

Mr R. Kay
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The Grange Car Park,
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CB7 4EE

25th May 2022

Dear Sirs

EAST CAMBRIDGESHIRE DISTRICT COUNCIL; SINGLE ISSUE REVIEW OF 2015 LOCAL PLAN - PROPOSED SUBMISSION STAGE (REG 19) CONSULTATION

Catesby Estates submit this is representation to the consultation on the Single Issue Review of the adopted Local PINa: Proposed Submission (Reg 19) stage consultation.

As the Council note it is a legal requirement for the Council to review and where necessary update its local plan to ensure that it is compliant with national policy. However, Catesby are concerned that the Council has dismissed without much consideration extending the plan period or the potential for its minimum requirement to be greater than that established using the standard method, two aspects we consider to be key to ensuring the plan is consistent with national policy. We explore both these issues further below.

Plan Period

Catesby does not agree that the plan period should be confined to 2011-31 in line with the adopted Local Plan. Given that the review is not expected to be completed until late 2023, this will mean that the review looks forward only some eight years. This is inconsistent with Paragraph 22 of the National Planning Policy Framework which says:

“ 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. “

The only reason given in the consultation document for this decision is that extending the plan period would likely have wider implications beyond the intention of the SIR. We do not consider this to be a sound reason to ignore the requirements of paragraph 22.

We ask that the plan period be extended to 2041, recognising the NPPF provisions, which will take account of the effects of prospective infrastructure improvements including the dualling of the A10; it will also align the review with the period of the Local Plan review in the Greater Cambridge area. The Council will also be well aware of the plan for utility infrastructure and the length of time it can

take to deliver reinforcement of networks. A longer term horizon would enable water and power providers to plan better for the infrastructure needed in the 2030s and beyond.

Paragraph 20 of the NPPF outlines that a strategic policy is one that sets out the overall strategy for the pattern, scale and quality of growth and makes provision for that growth. The focus of this review is to update the Council's strategic policy GROWTH1 in its current local plan and more specifically the number of homes it is required to deliver as set out in this policy. As such this policy must be, on the basis of paragraph 20 in the NPPF, considered a strategic policy. The consequence of this is that any amendments to this policy should look ahead for at least 15 years following the adoption of any amended local plan. This may have wider implications and it will be necessary for the Council to consider those implications as part of this review, and address these where necessary, if the revised plan is to be considered sound.

Housing Requirement

Catesby do not agree that the housing requirement should be set solely on the basis of the nationally-determined standard method. The NPPF (paragraph 60) is clear that the standard method should inform the local housing need assessment, not determine it, and that this is in order to determine the minimum number of homes needed.

We submit that the review should use the standard method to derive a minimum figure, with scope also to take account of the impact of the dynamic growth in employment and housing demand within the travel-to-work area which comprises much of East Cambridgeshire. A failure to recognise these needs in neighbouring areas and, in the course of the review, to take account of changing employment patterns post-pandemic could render the resulting plan unsound.

The PPG also sets out at paragraph 2a-010 that there will be circumstances where it is appropriate to consider whether actual housing need is higher than is indicated by the standard method. Therefore, it will be important for the Council to consider whether there are any such scenarios facing East Cambridgeshire. For example, the Council will need to consider whether economic growth across Cambridgeshire will require a higher level of housing in the County and especially those with good transport links to Cambridge. The city has one of the fastest growing economies in the country, is constrained by Green Belt and is one of the least affordable areas outside of the South East. If the level of economic growth in Cambridge is to be sustained it will be important that its neighbours, such as East Cambridgeshire, understand whether the wider impacts of this growth would require a higher level of housing than that arrived at using the standard method.

Housing Supply

Catesby's concern relates to the housing trajectory that will be included as part of the Single Issue Review. In setting out the proposed amendments the Council have set out in table 3 a summary of estimated housing supply. However, we do not consider it to be sufficient to meet the requirements of paragraph 74 of the NPPF with regard to the inclusion of a housing trajectory in a local plan. In

order to provide the necessary clarity as to delivery expectations and supply across the plan period an annualised trajectory should be included as part of the review of the local plan.

Furthermore, the level of supply required to meet what we would consider to be the appropriate period over which housing needs should be considered. At present the housing requirement in East Cambridgeshire as calculated using the standard method, and the most recent data on affordability published in March, results in a minimum housing requirement of 616 dpa. Therefore between 2022/23 and 2037/38 – 15 years post adoption in 2023/24 – the Council will need to find sufficient land to deliver 9,872 new homes. Using table 3.2 on page 15 of the consultation document and table 3 in the Council's latest Five-year Housing Land Supply Report there is a total supply of 9,502 homes on identified sites post 2022/23. In order to ensure needs are met in full and the proposed amendments found sound further land will need to be identified by the Council.

Conclusion

Catesby are concerned that the SIR is fundamentally flawed, particularly in its approach to the plan period and the consequential impact this has on the number of homes the Council should be looking to plan for in future. Catesby would welcome the extension of the Plan Period to 2041 and that the housing requirement should be determined in response to evidence gathered during the review, with the national standard method providing a minimum baseline figure.

Yours faithfully



Dawn Adams
Senior Planning Manager

