

Spatial Planning,
Cheshire East Council,
Westfields,
c/o Municipal Buildings,
Earle Street,
Crewe CW1 2BJ
Email: localplan@cheshireeast.gov.uk

Consultee ID: 755911
19/04/2016

Dear Sir / Madam

Cheshire East Local Plan Strategy: Proposed Changes (Consultation Draft)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Cheshire East Local Plan: Proposed Changes (Consultation Draft).
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. The Council and Local Plan Inspector will both be aware that the HBF made previous representations to the Local Plan at the time of original submission for examination. These comments were followed with hearing statements as part of the original examination in 2014 and the resumed examination in 2015. The HBF has not sought to replicate these previous comments other than as necessary to substantiate our on-going concerns with the amendments to the Local Plan identified within the '*Proposed Changes*'. It should, however, be noted that our original comments still stand and are considered to remain valid.
4. **The HBF would wish to continue its attendance at the examination hearing sessions to enable us to expand upon the points made within these and previous representations as well as respond to any new points made.**
5. The HBF wish to submit the following comments in relation to the proposed changes, these are set out in the same order as the consultation document. Where similar amendments exist in more than one place our comments focus upon the principal policy or text, they are not replicated for every amendment to avoid repetition.

Duty to Co-operate

6. Whilst the HBF still has some concerns regarding the Council's compliance with the requirements under the Duty to Co-operate, as set out within our original submission comments and hearing statements, it is noted that the Inspector has within examination document PS A017b indicated that in his opinion the Council has met the minimum legal requirements of the Duty to Co-operate. Subsequent to the initial examination hearing sessions the Council has updated its Duty to Co-operate Statement (examination reference: RE B008) and signed numerous memorandum of understanding with neighbouring authorities, including Stockport.

Policy PG 1: Overall Development Strategy

The policy is considered unsound because it is not justified, will not be effective, is not positively prepared.

7. The amendments to Part 2 of the policy increase the housing requirement from 1,350dpa to 1,800dpa and removes the stepped approach to delivery in favour of a consistent average over the plan period. The deletion of the stepped housing delivery requirement is consistent with our previous comments upon this issue and is therefore supported (Matter 3 hearing statement; examination ref: M3.003).
8. The upwards revision of the housing requirement from 1,350dpa to 1,800dpa is a positive step and is considered to more closely align with the housing needs of the area. It also more closely accords with our previous comments upon this issue. It is, however considered that the figure of 1,800dpa still falls short of the housing needs of the area and a further upwards revision should be considered.
9. The primary evidence for the proposed housing requirement is set out within the 2015 *Housing Development Study* (2015 ORS study) (examination ref: PS E033) produced by ORS on behalf of the Council. This study, whilst far more robust than the Council's previous work, contains a number of flawed assumptions in relation to demography, employment, market signals and affordable housing. The Council and Inspector will be aware that the HBF made a number of comments upon this study within our response to Matter 1 of the resumed examination hearing sessions (examination ref: RM1.004). The following comments do not replicate these earlier concerns but rather should be read in conjunction with them.

Demography

10. The 2015 ORS study identifies a demographic projection of housing need of 1,339dpa (paragraph 5.24). This projection, which ORS describe as “...*the most reliable and appropriate demographic projection for establishing future housing need.*” (2015 ORS study, paragraph 5.25), takes account of the 2012 sub-national household projections (2012 SNHP), long-term migration trends and makes adjustments for vacancy rates and second homes. Within our previous comments upon this issue (Matter 1 resumed examination hearing statement RM1.004) we raised issue with the fact that the demographic projections did not take account of the housing moratorium which was not lifted until 2008, nor the under-delivery against previous plan requirements. On the issue of under-delivery it is worth noting that the cumulative effect by 2013-14 was 2,251 dwellings against the former RSS requirement. Both of these issues will undoubtedly have had an impact upon rates of migration into Cheshire East and correlate with significant increases in house prices over the same period, identifying an element of stress in the market.
11. Further to these comments it is also notable that the 2015 ORS study is based upon the 2012 SNHP household representative rates (HRRs), formerly known as headship rates. Whilst it is agreed that the 2012 SNHP should be used as the starting point, it is also clear that local characteristics may require alterations to HRRs. This may be required to reflect the impact of previous policy decisions or to take account of an improving economic situation.
12. Nationally the HRRs contained within the 2012 SNHP are an upward adjustment upon the previous 2011 interim SNHP, which projected a decrease in HRRs based upon previous trends. Nationally the 2012 SNHP HRRs are significantly higher for younger age cohorts, particularly the 25 to 34 age group. The Government is actively seeking to increase HRRs through interventions such as Help to Buy and Starter Homes, the latter of which is aimed directly at the under 40 age groups. Given the improving economic conditions and these Government stimuli, it would appear appropriate to ensure that HRRs for these age groups in particular are seen to improve over the period of the plan.
13. Figure 25 of the ORS report identifies that the 2012 SNHP maintain an assumed trend of reducing HRRs for younger households (Aged 25 – 34) within Cheshire East. This is likely to be due to the sustained affordability challenges in

the authority associated with comparatively high house prices and high demand for housing. This trend is at odds with the Government's policy aims and appears contrary to the need to increase the working age population within Cheshire East which will be required to fulfil the jobs created by the economic growth envisaged for the area. The HBF consider a more positive approach would be to reverse this trend.

14. The Inspector addresses many of the above issues within his *Further Interim Views* (examination ref: RE A021) noting in paragraph 24 that;

"...the uplift proposed between the base demographic need and the proposed OAN/housing requirement figure would more than account for any adjustment needed to reflect these demographic factors"

15. Whilst the uplift is noted this is largely due to the need for employees to take up the new jobs created in Cheshire East. A change in the HRRs as advocated would mean that additional housing is required to accommodate the same level of employees. It is also noted that the Inspector references the 2015 PAS guidance (*Objectively Assessed Need and Housing Targets: Technical Advice Note*) which suggests that the 2012 SNHP provide the best information available at present. It is, however, also important to note that the PAS guidance also identifies that;

"...these rates (2012 HRRs) may be tested and adjusted in response to local evidence, so they take account of local factors not captured by the CLG projections...." (paragraph 6.42).

16. Furthermore the PPG identifies that;

"...The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply." (PPG, ID 2a-015)

17. Given the issues of under-delivery and affordability, coupled with the local characteristics of HRRs within Cheshire East the HBF consider that an adjustment to the demographic projections is justified. This adjustment should include changes to the HRRs which would inevitably impact upon the economic scenarios discussed below.

Employment

18. The 2015 ORS study considers employment trends, utilising a figure of 0.7% employment growth per annum. This figure is based upon the Ekosgen report *Alignment of Economic, Employment & Housing Strategy* (examination ref: PS E032) which concludes that this figure is consistent with the previous performance of the Cheshire East economy and in line with the economic ambitions of the Council. The HBF made comment upon the 0.7% figure within our response to Matter 1 of the resumed examination hearing sessions (examination ref: RM1.004), suggesting that higher figures have been achieved in the past and are projected to occur in the future. These comments are still considered valid.

19. An economic growth rate of 0.7% per annum, would utilising all other assumptions within the ORS study, provide a housing need of 1,894dpa (Figure 57). The study then reduces this 1,894dpa figure to 1,800dpa based upon it requiring unprecedented levels of migration. Whilst the HBF agree that the levels of migration identified in paragraph 5.89 of the ORS study are higher than previously recorded this must be put into context. As noted in paragraph 10 above, there was a restraint policy upon housing growth in operation and under-delivery over the period assessed. This includes the period 2002 to 2007 when the highest sustained rates of net migration were achieved and the highest recorded period since 2001 (2006-07) was achieved. If such restraint policies and under-delivery did not occur it is highly plausible that net migration would have been significantly higher.

20. The effect of not meeting the needs of the area within Cheshire East is to increase the level of in-commuting. This would require an unprecedented level of in-commuting with its associated impacts upon infrastructure and the environment. The ORS study does not provide any guidance upon how the reduction was derived or the level of impact this would have. It is notable that neighbouring areas, including Greater Manchester, Cheshire West and Stoke-on-Trent, have ambitions to grow their own economies. In this context it could be argued that Cheshire East will need

to become more sustainable in terms of meeting its own labour-force needs, not less. The PPG also advises against such approaches noting;

“... this could result in unsustainable commuting patterns... and could reduce the resilience of local businesses.” (PPG ID 2a-018).

21. Finally the 2015 PAS guidance (*Objectively Assessed Need and Housing Targets: Technical Advice Note*) suggests such an approach to be ‘risky’ and would also need neighbouring local authorities to agree to the change in commuting patterns (paragraph 8.16).

Market Signals

22. The HBF has addressed the issue of market signals within our comments upon the submission version of the plan our Matter 3 hearing statement (examination ref: M3.003) and Matter 1 hearing statement for the resumed hearing sessions (examination ref: RM1.004). In the interests of brevity they are not repeated here but nevertheless are still considered valid.

Affordability

23. The ORS study places considerable emphasis upon the private rented sector in assisting Cheshire East to achieve its affordable housing needs. This is reiterated within the subsequent *Affordable Housing Note* (examination ref: RE F019). The HBF does not dispute that a number of those receiving housing benefit support reside within the private rented sector. However, in terms of need, the NPPF definition of affordable housing precludes the private rented sector and as such this should not be considered a source of supply to overcome the affordable housing needs of the area. The PPG identifies how the need for affordable housing should be calculated (ID 2a-022 to 2a-029) at no stage does this suggest discounting the need to take account of the private rented sector. The Inspector within his *Further Interim Views* notes;

“...CEC may therefore wish to review its approach to establishing the need for affordable housing, even though any further uplift which might be needed to reflect these factors could probably be met by the increase in the OAN needed to balance jobs, homes and workforce...” (paragraph 28)

24. The HBF is unaware that the Council has sought to undertake such a review and whilst it is accepted this may not lead to any further uplift in the OAN until such work is undertaken this cannot be verified.

Inclusion of C2 uses

25. The 2015 ORS study housing figure of 1,800dpa contains approximately 100 C2 units per annum (figure 57). The principle of establishing a single OAN which includes the needs for two mutually exclusive forms of housing – i.e. nursing homes and dwelling houses – is not considered sound as the needs of one cannot be offset with increases in another.

Conclusions / Recommendations

26. In conclusion the HBF is supportive of the removal of stepped housing requirement. The increase in housing proposed, whilst welcome, is considered insufficient to meet the needs of the area. This is due to the lack of amendments to 2012 SNHP HRRs, low rates of economic growth, market signals analysis and affordable housing need. Even if all other assumptions were concluded as being sound the lack of justification for the 94dpa reduction for '*unprecedented levels of migration*' should be discounted due to the unprecedented level of commuting this would create.

Policy PG 3: Green Belt

27. The HBF agrees with the Council that the requirements to allocate sufficient land for the development of market and affordable housing, and for employment development to meet the identified needs constitute exceptional circumstances that justify the alteration of Green Belt boundaries through the preparation of the Local Plan (*Cheshire East Green Belt Assessment Update 2015*, examination ref: PS E034). Indeed it is noted that without such releases the amount of new development that could be planned would be low, this would lead to significant reliance upon neighbouring authorities agreeing to take any unmet needs. Our principle concern with the *Green Belt Assessment Update* relate to the objectivity of the study. Our concerns are set out within our Matter 3 resumed examination hearing statement (examination ref: RM3.006). These issues are not repeated here. Whilst it is noted that the Inspector (*Further Interim Views*, examination ref: RE A021) suggests that

the update provides an adequate approach (paragraph 46) our concerns regarding the objectivity of the assessment remain.

28. In terms of the alterations to Policy PG3 the HBF supports the deletion of part 7, which referred to a new area of Green Belt. This is consistent with our previous comments upon this policy as well as the Council's updated evidence base, *New Green Belt / Green Policy Gap* (examination ref: PS 031a.6).

Policy PG 4: Safeguarded Land

The proposed policy is considered unsound as it is not sufficiently positively prepared or justified by the evidence.

29. The HBF support the provision of safeguarded land. The Council's technical annex on safeguarded land, produced by ARUP (examination ref: PS E031a.5) clearly demonstrates that to ensure that Green Belt boundaries will not need to be altered at the end of the plan period safeguarded land is required. The HBF agrees with this assessment. The HBF does, however, consider that insufficient safeguarded land has been identified to ensure that the Green Belt boundaries will not require alteration at or before the end of the plan period.

30. The NPPF, paragraph 85, identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching '*well beyond the plan period*' and that local authorities should satisfy themselves that Green Belt boundaries '*will not need to be altered at the end of the development plan period*'. NPPF, paragraph 157, advocates a 15 year time horizon for Local Plans. It would therefore appear appropriate to ensure that the Green Belt boundaries are capable of enduring until at least 2045, a point noted within paragraphs 3.6 and 7.1 of the technical annex.

31. Amended plan paragraph 8.61b identifies that 200ha of safeguarded land are to be provided this, it is claimed, would provide sufficient safeguarded land for 8 to 10 years, based upon a density of 30 to 40 dwellings per hectare. Paragraph 8.62, as amended, further suggests that combined with other sources of supply this amount of safeguarded land will be sufficient to ensure that the Green Belt boundary will not need to be further amended at this time. The HBF consider there is a strong argument to provide a greater quantity of safeguarded land as this will provide greater choice and flexibility at plan review but also provide certainty for residents and the Council over the longevity of the Green Belt. This is particularly important

given the likely impacts of projects such as HS2 and the Northern Powerhouse upon the growth potential of the area over the longer term. If sufficient land is not provided now it will simply mean further amendments to the boundaries at subsequent plan reviews, this is not only contrary to the NPPF but also erodes public confidence in the purpose of Green Belt.

32. It is also notable that the Pre-Submission version of the plan (November 2013) identified a need for 291 hectares to meet development needs between 2030 and 2050. This is significantly greater than now proposed and is more likely to provide assurances that Green Belt boundaries will not need to be further amended at plan review.

33. The ARUP study contains a number of assumptions which cause concern relating to the reliability of the supply. The HBF addressed these points within our resumed examination hearing statement on Matter 3 (examination ref: RM3.006), for brevity these issues are not repeated here.

Recommendation

34. The HBF recommend that additional safeguarded land be provided through the plan, either within the Local Plan Strategy document or a commitment to provide a greater quantity within the forthcoming Site Allocations and Development Policies document.

Policy SC 5: Affordable Homes

The policy is unsound, the affordable housing requirement is not justified by the evidence and therefore will not be effective. The policy is also contrary to national policy contained within the NPPF.

35. The policy remains largely unchanged from that originally submitted for examination. The HBF considered the policy to be unsound. In summary our objections were based upon reasons of viability concerning the affordable housing target, based upon the Council's own evidence, and the fact that criterion 1(iii) indicates that where evidence indicates a change in the Borough's housing need the affordable housing threshold and percentage may be varied without a review of the plan. In the interests of brevity these issues are not repeated here, but can be reviewed within our comments upon the submission version of the plan and matter 10 statement upon the original examination sessions (ref: M10.002).

36. It is, however, worth noting that given the significant reduction in affordable housing need, from 1,401 per annum to just 355 per annum, suggested by the Council (paragraph 12.42 and *Housing Development Study 2015*, ref: PS E033) it is debateable whether a 30% affordable housing requirement is still valid. This is because the new affordable housing requirement identified represents less than 20% of the overall housing requirement. Examination document RE F019 indicates that the policy would be likely to provide more than the 7,100 affordable dwellings required over the plan period. If this is the case, as suggested by the Council, it appears illogical to retain an affordable housing requirement that may create a surplus of such accommodation. This issue is likely to be further compounded by the imminent introduction of a requirement for Starter Homes on qualifying sites. The policy would therefore place undue and unnecessary burdens upon the development industry and as such is unjustified and contrary to the NPPF (paragraph 173).

37. The HBF supports the proposed changes to the policy which delete the reference to the Homes and Communities Agency '*Design and Quality Standards*' along with the '*Code for Sustainable Homes*'. These deletions accord with our original representations and matter 10 hearing statements.

Policy SE 1: Design

The policy is unsound as it will place additional burdens upon the development industry which have not been justified by the evidence.

38. The HBF made comment upon this policy at submission whilst Lifetime Homes have now been removed our original concerns regarding the use of Building for Life¹² remain. Furthermore the amendments seek to introduce the nationally described space standards (NDSS) into part 4 of the policy. The Planning Practice Guidance (PPG) issued on 27 March 2015 covered Optional Technical Standards for housing identifying that they can only be introduced through the preparation of a Local Plan and then only where justification is provided.

39. The PPG (reference ID: 56-020) requires LPAs to identify need and establish a justification considering;

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can*

be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.*

40. As it stands, the Council has not provided any specific evidence in relation to the NDSS either within its evidence base or as part of the policy justification. It is therefore unjustified and contrary to national policy to introduce the NDSS through the plan at this stage.

41. To introduce the NDSS the Council should assess whether it should be applied across the board, covering general market family housing, affordable housing, student housing and flats and apartments. The Council should demonstrate an understanding of the likely effect of NDSS adoption on these differing housing models before applying the standards for consideration of planning applications.

42. Similarly as evidenced by the 2015 *Housing Development Study* (examination ref: PS E033) affordability is already a significant problem for Cheshire East. These issues are particularly acute for first time buyers and those down-sizing in advance of or during retirement. The additional costs of purchasing and running (e.g. increased fuel bills and council tax) a larger home are unlikely to be compatible with the desire to downsize and may put home ownership out of the reach of first time buyers.

43. Finally the implications of adoption of the NDSS would also need to be considered within the site allocations of both this document and the forthcoming *Site Allocations and Development Policies* document due to the impact upon density and likely requirement for greater land-take.

Policy SE 9: Energy Efficient Development

The policy remains unsound as it will place additional burdens upon the development industry which are not justified or consistent with national policy.

44. The deletion of references to the '*Code for Sustainable Homes*' and '*Lifetime Homes*' are supported. It is, however, noted that Part 2 of the policy retains the requirement for developments over 10 dwellings (including conversions) to secure at least 10% of their energy requirements from decentralised or renewable / low carbon sources.
45. The Council will be aware that following the Government's National Housing Standards Review, which was finalised in March 2015, local authorities can no longer apply additional energy standards relating to the construction, internal layout or performance of new dwellings. These are now solely matters for Part L of the Building Regulations and as such the plan should not be seeking to place further requirements upon developers. This is directly contrary to the Housing Standards Review.
46. It is recommended that part 2 of the policy be deleted.

Monitoring and Implementation

The proposals for plan monitoring and review are considered unsound as they are not positively prepared or effective.

47. The monitoring and implementation section (chapter 16) of the proposed changes document identifies a number of monitoring and implementation mechanisms. The HBF is primarily concerned with the delivery of housing and as such indicators S2 to S4, and their associated triggers are generally welcomed. Unfortunately the identified actions within the monitoring tables do not provide any certainty or clarity on if and when a plan review would be required. Whilst the triggers of a '*shortfall in housing completions of more than 20% over a rolling three average*' and '*a shortfall of greater than 1 year*' in the five housing land supply are noted the Council should be undertaking many of the actions these issues would trigger prior to meeting the trigger point. For the plan to be effective it is recommended that the action resulting from these triggers should be a full or partial review of the plan.
48. This would provide clarity and certainty to the plan. This will identify a firm commitment from the Council to undertake such a review in a timely manner and ensure that the development industry and residents are aware of the circumstances which would trigger a review. This is particularly important within Cheshire East due

to previous problems of housing under-delivery. It is also prudent that the plan acknowledges that High Speed Rail 2 (HS2) will have a significant impact upon the area and this is likely to require a plan review.

49. The HBF recommends that the review mechanisms be formalised in a plan policy. Such an approach would be consistent with the NPPF, paragraph 14, which requires plans to have sufficient flexibility to adapt to rapid change. It is also notable that where there are uncertainties over the impact of future infrastructure other plans have taken a similar approach to that which we advocate (Greater Norwich Joint Core Strategy). The plan itself, paragraph 15.21, acknowledges that HS2 may necessitate significant change to the plan. Likewise a continued failure to deliver sufficient housing could have serious detrimental impacts upon house prices, affordability and the economic potential of the area.

50. The HBF therefore recommends either a stand-alone policy, or an addition to Policy PG1, which commits the Council to undertake a review in the event of hitting the triggers set out within monitoring indicators S2 to S4 or significant change required due to the effects of HS2. A possible new paragraph for Policy PG1 is included below;

'3. The Council will monitor progress against these overall levels of development. In the event that the plan is failing to meet its requirements, then an early review of plan shall take place to modify the plan to rectify any shortfalls. The triggers for plan review are set out within the monitoring and implementation section of the plan.

4. High Speed Rail 2 is likely to provide significant additional economic growth to the area. The Council will respond to this by undertaking a full or partial review of the plan, once full details of the proposals are confirmed.'

Appendix E: Housing Trajectory

51. Appendix E provides an updated trajectory indicating how the new plan requirement will be met. The full details of the trajectory is included within the Council's February 2016 *Housing Supply and Delivery Topic Paper* (examination ref: RE F009). It is understood that this topic paper is to be updated with a base date of 31st March 2016 (plan paragraph E.13). Due to issues of timescale this paper was not available at the time of writing of these representations. The HBF does, therefore, wish to reserve our position prior to any future hearing sessions.

52. It is, however, worth noting that the HBF has a number of concerns and comments on the current trajectory and quantity of allocations proposed. These are set out below.

Commitments

53. Paragraph 3.10 of the *Housing Supply and Delivery Topic Paper* (Topic Paper) identifies that 4,811 homes have been completed since 1st April 2010 and a further 16,013 are commitments, as of 30th September 2015. These commitments are identified in table 4.4 of the Topic Paper. The table does, however, appear to assume that all permissions, be they full, outline or awaiting section 106 will be built out in full over the plan period. This is not necessarily the case and sites may deliver less than anticipated due to a wide range of reasons, not least due to speculative applications undertaken for valuation purposes. It is common practice to discount the level of commitments to ensure that it provides a more realistic level of delivery. This should ideally be based upon local information, however, where this is not available a 10% discount has been regularly applied in studies and appeal decisions.

Buffer

54. The HBF agrees with the Council that a 20% buffer is required within Cheshire East in accordance with NPPF paragraph 47 (Topic Paper, paragraph 4.4). However we disagree that this buffer should only be applied to the requirement and not the backlog (Topic Paper, paragraph 4.5). Whilst the Secretary of State decision, identified at paragraph 4.6, is noted there have, since this time, been many decisions supporting the application of a buffer to the shortfall. The following table provides a small sample of such decisions. The Amber Valley Inspector provides useful commentary upon the appropriateness of the two methods.

Reference	Local Authority	Date
Land at Tilehurst Lane, Bracknell: S78 appeal decision (APP/R0335/A/14/2219888), paragraphs 93 & 94	Bracknell Forest	2 nd February 2015
Land at Goch Way, Andover: S78 appeal decision (APP/C1760/A/14/2222867), paragraph 32	Test Valley	15 th May 2015

Warwick Local Plan: Inspector's findings regarding initial matters and issues, paragraph 41	Warwick	1 st June 2015
Amber Valley Local Plan: Inspector's letter	Amber Valley	10 th August 2015
Land off Tanton Road, Stokesley: S78 appeal decision (APP/G2713/A/14/2223624), paragraphs 41 to 47	Hambleton	7 th September 2015
Horsham District Planning Framework: Inspectors Report, paragraph 49	Horsham	8 th October 2015

55. The *Five Year Land Supply FAQs* produced by the PAS also identify that PAS;

“believe the preferred approach is for the buffer to be applied to both the requirement and shortfall. This is the most appropriate order because it ensures the buffer is applied to the full requirement which represents all the need that exists. The idea is that for every year you underprovide the amount adds onto the requirement to be met in the next five years.”

56. The HBF therefore consider the correct calculation of the five year requirement, as set out within paragraph 4.7 of the Topic Paper to be 16,907 dwellings.

Dealing with the Shortfall

57. The HBF supports the use of the ‘Sedgefield’ method as identified in Table 4.3 of the Topic Paper, this is considered most consistent with the Government’s objectives to significantly boost housing supply and the PPG which states;

“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’” (ID 3-035)

58. As noted by paragraph 4.22 of the Topic Paper assistance under the ‘Duty to Co-operate’ is not an option for Cheshire East and as such it stands to reason that it should seek to deliver its housing requirement in line with Government guidance. The HBF note the points at paragraph 4.20 which suggest why such an approach may be inappropriate. However, if the Council sought to pro-actively bring sites forward, including those yet to be identified through the Allocations document it

would be in a far better position to meet its needs early rather than try and put these off until later in the plan period. The HBF fundamentally disagrees with point (vi) which appears to suggest that the industry is unable to deliver. The lower rates of delivery over recent years have been largely due to the Council resisting a significant number of developments. It is notable that as these appeals are now being decided the rate of delivery is increasing and is likely to do so going forward.

59. It is noted that the Council intends to utilise a 'Sedgepool' methodology, aimed at dealing with the shortfall over 8 years, rather than 5. Whilst this is considered an improvement to simply spreading the backlog over the remainder of the plan (Liverpool method) this has not been tested at examination and is not considered appropriate. It is, however, noted that the Council will seek to adopt this methodology at forthcoming appeals, the HBF will await the outcome of these appeals with interest.

Information

60. I would like to be made aware of the following;

- Forthcoming examination hearing dates, within which we wish to participate;
- The publication of the examiner's recommendations and any publicly available correspondence regarding the Local Plan; and the
- Adoption of the Local Plan Strategy.

61. I would be happy to discuss any of the issues raised in this representation further prior to forthcoming hearing sessions.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229