



East Cambridgeshire
District Council

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

Stage 1 consultation

March 2021

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Introduction

East Cambridgeshire District Council is commencing a Single Issue Review (SIR) of its adopted Local Plan. This document outlines the scope of the review and how you can be involved in helping us with this SIR.

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

We are currently at the first stage in the SIR process and are consulting on the proposals.

How to make comments

This is the first opportunity for you to make comments on the emerging SIR. Please note that anybody can make comments, though please be aware the scope of the proposals outlined is quite narrow and most aspects of the proposals are quite technical in nature.

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

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

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

This first consultation, undertaken under Regulation 18 of *The Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended), will be for just over 6 weeks. The start date for making comments is Friday 26th March, and the closing date for all comments is at 23:59 on Friday 7th May 2021. Any comments received after this date will not be considered. Two further rounds of consultation are anticipated before the Plan proceeds to independent examination by an Inspector.

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

Please note that representations received cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. Please do not include any telephone numbers or signatures as we do not require this information. The Council respects your privacy and is committed to protecting your personal data. Further details on the Privacy Notices is available on our website <https://www.eastcamb.gov.uk/notices/privacy-notice>

Policies Map

Any reference to the terms Policies Map in this document relates to the adopted Policies Map (April 2015) as amended by any subsequently made Neighbourhood Plans. At this stage no changes are proposed to the Policies Map. If any changes are proposed to the Policies Map this will likely to be included in the next consultation version of this document, due to be published later in 2021.

Further information can be obtained from:

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

Telephone: 01353 665555

Email: planningpolicy@eastcambs.gov.uk

1. What stage are we at?

- 1.1 This is the first stage in a process of producing a Single Issue Review (SIR) of the Local Plan. This first stage (also sometimes known as a 'Regulation 18' consultation stage) of the Local Plan captures the issues we intend to address and sets a steer as to how we propose to tackle those issues.
- 1.2 As outlined in the timetable below, the SIR Local Plan process has a number of formal statutory stages which will take place over the next few years. This first stage consultation document is the first main formal stage in the process. Its main purpose is to seek views as to whether, within the scope set by the SIR, the right issues are covered and that all suitable options for accommodating change are considered. This is your opportunity to feed into the SIR Local Plan process at an early stage.

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

2 Why this Single Issue Review (SIR) is Needed

- 2.1 The Council's current Local Plan remains its 2015 version, adopted in April 2015¹.
- 2.2 Being greater than five years old, it was necessary (by law) to regularly review its content to determine how 'up to date' it is. The Council undertook, and published, a second formal Review in April 2020². That Review, in summary, concluded that the:

"...Local Plan 2015 does require to be revised, but only partially and only in respect of its strategic housing policies. Of those policies, Policy GROWTH1 needs to be revised, because it has an out of date housing requirement. Other strategic housing policies may also be updated during the course of updating GROWTH1, should that be necessary.

The rest of the Local Plan is considered to not, at the present time, be in need of updating, therefore a full update of the Local Plan is not considered necessary.

However, whilst only one policy has been identified in need of updating, this does not prevent the Council from commencing preparation of a new Local Plan, in whole or part, on matters as it sees fit."

- 2.3 The Council has considered three subsequent options to address the above conclusions. The options were as follows:

Option 1: Do as the Review in April 2020 concluded, and limit any update of the Local Plan to the matters identified in the Review, namely GROWTH1 and its housing requirement, and possibly, consequentially, other policies if strictly necessary; or

Option 2: Go beyond what the Review in April 2020 concluded, and do a more comprehensive or full new Local Plan; or

Option 3: Do nothing at present, and await further progression of Government's Planning White Paper to see whether to progress Option 1, Option 2 or, instead, simply wait for the new planning system to commence (under the provisions of what the Planning White Paper proposes) and start a new Local Plan on that basis.

- 2.4 Option 1 was selected by the Council as the way forward. For the avoidance of doubt, we are not seeking any representations as to whether the Council was correct to proceed on the basis of Option 1.

3 The Proposed Changes

- 3.1 The Council proposes to undertake the following six 'Proposals' as part of this SIR. Your views on each are welcome. Once we have received and carefully considered such views, we will proceed to prepare the detailed proposed updated wording for the Local Plan, and consult you again on that detailed wording later this year.

Proposal 1 – Scope of Changes

- 3.2 The Council intends, in line with its April 2020 formal review of its Local Plan referred to above, to focus the changes arising from the SIR to section 3.2 (Level of Growth) and 3.5 (Delivery of Growth) of the 2015 Local Plan, and specifically:

- Paragraphs 3.2.3 – 3.2.5, under the sub-heading 'Level of housing growth';
- Policy Growth 1, but limited to the first bullet point of Growth 1 only (which relates to the housing requirement for the district); and
- Paragraphs 3.5.5 – 3.5.7, under the sub-heading 'Housing delivery', this being necessary as a consequence of updating the above.

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

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

Proposal 2 – Plan Period

- 3.3 The Council does not intend to amend the overall 2015 Local Plan Period of 2011-31. To do so would likely have wider implications beyond the intention of the SIR.

Proposal 3 – Site Allocations

- 3.4 The Council does not propose to provide any further allocations in its Local Plan as a consequence of this SIR. This is because the volume of existing housing site 'commitments' (such as sites with planning permissions and other sites which are allocated for development via the 2015 Local Plan or more recent Neighbourhood Plans) will, it is anticipated with a high degree of confidence, comfortably exceed the quantum of the new housing requirement figure. Consequently, no new allocations would be necessary. Further details on this are set out below.

Proposal 4 – the Housing Requirement

- 3.5 The Council proposes to establish the new housing requirement in line with the national standard method for calculating a housing requirement (see later in this document for an explanation of this). The Council does not presently intend, nor does it consider it likely as the SIR progresses, to deviate from that nationally derived housing requirement standard method. For example, it does not intend to seek to take any additional housing requirement from any other neighbouring district area, nor does it seek to 'offload' any housing requirement arising in East Cambridgeshire on to another neighbouring district area.

Proposal 5 – Broad Locations

- 3.6 The Council will review the guidance in section 3.5.5-3.5.7 of the Local Plan in respect of the 'Broad Areas for housing' it discusses (such Areas only being at Littleport and Soham). Following that review, the Council will determine whether it is necessary to retain such Broad Areas or retain the Broad Areas with any updated guidance or explanation of them. There is no present intention to 'firm up' such Broad Areas as formal allocations.

Proposal 6 – consequential changes

- 3.7 The Council intends to add any necessary, minor consequential changes to the plan such as brief text in section 1 of the Plan explaining the changes arising from this SIR, and the process of that SIR.

4 What will the new housing requirement figure (Proposal 4) likely be?

- 4.1 Unlike in 2015 (when the current Local Plan was adopted), Government policy now prescribes how a local area determines its housing requirement (or 'local housing need'), under what is known as 'the standard method'³. Whilst it is possible for a local area to derive a different housing requirement using a different local based method, national policy prescribes that such a local based method is only appropriate where "exceptional circumstances justify an alternative approach" (NPPF para 60). The Council is not aware of any such 'exceptional circumstances' which would apply in East Cambridgeshire.
- 4.2 The standard method involves a number of variables which are added into a formula to calculate the local housing need, which in turn can be converted into a local housing requirement. The data for each variable is established by government (or associated body, such as ONS), so there is no discretion for a local area to determine what each variable is. However, each part of the formula requires the latest available evidence to be used, which can mean the actual local housing need can change a number of times over any year, though usually such changes only make relatively minor adjustments to the final outcome. The variables are:
- ONS forecast of household growth (which can change every 2 years, though government presently require the 2014 based forecasts to be used, despite more recent ones being available).

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

- The latest 'affordability ratio' in the local area, which is an assessment of how affordable homes are to buy, in comparison with local income in the area. This ratio is normally updated every March.
 - What the 'current' or 'starting' year is. Thus, the variables may change slightly depending on the year being used as the baseline.
- 4.3 As at mid-March 2021 (and before the March 2021 release of housing affordability ratio, which was not published at the time of writing), the Council understands that the latest (i.e. from 1 January 2021) local housing need for East Cambridgeshire is 592.28 dwellings per annum, which means a total of 5,922 dwellings are needed between 2021-31.
- 4.4 To calculate the total housing requirement for the 'plan period', the housing requirement for 2011-21 will be established as being the housing delivered between 2011-2021. This is consistent with the national method (see NPPG Reference ID: 68-031-20190722⁴), which explains that "*Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure*".
- 4.5 We have yet to establish the precise quantum of housing delivered between April 2011-March 2021, but will do so in the coming months. However, we know that between April 2011-March 2020 the total (net) housing delivered was 2,613, so we expect the final figure for the full 10-year period 2011-21 to be around 3,000, perhaps slightly more.
- 4.6 Assuming 2011-21 is 3,000, this is then added to the housing requirement for 2021-2031 which, in turn, means the total housing requirement for 2011-2031 is likely to be approximately 8,922 (i.e. 3,000 + 5,922). It is proposed, therefore, that policy GROWTH1, as to be updated, will have a housing requirement of approximately 8,922, though this figure will be firmed up over the coming months. However, GROWTH1 will split this requirement into two elements, first for the period 2011-21, and second for the period 2021-31. By doing so, this will be consistent with calculations associated with 'five year land supply' (see our website for details of our five year land supply reports⁵).

5 Present Housing Supply

- 5.1 At least once a year, the Council publishes a Five Year Housing Land Supply report⁶. The latest version of that report is dated December 2020 (though an addendum was published in March 2021 to reflect the outcome of the latest government issued Housing Delivery Test results for East Cambridgeshire).
- 5.2 The December 2020 report identifies a total supply as follows:
- Years 2020/21-2024/25 (the 'five year' period) = 4,362 dwellings
 - Years 2025/26-2030/31 (years 6-11) = 5,813 dwellings
 - Total 2020/21-2030/31 (11 years) = 10,175 dwellings
- 5.3 As can be seen, therefore, the Council can demonstrate a total supply over the 11 year period to 2020-2031 of 10,175 homes. This figure will be updated at some point in 2021, to cover the 10-year period 2021-2031, to match this SIR. However, we anticipate such a figure to be close to 10,000 homes, perhaps slightly above or slightly under.
- 5.4 It is therefore evident to the Council that the new housing requirement (presently calculated as being 5,992 dwellings, 2021-2031) will be far exceeded by the identified supply (around 10,000 homes).
- 5.5 It is for this reason that the Council does not presently propose to identify any further allocation as a consequence of this SIR, on the simple basis that supply already meets the requirement; indeed, supply is almost double the requirement.

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

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

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

- 5.6 Any new allocations will, therefore, be a matter for a future full update of the Local Plan (or, via any Neighbourhood Plans prepared in the district).

6 Consultation Questions

- 6.1 To assist the Council in progressing this SIR, it would particularly welcome views on the following matters:

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

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

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

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

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

- 6.2 As a reminder, we are not seeking views on any other aspect of the 2015 Local Plan, and we are not seeking any suggested new allocation sites. Please do not send to the Council any suggested sites for allocation in the Local Plan, as they will not be considered. If at any stage, either for this SIR or a future Local Plan, the Council seeks suggestions for new allocations, it will undertake a specific 'call for sites' process to do so. No such call for sites process is presently forecast.

7 Next steps

- 7.1 Once representations have been carefully considered from this first consultation, the Council will proceed to a further round of consultation. That consultation will set out the precise proposed changes to the 2015 Local Plan. We anticipate that consultation to take place later in 2021.