Establishing the dwelling requirement based on the LHN is entirely consistent with the approach set out in national policy, and is the approach set out in the submitted plan (and as defended at the recent hearing session in November).
- 4.7 As the Council is not seeking in this topic paper any change of approach, it simply repeats in this topic paper what it previously has said on this matter:

### **Regulation 19 and Submitted Plan (CD03):**

*“3.7 The Council proposes to establish the new housing requirement in line with national policy (see section 4 in [CD03] 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.*

### **ECDC response to Q7 and Q12 of the Inspector’s Initial Questions:**

Q7 Did the Council consider whether there should be an adjustment to the minimum housing requirement to help deliver affordable housing as per the PPG (Paragraph: 024 Reference ID: 2a-024-20190220)?

*The Council is not reviewing its affordable housing policy as part of the SIR.*

*As it is not reviewing that policy, it would seem somewhat illogical to amend a housing requirement figure, if the affordable housing policy itself is not being adjusted.*

*That said, the standard method already provides a very significant uplift to address affordability (approaching 50% in East Cambridgeshire’s case).*

*If the Inspector deems it necessary to investigate affordable housing needs, and whether an uplift is necessary, then the latest SHMA, October 2021, (<https://cambridgeshireinsight.org.uk/wp-content/uploads/2021/10/CWS-Housing-Needs-of-Specific-Groups-Oct21.pdf>) confirms at para 10.160 that the latest identified need for affordable housing in the district is 215 to rent and 39 for home ownership, a total 254 per annum (though it cautions that these figures may have an element of double counting – see 10.158)*

*The Council is proposing an annual housing requirement for the 9 year period to 2031 at 599.8 pa. As a proportion, therefore, affordable housing ‘need’ (254pa) is 42% of the proposed housing requirement.*

*A perhaps more accurate calculation is to determine the degree affordable housing need is met by the supply identified in the SIR. Supply is identified as being 7,371 for the nine year period*

2022-2031, at average of 819 homes pa. As a proportion of that supply, affordable housing need (254pa) is 31%

The Local Plan 2015 policy seeks 30-40% affordable housing. Whichever figure is used from above (31% or 42%), it is very close to the policy requirement.

There is, therefore, very limited evidence, if any, to justify a further adjustment (i.e. beyond the affordability adjustment in the standard method) to the housing requirement figure, and certainly the evidence is not so compelling as to find the SIR unsound for not including an uplift.

A comprehensive review of the housing policies, including affordable housing policy, is a matter for a full Local Plan update to consider

Q12 Would the Council please confirm whether it considers that section 010 Reference ID: 2a-010-20201216 of the PPG, which is concerned with when might it be appropriate to plan for a higher housing need figure than the standard method indicates applies in this case?

No, those scenarios do not apply.

See SIR paras 3.7-3.8 as to why the Council considers that position to be reasonable, with similar justification set out in our response to representations in CD0-5(C).

#### **ECDC response to Matter 2, Q14:**

Q.14 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a010-20201216)?

*It is important to remember that the soundness test applies to 'policies in this Framework and other statements of national planning policy'. The Courts have made it clear that the NPPG (to which the Inspector is referring in this question) is not national policy, and therefore does not directly apply to the tests of soundness<sup>1</sup>. Mrs Justice Lieven said in that case:*

*"[33] In my view the NPPG has to be treated with considerable caution when the Court is asked to find that there has been a misinterpretation of planning policy set out therein... As is well known the NPPG is not consulted upon, unlike the NPPF and Development Plan policies. It is subject to no external scrutiny... It can, and sometimes does, change without any forewarning. The NPPG is not drafted for or by lawyers, and there is no public system for checking for inconsistencies or tensions between paragraphs. It is intended, as its name suggests, to be guidance not policy and it must therefore be considered by the Courts in that light."*

*It is therefore important in the first instance to review what the NPPF says, as that forms the basis of national policy against which the plan should be tested (and not the NPPG).*

*At para 61, it makes it clear that to determine 'the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.'*

*The same para states: 'In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*

*Thus, the NPPF refers to a 'minimum' number derived from the standard method, and a potential top up of that arising from unmet need from its neighbouring authorities.*

*As far as the Council is aware there is no national policy, against which the Plan is being tested, which stipulates the council must consider other evidence which may indicate an uplift is required, other than any unmet need arising from its neighbouring authorities.*

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<sup>1</sup> See R (Solo Retail) v Torridge DC [2019] EWHC 489 (Admin) [33]-[34].



*In the Council's opinion, therefore, if the Inspector is to remain within the scope of the test of soundness and the judgement made by Mrs Justice Lieven, there is no need for the Inspector to consider whether or not there is any evidence to demonstrate an uplift in the housing need figure, other than to test whether an uplift is required due to unmet need from neighbouring authorities. To go beyond that scope, would arguably be going beyond what the Inspector is tasked to do.*

*Nevertheless, and for completeness, if it is determined that the NPPG guidance does form part of the soundness testing process, despite what Mrs Justice Lieven states ("it is...guidance not policy"), then the Council's position has been consistently clear through the preparation of the Plan: there is no evidence that any of the examples or suggestions in 2a-010-20201216 apply.*

Q.15 Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing as per the advice in the PPG (Paragraph: 024 Reference ID: 2a-024- 20190220)?

*The commentary under Q14 in respect of the use of the NPPG to form the basis of testing the soundness of plan equally applies to this question. There is nothing in the NPPF, for example, which states a council has to consider such evidence or consider an adjustment to its housing requirement accordingly.*

*Nevertheless, should the Inspector determine that this part of the NPPG does form the basis of testing the soundness of the plan, then the simple answer to the question is: no.*

*Not only is there no direct evidence, but the NPPG explains that the standard method already helps to address the affordability of homes in more general:*

*'The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.'*

*Paragraph: 006 Reference ID: 2a-006-20190220*

*A fuller response to this question is set out in EX.LA03(A), and the Council has nothing further to add.*

## **An explanation of why the Council considers that the Plan so amended should be found sound despite amended strategic policy GROWTH1 not looking ahead over a minimum 15 year period from adoption**

- 4.8 If the submitted Plan was amended in line with the Council's letter of 17 January 2023 (EX.LA09), there would be no material effect on the answer the Council has given to this question previously. Put simply, the end date of the Plan will remain 2031 (as per the current Local Plan 2015, the submitted Plan 2022, and the approach defended at the examination hearing).
- 4.9 Consequently, the submitted Plan, as amended, would continue to not look ahead over a minimum 15 year period, for reasons explained by the Council previously.
- 4.10 As the situation has not, and continues not, to be changed, the Council therefore repeats what it has previously said on this matter:

### **Regulation 19 and Submitted Plan (CD03):**

*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.*

### **ECDC response to relevant part of Q6 of the Inspector's Initial Questions:**

Q6 ... what is the evidence to justify the amended strategic policy GROWTH1 not looking ahead over a minimum 15-year period from adoption?

*There is nothing in law requiring a plan to have a 15 year period from adoption, and the NPPF at para 22 is clearly written with a full local plan update in mind (not a very small SIR).*

*There is also local precedent for a single issue review plan NOT having to comply with the '15 year period' rule set out by the NPPF. Adjacent neighbour Forest Heath (now part of West Suffolk) adopted a SIR of its housing requirement figure in September 2019, updating the housing requirement figure for the period to March 2031, a period of 11.5 years from adoption. See:*

*[Final-SIR-September-2019.pdf \(westsuffolk.gov.uk\)](#). At that time, the same 15 year 'rule' was included in the NPPF (para 22 of the 2018 version).*

*Overall, the Council's view is that imposing a minimum 15 year 'rule' on this SIR would be completely disproportionate (effectively causing this SIR to be abandoned); is not what the NPPF envisaged for circumstances like a SIR; and would be inconsistent with conclusions reached on past Inspector examined SIRs. Please also see response to question 11 Q8.*

### **ECDC response to Matter 2, Q11:**

Q.11 The amended Policy GROWTH1 would cover the period to 2031, and consequently will not look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22. What is the justification for this, and is the Plan positively prepared in this regard?

*The Council answered a similar question in its earlier letter to the Inspector (EX.LA03(A)), but for ease of reference will repeat the essence of that response here, under five sub headings: context; justification; positively prepared; precedence and conclusion.*

#### Context

*There is nothing in law requiring a plan to have a 15 year period from adoption, and the NPPF at para 22 is, it is argued, clearly written with a full Local Plan update in mind (not a very small SIR). That said, if the NPPF is taken literally, the Council understands why the question is being asked, and why some respondents have raised this issue.*

#### Justification

*The purpose of the Plan, as submitted, is to bring up to date a policy which is recognised as being out of date; it is bringing it up to date to meet the area's up to date objectively assessed need for housing; and in bringing up to date that policy, it is aligning that policy (as updated) so as to be in conformity with the rest of the plan (as unaltered).*

*To amend the policy in any other way (i.e. 15+ years approach) would result in an ineffective policy, contrary to the tests of soundness, because there would be disjoint between the updated policy looking to, say, 2040, and the rest of the plan (and its allocations) looking to 2031.*

*It is further worth pointing out in the evidence base (both the submitted and the updated evidence base document EXLA02), that committed supply beyond the plan period (2031) presently amounts to 2,325 homes, over 700 of which already have planning permission. At a*



housing requirement rate of 600 per annum, this equates to very nearly 4 years' worth of additional and identifiable supply of homes, from 2031 onwards. On the basis that in the remaining nine year plan period to 2031 we have identified 7,371 homes, which equates to over 12 years' worth of supply (i.e. 3 years' worth of 'buffer'), the plan and evidence as submitted (eg EX.LA02(B)) identifies over 16 years' worth of housing supply. So, whilst the 'end date' of the plan may well be only nine years, the supply of homes identified is significantly more, and indeed exceeds the 'minimum 15 year' aim set out in the NPPF for a full plan review.

### Positively prepared

The Plan is positively prepared because it is bringing up to date a policy which is recognised as being out of date; it is bringing it up to date to meet the area's up to date objectively assessed need for housing; and in bringing up to date that policy, it is aligning that policy (as updated) so as to be in conformity with the rest of the plan (as unaltered).

The alternative option to 'do nothing' (i.e. not update the out of date policy) would be the definition of not being positive.

### Precedence

There is both local and national precedent for a limited review of a plan not having to strictly comply with the '15 year' rule set out in the NPPF.

Adjacent neighbour Forest Heath (now part of West Suffolk) adopted a SIR of its housing requirement figure in September 2019, updating the housing requirement figure for the period to March 2031, a period of 11.5 years from adoption. See: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/Final-SIR-September-2019.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Final-SIR-September-2019.pdf). At that time, the same 15 year 'rule' was included in the NPPF (para 22 of the 2018 version).

Further afield, but far more up to date a case, the Inspector of this East Cambridgeshire Plan is presently examining a partial update of the Bath and North East Somerset Council Local Plan, albeit such a plan has already had the benefit of its hearing sessions. The same issue arises in that Plan / Examination. In his post hearing letter of 11 August 2022<sup>2</sup>, the Inspector states:

20. The NPPF in paragraph 22 says that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements in infrastructure.

21. The submitted Plan as a partial update to the adopted Core Strategy and Placemaking Plan, has a limited scope, with the intention that changes proposed are confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan. Consequently, the Plan is not seeking to amend the plan period, of 2011 to 2029. Inevitably, fitting with the Core Strategy timeframe means that the strategic policies which are proposed to be amended, or new strategic policies, would not look forward for a 15 year period from adoption.

22. Whilst the changes proposed in the submitted Plan are limited in scope and do not change the overall spatial strategy or the scale of development required, those amendments to policies considered necessary to address climate and ecological emergencies, such as that relating to wind energy development and the energy efficiency of buildings, are nevertheless significant.

23. I take into account the particular circumstances which led up to the point when the Council decided to prepare the Plan. The Council was preparing a new Local Plan (2016-2036) within the context of the West of England Joint Spatial Plan (JSP). However, following the withdrawal of the JSP, the Council paused the preparation of the

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<sup>2</sup> See <https://beta.bathnes.gov.uk/sites/default/files/EXAM%2018%20-%20Inspector%27s%20Post%20Hearing%20Letter%20110822.pdf>

*new local plan. This has been followed by the West of England Combined Authority preparing the SDS, alongside which the Council intends to undertake a full review of its Local Plan. Whilst the Council has set out its commitment to do this in its Local Development Scheme, this will nevertheless take time. I consider it pragmatic therefore, for an otherwise sound Plan (as amended) to proceed to adoption despite the plan period being unchanged, and amended/new strategic policies not looking forward for a 15 year period, in order to update policies so that they better address the climate and ecological emergencies, address certain local issues, replenish housing supply and maintain the necessary supply of housing land, and amend policies so they are up to date with national policy.*

*Thus, in the above case, the Inspector is taking a 'pragmatic' approach and allowing a Plan to proceed without strictly meeting the '15 year' national policy recommendation, despite (a) the plan having an end date of 2029 (which is two years earlier than the East Cambridgeshire Local Plan, so likely only have 6 or 7 years before its end date is reached post adoption) and (b) that partial update having a much wider scope than the submitted East Cambridgeshire Plan.*

*It is accepted that all Plans must be considered on their own merits and in their own context (albeit we have the benefit in this case of the same Inspector, so the context is well known to the Inspector in both places). Nevertheless, from the evidence available, it appears extremely hard to make a case that is 'pragmatic' for Bath and North East Somerset to proceed, but that it is not 'pragmatic' in East Cambridgeshire's case. If anything, the 'pragmatic' case appears stronger in East Cambridgeshire, because the end date is further away, and the scope of changes much more limited.*

#### Conclusion

*Overall, the Council's view is that imposing a minimum 15 year 'rule' on this SIR would be completely disproportionate (effectively causing this SIR to be abandoned); is not what the NPPF envisaged for circumstances like a SIR; and would be inconsistent with conclusions reached on past and currently examined partial updates of a Local Plan.*

## **A consideration of the implications, if any, for the sustainability appraisal and Habitats Regulations Assessment of the Plan**

- 4.11 In short, if the submitted Plan is modified in line with the Council's letter of 17 January 2023 (EX.LA09), there would be no material effect on the submitted SA (CD06) and HRA (CD07).
- 4.12 Those two documents were prepared on the basis of assessing the impacts (positive and negative) of the proposal in the submitted Plan, the proposal being to reset the housing requirement figure from 2022 onwards. The proposal in the Council's letter of 17 January 2023 (EX.LA09) would have the effect of that number remaining the same as the number in the submitted Plan. The implication of this, is that the SA and HRA as submitted remain valid, because the fundamental issue tested (the proposed housing requirement 2022-2031, and the reasonable alternatives) remain the same.
- 4.13 However, and as expressed in the Council's letter of 17 January 2023 (EX.LA09), if the submitted Plan is amended so that the effect being that the housing required to be delivered in the plan period comprised both the housing requirement plus the 'backlog' from 2011, then that would require a fundamental reconsideration of the two documents. That said, it is likely to result in only a limited change to the SA (CD06), because, in effect, the preferred option would simply shift to a rephrased Option 3 in the SA (i.e. a 'higher housing' figure than that in the submitted Plan). The decision maker (Council and Inspector) would then have to determine whether it was reasonable to proceed on the basis of option 3 (taking account of the greater negative findings set out under Option 3, than is presently the case of the submitted preferred option 1).
- 4.14 Of greater consequence is the implications for the HRA report.

- 4.15 This, similarly, was based on an assessment of implications arising from the submitted Plan, that submitted Plan having no new allocations or increased growth forthcoming from the Plan than was already committed and planned for.
- 4.16 If the housing to be delivered in the period was substantially increased (i.e. housing requirement + backlog), then the whole basis of the submitted HRA would fail. The conclusion in the submitted HRA states as follows:

*6.1.1 A screening assessment has been undertaken to identify the likely significant effects of the policies and proposals within the SIR (Regulation 19) publication draft Local Plan.*

*6.1.2 The SIR has only 1 main element to it, that being an updating of the policy GROWTH 1, and specifically the housing requirement figure within that policy. The proposed updated housing requirement figure has been tested against the level of commitments of housing growth already (i.e. sites with planning permission or sites allocated in the 2015 Local Plan or subsequent adopted Neighbourhood Plans).*

*6.1.3 It is demonstrated in the SIR that the quantum of housing proposed (the new housing requirement figure) is lower than the quantum of housing already committed (i.e. housing that is anticipated to be delivered with or without the SIR progressing to adoption). It is therefore proposed in the SIR that no further new site allocations be proposed, meaning no additional growth will arise as a consequence of the SIR.*

*6.1.4 The development provided for under those committed sites has already been subject to assessment under the Habitat Regulations at the project stage, including consultation with Natural England as the statutory conservation body. There is therefore no requirement to re-assess such commitments, because they have already been found to be acceptable by the relevant local planning authority as the competent authority, at a project level. In any event, even if they were 'reassessed' and such an assessment concluded potential for significant effects, the committed sites could be progressed in any event, with or without the proposals in the SIR. Any reassessment is therefore not only necessary, but would be a futile exercise if undertaken.*

*6.1.5 The same reasons above equally apply when considering the SIR in combination with other plans and projects.*

[summary table also included in the HRA at this point]

*6.1.6 Overall, therefore, it is the opinion of the Local Planning Authority that the SIR Local Plan, alone or in combination with other plans and projects, is unlikely to have any significant effects on any of the applicable protected sites*

- 4.17 It is clear that such a conclusion set out above would no longer be valid under a 'housing requirement + backlog' scenario.
- 4.18 Consequently, the HRA process would have to commence afresh, and would have to be prepared on the basis that the required number of homes to be delivered between 2022 and 2031 was significantly greater than the supply already committed (i.e. the opposite of both the submitted plan and the submitted plan as suggested by the Council to be modified).
- 4.19 Without prejudice to that updated HRA, it is highly likely that the proposal would not be capable of being 'screened out', and consequently the proposal would have to proceed to a full HRA. That full HRA would be time consuming and potentially costly, and with a very uncertain outcome. The option of simply passing the 'burden' of preparing HRAs down to future applicants is not permissible, never mind practical or efficient use of everyone's resource.
- 4.20 However, of course, all of the above is not the proposed course of action recommended by the Council. The Council is proposing that the submitted plan be modified by updating the base date of the Plan to 2022, meaning the number of homes required to be delivered between 2022-2031 would remain unaltered. The submitted HRA and SA would, consequently, remain valid perhaps with just some very limited minor non-consequential editing.

## **A schedule of suggested main modifications necessary to make the submitted Plan sound.**

- 4.21 Attached at appendix A is a full schedule of suggested main modifications compared with the Plan as submitted.
- 4.22 Appendix A therefore pulls together previously raised suggested main modifications (updating them where necessary), the Inspector's suggested modifications and further modifications to align with the approach in the Council's letter of 17 January 2023

## Appendix A – Schedule of Suggested Main Modifications

The following tables sets out the latest set of suggested modifications by the Council, in order to (in the opinion of the Council) make the Plan as submitted sound.

The layout of this Appendix A first identifies and replicates the ‘Proposed Change’ as set out in the Regulation 19 / Submitted Plan. This is included here for ease of refence, but is identical to that set out in section 8 of the Regulation 19 / Submitted Plan.

Immediately under each Proposed Change is a second table which identifies, in the Council’s opinion, the suggested modification necessary in order to make the submitted Plan sound. In this second table, only the modification to the submitted Plan is shown.

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Submitted Plan Proposed Change ref:	Explanation	Local Plan Text (as proposed to be amended by the submitted plan)
1	Front Cover amended by addition of the following under “April 2015”	<i>(as amended [add date of adoption])</i>

Modific-ation Ref	Explanation	Modification proposed, compared with the Submitted Plan
N/A	No modifications to Proposed Change Ref 1 proposed	N/A

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Submitted Plan Proposed Change ref:	Explanation	Local Plan Text (as proposed to be amended by the submitted plan)
2	Text Box at top of Page 1 amended as follows	<div style="border: 1px solid black; padding: 5px;"> <p>This East Cambridgeshire Local Plan Development Plan Document was adopted at a full meeting of East Cambridgeshire District Council on 21 April 2015, <b><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></b></p> </div>

Modification Ref	Explanation	Modification proposed, compared with the Submitted Plan
N/A	No modifications to Proposed Change Ref 2 proposed	N/A

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Submitted Plan Proposed Change ref:	Explanation	Local Plan Text (as proposed to be amended by the submitted plan)
3	Add new text after para 1.2.7 as follows	<b><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</i></b>



		<p><i>requirement figure in Policy GROWTH 1, together with some updating of the supporting text to Policies GROWTH 1 and GROWTH 4.</i></p> <p><b>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.</b></p>
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<b>Modification Ref</b>	<b>Explanation</b>	<b>Modification proposed, compared with the Submitted Plan</b>
N/A	No modifications to Proposed Change Ref 3 proposed	N/A

<b>Submitted Plan Proposed Change ref:</b>	<b>Explanation</b>	<b>Local Plan Text (as proposed to be amended by the submitted plan)</b>
4	Amend the supporting text 3.2.3-3.2.5 as follows	<p><b>Level of housing growth</b></p> <p>3.2.3 Following the abolition of Regional Spatial Strategies, the District Council is <b>was</b> responsible for identifying a housing 'target' in the <b>2015</b> 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 <b>for the 2015 Local Plan needed</b> <del>needs to be</del> justified and based on an objective assessment of need (paragraph 47 in <b>2012</b> National Planning Policy Framework). <del>This involves looking at housing needs and demands (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).</del> It also involves <del>co-ordination with the strategy of neighbouring authorities, and working together to ensure the needs of the</del></p>

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.
- 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).

		<ul style="list-style-type: none"> <li>• <del>Is consistent with the strategy for the Cambridge Sub-region (as set out in the Joint Planning Statement).</del></li> <li>• <del>Will be supported by appropriate levels of new infrastructure and services; and,</del></li> <li>• Will help to facilitate the delivery of appropriate levels of affordable housing to meet local needs over the Plan period.</li> </ul> <p><b>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.</b></p> <p><b><i>*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.</i></b></p>
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Modification Ref	Explanation	Modification proposed, compared with the Submitted Plan
4A	This suggested modification forms part of the wider suggestion that the Plan starting date, for housing requirement purposes, becomes 2022.	<p>No change to that submitted except to para 3.2.5 which is further updated (with strikethrough indicating the modifications necessary) as follows:</p> <p><b>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</b></p>

<p>Consequently, para 3.2.5 of the submitted plan no longer requires its second half, and can be deleted.</p>	<p>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). <b><i>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.</i></b></p> <p><del>*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.</del></p>
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Submitted Plan Proposed Change ref:	Explanation	Local Plan Text (as proposed to be amended by the submitted plan)
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"> <li>• Make provision for the delivery of 44,500 <b>xxxx*</b> dwellings in East Cambridgeshire, <b>comprised of a dwelling requirement of:</b> <ul style="list-style-type: none"> <li>- <b>[3,018 + 2021/22 housing completions] dwellings, for the eleven year period 2011-2022</b></li> </ul> </li> </ul> </div>

		<p>- <b>5,398 dwellings for the nine year period 2022-2031</b></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>In the period 2012 to 2031, the District Council will:</p> <ul style="list-style-type: none"> <li>• Make provision for at least an additional 3,000m<sup>2</sup> (net) of convenience and 10,000m<sup>2</sup> (net) of comparison retail floorspace in the district.</li> </ul> <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>	
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<b>Modification Ref</b>	<b>Explanation</b>	<b>Modification proposed, compared with the Submitted Plan</b>
5A	<p>This suggested modification forms part of the wider suggestion that the Plan starting date, for housing requirement purposes, becomes 2022. Consequently, GROWTH 1 should establish the housing requirement for the period 2022-2031 only</p>	<p>Compared with the submitted plan, modify as follows:</p> <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"> <li>• Make provision for the delivery of <del>xxxx</del> <b>5,398</b> dwellings <b>between 2022-2031</b> in East Cambridgeshire, <del>comprised of a dwelling requirement of:</del> <ul style="list-style-type: none"> <li>— <del>[3,018 + 2021/22 housing completions]</del> dwellings, for the <del>eleven year period 2011-2022</del></li> <li>- <del>5,398 dwellings for the nine year period 2022-2031</del></li> </ul> </li> <li>• 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.</li> </ul> </div>

		<p>In the period 2012 to 2031, the District Council will:</p> <ul style="list-style-type: none"> <li>• Make provision for at least an additional 3,000m<sup>2</sup> (net) of convenience and 10,000m<sup>2</sup> (net) of comparison retail floorspace in the district.</li> </ul> <hr/> <p><del>* 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</del></p>	
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Submitted Plan Proposed Change ref:	Explanation	Local Plan Text (as proposed to be amended by the submitted plan)
6	Para 3.5.6 will be consequentially updated as follows:	<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 <del>xxxxx</del>* dwellings, as set out in Policy GROWTH 1. The latest projections (as at <del>October 2021</del> September 2014) indicate that an estimated 12,000 <del>over 11,000</del> additional dwellings could come forward between 2011 and 2031, <b>with a further identifiable supply of over 2,000 dwellings beyond the plan period (i.e. post 2031)</b>. 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 <del>excludes</del> reference to, <b>or any assumed further supply from</b>, '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 <del>could be developed in the future</del> <b>two of which, out of the five identified, have recently received planning permission for development</b>. The supply from this source is <del>not anticipated to be required in strategic terms until</del>, <b>as anticipated, therefore coming forward in</b> the later part of the Plan period. Therefore, <b>whilst</b> 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, <b>in the meantime the principle of development coming forward on the Broad Areas is now established</b>. 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,</p>



		<p>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><i>* 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</i></p>
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Modification Ref	Explanation	Modification proposed, compared with the Submitted Plan
6A	<p>This suggested modification forms part of the wider suggestion that the Plan starting date, for housing requirement purposes, becomes 2022. Consequently, the text of 3.5.6 need modifying compared with that of the submitted plan.</p> <p>In addition, as discussed at the hearing session in November 2022, the text associated with the broad locations is in need of adjusting, as the submitted text was not justified.</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 <del>xxxxx</del>* <b>5,398</b> dwellings, as set out in Policy GROWTH 1. The latest projections (as at <del>October 2024</del> <b>August 2022</b>) indicate that over 11,000 <b>7,000</b> additional dwellings could come forward between <del>2014</del> <b>2022</b> and 2031, with a further identifiable supply of over 2,000 dwellings beyond the plan period (i.e. post 2031). The table 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, two of which, out of the five identified, have recently received planning permission for development. <del>The supply from this source is, as anticipated, therefore coming forward in the later part of the Plan period. Therefore, whilst the</del> <b>The</b> locations are broadly identified and it is intended that the specific site boundaries will be identified through the next Local Plan review, <del>in the meantime the principle of development coming forward on the Broad Areas is now established.</del> 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><del>* 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</del></p>

Submitted Plan	Explanation	Local Plan Text (as proposed to be amended by the submitted plan)
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Proposed Change ref:																																																										
7	Para 3.5.7, and table 3.2, will be consequentially updated as follows	<p>3.5.7 Further details of the various sources of housing <b>delivered, housing</b> 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 <b>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.</b> [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.</p> <p>Table 3.2 – Summary of estimated housing supply 2011-31</p> <table border="1" data-bbox="696 657 2056 1367"> <thead> <tr> <th data-bbox="696 657 869 863">Location</th> <th data-bbox="869 657 1037 863">Completions 2011/12–2012/13</th> <th data-bbox="1037 657 1205 863">Outstanding commitments as at 1.4.13</th> <th data-bbox="1205 657 1373 863">Large potential sites</th> <th data-bbox="1373 657 1541 863">Small windfall sites</th> <th data-bbox="1541 657 1709 863">Specific rural sites</th> <th data-bbox="1709 657 1877 863">Allocations</th> <th data-bbox="1877 657 2056 863">TOTAL</th> </tr> </thead> <tbody> <tr> <td data-bbox="696 863 869 967">Market towns</td> <td data-bbox="869 863 1037 967">458</td> <td data-bbox="1037 863 1205 967">950</td> <td data-bbox="1205 863 1373 967">315</td> <td data-bbox="1373 863 1541 967">241</td> <td data-bbox="1541 863 1709 967">0</td> <td data-bbox="1709 863 1877 967">5849</td> <td data-bbox="1877 863 2056 967">7782</td> </tr> <tr> <td data-bbox="696 967 869 1031">Ely</td> <td data-bbox="869 967 1037 1031">95</td> <td data-bbox="1037 967 1205 1031">145</td> <td data-bbox="1205 967 1373 1031">56</td> <td data-bbox="1373 967 1541 1031">68</td> <td data-bbox="1541 967 1709 1031">0</td> <td data-bbox="1709 967 1877 1031">3679</td> <td data-bbox="1877 967 2056 1031">4043</td> </tr> <tr> <td data-bbox="696 1031 869 1094">Soham</td> <td data-bbox="869 1031 1037 1094">260</td> <td data-bbox="1037 1031 1205 1094">256</td> <td data-bbox="1205 1031 1373 1094">40</td> <td data-bbox="1373 1031 1541 1094">114</td> <td data-bbox="1541 1031 1709 1094">0</td> <td data-bbox="1709 1031 1877 1094">1620</td> <td data-bbox="1877 1031 2056 1094">2290</td> </tr> <tr> <td data-bbox="696 1094 869 1158">Littleport</td> <td data-bbox="869 1094 1037 1158">103</td> <td data-bbox="1037 1094 1205 1158">549</td> <td data-bbox="1205 1094 1373 1158">188</td> <td data-bbox="1373 1094 1541 1158">59</td> <td data-bbox="1541 1094 1709 1158">0</td> <td data-bbox="1709 1094 1877 1158">550</td> <td data-bbox="1877 1094 2056 1158">1449</td> </tr> <tr> <td data-bbox="696 1158 869 1222">Villages</td> <td data-bbox="869 1158 1037 1222">200</td> <td data-bbox="1037 1158 1205 1222">321</td> <td data-bbox="1205 1158 1373 1222">276</td> <td data-bbox="1373 1158 1541 1222">421</td> <td data-bbox="1541 1158 1709 1222">70</td> <td data-bbox="1709 1158 1877 1222">659</td> <td data-bbox="1877 1158 2056 1222">1947</td> </tr> <tr> <td data-bbox="696 1222 869 1367">Rural windfall estimate</td> <td data-bbox="869 1222 1037 1367">-</td> <td data-bbox="1037 1222 1205 1367">-</td> <td data-bbox="1205 1222 1373 1367">-</td> <td data-bbox="1373 1222 1541 1367">471</td> <td data-bbox="1541 1222 1709 1367">-</td> <td data-bbox="1709 1222 1877 1367">-</td> <td data-bbox="1877 1222 2056 1367">471</td> </tr> </tbody> </table>	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
Location	Completions 2011/12–2012/13	Outstanding commitments as at 1.4.13	Large potential sites	Small windfall sites	Specific rural sites	Allocations	TOTAL																																																			
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Rural windfall estimate	-	-	-	471	-	-	471																																																			

Broad locations	-	-	-	-	-	-	1,800
TOTAL	658	1274	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**

Site Status at 01 April 2021		Total Delivered 2011-2021	Total Supply 2021-2026	Total Supply 2026-2031	Total Supply 2021-31	Total Supply Post 2031
Planning permission		3,018	3,930	1,760	5,690	698
Dwellings allocated in development plan, without consent at April 2021			346	641	987	115
Dwellings on unallocated sites and without consent at April 2021			1	0	1	0
Other supply	Dwellings with insufficient evidence that they will be delivered within first five year period		0	1,004	1,004	1,195

			<i>Windfall allowance</i>		<b>150</b>	<b>250</b>	<b>400</b>	<b>N/A</b>
			<i>Older people's accommodation (C2)</i>		<b>97</b>	<b>0</b>	<b>97</b>	<b>0</b>
			<b>Totals</b>	<b>3,018</b>	<b>4,524</b>	<b>3,655</b>	<b>8,179</b>	<b>2,008</b>
			<b>Grand Totals</b>	<b>11,197</b> <b>(Housing Supply 2011-2031)</b>				<b>2,008</b> <b>(Housing Supply Post 2031)</b>

<b>Modification Ref</b>	<b>Explanation</b>	<b>Modification proposed, compared with the Submitted Plan</b>
7A	<p>Adjustment to para 3.5.7 to insert a housing trajectory illustrating the expected rate of housing delivery over the plan period, as required by para 74 of the NPPF.</p> <p>Table 3.2 further updated, to reflect the August 2022 published Five Year Land Supply Report, as follows:</p>	<p>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 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. <b><u>At the time of writing, the latest housing trajectory setting out the deliverable supply of housing per year is set out below:</u></b></p>

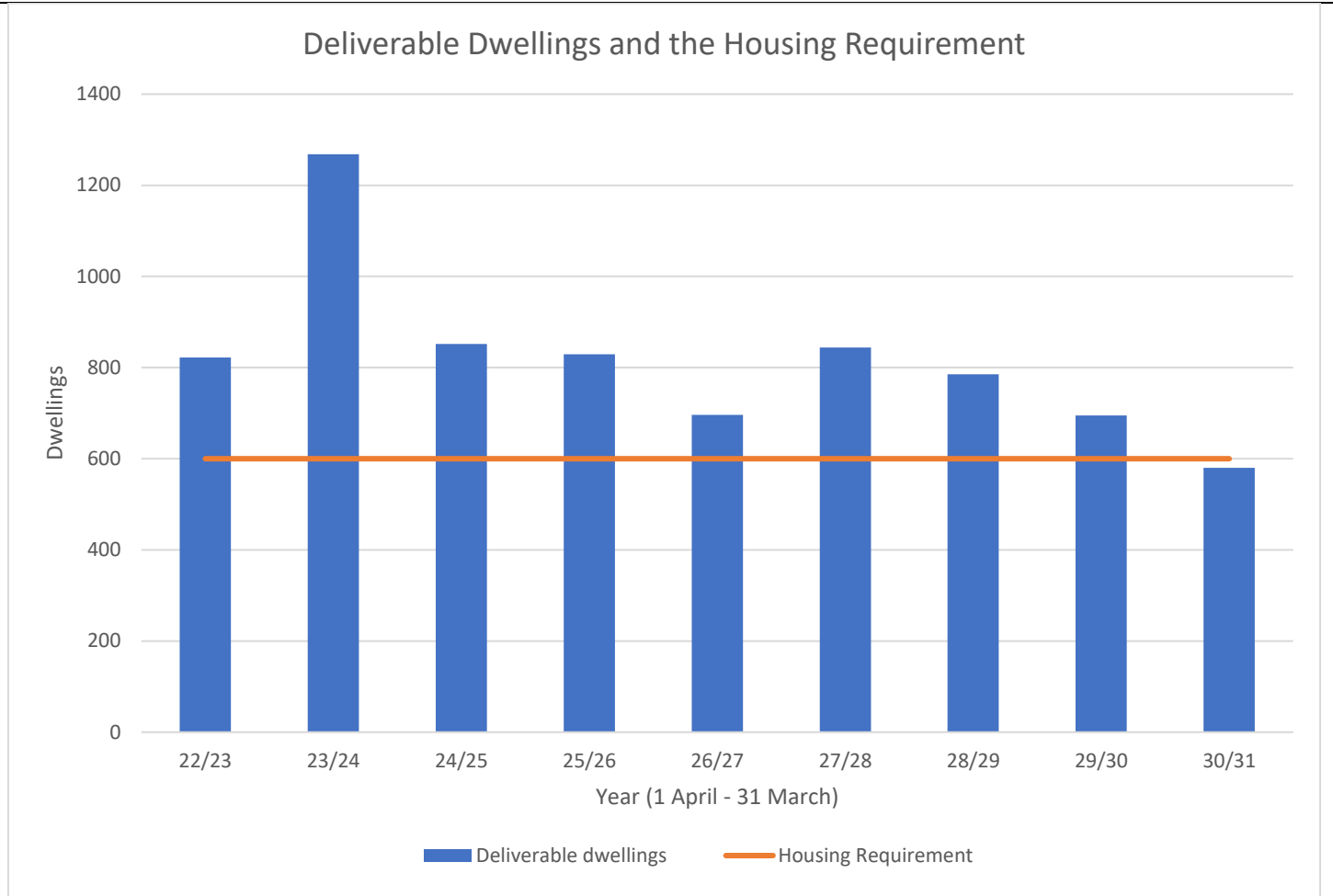


Table 3.2 – Summary of estimated housing supply 2011-31<sup>±</sup>

~~\*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.~~

<b>Site Status at 01 April 2021</b>		<b>Total Delivered 2011-2021</b>	<b>Total Supply 2021-2026</b>	<b>Total Supply 2026-2031</b>	<b>Total Supply 2021-31</b>	<b>Total Supply Post 2031</b>
<b>Planning permission</b>		<b>3,018</b>	<b>3,930</b>	<b>1,760</b>	<b>5,690</b>	<b>698</b>
<b>Dwellings allocated in development plan, without consent at April 2021</b>			<b>346</b>	<b>641</b>	<b>987</b>	<b>115</b>
<b>Dwellings on unallocated sites and without consent at April 2021</b>			<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>Other supply</b>	<b>Dwellings with insufficient evidence that they will be delivered within first five year period</b>		<b>0</b>	<b>1,004</b>	<b>1,004</b>	<b>1,195</b>
	<b>Windfall allowance</b>		<b>150</b>	<b>250</b>	<b>400</b>	<b>N/A</b>
	<b>Older people's accommodation (G2)</b>		<b>97</b>	<b>0</b>	<b>97</b>	<b>0</b>
<b>Totals</b>			<b>3,018</b>	<b>4,524</b>	<b>3,655</b>	<b>8,179</b>
<b>Grand Totals</b>		<b>11,197 (Housing Supply 2011-2031)</b>				<b>2,008 (Housing Supply Post 2031)</b>



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

		<b><u>Totals</u></b>	<b><u>4,467</u></b>	<b><u>2,904</u></b>	<b><u>7,371</u></b>	<b><u>2,325</u></b>	
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