

Home Builders Federation

Matter 2

EAST CAMBRIDGESHIRE SINGLE ISSUE REVIEW EXAMINATION

Further Matters, Issues and Questions

Matter 2: Provision of 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?

The HBF would agree that the minimum housing requirement derived from the standard method would be 600 dwellings per annum (dpa). However, for the period 2022 to 2031 we would question whether this is sound it does not take account of the fact that plans are expected by national policy to look ahead at least 15 years. As such it is questionable whether it takes full account of the long term shortfalls in housing delivery. In addition it is not possible to state that this level of growth is sound over the 15 year plan period required by national policy as the Council have, as we indicate under Q3 below, not undertaken the required work to understand the potential economic growth scenarios.

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?



The period 2022 to 2031 is inconsistent with national policy and not a positive approach to plan making and meeting development needs as such is not considered to be sound. The council state there is nothing in law requiring a 15 year period however as the Council will be fully aware the NPPF is a material consideration with regard to the soundness of the local plan. To ignore the need to plan strategically over the required time frame set out in national policy cannot be dismissed so easily as is suggested by the Council.

As we set out in our representations the plan period is not consistent with paragraph 22 of the NPPF which states that plans should look ahead for a minimum of 15 years. It is also important to note that the 2012 NPPF was more equivocal about the plan period stating that the plan period should be “...an appropriate timescale, preferably a 15 year time horizon” compared to the current NPPF which, as mentioned above, is more certain in its statement on plan period. This suggest that the Government’s intention when framing paragraph 22 was to ensure plans were strategic in their outlook and took account of longer term development needs. It certainly cannot have been the Government’s intention that a change in the local housing needs assessment allows an LPA to simply review that aspect of the current plan to remove any back log in their housing supply without any consideration being given to longer term development requirements. Therefore, in the situation presented by the Council, it would be expected that the longer term development needs would be considered and addressed through the preparation of a new local plan, or at the very least a more comprehensive review than the one that has been undertaken by ECDC.

The need for the longer time frame is even more necessary if the plan period is rebased. Rather than amending the housing requirement within the existing plan period the Council are creating a whole new period over which development needs must be considered. In effect this is create a new plan that should look strategically at future development needs. As such if the Council wants to rebase the plan period and its annual housing requirement to be consistent with national policy then it follows that it should extend the plan period to also be consistent with national policy. The Council cannot pick and choose which elements it wants to apply in order to remove the backlog without having to consider future needs. The Council have indicated that this will require it to undertake significant further work beyond the scope of the SIR. But it was the Council’s choice to bring forward the SIR and not prepare a wider review of the plan. As such it may not be possible to resolve the soundness issues arising from the Council’s latest proposals.

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?

Rebasing the plan period without the consequential amendment to extend the plan period is unsound. It must also be remembered that the application of the standard method is based on the premise that plans will look ahead over a minimum of 15 years ensuing that the homes delivered over this period as a whole seek to address past shortfalls in delivery. As set out above in our view the Council's approach is unsound as to rebase the plan period without looking ahead 15 years is inconsistent with national policy. In effect the Council's proposal is to create new plan starting from 2022 but one that only looks forward nine years. This is because it does not want to undertake the work required to ensure that the rest of the plan is consistent with a policy compliant plan period. The rebasing of the plan period requires a consequential extension to the plan period alongside wider work relating to other areas of the plan that the Council admit they have not undertaken. As such even with an extended plan period it would not be possible at this stage to say that the modification was justified.

The approach proposed by the Council is one that can only be sound as part of a wider review of the local plan. The Council have chosen not to update any other aspects of the plan through their review making it virtually impossible for the proposed modification to be considered sound through this examination.

Main Modifications

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

What is notable from the Council's topic paper is that they state that the proposed modifications are made to make it simpler for those tasked with implementing the plan on the basis that the purpose of the plan is primarily for subsequent users. The HBF would suggest the purpose of plan is to seek to meet the development needs of an area, as established in paragraph 11 of the NPPF. Plans should provide clarity to the decision maker, but it is not the primary purpose of a local plan.

Given that the Council's proposed modifications do not seek to meet the development needs of the area across a policy compliant plan period they cannot be considered sound. They are neither positive nor consistent with national policy and the Council should either accept the inspector's initial recommendation or withdraw the SIR from examination and start preparing a new local plan.

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