## **Home Builders Federation**

ID: 1147379

Matter 4

## EAST CAMBRIDGE BOROUGH LOCAL PLAN EXAMINATION

Matter 4: Housing and Employment land Requirement

Issue 1: Whether the Council's approach to calculating its housing and employment requirements is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

30. Is the identified overall housing requirement of 10,835 dwellings or 542 per annum (dpa) over the plan period justified and consistent with national policy?

No. This requirement will not meet the assessed housing needs of the Council and as such is inconsistent with paragraph 47 of the NPPF. The Council should commit to ensuring the delivery of 12,900 homes between the 2014 and 2036. As we have set out in our statement to Matter 3 the Council have chosen to ignore two years of under delivery by adopting the standard methodology and bring forward the start of their plan period. It is also essential that the Council set this requirement as a minimum to ensure it is not considered a ceiling or cap on the amount of development.

31. Do either of the two parts of the second bullet point within Paragraph 14 of the Framework apply to meeting East Cambridgeshire's objectively assessed needs? If so, how?

The Council have identified the potential constraints on development as set out in paragraph 14 footnote 9 and evidently these have not prevented them from being able to prepare a plan that meets their development needs as set out in LP2. It is also important to remember when considering paragraph 14 that the adverse impacts must significantly outweigh the benefits of further development. Given the worsening affordability of homes ECDC; the need for more affordable homes; and the fact that the housing and employment aspirations will support much needed infrastructure improvements the bar for any adverse impacts that will lead to development being considered unsustainable must be very high.

32. What is the justification to discount the OAN figure by 1,125 dwellings and to rely on Peterborough to contribute to the delivery of East Cambridgeshire's needs? What evidence is there that Peterborough has previously delivered the housing needs of East Cambridgeshire, and will continue to do so, and when?

No further comment

33. The soundness of individual site allocations will be considered at Stage 2 of the Examination, and I will not be considering individual site allocations in any detail at this stage. However, is the assumption that 1060 dwellings will be delivered over the plan period as a result of windfall developments and unallocated Community Land Trust sites realistic and justified by evidence?

No further comment

## **Recommendation on Matter 4**

The Council should continue to plan its housing need on the basis of a 2014 to 2036 period as that is the basis for their Objective Assessment of Housing Need and employment growth. For this plan it will require the delivery of at least 12,900 homes for this period either within East Cambridgeshire or in another part of the HMA where appropriate. The second bullet point of Policy LP2 should therefore be amended accordingly.

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