



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

East Cambridgeshire Local Plan – Single Issue Review (SIR) Proposed Submission Stage Response Form

PLEASE USE BLACK INK TO COMPLETE THIS FORM

Please refer to 'Guidance notes on completing the Representation Form'

From 3 May to 13 June 2022, you can make representations on the soundness and legal compliance of the proposed submission Single Issue Review of the Local Plan. **All comments must be received by 11:59pm on 13 June 2022.** Responses made at this stage will be treated as formal representations and considered by an independent Planning Inspector: late submissions are unlikely to be considered by the Inspector.

Where possible, we prefer you to use this form when submitting your comments. This allows you to type your comments next to the policy or paragraph that you want to comment on. If you need any help in completing this form, please read the guidance note available on our website which explains how to make comments and how any comments will be dealt with. Please send your completed form either via email or through the post.

PART A: YOUR DETAILS

Data Protection and Freedom of Information	
All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments, including addresses, will also be available to view on request. By submitting this response, you are agreeing to these conditions.	
Name: Suzanne Nugent	Agent (if applicable):
Organisation (if applicable) : Cheffins Planning	Name:
Address: 76 Broad Street, Ely	Address:
Postcode: CB7 4BE	Postcode:
Email: [REDACTED]	Email:
Tel: [REDACTED]	[REDACTED]:
Signature: Suzanne Nugent	Date: 12.06.22

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

The Submission of the Local Plan for independent examination:
The Publication of the Inspector's Report:
The Adoption of the Local Plan:

Yes
Yes
Yes

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested change. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies**

If you need assistance please call 01353 665555

Please email completed forms to planningpolicy@eastcambs.gov.uk or post to:
Local Plan Consultation, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs CB7
4EE



for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the SIR Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	<input type="text" value="4.1"/>	Policy	<input type="text"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

SIR Local Plan	Yes	<input type="checkbox"/>	No	<input type="text" value="No"/>	Don't know	<input type="checkbox"/>
Sustainability Appraisal (SA)	Yes	<input type="checkbox"/>	No	<input type="text"/>	Don't know	<input type="checkbox"/>

Q3. Do you consider the SIR Local Plan is:

Positively Prepared	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
Justified	Yes	<input type="checkbox"/>	No	<input type="text" value="No"/>	Don't know	<input type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input type="text" value="No"/>	Don't know	<input type="checkbox"/>
Consistent with national policy	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the SIR Local Plan or SA.

Figures from the Standard Method are minimum estimates of local housing need and not binding housing requirements. Plan-makers may set housing requirements greater than the Standard Method or provide for less housing, subject to the provisions of the NPPF.

In exceptional circumstances the NPPF allows for an alternative approach to the Standard Method which also reflects current and future demographic trends and market signals. Planning Practice Guidance on housing and economic development needs assessments, paragraph 010, lists circumstances where it might be appropriate to plan for a higher housing need figure than the Standard Method indicates. Two of these exceptional circumstances apply in East Cambridgeshire:

- 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;
- An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

Firstly, the adopted Local Plan is clear that the district is a growth area. This is highlighted in paragraphs 2.2.1, "...The population has increased significantly in recent years and growth is expected to continue" and paragraph 2.3.1, "...a number of specific issues need to be addressed. These are mainly related to the challenges of managing high levels of growth and the effects of population increase. In recent years, East Cambridgeshire has experienced considerable population and housing growth due to its location within a growth area. In particular, the success of the Cambridge economy has had a profound effect as the relative affordability of housing, compared to Cambridge, has stimulated rapid population growth in East Cambridgeshire." The 2015 Local Plan sets out a long-term growth strategy to deliver the jobs and housing needed.

THANK YOU FOR TAKING TIME TO RESPOND

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Secondly, the District Council plans to deliver an ambitious programme of strategic infrastructure improvements. The East Cambridgeshire Infrastructure Investment Plan November 2017 (IIP) identifies infrastructure which, “is generally strategic in nature, insofar that its delivery is necessary to meet the strategic or cumulative needs of Local Plan growth across the district, or within a specific locality or geographic area.” Appendix 1 lists 49 strategic infrastructure improvements for delivery between 2016- 36. Just under two-thirds of these projects are costed, with a total estimated cost of over £170 million. A Community Infrastructure Levy (CIL) was introduced in February 2013, which provides funding towards these projects.

As advised in the PPG, it is clear that exceptional circumstances exist in East Cambridgeshire – a growth area with significant new strategic investment planned. Economic growth should be factored into an additional uplift on the baseline LHN figure derived from the Standard Method.

The area remains of key economic importance, generating substantial housing need which, combined with limited supply, means that housing is difficult to access at an affordable price. This then acts as a brake on economic growth and a driver of longer commuting patterns.

The affordability ratio is high, and steadily worsening. In 2011, the ratio was 7.92, in 2016 it was 9.47 and it now stands at 10.7 (2021). This has severely impaired the ability of new householders or those who wish to move out of the rented sector to afford housing. It represents a very serious situation in East Cambridgeshire and housing delivery rates have, until very recently, been much too low to address the problem. There is also an undersupply of affordable housing within the definition in the National Planning Policy Framework.

For these reasons, adoption of the Standard Method will do nothing to address the legacy of undersupply that worsens affordability and poverty for local residents. There is clearly a substantial affordable housing need in the District which supports the consideration of an upward adjustment to support affordable housing delivery. Such an adjustment would be in accordance with Government guidance. The PPG states that an increase in total housing figures should be considered where it could help deliver the required number of affordable homes. For example, in relation to the Local Plan for Bolsover District, the Local Plan Inspector concluded that a 10% uplift would be justified and effective.

To ensure that the Review is found sound, the housing requirement should be increased by at least 10% to ensure that the Local Plan can increase supply effectively and in turn seek to address the affordability crisis.

(Continue on a separate sheet if necessary)

Q5. If you answered ‘No’ to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the SIR Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

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(Continue on a separate sheet if necessary)

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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