

EXAMINATION INTO EAST CAMBRIDGESHIRE'S LOCAL PLAN

**MATTER 3: OBJECTIVELY ASSESSED NEEDS FOR HOUSING
AND EMPLOYMENT LAND**

**PERSIMMON HOMES EAST MIDLANDS, REPRESENTATION ID
PS211**

MAY 2018

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Matter 2: Objectively Assessed Needs for Housing and Employment Land

Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Question 20: What is the implication of there being a different time period for housing need and employment justification?

- Not enough housing will be provided to meet needs within the district. Changing the plan period from Housing from 2014 to 2016 will mean that in effect 2 years of needed housing will not be provided. This is crucial as the Council's monitoring results show an undersupply between 2014 – 2016 of 778 homes.
- With the plan period for housing being 2 years less than for employment, this will mean insufficient housing is provided to meet the employment needs and objectives of the council. Inevitably, this approach will compromise the council's overall employment aspirations for the plan period.
- There are options within the plan for additional housing to be allocated. A prime example of this is a site PHEM have an interest in Soham (site reference SOH.H10 Land off Kingfisher Drive, Soham). Under the representations for this site allocation PHEM have submitted a Master Layout alongside a suite of technical reports which demonstrates this site can easily accommodate 175 dwellings rather than the maximum limit of 100 dwellings imposed in the local plan. The supporting plans and documents submitted as part of this consultation on this allocation demonstrated that 175 dwellings could be accommodated whilst also respecting the site specific requirements of this policy, namely landscape character and odour.

Question 24: Is the Council's use of the standard methodology to determine local housing need, referred to within the draft consultation draft of the National Planning Policy Framework, justified, positively prepared, effective, consistent with national policy, and an appropriate alternative methodology to that set within the Planning Practice Guidance?

- The appropriateness of the Council using the standard methodology has already been questioned in PHEM's original representation, the contents of which still remain valid. There is still the same level of uncertainty with the use of this standard methodology, with significant concerns raised during the consultation on this document by many bodies, including Persimmon Homes.

- even if this approach were to be accepted, the missing 2 years of housing (778 dwelling shortfall) still need to be provided for.
- There is clearly a need for housing numbers to be raised. As mentioned in our response to question 20 above, there is capacity for dwelling numbers at a deliverable site for which we have control of at Kingfisher Drive Soham (SOH.H10) for dwelling numbers to be increased.

Question 25: How does the methodology compare in absolute numerical terms to the more traditional approach set out within the Planning Practice Guidance and which has been followed within the October 2016 Objectively Assessed Housing Need Paper (PE6)? What is the Council's reason to alter its approach to the calculation of its objectively assessed need between the publication of the Further Draft Local Plan in February 2017 and the Proposed Submission version of November 2017?

- Annually housing number change from 586 a year to 598 dwellings per year (on the basis of the minimum figures set out within the Consultation document which have not been adjusted to consider local circumstances). The main concern is the impact of the missing 2 years of housing.
- The Council do not evidence in the Proposed Submission Local Plan why they have changed approach
- As a consequence of the above, PHEM's are of the view that overall housing figured need to increase. It would be logical for the additional housing numbers to be provided for in the main part within the larger, sustainable settlements, including Soham. Specifically in Soham, as discussed above at Q 20 and Q24, proposed housing allocation SOH.H10 (Land off Kingfisher Drive, Soham) has capacity to accommodate a great level of development.

Question 27: Are the housing figures and assumptions contained within PE6, robust and justified? Do they take into account recent DCLG household projections, appropriate market signals, forecast jobs growth and the need for adequate levels of affordable housing to be provided? Has an allowance been made for vacancy rates and second homes with reference to existing and future housing stock?

- No additional comments to make from PHEM representation.

