

**East Cambridgeshire Local Plan
Single Issue Review
October 2022**

**Matter 2
Hearing Statement**

Matter 2 : Provision for Housing

The plan period

Q11 - 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 The Land Promoters and Developers Federation (LPDF) do not consider Policy **GROWTH 1** to be positively prepared as it is contrary to the guidance contained in paragraph 22 of the National Planning Policy Framework (the Framework). The policy is therefore considered to be unsound.
- 1.2 Paragraph 20 of the Framework outlines the types of policies which should be considered to be 'strategic policies' which are ones that set out an overall strategy for the pattern, scale and design quality of places and that make provision for, amongst other things, housing. Therefore policy **GROWTH 1** is a 'strategic policy'.
- 1.3 Paragraph 22 of the Framework is quite clear that "strategic policies should look ahead over **a minimum 15 year period** from adoption, to anticipate and respond to long-term requirements and opportunities..." (emphasis added).
- 1.4 As Policy **GROWTH 1** is clearly a strategic policy but will only cover at most, an 8 year timeframe from the point of adoption to the end of the current Local Plan period at 2031 (because the plan period for the Single Issue Review (SIR) is not being extended), the policy is considered to be inconsistent with national guidance and therefore unsound.

The housing requirement – overall approach

Q12 - 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?

- 1.5 It is not considered that the approach taken by the East Cambridgeshire Local Plan SIR in applying the housing requirement in two parts, is sound.
- 1.6 The Council state in paragraph 4.6 of the SIR that "The housing requirement for 2011-22 will be established as being the housing delivered between 2011-2022", as this is consistent with guidance in PPG (ID: 68-031- 201907222).
- 1.7 However, the PPG (ID: 68-031-20190722) goes on to state that "Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing".
- 1.8 As the Council is preparing the SIR part way through the current plan period, and has failed to meet its annual housing requirement figure in every year since the start of the plan period (2011) leading to a significant shortfall of housing delivery against Policy **GROWTH 1** (over a 2,700 dwelling shortfall), the guidance set out in the PPG (ID: 68-031-20190722) applies.

- 1.9 Therefore, as the Council has failed to follow the correct approach within the SIR as outlined in the PPG, the plan is considered to be inconsistent with national policy and not positively prepared.

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

Q13 - Why has the plan period not been rebased to the base date used in the standard method calculation? Is this justified?

- 1.10 It is considered that the Council should of rebased the base date used for the standard method as the current approach that the SIR uses is not justified and is considered to be unsound.
- 1.11 The guidance contained in the PPG (ID: 2a-012-20190220) relating to the Standard Method states that “The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period”. As the Standard Method provides a 10 year base line figure, and the East Cambridgeshire SIR will only have 8 years to run from the anticipated point of adoption, the Standard Method figure cannot be guaranteed to represent the minimum housing need required to be planned for within the district going forward. The figure is also not being applied to the whole of the plan period as the SIR is being prepared part way through the adopted Local Plan period.
- 1.12 The Council is therefore relying on a proposed housing requirement for the SIR which is derived from the Standard Method, which is not fit for purpose and which is not in conformity with the guidance set out in the PPG.

The housing requirement 2011 – 2022 and dealing with past under-supply

Q20 - 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)?

- 1.13 Yes. If the SIR is to be progressed then past under delivery of housing must be taken into account in establishing the housing requirement for the remainder of the plan period.
- 1.14 If the SIR is to progress, with the significant shortfall in housing delivery in East Cambridgeshire since the beginning of the plan period, and taking account of the advice set out in PPG Paragraph 011 (Reference ID: 2a-011-20190220), then the plan must take past under-delivery into account when setting the housing requirement. This is to ensure that sufficient housing has been provided within the district to meet the full housing requirement across the whole plan period.