

RPS

Proposed Submission Local Plan Examination Hearing Statement

In respect of

East Cambridgeshire Proposed
Submission Local Plan
Examination – Matter 4

On behalf of

Abbey Properties Cambridgeshire
Limited & Peter and Michael
Seymour and Nicholas and Judith
Holdsworth

RPS Ref: JCG22793

23 May 2018

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ADDING VALUE

QUALITY MANAGEMENT

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1 INTRODUCTION

- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth, to submit a Hearing Statement and appear at the Examination Stage 1 Hearings on their behalf in relation to the East Cambridgeshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to both the Local Plan Further Draft consultation in January 2017 and the Proposed Submission consultation in November 2017.
- 1.3 The representations to the Local Plan Further Draft raised objections to the proposed housing allocations within Witchford and a number of draft policies including the Settlement Hierarchy and the Countryside (Policy LP3), Achieving Design Excellence (Policy LP22) and Conserving and Enhancing Heritage Assets (Policy LP27).
- 1.4 The 2017 November representations to the Proposed Submission Local Plan raised further objections to the proposed allocation of housing sites within Witchford and a number of the draft policies including LP2, LP3, LP6, LP16, LP32, Witchford1, Witchford2, Witchford3 and the Sustainability Appraisal.
- 1.5 These representations are provided in the appendices to the Hearing Statement submitted in relation to Matter 1.
- 1.6 This Statement details our clients' responses to Matter 4 of the Inspector's Matters, Issues and Questions for discussion at the Stage 1 Examination Hearing Sessions. Hearing Statements have also been prepared in respect of the other 3 Matters. We reserve our position to submit further Hearing Statements in relation to the Stage 2 Examination at the appropriate juncture.

2 RESPONSE TO THE INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT THE EXAMINATION HEARINGS

2.1 The Inspector has posed a number of questions in respect of 4 Matters for the Stage 1 Examination. This Hearing Statement seeks to respond to questions of relevance to our clients' interest in respect of Matter 4. These responses are provided below.

Matter 4: Housing and employment land requirement

Housing

Question 30

- 2.2 Question 30 considers whether the overall housing requirement of 10,835 dwellings over the plan period is justified and consistent with national policy.
- 2.3 Draft Local Plan Policy LP2 sets out the Council's housing target for the plan period 2016-2036. However, the draft Local Plan and Cambridge Strategic Housing Market Assessment (October 2016) covers the period of 2014-2036 (the same as the employment growth strategy detailed for Question 20). Therefore the draft Local Plan has effectively omitted 2 years (2014-2015) of housing growth from the plan period. We consider this could result in up to 1,196 dwellings being excluded from the OAN for the plan period.
- 2.4 Furthermore, the Council has failed to acknowledge their existing shortfall within the emerging policy. The adoption of the Government's Local Housing Needs figures by East Cambridgeshire has resulted in them applying a 'clean slate' from 2016-17 and essentially ignoring the historic shortfall in the District. According to the East Cambridgeshire's AMR, there has been a minimum shortfall of 782 units across the District from 2007 to 2017. While we question below whether the total shortfall has been correctly calculated, the Council's AMR clearly indicated that 1.3 years supply of housing has effectively been 'lost' in the District. We can find no indication that this historic shortfall has been addressed within the plan period, let alone within the first 5 years of plans as suggested by national guidance.
- 2.5 Additionally, judging by the Councils' Five Year Housing Land Supply Report 2017, East Cambridgeshire District Council has erred in not applying their housing targets retrospectively. This is despite the Council's SHMA and evidence base covering an earlier period. For example, the Council only applied the current adopted Local Plan (May 2015) housing figures of 575 units per annum from 2015 despite the target applying across a 20 year period from 2011. Therefore, the Council are effectively ignoring the larger historic shortfall in completions against their housing requirement.
- 2.6 We therefore conclude that the overall housing requirement over the plan period is not justified nor is it consistent with national policy. East Cambridgeshire District Council has failed to knowledge its historic shortfall as required by the PPG. The draft Local Plan also fails to consider the housing

need arising from 2014-2015 and therefore does not fully assess the District's housing requirements over the entire plan period as required by the NPPF.

Question 32

- 2.7 Question 32 relates to the contribution Peterborough City Council makes to the delivery of East Cambridgeshire's housing need.
- 2.8 The Proposed Submission Local Plan period runs from 2014-3036. East Cambridgeshire District Council has decided to adopt the Government's figures in September 2017 to calculate its housing need for the period 2016 to 2036.
- 2.9 We question whether the Council's continued pursuit of a Memorandum of Co-operation with Peterborough City Council is consistent with the adoption of the national standard method of calculating the 'Local Housing Need'.
- 2.10 The Government's proposed standardised methodology for calculating housing need comprises a three step methodology as set out below:
- Setting the baseline
 - An adjustment to take account of market signals; and
 - Capping the level of any increase.
- 2.11 The methodology calculates the housing need for each local authority by applying the specific household projections and market signals for that authority. Therefore, the housing figures have been produced in order to meet the need of that **particular** local authority. Therefore each local authority should attempt to meet this need and cater for its own growth as the methodology has been based on Local Authority areas. For East Cambridgeshire the 11,960 dwellings (over the period 2016-2036) is calculated using this method.
- 2.12 However, this need is reduced by an arbitrary 1,125 dwellings to reflect the Memorandum of Co-operation across the SHMA authorities agreed back in 2013. This agreement was based on Housing Market Areas rather than the Local Authority Area. Therefore we contend that the reduction in East Cambridgeshire's housing need is not justified or sound in light of the different methodologies being applied - a form of 'pick and mix' approach. Additionally the Memorandum of Co-operation originated within East of England Plan which has now been revoked.
- 2.13 Additionally the Council have not demonstrated that Peterborough is actually providing the housing required by the Memorandum of Co-operation (75 dwellings per annum until 2031). According to the Peterborough City Council (PCC) AMR 2017, the City has failed to meet its annual requirement for the completion of dwellings annually since 2013 (**Appendix 4**). Therefore, PCC has failed to comply with agreed Memorandum of Co-operation and the housing need for Cambridge Housing Market Area is not being fully met.
- 2.14 Furthermore we note that the Government's proposed standardised housing methodology for Peterborough would result in a reduction in that authority's housing need to 942 dwellings per annum. As set out above, the Government's proposed standardised methodology for housing need does not include the dwellings agreed through the Memorandum of Co-operation for the housing

market area. Therefore, should Peterborough choose to simply apply the Government's figures without any further uplift due to, for example, local political pressures, it would no longer provide the additional dwellings required by the Memorandum of Co-operation. This would leave East Cambridgeshire needing to accommodate the remaining dwellings to make up any shortfall.

3 CONCLUSION

- 3.1 On behalf of our clients, we have a number of concerns in relation to the soundness of the draft submission version of the East Cambridgeshire Local Plan. This Hearing Statement has been produced to respond to Matter 4: Questions 30 and 32 identified in the Inspector's Matters, Issues and Questions document.
- 3.2 We consider that the housing requirement set out in Policy LP2 should be recalculated to include the housing need for the years 2014 and 2015 and the historic shortfall which has occurred in East Cambridgeshire.
- 3.3 Furthermore due to the significant changes to the housing methodology since the Memorandum of Co-operation was agreed we also consider it is inappropriate for the reduction to be applied to East Cambridgeshire's housing need figure based on the Government's methodology.