
**EAST HERTFORDSHIRE DISTRICT COUNCIL – DISTRICT
PLAN 2011-2033 – EXAMINATION**

**EXAMINATION HEARING STATEMENT – MATTERS AND
ISSUES**

Prepared by Strutt & Parker on behalf of M Scott P LTD (I.D Number
1148547)

May 2018

East Cambridgeshire Local Plan Examination

Matter 2: Vision and Objectives and Development Strategy

Issue 2: Does the overarching development strategy for the Plan present a positive framework which is consistent with national policy, justified and effective, and will contribute to the achievement of sustainable development within the District?

- Q18. *Nearly half of the housing requirement set out within the submitted Local Plan is proposed to be delivered on strategic sites at Ely, Kennett, Littleport and Soham. Is the strategy and distribution of development justified, effective, positively prepared and consistent with the particular circumstances of East Cambridgeshire District?*
- 1.1 The Plan's focus on strategic sites, in particularly Littleport and Soham is not considered to represent an effective, positively prepared strategy given the viability issues associated with these two settlements. The Council's CIL Charging Schedule identifies these as the two areas in the district which are the least viable and as such attracting reduced levels of CIL contributions.
 - 1.2 This is further acknowledged in Policy LP6: Meeting Local Housing Needs, which reduces the affordable housing expectation from 30% down to 20% for Soham and Littleport. It is considered that the Plan should give greater weight to the issue of viability and accordingly be based on a more proportionate distribution of growth, focusing on parts of the district which perform more strongly in respect of viability, including the larger villages such as Haddenham.
 - 1.3 Paragraph 47 of the NPPF requires plans to identify a supply of specific deliverable sites in order to deliver a 5 year housing land supply. Footnote 11 states:
"to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realist prospect that housing will be delivered on the site within 5 years and in particular that development of the site is viable."
 - 1.4 Many of the Soham and Littleport allocations were carried forward from the 2015 Local Plan and have to date failed to deliver housing in any significant numbers.
- Q19. *Will the development strategy achieve the Council's vision and strategic objectives and deliver sustainable development for East Cambridgeshire? Does Policy LP3 clearly set out the distribution of development and is the settlement hierarchy justified? Does the evidence suggest that some settlements should be placed at different levels within the hierarchy? If so, what implications would this have, if any, on the development strategy?*
- 2.1 As set out above it is not considered that the development strategy will necessarily deliver the Council's vision and strategic objectives to deliver sustainable development. There are significant questions about the ability of the Soham and Littleport allocations to deliver housing over the Plan period, not least due to highways and flood concerns respectively. To be considered sound, the Plan should embrace a more proportionate approach which seeks to boost housing supply in the larger villages. Such an approach would be more appropriate given the rural nature of the district. Furthermore, a wider proportion of smaller sites across the larger more viable villages will be more likely to come forward, delivering higher CIL returns and higher percentages of affordable housing. Such an approach will be more likely

to deliver the Council's vision and objectives, and ensure that adequate levels of housing land supply are maintained.

- 2.2 While the new NPPF is still at the consultation stage, the Plan should take a proactive approach to site allocations which are realistic and deliverable. The consultation draft NPPF includes a new Housing Delivery Test, which can be taken as a clear direction of travel. It is not simply enough for the Plan to identify sufficient sites to meet its OAN, but these must also be sites which are deliverable and will enable the district to maintain its supply. While the table on page 13 of the Plan indicates the need to allocate sites to deliver 8,933 dwellings and the plan includes allocations for around 9,770 new homes, the Council has a historic record of under delivery. The Plan needs to deliver 542 dwellings pa however, in 2016/17 the indication is that only 232 homes were built. While the Plan includes larger strategic allocations, it also acknowledges the potential backlog and opts to use the 'Liverpool Method' for future five year supply calculations. The National Planning Practice Guidance advises that the shortfall should be addressed within the first five years of the (the Sedgefield Method).
- 2.3 It is not considered that the Plan's approach is one which will lead to the district significantly boosting the supply of housing. As such, the Plan should not be considered positively prepared, consistent with national policy and as such sound.