



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

EXAMINATION HEARING STATEMENT – MATTER 17

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

August 2018

East Cambridgeshire Local Plan Examination

Matter 17: Delivering a wide choice of high quality homes

Issue 1: Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy?

Introduction

This matter relates to the delivery of a wide choice of high quality homes. The Inspector has asked a series of specific questions about Council's approach which the authority will need to respond to in order to demonstrate that the plan is justified, effective and consistent with national policy. It is difficult to comment in any detail on these particular issues until the Council has produced its evidence and submitted it to the examination. More detailed debate will then be possible at the Examination Hearing. Set out below are some high level comments and observations on some of the issues which have been raised and are generally covered in more detail in our earlier submissions to the Examination.

Q63. What is the estimated total supply of new housing in the plan period 2016-2036? How does this compare with an annual requirement of 598 dwellings (1,960)? Would it be appropriate for the time scale of the plan to be reduced from 2016 – 2034 (as per the Council's letter of 3rd August 2018) and would such an approach be justified, effective and consistent with national policy?

- 1.1 In respect of the Council's housing land supply, if the table at paragraph 3.3.9 of the submission plan is adjusted to remove the redistribution from the wider Cambridgeshire and Peterborough Housing Market Areas, the remaining total to be allocated on sites has to be adjusted upwards from 8,933 to 10,058. Currently, the submission local plan makes provision, via allocations for around 9,770 new homes, which would represent a shortfall of 288 homes over the plan period.
- 1.2 The Council's suggestion that the plan period is adjusted indicates a very basic statistical approach to addressing the issue of this shortfall. It is acknowledged that the plan period would still extend over 15 years as required by the NPPF, however, when considered along with the Council's desire that the "Liverpool Method", should apply to supply calculations up to 2020, suggests that there is no serious attempt for the plan to positively address the housing supply backlog and boost delivery in the next five years. In order to significantly boost the supply of housing in the short term, clearly the plan needs to include more allocations in the more viable parts of the District on small to medium sized sites, and also encourage more proportionate levels of growth across the Large Villages. Until such modifications are made the plan cannot be considered to be justified, effective and consistent with national policy.

Q69. How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply not specifically identified? Can this be quantified?

- 2.1 The local plan carries forward the principle of development envelopes and countryside protection as within the 2015 local plan within Policy LP3. However, the plan acknowledges that whilst growth is mainly town-led there is "a significant emphasis on distributing growth proportionately across the District. However, this does not mean a detailed fixed growth percentage is applied to all settlements. Rather, it is simply saying that all areas should be considered for growth, on a broadly proportionate basis."

- 2.2 However, the plan does not seem to follow this principle through. For example, it is set out within the settlement hierarchy that Haddenham is the third largest of the Large Villages behind Sutton and Burwell, yet only 10% population growth is proposed, the third lowest level of growth out of the nine settlements within this category. Furthermore, the number of dwellings which will be delivered by comparison between the allocations and permissions is 14 dwellings below the number of dwellings proposed in Policy Haddenham 3, reducing projected growth by 9%.
- 2.3 In terms of quantifying the potential sources of supply not specifically identified, there is an opportunity for Haddenham to deliver some additional growth for the District. In particular, an outline application (LPA ref: 18/01041/OUM) has recently been submitted for the site at Land East of Metcalfe Way. If approved this would deliver a further 34 dwellings and represent a more proportionate level of growth for the settlement.

Q70. Has there been a persistent undersupply of housing? If so, is it appropriate that a buffer of 20% be applied?

- 3.1 It is clear that over recent years, there has been a persistent undersupply of housing. This is acknowledged in the forward to the submission local plan which states that:

"in 2014/15, we only built 163 homes across the whole district, and only a slightly higher figure of 181 homes in 2015/16 and 232 homes in 2016/17."

- 3.2 In fact, housing delivery has not been at a level necessary to meet the current annual requirements for the past 8 years. It is clear therefore that the District has a serious problem with housing delivery irrespective of housing land supply. The submission local plan should take a more realistic approach to dealing with the shortfall and the persistent undersupply of housing. This should be addressed within the first 5 years of the plan and a 20% buffer should be applied. Whilst the examination of this plan is subject to the 2012 Framework, it should be noted that the housing delivery test contained in the new Framework will come into effect in the first 5 years of the new local plan period.
- 3.3 There has also been a chronic shortage in the delivery of affordable housing – in 2016-17 only 11 affordable homes were delivered across the entire District. A large proportion of the new homes proposed in the submission plan are in the less viable areas and have a reduced requirement for affordable housing provision, which may still reduce further through viability testing.

Q71. How should the shortfall in delivery since 2016 be dealt with?

- 4.1 The shortfall in delivery should be dealt with by enabling the plan to embrace a more positive approach which seeks to boost housing supply in a more proportionate manner across the rural areas. Such an approach would be more appropriate given the rural nature of the District. Furthermore, a wider proportion of small and medium sized sites across the larger more viable villages such as Haddenham will be more likely to facilitate house delivery in the next five years. This is the appropriate way for the plan to boost housing supply and redress the backlog.