

Sent by email to: [REDACTED]

10/06/2022

Dear Sir/ Madam

**Response by the Home Builders Federation to the consultation on the Single-Issue Review of the East Cambridgeshire Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the Single-Issue Review (SIR). The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

**Amendments to Policy GROWTH 1 of the 2015 Local Plan**

The proposed amendment is unsound as it is inconsistent with national policy and is unjustified.

*Assessment of housing needs*

2. We would agree with the Council's assessment of the minimum number of homes it needs to provide based on the standard method which when rounded up results in a housing need, when rounded up, of 600 dwellings per annum (dpa) for the period start from 2022/23. On the basis of the Council's plan period this result in a housing need of 5,400, two homes more than is stated in the proposed amendment to GROWTH 1. The proposed amendment to GROWTH 1 and the supporting text should clearly state that the annual requirement for housing over the plan period is 600dpa base the total housing requirement for the plan period based on this figure. Paragraph 61 of the National Planning Policy Framework (NPPF) also states that this is the minimum number of homes that should be delivered by the Council, and this should be clearly stated in the amended policy.
3. Planning Practice Guidance (PPG) also sets out at paragraph 2a-010 that there will be circumstances where it is appropriate to consider whether actual housing need is higher than is indicated by the standard method. In considering these matters the Council has examined whether there are unmet needs in neighbouring areas and the presence of growth deals that could lead to higher-than-expected growth. Whilst this paragraph sets out these scenarios as examples it is evident



from the language used in this paragraph that the list presented is in no way exhaustive. As such the Council should have considered this issue in more depth and whether the level of housing growth will be sufficient to support the expected level of jobs growth in the area. It is important that the plan is internally consistent and that amendments to housing needs are consistent with its expectation for economic growth.

4. Finally, the Council will need to consider, in line with paragraph 2a-024 of PPG whether the housing figures included in the plan should be uplifted to better support the provision of affordable housing. The most recent evidence we could find with regard to affordable housing needs is the 2016 OAN update, which indicates at paragraph 137 that 209 affordable homes are needed each year to meet needs. Given that affordable housing completions between 2011/12 and 2020/21 have averaged 15.3% of total delivery and have exceeded 20% in only three of those years it is clear that the Council needs to deliver more market housing in order to support the delivery of the affordable housing needed in East Cambridgeshire.

*Period over which housing needs must be considered*

5. The Council continue to state that it is unnecessary to look beyond 2031 in relation to housing needs and the delivery of new homes to meet those needs. The Council is aware that paragraph 22 of the NPPF requires strategic policies to look ahead over a minimum of 15 years from the point of adoption. However, despite this the Council maintain that because extending the period over which housing needs are considered would potentially have wider implications beyond the intention of the SIR it is not reasonable to make such an amendment. As we outline below this position is not justified and as such the proposals in the SIR are unsound.
6. In considering whether the period over which housing needs is considered should be extended it is essential that the Council first considers whether the policy being amended is a strategic policy and, if it is considered to be a strategic policy, that it is consistent with the NPPF. Firstly, paragraph 20 of the NPPF outlines that a strategic policy is one that sets out the overall strategy for the pattern, scale and quality of growth and makes provision for that growth. The focus of this review is to update the Council's strategic policy GROWTH 1 in its current local plan and more specifically the number of homes it is required to deliver as set out in this policy. As such this policy must be, on the basis of paragraph 20 in the NPPF, considered a strategic policy. The consequence of this is that any amendments to this policy should look ahead for at least 15 years following the adoption of this policy. This may have wider implications and it will be necessary for the Council to consider those implications as part of this review, and address these where necessary, if the revised policy is to be considered sound.
7. It is also worth reiterating from our previous comments that the requirement for strategic policies to look ahead for 15 years from their adoption is a shift in national policy between the 2019 NPPF and the 2012 version against which the adopted

local plan was examined. The 2012 NPPF only stated at paragraph 157 that local plans should “*be drawn up over an appropriate timescale, preferably a 15-year time horizon*”. This is an important qualification with regard to the period over which strategic policies should be considered and one that clearly needs to be taken into account in establishing the housing requirement in any local plan.

8. It is imperative for the Council to recognise that the NPPF and its associated guidance must be read as a whole. Its policies are interlinked, and the Council cannot cherry pick those it wants to address through the review of the local plan and ignore others that may require it to meet development needs over a longer period. For example, the local plan will set not only housing requirements but also the infrastructure needs for development which are used by utility companies to increase their capacity. Planning for a longer period provides clarity to utility companies as to how much growth is expected and where development to support that growth will go, allowing them to plan more effectively. The Council’s short-term plan will not provide that certainty and could delay infrastructure improvements required to support development beyond 2031.
9. To conclude, the Government is clear that strategic policies should look forward a minimum of 15 years from adoption and as such the Council’s decision not to amend the plan period is fundamentally unsound. We therefore consider it necessary for the proposed amendments to GROWTH 1 set out the housing requirement for East Cambridgeshire up to 2037/38.

#### *Housing requirement 2011/12 to 2021/22*

10. In updating policy GROWTH 1 the council set out that the housing requirement for the period 2011/12 to 2021/22 is effectively what was delivered stating “*the housing requirement for 2011-2022 is, in accordance with national guidance, determined as being the housing delivered in that period.*” This statement is wrong. The housing requirement has not reduced for that period it is just the case that the undersupply during this period is now wrapped up into the local housing needs assessment of 600 dpa. The Council should delete this statement and any reference to the housing requirement for the period 2011/12 to 2021/22 being 3,018 (plus any completions from 2021/22). If the Council are to refer to the housing requirement for this period and its relation to the requirement in future years, it must be accurate and should not be in policy. On the basis of the Council’s approach the plan period should start from the first year in which baseline household growth used in the standard method is calculated and look forward for at least 15 years from adoption.

#### *Housing trajectory*

11. The Council have set out in amended table 3.2 in proposed change number 7 a summary of estimated housing supply. However, we do not consider it to be sufficient to meet the requirements of paragraph 74 of the NPPF with regard to the inclusion of a housing trajectory in a local plan. In order to provide the necessary

clarity as to delivery expectations and supply across the plan period an annualised trajectory should be included as part of the review of the local plan.

### *Housing supply*

12. As the Council note the standard method wraps up any past undersupply through the affordability uplift, therefore delivery prior to the point at which the LHNA is undertaken is not considered by the Council to be relevant. At present the housing requirement in East Cambridgeshire as calculated using the standard method, and the most recent data on affordability published in March, results in a minimum housing requirement of 600 dpa. Therefore between 2022/23 and 2037/38 – 15 years post adoption in 2023/24 – the Council will need to find sufficient land to deliver 9,600 new homes. Using the amended table 3.2 and table 3 in the Council's latest Five-year Housing Land Supply Report there is a total supply of 9,502 homes on identified sites post 2022/23. In order to ensure needs are met in full with a policy compliant amendment to GROWTH 1 further land for development would need to be identified by the Council.

### **First homes**

13. The Council are not proposing to make any other amendments to the adopted local plan other than to GROWTH 1. However, we would suggest that the Council need to consider amendments to HOU3 to take account of the introduction of First Homes as set out in the Written Ministerial Statement published on the 24<sup>th</sup> of May. This statement establishes that local plans should take into account the new First Homes requirements from the 28<sup>th</sup> of June 2021 and consider whether the tenure mix in current policies should be amended. We would suggest that the Single-Issue Review is the ideal opportunity for the Council to amend its current tenure mix requirements to take account of First Homes.

### **Conclusion**

14. The HBF consider that the SIR is fundamentally flawed, particularly in its approach to the timescale over which housing needs and supply are being considered. As we outline above the NPPF is clear that strategic policies must look forward for at least 15 years from their adoption and we would recommend that the Council takes such an approach.

Yours faithfully



Mark Behrendt MRTPI  
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