

**RPS**

## **Proposed Submission Local Plan Examination Hearing Statement**

In respect of

East Cambridgeshire Proposed  
Submission Local Plan  
Examination – Matter 3

On behalf of

Abbey Properties Cambridgeshire  
Limited & Peter and Michael  
Seymour and Nicholas and Judith  
Holdsworth

RPS Ref: JCG22793

23 May 2018

*Secure & Stable*  
ADDING VALUE

# QUALITY MANAGEMENT

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# 1 INTRODUCTION

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- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth, to submit Hearing Statements and appear at the Examination Stage 1 Hearings on their behalf in relation to the East Cambridgeshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to both the Local Plan Further Draft consultation in January 2017 and the Proposed Submission consultation in November 2017.
- 1.3 The representations to the Local Plan Further Draft raised objections to the proposed housing allocations within Witchford and a number of draft policies including the Settlement Hierarchy and the Countryside (Policy LP3), Achieving Design Excellence (Policy LP22) and Conserving and Enhancing Heritage Assets (Policy LP27).
- 1.4 The 2017 November representations to the Proposed Submission Local Plan raised further objections to the proposed allocation of housing sites within Witchford and a number of the draft policies including LP2, LP3, LP6, LP16, LP32, Witchford1, Witchford2, Witchford3 and the Sustainability Appraisal.
- 1.5 These representations are provided in the appendices to the Hearing Statement submitted in relation to Matter 1.
- 1.6 Section 2 of this Statement details our clients' responses to Matter 3 of the Inspector's Matters, Issues and Questions for discussion at the Stage 1 Examination Hearing Sessions. We reserve our position to submit a further Hearing Statement in relation to the Stage 2 Examination at the appropriate juncture.

## 2 RESPONSE TO THE INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT THE EXAMINATION HEARINGS

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2.1 The Inspector has posed a number of questions in respect of 4 Matters for the Stage 1 Examination. This Hearing Statement seeks to respond to questions of relevance to our clients' interest in respect of Matter 3. These responses are provided below.

### **Matter 3: Objectively Assessed Needs for Housing and Employment Land**

#### *Objectively Assessed Need*

#### Question 20

- 2.2 Question 20 relates to the different time periods set out for housing need and employment growth.
- 2.3 We consider that there is a strong correlation between employment growth and housing need within a District. There is also the need to provide a sufficient number of homes within the District in order to ensure there is sufficient accommodation for the workforce. We therefore consider that there is a clear link between housing need and employment growth.
- 2.4 The PPG sets out that the primary objective of a Strategic Housing Market Assessment (Paragraph: 002 Reference ID: 2a-002-20140306) is to:
- identify the future quantity of housing needed, including a breakdown by type, tenure and size;
  - identify the future quantity of land or floorspace required for economic development uses including both the quantitative and qualitative needs for new development; and
  - provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply.
- 2.5 The PPG goes on to define need as:
- “Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.”* (Paragraph: 003 Reference ID: 2a-003-20140306)
- 2.6 It is difficult to see how this can be easily achieved if differing time periods are being applied to the housing and economic data.
- 2.7 We are concerned that adopting different time periods between the housing need figure and employment growth could result in employment opportunities arising prior to a sufficient number of the dwellings being completed to accommodate the growing workforce, or more dwellings being

delivered (and thus an increased resident population) than the local jobs market can sustain, resulting in unsustainable commuting patterns. As set out in the PPG, where the supply of working age population is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. The PPG concludes that 'plan makers will need to consider how the location of new housing or infrastructure development could help address these problems'. (Paragraph: 018 Reference ID: 2a-018-20140306)

- 2.8 Differences in the years which the housing need and employment growth are calculated results in difficulties and added complexities in ensuring that housing numbers are sufficient to provide a large enough labour force. This could increase the risks to local business and potentially result in unsustainable commuting patterns which would have a negative impact on East Cambridgeshire and other neighbouring authorities.
- 2.9 In order to address this, we consider that the Council should calculate the number of dwellings required to accommodate the 545 jobs created during 2014-16; i.e. the years prior to the Council's decision to pursue a different methodology to its calculation of housing need. This number of additional dwellings should then be included within the housing need calculations with the aim of being delivered as early as possible during the plan period to ensure that planned growth can be accommodated.

### 3 CONCLUSION

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- 3.1 On behalf of our clients, we have a number of concerns in relation to the soundness of the draft submission version of the East Cambridgeshire Local Plan. This Hearing Statement has been produced to respond to Matter 3: question 20 identified in the Inspector's Matters, Issues and Questions document.
- 3.2 The Council are applying different time periods for housing need and employment growth within the Proposed Submission Draft Local Plan. This should be reviewed and the housing need figure amended to ensure a sufficient number of dwellings are provided to meet the employment growth proposed.