



## **HEARING STATEMENT**

### **Examination of the East Cambridgeshire Local Plan – Single Issue Review**

On behalf of:  
**Castlemore Homes**

In respect of:  
**Matter 2: Provision for Housing**

Date:  
**October 2022**

Document Reference:  
**GA/DJ/01322/S0002**

## 1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Castlemore Homes in respect of **Matter 2: Provision for Housing** of the Inspector’s Initial Matters, Issues and Questions for the Examination of the East Cambridgeshire Local Plan – Single Issue Review.
- 1.2 The Statement is intended to assist the Inspector’s consideration of the soundness of the Plan and will form the basis of our points for discussion at the Examination hearing sessions. We have answered questions 11, 12 and 15, but note that there is a lot of cross-over between questions 11 and 12 and other more specific questions which we have not sought to answer to avoid repetition.

## 2. 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?

### 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?**

- 2.1 There is no justification and the plan is not positively prepared in this regard.
- 2.2 In ECDC’s response to the Inspector’s initial questions (EX.LA03, Q6), the only justification put forward is that it would be disproportionate to require a 15 year period for a very small Single Issue Review (SIR) plan and that there is a local precedent for a not having to comply with the 15 year period. The example given is the SIR of Forest Heath’s Core Strategy Policy CS7, that was adopted in 2019 to plan to 2031.
- 2.3 There is a clear difference between the Forest Heath SIR and ECDC’s SIR. The Forest Heath SIR seeks to meet the OAN of the area for the full plan period (i.e. 2011-2031). It identifies that housing delivery for the first 6 years of the plan period was below the annual housing requirement and that current allocations would not meet the full OAN for the plan period. It therefore assesses the additional housing needed, distributes this housing to specific settlements and provides that sites will be allocated in a Site Allocations Local Plan or Neighbourhood Plans to meet the additional need. The Forest Heath SIR therefore does not seek to change the housing requirement for the early years of the plan period, but rather seeks to plan positively to ensure that the district’s full OAN for the whole 20 year plan

period is met. In this respect it ensures that the existing strategic policies set out in the Core Strategy are deliverable rather than seeking to set a new strategic policy for the number of homes to be delivered.

- 2.4 The approach taken by ECDC is quite different. The ECDC SIR seeks to amend the housing requirement for the first 11 years of the plan period to match the number of homes delivered and then set a new housing requirement based on the standard methodology for the remaining 9 years of the plan. Unlike Forest Heath, the ECDC SIR therefore only plans to meet the district's housing needs for a 9 year period. It does not provide a strategy which, as a minimum, seeks to meet the area's OAN for the full plan period (in fact it is silent on what the OAN is for the first 11 years of the plan) and cannot therefore be considered to be positively prepared.
- 2.5 The SIR is not justified as there is a clear reasonable alternative strategy that would seek, as a minimum, to meet the district's full OAN over the plan period. As set out under Q.12, based on the Council's delivery forecasts, this would require the identification of sites to deliver an additional 800 dwellings to 2031.

### 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?**

- 2.6 As set out in our original representations, we consider that a full Local Plan update is required which would necessitate a new housing requirement for a minimum period of 15 years from adoption.
- 2.7 However, if the Council is intent on proceeding with a SIR of their housing requirement, this must accord with NPPF paragraph 23 which states that:

*"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to **address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.**"* [emphasis added]

- 2.8 This confirms that the requirement at NPPF paragraph 11(b) (i.e. the presumption in favour of sustainable development) for strategic policies to provide for objectively assessed needs **applies for the whole plan period**. The SIR does not seek to change the plan period, but rather to set a new

strategic policy that would only plan for the OAN for the final 9 years of the plan period. This is contrary to national policy.

- 2.9 The justification set out in the SIR for using past delivery (or under-delivery) as the housing requirement for the first 11 years of the plan period is that this under-delivery is baked into the standard method as part of the affordability ratio. We would agree that this applies for under-delivery prior to the start of the plan period, but not for under-delivery during the plan period itself as the NPPF requires strategic policies to plan for the full OAN over the whole plan period.
- 2.10 By way of an example, if we look at the East Suffolk Council Suffolk Coastal Local Plan<sup>1</sup> (SCLP, adopted in September 2020) which plans for the period 2018-2036, the housing requirement is calculated using the standard method for the whole plan period from 2018. It does not set a housing requirement from the date of adoption and say that for the first 2 years of the plan period the housing requirement is the number of homes that were delivered.
- 2.11 We set out in our previous representations how the housing requirement should be calculated using the housing requirement at Policy GROWTH 1 for the period that was considered up to date (i.e. up to 2020 or 5 years post adoption) and the standard method for the remaining part of the plan period. This gives a total requirement of 11,772.58 (588.63 dpa) and this is the figure that needs to be planned for in the SIR.
- 2.12 The SIR identifies the delivery 3,018 dwellings between 2011-21 and the Council's update on housing statistics (EX.LA02) states that 619 dwellings were delivered in 2021-22. This gives a total delivery of 3,637 dwellings and a remaining requirement of 8,135 the final 9 years of the plan period or 903 dwellings per year.
- 2.13 ECDC's response to the Inspector's initial questions (EX.LA03, Q8) identifies a supply of 7,371 dwellings for the final 9 years of the plan period. The total anticipated supply during the plan period is therefore 11,008 dwellings, or 764 dwellings below our calculation of the OAN. This indicates a need to allocate additional housing sites as part of the SIR.
- 2.14 Further, based on an annual requirement of 903 dwellings, the Council's 5 year housing land supply requirement would need updating to 4,515 dwellings. The ECDC 5 Year Land Supply Report (12 August 2022) (EX.LA02(B)) identifies a supply between 2022-27 of 4,467 dwellings meaning that once adopted the Council would only be able to demonstrate a 4.95 year housing land supply. This again indicates a need to allocate additional housing sites as part of the SIR to ensure a robust supply of housing.

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<sup>1</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

**Question 15**

**Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing as per the advice in the PPG (Paragraph: 024 Reference ID: 2a-024-20190220)?**

2.15 Yes.

2.16 In a recent inquiry appeal decision at 163-187 High Street, Bottisham (Ref: 3282241) issued on 7<sup>th</sup> April 2022, the Inspector outlines a point of agreement between the parties that there is a significant need for affordable housing in the District. The Inspector notes that the Strategic Housing Market Assessment (SHMA, 2013) sets this at 3,517 net dwellings in the period 2011 to 2031, or 176 dwellings per annum (dpa).

2.17 The table below presents the Council's affordable housing delivery for the first 10 years of the plan period based on the figures contained in the Council's Annual Monitoring Reports for each year. It demonstrates that there has been a shortfall in affordable housing delivery of 1,281 dwellings during this period even before accounting for any affordable homes that may have been lost through sales in that period.

Year	SHMA Need	Dwellings Delivered*	Balance
2011/12	176	82	-94
2012/13	176	14	-162
2013/14	176	24	-152
2014/15	176	19	-157
2015/16	176	54	-122
2016/17	176	11	-165
2017/18	176	88	-88
2018/19	176	63	-113
2019/20	176	67	-109
2020/21	176	57	-119
<b>Total</b>	<b>1,760</b>	<b>479</b>	<b>-1,281</b>

\*Source: East Cambridgeshire District Council Annual Monitoring Reports.

2.18 This table demonstrates that the Council has delivered just 27% of the affordable homes need across the District during the first 10 years of the plan period. By contrast they have delivered 52% of total housing need during this period (3,018 dwellings from a housing requirement of 5,750).

This demonstrates that the delivery of affordable housing as a proportion of mixed market and affordable schemes will not deliver sufficient affordable housing to meet needs. Furthermore, as set out in ECDC's response to the Inspector's initial questions (EX.LA03, Q7), the latest SHMA (2021) identifies an increased need for 254 affordable dwellings per annum. In accordance with the PPG (ID: 2a-024), an increase in total housing figures is therefore justified to help deliver the required number of affordable homes.