



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: Dudley Developments	Agent (if applicable): Carter Jonas LLP
Organisation (if applicable):	Name: Brian Flynn
Address: c/o Agent	Address: Carter Jonas LLP One Station Square Cambridge
Postcode:	Postcode: CB1 2GA
Email:	Email: [REDACTED]
Tel:	Tel: [REDACTED]
[REDACTED] Jonas on behalf of Dudley Developments	
Date: 13/06/22	

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:

X
X
X

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:**



EAST CAMBRIDGESHIRE DISTRICT COUNCIL

East Cambridgeshire Local Plan – Single Issue Review (SIR)

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 Section 4: Housing Requirement

Q2. Do you consider the following to be legally compliant?

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

Q3. Do you consider the SIR Local Plan is:

Positively Prepared	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Justified	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Effective	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Consistent with national policy	Yes <input type="checkbox"/>	No <input checked="" 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.

Section 4 of the Proposed Submission SIR explains the housing requirement to be included in the replacement to Policy GROWTH 1. The proposed housing requirement is based on the local housing need calculation using the standard method set out in national policy and guidance, and no adjustments are applied to this figure. Section 4 of the SIR does not consider or assess the national guidance contained in Section Id:2a (Housing and Economic Needs Assessment) of the Planning Practice Guidance that identifies factors that might lead to an adjustment to the housing requirement, or Section Id.63 (Housing for Older and Disabled People) that explains how the housing needs of these groups should be addressed in development plans. In summary, the following factors support an upward adjustment to the housing requirement: East Cambridgeshire is within the Oxford to Cambridge Arc; the Cambridge and Peterborough Devolution Deal commits the authorities in the area, including East Cambridgeshire, to double economic output by 2040; the delivery of affordable housing in East Cambridgeshire has been poor; and there is an unmet need for older persons housing and extra care accommodation.

The SIR should be consistent with national policy and guidance on meeting housing needs. Paragraph 59 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 60 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 61 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, older people, students, renters and self-builders. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method. Paragraph 010 of Id.2a makes it clear that the standard method is the minimum starting point for determining local housing needs and acknowledges that there may be circumstances where actual housing need is higher than the standard method indicates, and includes a growth strategy and strategic infrastructure. Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes. It should be noted that an adjustment to the housing requirement to increase the supply of affordable housing is different to the affordability adjustment already factored into the standard method calculations. Section Id.63 of the Planning Practice Guidance explains how to identify and then meet the housing needs of older and

disabled people. Paragraph 006 of Id.63 expects plans to include policies to meet the housing needs of older and disabled people, and could identify the number of units of specialist housing for older people that is needed during the plan period. Paragraph 013 of Id.63 is flexible towards the allocation of sites, but acknowledges that allocating sites for specialist housing for older people provides greater certainty and encouragement to meet needs and is appropriate where there is an identified unmet need for this type of housing.

The housing requirement as described in Section 4 of the SIR does not go any further than the standard method and takes no account of any factors that would lead to an adjustment to the housing figure. The factors related to economic growth, strategic infrastructure, affordable housing and housing for older people are assessed in more detail below, to determine whether an adjustment should be made to the housing figure in SIR.

East Cambridgeshire is within the Oxford to Cambridge Arc, and was one of the local authorities that agreed a joint declaration with the Government to deliver the agenda for the Arc, including economic growth. The Government consulted on a Vision for the Arc between July and October 2021, and is due to publish a Preferred Options document in Spring 2022 and the Draft Spatial Framework document in Summer 2022. The Arc Spatial Framework is due to be adopted by 2023 and will set out development and infrastructure needs for the Arc to 2050. The Government will define the development needs for the Arc, and it is anticipated that, because of the potential for economic growth and the opportunity to address infrastructure constraints and deliver environmental improvements, those development needs would be high. East Cambridgeshire will have a role in meeting the development needs identified for the Arc, and this should be assessed to determine whether an adjustment to the housing requirement is needed.

The Cambridge and Peterborough Devolution Deal commits the authorities in the area to planning to double economic output by 2040, including East Cambridgeshire. The Cambridge and Peterborough Independent Economic Review (CPIER) considered that *“the aim of doubling GVA in this area by 2040 is realistic, and will be achieved in part by attracting knowledge-intensive businesses which would not locate elsewhere in the UK. Success here is of national significance. But it will only be attained if there is more ambition with regard to the development of new housing, and a careful prioritisation of infrastructure projects.”* (CPIER Final Report, September 2018, Preface). The Mayor of Cambridgeshire and Peterborough will in due course be preparing Strategic Spatial Framework Stage 2 document that will need to reflect the commitment to double economic output, and will be informed by an objective assessment of development needs including housing needs for Cambridgeshire and Peterborough. The housing requirement in SIR should assess whether an adjustment is required to reflect the commitment to double economic output contained in the Devolution Deal, and which applies to East Cambridgeshire.

There are a number of transport projects identified in the Cambridgeshire and Peterborough Local Transport Plan that relate to East Cambridgeshire, and include the following: capacity improvements on the A10 between Ely and Cambridge; capacity enhancements in Ely; a new railway station at Soham; a rail capacity study between Cambridge and Ipswich which includes the railway stations at Dullingham and Kennett; local improvements to the bus network along key corridors and connecting villages within East Cambridgeshire – see Greater Cambridge Partnership ‘Making Connections’ project; and, improvements to walking and cycling infrastructure. These transport infrastructure projects should be assessed to determine whether an adjustment to the housing requirement is needed.

It is noted in the latest monitoring information (Authority Monitoring Report for 2020/2021 (published in December 2021) that the delivery of affordable housing in East Cambridgeshire continues to be poor – see Table 6 in AMR and attached to these representations in Appendix 1. There are no years since the start of the plan period in 2011 when overall policy requirements for affordable housing have been achieved. The Bottisham appeal decision (Appeal Ref: APP/V0510/W/21/3282241) – attached with the representations to Section 2 – referred to affordable housing in East Cambridgeshire. Paragraphs 58 and 59 of the appeal decision highlight the affordable housing needs and delivery in East Cambridgeshire, and identifies a significant need for affordable housing, poor delivery of affordable housing that has led to a significant shortfall, and persistent under-delivery of affordable housing during the last 10 years. As highlighted in Paragraph 58 of the appeal decision, there is a shortfall in the delivery of affordable housing between 2011 and 2021 of 1, 281 dwellings. According to the Council’s Housing Register there are currently 9 households with a local connection to Dullingham with an affordable housing need. There will be an affordable housing need in most villages in East Cambridgeshire, which is not taken into account in the housing requirement. The need for affordable housing and the shortfall in the delivery of affordable housing are factors that should have been assessed to determine whether an adjustment to the housing requirement in SIR is needed. The fact that meeting affordable housing needs has not been assessed is not consistent with national guidance and is unsound. It is considered

that an upward adjustment should be made to the housing requirement in SIR to meet affordable housing needs in accordance with Paragraph 024 of Section Id.2a of the Planning Practice Guidance.

The Bottisham appeal decision also considered the need for older person housing in East Cambridgeshire. Paragraph 62 of the appeal decision confirms that adopted Policy GROWTH 1 does not address the needs for older persons or extra care accommodation, and as such is inconsistent with national policy and guidance and is out of date. Paragraphs 62 and 63 of the appeal decision identify the needs for older person housing and extra care accommodation in East Cambridgeshire, and at Paragraph 66 the Inspector concluded that the needs for both types of housing were acute and growing. It is noted in Paragraph 68 of the appeal decision that there are no applications, no site allocations, and no predicted completions in the next five years for extra care accommodation in East Cambridgeshire, and that the general housing site allocations cannot be relied upon to provide extra care accommodation. The Bottisham appeal provides a recent assessment of the needs for housing for older people and for extra care accommodation, and concluded that those needs are not being met by policies in the adopted East Cambridgeshire Local Plan including adopted Policy GROWTH 1. The proposed housing requirement in replacement Policy GROWTH 1 and the SIR does not assess or seek to meet the housing needs of older people, which is inconsistent with Paragraph 61 of the NPPF and unsound. It is considered that the SIR should identify the housing needs of older people in accordance with Section Id.63 including Paragraphs 006 and 013, and define policies to meet those needs and allocate sites because there is an unmet need for this type of housing.

In conclusion, there are economic strategies and transport infrastructure projects that will have an impact on the growth of East Cambridgeshire. There is a need to increase the supply and delivery of affordable housing in East Cambridgeshire. All of these factors indicate that upward adjustments are required to the housing figure derived from the standard method for East Cambridgeshire, and those adjustments should be applied to the housing requirement in replacement Policy GROWTH 1 in the SIR. There is an unmet need for older persons housing and extra care accommodation, which is not being met by the policies and allocations of the adopted East Cambridgeshire Local Plan. The SIR and the replacement Policy GROWTH 1 should identify the housing needs of older people, define policies to meet those needs, and allocate sites for this type of housing.

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.

The following changes are requested to Section 4:

- **It is requested that appropriate adjustments are made to the housing requirement in replacement Policy GROWTH 1 to reflect the factors identified in Sections Id.2a and Id.63 of the Planning Practice Guidance, and in particular to address affordable housing needs and older person housing needs.**

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?

Yes I do wish to participate at the oral examination

THANK YOU FOR TAKING TIME TO RESPOND

If you need assistance please call 01353 665555

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

(Office only) Ref:.....

APPENDIX 1**East Cambridgeshire AMR 2020-21 (December 2021)****Table 6: Affordable Housing Completions**

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	Total
Total Gross Completions (All Homes) (excludes C2 equivalent)	394	307	208	181	203	246	300	381	491	415	3,126
Affordable (Gross)	82	14	24	19	54	11	88	63	67	57	479
Percentage Affordable	20.8%	4.6%	11.5%	10.5%	26.6%	4.5%	29.3%	16.5%	13.6%	13.7%	15.3%