



East Cambridgeshire Local Plan Single Issue Review

Inspector's Further Matters, Issues and Questions Matter 2 – Provision for Housing (Continued)

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MATTER 2 – PROVISION FOR HOUSING (CONTINUED)

Housing Requirement

Question 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?

- 1.1.1 No.
- 1.1.2 The Single-Issue Review is not seeking to amend the plan period in accordance with national policy requirements as this would necessitate the widening of the scope of the review to consider other elements of plan making. In seeking to defer consideration of these matters to a future wider review of the Local Plan this does not meet the test of being positively prepared. This also raises questions around the effectiveness of the Local Plan as per paragraph 35 (c) of the NPPF 2021.
- 1.1.3 The importance of planning for a 15 year period when utilising the standard method and to address under and over delivery in housing can not be underestimated and this is covered in further detail in relation to question 3.

Strategic Policy

Question 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?

- 1.1.4 No, this approach is not consistent with national policy, nor would it be effective. As highlighted throughout our previous representations and within this statement, Paragraph 22 of the NPPF states that strategic policies should look over a minimum 15 year period from adoption. This SIR will not meet this requirement and the Plan

cannot be determined to be consistent with national planning policy and is therefore unsound.

- 1.1.5 Further commentary regarding the implications of this, primarily on housing delivery are set out throughout our representations submitted to this examination.

Delivery Shortfall in the adopted plan period to date

Question 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?

- 1.1.6 No, the standard method's intended application is for a period of a minimum of 15 years to ensure that any previous trends, whether that be significant over-delivery or, in the case of East Cambridgeshire, significant under-delivery are addressed over the plan period. For example, where a significant previous over delivery it is expected to see a stabilisation of affordability ratios and in some cases a reduction. In the case of significant under delivery, it can take some time for this to be reflected through affordability ratios hence the critical nature of the 15-year plan period.
- 1.1.7 The approach utilised by the Council and remaining plan period does not even account for the 10 year baseline for population growth used within the standard method calculation.
- 1.1.8 Furthermore, while, as highlighted by the Council, the delivery of housing at the standard method figure rate (600 dpa) would represent an uplift from the housing completions over the previous 9 years of the plan it cannot be considered that this addresses the significant shortfall in delivery experienced.

- 1.1.9 Therefore, the proposed approach is not justified nor effective and limiting the scope of the review without seeking to extend the plan period does not equate to a positively prepared plan.

Main Modifications

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

- 1.1.10 Gladman do not consider that the Single Issues Review is appropriate and does not mean the tests of soundness identified in paragraph 35 of The Framework.
- 1.1.11 The Council are now suggesting that Policy GROWTH1 will only be amended from 2022 therefore accepting the failure of the Local Plan strategy to deliver the identified housing requirement in the early part of the plan period. However, they continue to fail to deliver the shortfall in delivery by applying an incorrect approach to the standard method for calculating local housing need through not setting a minimum 15 year outlook for the strategic policy.
- 1.1.12 The Council, through the SIR and freshly suggested modifications, are simply seeking to safeguard their five year housing land supply position over the coming years rather than actively seeking to undertake full review of the Local Plan. This is not a positive approach to plan-making and meeting the identified needs of the area, is not consistent with national planning policy, is not an appropriate strategy and therefore is not justified.

