



East Cambridgeshire Local Plan Single Issue Review

Matter 2 – Provision for Housing

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01260 288888

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MATTER 2 – PROVISION FOR HOUSING

The Plan Period

Question 11: The amended Policy GROWTH1 would cover the period to 2031, and consequently will not look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22. What is the justification for this, and is the Plan positively prepared in this regard?

- 1.1.1 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.
- 1.1.2 The importance of planning for a 15 year period can not be underestimated and this is covered in further detail in relation to question 20.

The housing requirement – overall approach

Question 12: The Plan seeks to apply a housing requirement in two parts, derived from the past delivery of housing from the base date of the local plan to date, and thereafter applying the outcome of the standard method for the remainder of the plan period. Is the approach set out in the Plan justified, positively prepared, consistent with national policy and would it be effective?

- 1.1.3 No, this approach is not consistent with national policy, nor would it be effective.

- 1.1.4 It is not possible to revise the housing target after the fact for the period 2011-2022 to suit the Council. The suitable response would be to rebase the plan period as per planning practice guidance.

The housing requirement 2022-2031. Calculation of local housing need using the standard method

Question 13: Why has the plan period not been rebased to the base date used in the standard method calculation? Is this justified?

- 1.1.5 Similarly for the reason that the plan period has not been extended, the plan has not been rebased due to the additional work and the widening of the review that would be required.
- 1.1.6 Deliberating seeking to minimise the scope of the review does not constitute positive plan making.

The housing requirement 2021-2022 and dealing with past under-supply

Question 17: What is the Objectively Assessed Need (OAN) for housing for the first part of the plan period 2011 to 2022?

- 1.1.7 The OAN for the period 2011 to 2022 is 5,750, or 575 dwellings per annum. Actual completions for this period were significantly below this figure, totalling a shortfall of 2,732 dwellings.
- 1.2 Question 18: What is the justification for basing the first part of the dwelling requirement upon completions to date in the plan period?
- 1.2.1 The only justification that Gladman can ascertain for basing the first part of the dwelling requirement upon completions is to avoid having to incorporate the

significant shortfall of completed dwellings in this period to the remainder of the plan period.

1.2.2 Gladman assert that in this regard, the Single Issue Review is not positively prepared, nor effective.

1.3 Question 19: Does the Plan as proposed as a minimum, provide for objectively assessed needs for housing for the period 2011 to 2022, and is the proposed approach set out in the Plan consistent with national policy?

1.3.1 No, the new proposed housing requirement using the standard method for the remainder of the plan period, an increase of 25 dwellings per annum from the initial housing requirement, would not address the significantly accrued shortfall during the period 2011-2022.

1.3.2 There would still be an under delivery against the OAN for this period if all dwellings currently committed are built out by the end of the plan period to 2031.

1.4 Question 20: Given that the base date of the Plan has not been changed to that of the standard method calculation, which is proposed to be applied over the remaining part of the plan period, should past under delivery of housing in the plan period to date (measured against the adopted Local Plan) be taken into account in establishing the housing requirement for the remainder of the plan period in the amended Policy GROWTH1 (See PPG Paragraph: 011 Reference ID: 2a-011-20190220)?

1.4.1 Yes, past under delivery should be applied to the housing requirement for the remainder of the plan period. The standard method is intended to be applied over a 15-year horizon 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.

