



Gladman Developments Ltd

East Cambridgeshire Local Plan Examination

Matter 11 – Strengthening Communities

Issue 1: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to the provision of housing and affordable housing?

Dwellings with Higher Access Standards

Q48. What is the justification to require all housing within the district to be built to Building Regulations Part M (Vol 1) Category 2? Is there a quantified need and how does this requirement impact on viability of housing and its deliverability? Is the policy effective and consistent with national policy?

The Council's evidence base report PS.EVR6 provides very limited justification for the policy requirement for all new dwellings to be built to M4(2), merely referring to the fact that East Cambridgeshire has an increasingly aging population and noting that these older age groups are particularly prone to ill health and mobility issues.

Gladman submit that if the intention was for all housing to be of this standard the Government would not have included it as an optional standard. Consequently the Council need clear robust evidence to justify the policy requirement for all housing to meet this optional standard. This evidence isn't currently available and therefore the policy requirement is not justified.

Self-Build Homes

Q49. What is the justification for the 100 dwelling plus threshold set for self-build housing? Is such an approach justified, effective and consistent with national policy? What are the practical implications? Is the wording of this policy effective?

Gladman object to the requirement for a minimum of 5% of dwellings on schemes over 100 dwellings to be provided as serviced plots for self-build. These types of locations may not actually be

preferable for those wishing to build their own homes. It is considered that a more sensible and effective approach may be to provide for smaller serviced parcels to attract self-build and SME's to the market.

The proposed approach places the entire burden of meeting the duty to support self-build onto the development industry, rather than the Council looking at their own land and also the encouragement of landowners to provide for self-builders rather than this blanket policy on all schemes of 100 or more dwellings.

Gladman remain unclear of the justification and evidence base for the scale of self-build demand and the subsequent minimum 5% requirement on schemes over 100 dwellings. Gladman do not consider this policy requirement to be supported by robust evidence.

There may be situations where these self-build plots are difficult to deliver which could result in non-delivery of otherwise sustainable land for housing. This needs to be avoided through a flexible policy approach. In practical terms and to ensure the effective delivery of housing if this policy remains in the East Cambridgeshire Local Plan it needs to be flexible and have an appropriate mechanism whereby if self-build plots are not brought forward within a given time frame then they revert back to being delivered as market housing as part of the wider scheme. If there is the appetite and demand for self-build these are likely to be brought forwards relatively quickly.

Homes for older people

Q50. Is the wording of this element of Policy LP6 effective, clear and consistent with national policy? How does the occupancy of a development influence the visual impact of the proposal? How can a more positive approach be set out?

Gladman reiterate previous submissions which supported the inclusion of 'homes for older people' within Policy LP6. The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach within the Local Plan.

Notwithstanding the support for this element of Policy LP6, Gladman submit that the Council needs a robust understanding of the scale of this type of need across the District to ensure that they are planning to deliver the necessary accommodation to meet this need. The Local Plan also needs a positive and effective policy approach to ensure the delivery of this accommodation.

Policy LP6 states *"For major development proposals, it should be set out how such measures have been considered and incorporated into the proposals. Proposals will be refused which fail to demonstrate appropriate measures have been considered and incorporated, where it would appear to have been practical, likely viable and appropriate to have done so."*

Gladman object to the proposed policy wording as it is not considered that this would be effective at ensuring the housing needs of older people are met. The following text provides an example of the

type of policy wording, which takes a more positive approach and may be more appropriate and effective:

“The provision of purpose built and/or specialist accommodation with care for older people in sustainable locations will be supported in Main Settlements, Large Villages and Medium Villages. Schemes should also be considered in other sustainable settlements where there is a proven need. Apartments should be restricted for occupation by only those with care needs, include minimum compulsory care packages and should also include age restrictions and extensive range of communal facilities.

Schemes are expected to be promoted in partnership with an onsite 24/7 care provider to safeguard the delivery of care and support to residents.

Such schemes fall wholly within the auspices of C2 use, meet an otherwise unmet need for specialist accommodation for older people, deliver care and communal facilities and will not therefore be required to contribute towards affordable housing. “