



Independent Examination: East
Cambridge Single Issue Review (2022)
Matter 2: Provision for Housing

Church Commissioners for England

October 2022

Matter 2: Provision for housing

Question 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?”

- 1.1. Paragraph 20 of the National Planning Policy Framework (July 2021) (‘NPPF’) sets out what is considered a strategic policy, these being policies that set out an overall strategy for the pattern, scale and design quality for:
 - Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and management, and the provisions of minerals and energy;
 - Community facilities (such as health, education, and cultural infrastructure); and
 - Conservation and enhancement of the natural, built, and historic environment, including landscapes and green infrastructure.
- 1.2. Additionally, paragraph 22 states:

“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.”
- 1.3. The revised Policy GROWTH1 must, on the basis of paragraph 20 of the NPPF, be considered a strategic policy. It should therefore as a “*minimum*”, “*look ahead*” over 15 years from adoption. Given that it is anticipated that the Plan will be adopted in October 2023, its time horizon should be extended to 2038 rather than the proposed 2031. This would ensure the Council can plan more effectively to respond to longer term opportunities, such as those linked to the Oxford-Cambridge Arc and would necessitate further consideration of the housing requirement.
- 1.4. It is the Church Commissioners’ view that emerging revision to Policy GROWTH1 is not currently “sound” as it does not comply with paragraph 22 of the NPPF and is therefore not “consistent with national policy” (as is required by paragraph 35 of the NPPF).

Question 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: 2a-010-20201216)?”

- 1.5. The Standard Method does not determine the housing requirement of an area, instead it should be used as a starting point. The national Planning Practice Guidance (‘PPG’) (most recently updated in June 2021), Paragraph: 010 Reference ID: 2a-010-20201216, states:

“The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”

“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;”*

- 1.6. The 2015 Local Plan states in para 2.3.1. that key issues for East Cambridgeshire are *“related to the challenges of growth and effects of population increase.... Due to its location within a growth area”*.
- 1.7. Additionally, the Government’s “Planning for Sustainable Growth” policy paper, published in February 2021, describes how districts covered by the Oxford-Cambridge Spatial Framework area have experienced considerable and consistent population growth (up 17% since 2000¹) second only to London in the UK.
- 1.8. Whilst the Church Commissioners appreciate that the 2014-Household Projections estimate used to calculate the local housing need figure will take into account some of the growth outlined in the “Planning for Sustainable Growth” paper, there is a clear upward trajectory since then which indicates a significantly growing population which is likely to be sustained into the future.
- 1.9. This concern is exacerbated by the acknowledgement from ONS that Household Projections are only useful “if recent trends continue” and that they do not take

¹ [Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework, February 2021](#)

into account policy, development aims, or extenuating circumstances.² The Commissioners are concerned therefore that the standard local housing need figure will not be an appropriate housing requirement for the region as investment and growth continues.

- 1.10. Considering the historical and anticipated growth in the region, the Commissioners disagree with the Council’s decision that *“no adjustment was necessary in translating the identified housing need into the housing requirement figure³”* as this is inconsistent with the Government’s ambition to *“increase housing supply⁴”*, and with the acknowledgement in the 2015 Local Plan that the district is in a growth area.
- 1.11. Policy GROWTH1 should be targeting higher growth than the Local Housing Need calculated using the Standard Methodology. The Commissioners consider that a housing requirement uplift should be utilised to support economic growth and ensure that the plan is future-proofed and provides flexibility, choice and competition in the housing market, reflecting PPG Paragraph: 010 Reference ID: 2a-010-20201216.
- 1.12. Currently, it is the Commissioners view that the East Cambridgeshire Single Issue Review fails the NPPF “tests of soundness” as identified in Paragraph 35.
- 1.13. The Commissioners’ view is that the Single Issue Review fails to *“positively prepare”* (NPPF, Paragraph 35(a)) for the level of growth anticipated across the region, as identified above. Additionally, the Single Issue Review also fails to follow the guidance in Paragraph 20 of the NPPF, as the revised Policy GROWTH1 does not *“look forward”* the minimum 15 years. Given that it is anticipated that the Plan will be adopted in October 2023, its time horizon should be extended to 2038, rather than the proposed 2031. Therefore, the Single Issue Review fails to be *“positively prepared”* (35(a)) and is inconsistent with national policy (35(d)).

² Household Projections, 2014-based: Methodological Report, Department for Communities and Local Government, July 2016

³ [East Cambridgeshire Local Plan – Single Issue Review – Proposed Submission Stage \(Reg 19\) consultation](#)

⁴ [Tackling the under-supply of housing in England, February 2022](#)

Question 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)?”

- 1.14. As set out in their representations to the Regulation 18 and 19 consultations, the Commissioners remain concerned with the Council’s preferred approach of focusing the review to a single issue (Policy GROWTH 1).
- 1.15. It is the Church Commissioners’ view that such a narrow scope does not fully consider wider economic considerations that warrant adjustments to the housing requirement established through the Standard Method, and subsequently the amount of affordable housing which should be delivered in the district.
- 1.16. The Council’s evidence base for the Single Issue Review references the challenges in housing affordability and provision.
- 1.17. The Council’s latest Annual Monitoring Report (December 2021) (‘AMR’) states *“the success of the Cambridge economy has caused the district to experience considerable recent pressure for housing growth. However, the pace of economic growth has not matched that of housing growth which has meant a significant recent increase in the level of out-commuting.”*
- 1.18. The AMR confirms that, on average, 47 affordable homes have been completed annually over the last 10 years. This is only 22% of the identified 215 affordable homes per annum required calculated in the 2021 Housing Needs of Specific Groups report prepared by GL Hearn⁵.
- 1.19. This issue is further detailed in the East Cambridgeshire Local Plan – Second Consultation Report (published March 2022), where the Council responded to concerns about affordability with:

“It is acknowledged that there is a need for more affordable housing, now, and almost certainly this will continue to be the case in the future. Delivery of new affordable housing is likely to be of significant weight when considering any development proposals.

However, the current Local Plan policies provide a sound framework for delivery of such homes, and there is no need for this narrow SIR to amend such policy. A comprehensive review of the housing policies, including affordable housing policy, is a matter for a full Local Plan update to consider.”
- 1.20. It is the Commissioners’ view that contrary to the Council’s position, the continued under-provision of affordable homes illustrates that current Local Plan policies are in fact failing to provide a successful framework for their delivery.
- 1.21. As per PPG Paragraph 024 Reference ID: 2a-024-20190220, an adjustment to the minimum housing requirement would help facilitate the greater delivery of affordable homes.

⁵ <https://cambridgeshireinsight.org.uk/wp-content/uploads/2021/10/CWS-Housing-Needs-of-Specific-Groups-Oct21.pdf>



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