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**Sent by Email only**

20<sup>th</sup> March 2017

Dear Sir / Madam,

## **Cheshire East: Schedule of Proposed Main Modifications to the Local Plan Strategy – Proposed Changes (March 2016 Version)**

1. Thank you for consulting the Home Builders Federation (HBF) on the proposed main modifications to the Cheshire East Local Plan Strategy – Proposed Changes document. The Council and Inspector will be aware that we have made detailed comments throughout the examination of the Cheshire East Local Plan Strategy. We have not sought to replicate those comments within this response but trust they will be given due consideration. Whilst we welcome the fact that the main modifications have sought to overcome a number of our concerns some remain outstanding.
2. Our comments upon the main modifications are provided below.

### **Modification Number: MM03 (Policy PG1: Overall Development Strategy)**

3. The HBF is supportive of the proposed changes which identify the housing need as a minimum of 36,000 net additional dwellings over the plan period at an average rate of 1,800 dwellings per annum (dpa). We also support the inclusion of paragraph 8.9a which acknowledges that due to the minimal effect of the 2014 based household projections upon housing need no reduction is proposed. This is considered justified.
4. The HBF is, however, disappointed to note that the housing need figure has not been increased in line with our previous comments upon the Proposed Changes document and matter 1 resumed examination hearing statement. These comments are still considered valid.
5. The HBF is also supportive of the plan providing flexibility by including a buffer of 3,560 dwellings over the housing need figure. The inclusion of a buffer is considered to conform to the NPPF requirements for plans to provide flexibility, choice and be able to deal with changing circumstances. We do, however, consider given the

previous under-delivery within the district that a buffer larger than 10% would be justified.

**Modification Number: MM18 (Policy SC5: Affordable Housing)**

6. The HBF supports the amendments to the thresholds within part ii of the policy. This conforms to the amended guidance within the PPG (ID 23b-031) and the Written Ministerial Statement, dated 28<sup>th</sup> November 2014.
7. Despite our previous comments upon this issue part iii of the policy remains unchanged. The HBF considers this unsound and should be rectified. The Council cannot simply change the thresholds and percentage requirements without a full or partial review of the plan. The NPPF, paragraph 174, clearly identifies that Council's must; "...set out their policy on local standards in the Local Plan, including requirements for affordable housing...". It is therefore clear that the Council will only be able to make changes to its affordable housing policy through a review of the plan as to do otherwise will effectively create new policy. The Inspector's letter regarding Leeds City Council's affordable housing policy, which suggested including thresholds and standards in an SPD, confirms this point, making it clear that local standards and targets must be set out within plan policies to ensure they are sound (letter to Council dated 8th November 2013).
8. The HBF therefore recommends the following amendment to part iii provide clarity and certainty;

*"In future, where Cheshire East Council evidence, such as housing needs studies or housing market assessments, indicate a change in the Borough's housing need the above thresholds and percentage requirements may be varied **through a full or partial review of the plan;**"*

**Modification Number: MM19 (Policy SE1: Design)**

9. The HBF supports the deletion of part 4(i) of the policy. This is consistent with our previous comments upon this policy.

**Modification Number: MM24 (Policy SE9: Energy)**

10. The HBF supports the deletion of the reference to dwellings in part 2. This is consistent with our previous comments upon this policy.

**Modification Number: MM88 (Housing Trajectory)**

11. The proposed modification introduces the Council's 'Sedgepool 8' methodology. As discussed at the resumed examination hearing sessions the HBF is unaware of such a methodology being used elsewhere. Whilst the HBF considers this methodology preferable to the 'Liverpool' methodology it is not considered to be in conformity with the PPG (ID 3-035). The HBF considers the Sedgefield methodology which deals with any backlog in the first five years to be the most appropriate and consistent with current national guidance.

**Modification Number: Annex 1 (Amendments to Table 16.1)**

12. Indicator S3 will need to take account of the Governments recently published Housing White Paper methodology for dealing with under-delivery and the five year housing land supply.

**Information**

13. I would be happy to discuss any of the above comments in greater detail. The HBF would like to be involved in further hearing sessions if considered relevant and necessary.

14. We would also like to be informed of the following;

- Publication of the inspectors' recommendations
- Adoption of the Local Plan

Yours sincerely,

*MJ Good*

**Matthew Good**  
**Planning Manager – Local Plans**

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