

**Examination of the Single Issue Review of the
East Cambridgeshire Local Plan 2015**
Hearing Statement on behalf of
Pigeon Investments

**Matter 2: Provision for housing
Other Matters**

October 2022

Turley

1. The plan period

Q.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 The Council has not adequately justified its proposal to retain such a short plan period, which plainly conflicts with the National Planning Policy Framework (NPPF) and its strengthened requirement for plans to look at least 15 years forward from adoption¹. As such the Plan has not been positively prepared.

¹ MHCLG (2021) National Planning Policy Framework, paragraph 22

2. The housing requirement – overall approach

Q.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?

2.1 No. For the reasons outlined in our subsequent responses to Q13-20, Pigeon firmly rejects the Council's attempts to retrospectively alter the housing requirement for the plan period to date, and maintains that the outcome of the standard method does not provide a reliable indication of the district's housing needs in the coming years. Thus the Plan does not promote sustainable development and has not been positively prepared.

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

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

3.1 Pigeon are unclear as to why the Council has not opted to rebase, and subsequently extend, the plan period so as to rightly focus on meeting future housing needs. The Council's proposed retention of 2011 as a base date only serves to create the conditions in which it has attempted to reset the historic housing requirement, which – as discussed in our responses to Q17-20 – is not positive planning so is not sound.

Q.14 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG?

3.2 Yes. There is a substantial amount of evidence to suggest that there is likely to be a greater need for housing in East Cambridgeshire than implied as only a minimum by the standard method.

3.3 There clearly is ongoing investment in the district's infrastructure and economy, linked to the Devolution Deal through which the Government agreed to invest some £770 million throughout Cambridgeshire and Peterborough in exchange for '*substantial*' economic growth and housing delivery². The PPG explicitly recognises the prospect of higher need in areas where '*funding is in place to promote and facilitate additional growth*'³.

3.4 An Independent Economic Review in 2018 itself recommended the setting of new and higher housing targets throughout Cambridgeshire and Peterborough, as much as 66% above the minimum need currently implied by the standard method⁴. Existing targets – which in East Cambridgeshire's case were only slightly lower than the figure now generated by the method (575/600dpa) – were found to be '*insufficiently high to accommodate the existing, let alone anticipated growth in the economy*'⁵.

3.5 The Council has failed to take the Independent Economic Review into account, and has attempted to undermine its status by suggesting that it only makes '*recommendations*' and has no legal status⁶. The taking of such an attitude towards objective evidence is extremely concerning and is considered to fundamentally conflict with the NPPF, which requires all policies to be '*underpinned by relevant and up-to-date evidence*'⁷. There

² HM Government (2017) Cambridgeshire and Peterborough Devolution Deal

³ PPG Reference ID 2a-010-20201216

⁴ Cambridgeshire and Peterborough Independent Economic Review (2018) Final Report, p69

⁵ *Ibid*, p12

⁶ East Cambridgeshire District Council (2021) Stage 1 consultation report [CD05(A)] p3

⁷ MHCLG (2021) National Planning Policy Framework, paragraph 31

remains, in this context, a conspicuous lack of evidence to justify the Council's proposed approach, with it having not taken the opportunity to collaborate with the neighbouring Greater Cambridge authorities on a properly integrated assessment of housing and economic development needs⁸.

Q.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?

- 3.6 Yes. The Council's own evidence indicates that there is a need for 215 affordable homes per annum in East Cambridgeshire, more than four times the 47 such homes completed annually since 2011. Its proposed housing requirement would theoretically increase past delivery by 81% but even if this were to occur it could only provide 85 affordable homes per annum and thus still meet only 40% of the evidenced need.
- 3.7 Some 717 dwellings per annum could be required to meet the full need for affordable housing, if optimistically assumed that 30% of all new homes are affordable, albeit the Council has typically secured only half as much (15%) over the lifetime of the current Local Plan⁹.
- 3.8 The Council has been repeatedly encouraged, by Pigeon and others, to consider planning for a greater overall number of homes to boost the delivery of much-needed affordable housing. It is clearly concerned that to do so would amount to '*double counting*' the affordability uplift applied in the standard method, but this is simply baseless where the PPG continues to separately and explicitly state that '*an increase in total housing figures...may need to be considered where it could help to deliver the required number of affordable homes*'¹⁰.

Q.16 Is the explanatory text set out in paragraph 3.2.5 of the Plan relating to objectively assessed need and the standard method consistent with national policy as expressed in the NPPF?

- 3.9 No. This text must be amended to clarify that the standard method is used to determine only '*the minimum number of homes needed*'¹¹, rather than providing a definitive measure of '*local housing need*' as currently implied.
- 3.10 While there is implied to have been '*consultation and testing of this figure*', Pigeon believe that there must be further explanation of precisely how the figure has been tested, with supporting evidence, albeit this will clearly be difficult at present where the Council's evidence base is severely lacking.

⁸ GL Hearn, SQW and Cambridge Econometrics (2020) Greater Cambridge Employment Land and Economic Development Evidence Study; GL Hearn (2020) Greater Cambridge Local Plan: Housing and Employment Relationships

⁹ East Cambridgeshire District Council (2021) Annual Monitoring Report, Table 6

¹⁰ PPG Reference ID 2a-024-20190220

¹¹ MHCLG (2021) National Planning Policy Framework, paragraph 61

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

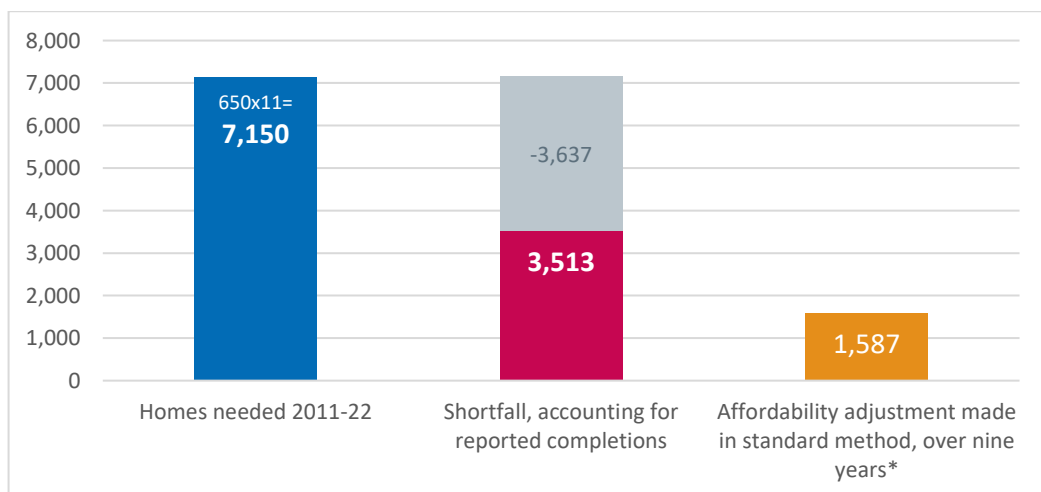
Q.17 What is the Objectively Assessed Need (OAN) for housing for the first part of the plan period 2011 to 2022?

- 4.1 The Inspector examining the current adopted Local Plan concluded that there was a need for 13,000 homes in East Cambridgeshire over the period from 2011 to 2031, equivalent to 650 dwellings per annum¹². While the standard method has since been introduced, this is not considered to warrant a reappraisal of previously evidenced housing needs.
- 4.2 Based on this annual average, there can be reasonably considered to have been an objectively assessed need for 7,150 homes in East Cambridgeshire over the eleven-year period from 2011 to 2022.

Q.18 What is the justification for basing the first part of the dwelling requirement upon completions to date in the plan period?

- 4.3 There is no valid reason to do so.
- 4.4 The Council's position that the affordability adjustment made in the standard method sufficiently accounts for past undersupply is not justified, as it is clearly inadequate in a numerical sense. This adjustment adds a total of only 1,587 dwellings to the demographic baseline over nine years, whereas the shortfall is more than twice as large.

Figure 4.1: Benchmarking Affordability Adjustment against Historic Shortfall



* Difference between demographic baseline (423.5) and LHN of 599.78, multiplied by nine years

¹² Planning Inspectorate (March 2015) Report on the Examination into the East Cambridgeshire Local Plan, paragraph 18

Source: Turley analysis

- 4.5 While clearly insufficient, the Council appears to have argued – in its response to the Inspector’s preliminary questions¹³ – that the very presence of the affordability adjustment would somehow make the Plan unsound if a further adjustment was made to account for past undersupply. The PPG is actually much less restrictive than the Council implies, stating 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”¹⁴

- 4.6 This is clearly relevant to East Cambridgeshire, where the SIR is being examined eleven years into the plan period proposed by the Council. It shows that the Council has rejected the opportunity to take a more positive approach that sought to better compensate for its past failure to meet housing needs. The lack of such positive planning, and the determination to use the precise figure generated by the standard method while writing off past performance, makes the proposed approach unsound.

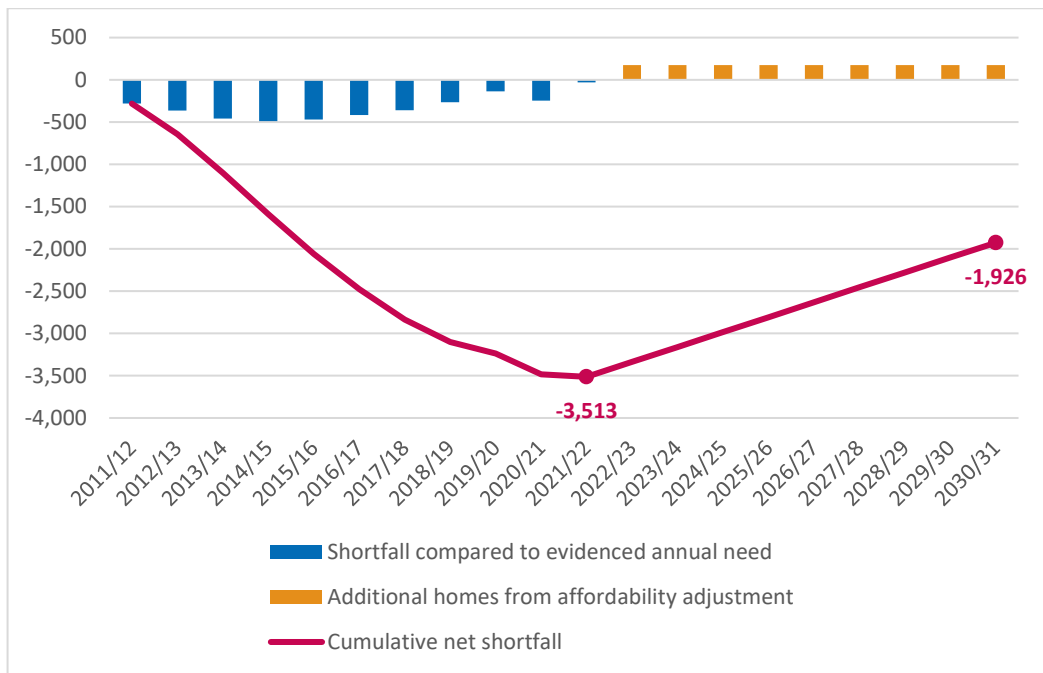
Q.19 Does the Plan as proposed as a minimum, provide for objectively assessed needs for housing in the period 2011 to 2022, and is the proposed approach set out in the Plan consistent with national policy?

- 4.7 No. The Plan, as proposed, would at best address under half of the shortfall that has accumulated over the period from 2011 to 2022, if generously following the Council’s logic that it is being addressed by the affordability uplift applied through the standard method (which is itself still considered to underestimate future needs). A substantial amount of this need would consequently remain outstanding, as shown by Figure 4.2 overleaf.

¹³ ECDC response to initial questions (7 September 2022) [EX.LA03(A)] p5

¹⁴ PPG Reference ID 68-031-20190722

Figure 4.2: Impact of Affordability Adjustment in Clearing Shortfall



Source: Council monitoring; Turley analysis

Q.20 Given the base date of the Plan has not 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?

4.8 In the circumstances, Pigeon believe that the Council must take a more positive approach that seeks to better address the shortfall that has accumulated over the current plan period. This could reasonably, as this question suggests, be an adjustment made in arriving at a housing requirement rather than necessarily featuring in the assessment of need.

5. Other matters

Q.21 Is paragraph 3.5.6 justified in relation to the status of the Broad Areas?

- 5.1 No. For the reasons outlined in our subsequent responses, Pigeon disagree with the approach of this paragraph which continues to maintain that the supply from the Broad Locations is not anticipated to be required until the later part of the Plan period and that it is intended that the specific site boundaries will be identified through the next Local Plan review.
- 5.2 The Council's justification for this approach is based on the view that they have an excess supply of housing up until 2031 and beyond, this is based upon a housing requirement which Pigeon consider is unsound and does not take into consideration the future economic growth of the District and the severe affordability issues.
- 5.3 The proposed new wording in this paragraph effectively allocates the Broad Areas with no defined boundaries, for development in the same manner as a site allocation but without any of the essential robust scrutiny to establish these are the most appropriate sustainable and deliverable sites in the district.
- 5.4 Moreover it is concerning that the Council appears to imply that one of the reasons why the wording will be amended to 'the principle of development coming forward on the Broad Areas is now established' is because planning permissions have been granted. This is back to front in that it bypasses the site allocations stage which would ensure housing is located on the most sustainable sites.
- 5.5 Pigeon remains of the view that the SIR provides the opportunity to review the Broad Areas and to remove these indicative areas and undertake a thorough review of deliverable sites that can be brought forward within the extended Plan period to provide new homes and jobs in sustainable locations for local residents. The current justification seeks to only provide for future housing in locations previously considered for the 2015 Local Plan and fails to consider further the implications of infrastructure improvements and those villages with good connectivity to Cambridge and access to job opportunities.

Q.22 Are the changes proposed to paragraph 3.5.7 of the adopted plan justified and consistent with NPPF which includes that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period?

- 5.6 Pigeon highlighted the importance of providing an annualised trajectory in the policy, in their representations to the Second Consultation Document (December 2021). The Council in their consultation report March 2022¹⁵, stated:

¹⁵ Second Consultation Report – March 2022: Issue 4, final bullet and ECDC's corresponding response.

‘... whilst such information is already provided (in our annual Five Year Land Supply Report publication), it is agreed that a simple graph could provide greater ‘snapshot’ clarity of that year on year forecast growth. It will be provided as part of the next round of consultation.’

- 5.7 However, notwithstanding this commitment by the Council, no annualised trajectory or graph was included in the Proposed Submission Stage (Reg 19) consultation May 2022 to June 2022. Nor was any explanation given as to why the Council had backtracked. Pigeon raised the issue once again in their subsequent representations to that version of the SIR.
- 5.8 The Council’s consultation report in July 2022¹⁶ listed the comment under Issue 7: Other comments raised. The only response given by the Council is ‘Other comments have also been noted, many of which are addressed in other issues raised.’ There is no reference to the trajectory anywhere in the document.
- 5.9 It is therefore considered that the SIR fails to meet the requirements of paragraph 74 of the NPPF.

¹⁶ Summary of Main Issues Raised in Representations in respect of the Proposed Submission Local Plan SIR: A regulation 22(1)(c)(v) statement July 2022: Issue 7, bullet point 6 and ECDC’s corresponding response

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