

Sent by email to: planningpolicy@eastcambs.gov.uk

04/02/2021

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.
2. As the Council note it is a legal requirement for the Council to review and where necessary update its local plan to ensure that it is compliant with national policy. However, we are concerned that the Council continues to dismiss key concerns such as extending the timescale over which housing needs should be considered or whether its minimum housing requirement may be greater than that established using the standard method, two aspects we consider to be key to ensuring the plan is consistent with national policy. We explore both these, and other, issues further below.

Housing requirement

3. We would agree with the Council's assessment of the minimum number of homes it needs to provide based on the standard method. As the Council also note this will need to be updated to take account of the most up to date affordability data that is expected to be published in March. However, in establishing its housing requirement, it is important to recognise that the LHNA using the standard methodology results in the minimum number of homes that must be planned for. As such in amending GROWTH1 the Council will need to state that the number of homes it is required to deliver is a minimum.
4. The Council state that they have not been asked to meet the needs from a neighbouring area as well as noting that it does not intend to take any additional



housing from any neighbouring area, nor does the Council intend to “offload” any of its own housing requirement elsewhere. As we highlighted previously whilst it is encouraging that the Council is seeking to meet its own development needs in full it will be important that the Council does not predetermine its consideration of unmet needs should they arise. If there are unmet needs in a neighbouring area the Council must consider these as part of the plan making process and make reasoned judgements as to why it cannot support such a request, if it arises, rather than make such statements from the outset.

5. 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. This paragraph sets out some scenarios to consider but it is evident from the language used in this paragraph that the list presented is in no way exhaustive. It will be important that the Council examines other scenarios such as whether the level of housing growth will be sufficient to support the additional jobs growth being proposed as part of this local plan. It is important that there is internal consistency between the level of housing growth being proposed and the expected number of jobs being planned for.

Period over which housing needs must be considered

6. The Council continue to state that it 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 National Planning Policy Framework (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 it not justified and as such the proposals in the SIR are unsound.
7. 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 GROWTH1 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.

8. 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.
9. It is important 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.
10. 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 proposal not to amend the plan period is fundamentally unsound. We therefore consider it necessary for the proposed amendments to GROWTH1 set out the housing requirement for East Cambridgeshire up to 2037/38.

Housing supply

11. Our first concern relates to the housing trajectory that will be included as part of the Single Issue Review. In setting out the proposed amendments the Council have set out in table 3 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.
12. Our second concern is with regard to the level of supply required to meet what we would consider to be the appropriate period over which housing needs should be considered. As the Council recognise 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 616 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 9,872 new homes. Using table 3.2 on page 15 of the consultation document 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 and the proposed amendments found sound further land will need to be identified by the Council.

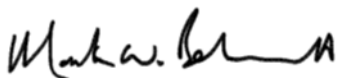
First homes

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 24th of May. This statement establishes that local plans should take into account the new First Homes requirements from the 28th 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 are concerned 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 such an approach is taken by the Council. We would welcome the opportunity to discuss this matter with Council and ensure that you do not submit a local plan that is unsound as its inconsistent with national policy and fails to meet the development needs of East Cambridgeshire in full.

Yours faithfully



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