

Date: 25th August 2016

Consultee ID: 755911

Matter: 4

CHESHIRE EAST LOCAL PLAN STRATEGY – PROPOSED CHANGES

Matter 4: Other Policies Subject to Proposed Changes (Policies SC2, SC4-SC5, SE3, SE5-SE9 & CO2)

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within the Inspector's *Matters and Issues* document (examination ref: PC A008) in regard to the Cheshire East Local Plan Strategy: Proposed Changes document (hereafter referred to as the *Proposed Changes* document).
2. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan (dated 25th April 2014), original examination hearing statements (dated 20th August 2014), resumed examination hearing statements (dated 24th September 2015) and proposed changes document (dated 19th April 2016). The HBF has also expressed a desire to attend the proposed changes examination hearing sessions.

Key issue: Do the revised policies provide an appropriate, effective and soundly based framework for: - supporting stronger communities, including the provision of leisure, sports and recreation facilities, and providing a mix of dwellings, including affordable housing; - protecting, maintaining and enhancing the high quality environment within Cheshire East, including biodiversity and geodiversity, green infrastructure, the historic environment, renewable energy and energy efficient development; and - enabling business growth through transport infrastructure, which is positively prepared, justified with evidence and consistent with the latest national policy?

4.3 Affordable Homes (Policy SC5)

a. Is the revised approach to providing affordable housing appropriate, soundly based, justified, effective, deliverable, viable and consistent with the latest national policy, particularly in setting the site thresholds for seeking affordable housing in Local Service Centres and all other locations apart from Principal Towns and Key Service Centres?

3. It is noted that the Council intends to amend the proposed threshold for requiring affordable housing outside of the Principal Towns and Key Service centres. This is set out within the Council's 'Summary of Key Issues and Further Changes to the LPS' document (examination ref: PC B004). Given the recent Court of Appeal decision and changes to the PPG this is considered appropriate.
4. The HBF has also reviewed the Council note 'Private Rented Sector and Affordable Housing Need' (examination ref: RE F019). This is considered too add little to the debate over the inclusion of the Private Rented Sector in accommodating affordable housing needs, which remains contrary to the NPPF definition. We refer the Inspector to our previous comments upon this issue (examination ref: RM1.004).

5. Other than the changes to the threshold the HBF is unaware of any new evidence or proposed policy changes. We do, however, remain concerned over the policy wording and implications, particularly with regards to viability and the implications of part 1(iii) of the policy. This criteria provides no certainty for the development industry and is directly contrary to the NPPF. The NPPF (paragraphs 17 and 154) state that local plan policies must be clear so that applicants know what they must do to submit an application that is likely to be approved, and decision-takers know how to react to that application. The NPPF is also clear (paragraph 174) that local plans must set out the burdens that will be placed upon the development industry. Criterion 1(iii) would not provide this certainty and as such is likely to have a detrimental impact upon delivery. Further comments upon this issue are included in our comments upon the submission version of the plan and original matter 10 examination hearing statement (examination ref: M10.002).

4.9 Energy Efficient Development (Policy SE9)

a. Does revised Policy SE9 properly reflect the latest national policy arising from the outcome of the recent Housing Standards Review?

6. Within our comments upon the '*Proposed Changes*' document against Policy SE9 we objected to Part 2 of the policy which required developments over 10 dwellings (including conversions) to secure at least 10% of their energy requirements from decentralised or renewable / low carbon sources. This is was not considered consistent with national policy.
7. The HBF therefore welcomes the proposed amendments to this policy, set out on page 16 of examination document '*Summary of Key Issues and Further Changes to the LPS*' (ref: PC B004).
8. In addition, and whilst not explicitly raised by the Inspector, we also welcome the changes proposed to Policy SE 1 which deletes the reference to internal and external space standards. This also accords with our comments upon the '*Proposed Changes*' document.

Yours sincerely,



Matthew Good
Planning Manager – Local Plans

Email: matthew.good@hbf.co.uk

Tel: 07972774229