

EXAMINATION INTO EAST CAMBRIDGESHIRE'S LOCAL PLAN

**MATTER 17: DELIVERING A WIDE CHOICE OF QUALITY
HOMES**

PERSIMMON HOMES EAST MIDLANDS REPRESENTATION

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Matter 17: Delivering a wide choice of quality homes

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

Summary of Statement

1. PHEM is of the opinion that while it supports the timely conclusion of the examination of the Plan to adoption, it should be done so on the basis that the Plan is effective in addressing arising housing needs. As such, the reduction of the plan period and a stepped housing trajectory are ineffective means of achieving positive housing delivery.
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PHEM's response to the Inspector's Questions

Question 63) What is the estimated total supply of new housing in the plan period 2016 – 2036? How would this compare with an annual requirement of 598 dwellings (11,960)? Would it be appropriate for the timescale of the Plan to be reduced from 2016 – 2034 (as per the Council's letter of 3 August 2018) and would such an approach be justified, effective and consistent with national policy?

Question 63) (in part) Would it be appropriate for the timescale of the Plan to be reduced from 2016 – 2034 (as per the Council's letter of 3 August 2018) and would such an approach be justified, effective and consistent with national policy?

2. It is not justified, effective or consistent with national policy to reduce the Plan Period by two years to avoid providing the additional homes identified by the Inspector.
3. PHEM is in agreement with the Council that it is everyone's best interests to proceed to a timely adoption of the Local Plan. However, it is in the best interests of the residents and those in need of housing in East Cambridgeshire that the plan adopted is effective and delivers against the needs of the district.
4. The authority is advocating reducing the total number of dwellings to be planned for in this plan by two years, as well as advocating a stepped housing trajectory to reduce the level of new homes it is measured against in the early parts of the plan period. While both would seek to move swiftly to adoption of a Plan, both are harmful to the delivery of new homes for people in need in the District.
5. In responding to this matter, PHEM would draw attention to the opening statements contained in the Foreword of the Submitted Plan. Most notably the following paragraphs:

“In 2014/15, we only built 163 homes across the whole district, and only slightly higher figures of 181 homes in 2015/16 and 232 homes in 2016/17. This is simply not sufficient.

Every week, on average, around 10 new ‘households’ are created in East Cambridgeshire, whether that be children growing up wanting their own homes; young people in shared accommodation getting married and wanting to start a family; people moving to the area to take a job; or partners deciding to go their separate ways. Yet for the last three years we only built 3 or 4 homes a week. That leaves, on average, 6 or 7 newly created households in East Cambridgeshire having no home to move into, every week. We can’t let this continue. And we aren’t building enough ‘affordable homes’ either. Just 19 in 2014/15 and 54 in 2015/16. Again we can’t let this continue”.

6. The Council has set out some strong statements in the opening Foreword of the Plan, particularly around its delivery not being sufficient and not letting the current/past trends continue. The proposals by the Council now run absolutely counter to this statement
7. Reducing the plan period by two years reduces the associated requirement of the Plan, and the assumption here is that by removing two years at the end of the period it will have no detrimental affect on housing delivery in the early period of the Plan. This, however, is a false assumption. Much needed housing across the Plan period can be provided earlier. Indeed PHEM is promoting land at Soham [**Policy SOH.H10**] for increased levels of development that is included in the Plan by 75 dwellings. An increased allocation at this location would be able to accommodate part of the increased housing number, and deliver part of that additional component earlier than the last two years. This would be consistent with the Plan, its aims, its objectives and indeed the aspirations of the Foreword.
8. Reducing the Plan period is therefore not the response that is required to moving swiftly with the Plan to adoption on the basis that the Plan is effective. It is not an extensive exercise to establish additional housing that can come forward now.
9. The Plan is seeking to consistently reduce its responsibility to provide new homes on the promise that things will improve. This actually results in more constraint on the housing market, rather than providing certainty which in turn increases delivery in a sustainable coordinated manner.
10. The Plan has been submitted on the basis of a Vision, Objectives and a planning strategy to 2036 on order to address delivery problems of the past. The proposal put forward by the Council now does nothing to address the issues and in fact compounds them.

11. The plan period should remain as the submitted Plan and additional housing land be found, particularly where existing sites in the Plan, such as PHEM's site at Soham can be increased.

Question 74) Is there a case for a staggered or phased housing requirement with a lower figure in the early years of the plan period to take account of the larger strategic allocations and the findings of my letter of 30th of July? If so, what would the appropriate phasing in respect of annual housing requirements and timing?

12. The rationale for a stepped housing trajectory is so that the Council can achieve a five year supply. This is an artificial five year supply position as it is created specifically for the Council to achieve it which runs counter to the intention of the NPPF in the first instance.
13. One has to ask whether the stepped housing trajectory to achieve a five year housing supply actually delivers on the Council's intentions in the first instance. Housing need is not generated on a stepped basis, it is generated on an daily/annual basis and this is how the Council's evidence has been formulated through the Standard Methodology approach.
14. There is significant need for new homes in East Cambridgeshire now, not deferred consistent with a stepped trajectory. One therefore has to ask whether a stepped trajectory is effective and justified against the evidence that generates housing need, including affordable housing, overcrowding and homelessness now. For those people that can be the most vulnerable people in society, a stepped housing trajectory does nothing.
15. PHEM is of the opinion that housing delivery can be increased but it requires the Plan to be positively prepared on all aspects.

