



East Cambridgeshire  
District Council

Examination of the East Cambridgeshire Local Plan  
Single Issue Review

Matter 2 (Continued) – Provision for housing

East Cambridgeshire District Council  
Hearing Statement

March 2023

## Matter 2: Provision for housing (continued)

**Issue: Are the proposed amendments to Policy GROWTH1 and the explanatory text of the Plan positively prepared, clear, justified and consistent with national policy and will they be effective?**

### Housing requirement

**Q.1 The Council suggest that the housing requirement for the Plan set out in Policy GROWTH1 would be based on the minimum local housing need calculated using the standard method, to cover the period 2022 to 2031. Would the resulting housing requirement of 600 dwellings per annum derived from the minimum local housing need be sound?**

Whilst the Council's position is set out in detail in EX.LA11, the Council highlights two points in response to this question:

- All parties appear to agree that the figure of 600 dwellings per annum is an accurate representation of the minimum housing need derived from the standard method for the period 2022 to 2031.
- The Council has consistently said there is no evidence or justification for an 'alternative' approach to calculating need, nor any 'exceptional circumstances' to justify planning for a higher or lower figure, and no evidence of any neighbouring authority seeking cross border transfer of need. There is nothing in the NPPF which says a local authority must establish a housing requirement higher than its identified housing need. Indeed, the *Levelling-up and Regeneration Bill: reforms to national planning policy* (Dec 2022) consultation re-emphasised that point at Chapter 4, para 11, where it states:

*"We will also make clearer in policy that authorities who wish to plan for more homes than the standard method (or an alternative approach) provides for may do so, where they judge that is right for their areas, for example to capitalise on economic development opportunities."*

The above quote confirms that Government intends to make it clearer (i.e. not change) in policy that an LPA may (not must) set a housing requirement higher than the standard method, but only where they judge that is right for their area. The Council has consistently judged that a higher figure is not right for its area, and in line with existing national policy (which government wishes to make clearer, but not change), the Council submitted a Plan with a forward looking housing requirement from 2022 that aligned with the standard method. The suggested modifications by the Council do not alter that figure. It remains the same figure derived from the standard method.

The housing requirement 2022-31 is therefore sound in the submitted plan and, because it is the same figure, sound in the submitted plan as suggested to be modified.

### Strategic Policy

**Q.2 It is suggested that Policy GROWTH1, in respect of the delivery of housing, should be amended so that it would cover the period 2022 to 2031. Would the amended Policy be justified, positively prepared, effective and consistent with national policy? If not, how should the proposed Policy be amended to make it sound?**

Again, the Council's position is set out in detail in EX.LA11, but the Council highlights one point in response to this question:

- The suggested amendment to the policy actually does not materially amend the policy at all for what is planned in the period 2022-2031. The housing requirement for that period remains exactly the same, in both the submitted plan and the submitted plan as suggested to be modified. And the Council's response to Q1 confirms why it is believed such a figure was sound in the submitted plan, and consequently (because it has been unaltered) sound in the suggested modified plan.

### **Delivery shortfall in the adopted plan period to date**

***Q.3 There is a shortfall in the delivery of housing in the current plan period to April 2022 of 2,688 dwellings against the adopted requirement. The Planning Practice Guidance is clear that the standard method (for calculating minimum local housing need) identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately, as the affordability adjustment is applied to take account of past under-delivery. The Council's suggestion to rebase housing need to 2022 and for the housing requirement in Policy GROWTH1 to be amended so that it covers the period 2022 to 2031, rather than commencing in 2011, would address the existing shortfall to April 2022. Would this be sound?***

Put simply, this question answers itself.

To answer the specific question at the end, yes, the approach is sound. And it is sound because, as the pre-ambule to the question explains, the approach is consistent with national policy.

It appears to the Council that the challenge the examination has had to grapple with is, in simple terms, 'what do we do about the housing shortfall arising from the adopted plan?'

But, we need to put this question we're grappling with in context.

- First, it is presumed fair to say that no local plan has ever, or will ever, precisely hit its housing requirement figure at the point that plan is subject to an update. If one has miraculously precisely hit its target, then that was more a matter of luck, than judgement. Thus, all (or virtually all) plans will invariably have an under or over supply of delivery, at the point of preparing an updated plan. A shortfall in the delivery of housing in the plan to be replaced is, therefore, not unusual.
- Second, the whole point of updating a plan (whether partial or full update) is to reset the requirements, based on the evidence of the day. The purpose of updating a plan is not to add new requirements on top of what the previous plan said, ad infinitum. If that was the case, we'd be still totting up figures going back decades to the birth of town planning, trying to work out whether there was an over supply or undersupply from each plan ever produced (which, incidentally, if someone was keen to explore such evidence for academic purposes, they would find that East Cambridgeshire oversupplied its housing requirement six years out of seven, at the start of the Millennium, so, contrary to some views, the district is not, on a long term basis, a persistent under deliverer of homes).

Thus, turning to the purpose of the submitted plan, it was to update the housing requirement figure. Perhaps, in hindsight, the submitted plan clumsily presented that update by adjusting the housing requirement 2011-22 to match delivery in that period, rather than simply deleting that time period

form the housing requirement for that updated plan. But the calculations for the period 2022-31 were sound and remain sound, and the actual number of homes required to be delivered in the period 2022-31 remains the same in the submitted and the suggested modified plan, and remain sound.

What would not be sound, because there is no basis in national policy, is to expect an LPA to plan to meet **both** (a) the backlog from an old plan which is being updated; **and** (b) housing need which has been accurately derived from the standard method, as advocated by national policy, which explicitly addresses any under-delivery from the past.

To add **both** together would be wrong. It would be contrary to national policy to address under-delivery twice. It would amount to double counting such under-delivery, because any such under-delivery would be accounted for twice, both in (a) and in (b). It would therefore clearly be unsound. A modification to that effect would therefore clearly be unsound.

And not only would it be wrong and unsound, the error would be compounded by the fact that it would result in an undeliverable plan. There can be no greater definition of an unsound plan, than one which is known to be undeliverable.

The submitted plan, and the submitted plan as suggested to be modified, do not have such failings, whichever version is chosen. Any under-delivery, in each case, is fully addressed in line with national policy by applying the standard method, a method which explicitly accounts for any past under-delivery.

## **Main Modifications**

### ***Q.4 The Council has suggested an updated schedule of Main Modifications (EX.LA11). Are the suggested Main Modifications necessary for soundness?***

Whilst much of the modifications are somewhat uncontroversial, and relate to the factual updating of the text to take account of recent delivery and the latest housing need calculations, the more contentious suggested modification to GROWTH1 and, perhaps, the adjustment of the text in relation to the 'Broad Areas' are necessary for soundness, on the simple basis that they are clearer and consequently more effective.

That said, the package of suggested modifications (including those to GROWTH1) are somewhat presentational improvements, rather than fundamental or significant changes to the basis of the submitted plan (or the subsequent implementation of that plan, if adopted).