

Examination of the East Cambridgeshire Local Plan (2016-2036)

Matter 4 Housing and Employment Land Requirements

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1. Introduction

This Statement has been produced by Cheffins Planning on behalf of a consortium of Peter and John Lofts, developers and landowners and others who own residential development interests in East Cambridgeshire. The Lofts and others have responded to the draft Local Plan consultation in November 2017 and wish to add to these representations via this examination.

2. Inspector's Questions

This Statement is particularly concerned with two matters listed within the Inspector's Questions namely

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?

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 Trust Land sites realistic and justified by evidence?

3. Responses to the above questions

Question 32

It is interesting to note that whilst the Peterborough Five Year Housing Land Supply 1 April 2017 to 31st March 2022 now refers to the Memorandum of Cooperation, the Peterborough OAN is based on 981 dwellings per year, without providing any information as to how the future dwellings required by the MOC are to be delivered.

The conclusion has to be reached that whilst the East Cambridgeshire assessment of five year housing land supply has been adjusted to take account of externally generated delivery under the MOC for the period 2017-2022, the Peterborough version does not show a reciprocal arrangement, on the basis that this is deemed a matter for their future Local Plan examination.

It is therefore highly questionable whether 375 dwellings can be legitimately subtracted from the five-year supply in East Cambridgeshire when they are patently not being provided for in the reciprocal City Council five-year land supply assessment. Whilst the emerging Peterborough Core Strategy intends to make some provision for the delivery of these East Cambridgeshire dwellings during its Plan period, there is no certainty as to what the actual timescale will be for the provision of these dwellings in relation to other City priorities, or what their location or trajectory rate will be.

Paragraph 3.4 of the background paper discusses the 'Memorandum of Cooperation' made as part of the previous examination process for the adopted Local Plan. However, contrary to what is stated in this paragraph, we do not accept the assumption that the acceptability of accommodating some of the housing needs of East Cambridgeshire elsewhere remains valid, particularly as Peterborough City Council also has a record in under-delivery in housing against its Core Strategy targets.

This assumption cannot be justified by the Council and should be scrutinised as part of the Local Plan examination. It is interesting to note that Peterborough City Council only looks at the last three years of delivery whereas earlier versions of its Five-Year Housing Land Supply reports show an under

delivery questioning whether a 20% as opposed to a 5% buffer should be applied? It should also be noted that the use of prior notification applications for office to residential conversions has significantly skewed the results and is unlikely to continue at that rate.

In view of the above there are clear questions as to whether Peterborough City Council is actively seeking to provide the dwellings agreed under the MOC and are the circumstances to redistribute development to Peterborough still so compelling to justify this redistribution, especially as the most significant demand is in the south of East Cambs District?

Question 33

It is recognised that paragraph 48 of the National Planning Policy Framework states that “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens”.

It is questioned whether the windfall allowance is actually justified with the Council being confident that there will be a step change in the delivery of housing from 2020-2021. In addition, Whilst, the Council believe a conservative estimate for delivery from community-led schemes is 500 dwellings, no detailed evidence has been made as to the how the Council has made this assumption regarding delivery. This is not with-standing the issues surrounding the soundness of Policy LPS3 in relation to CLT schemes.

4.0 Conclusions

In view of the above there are clear questions as to whether Peterborough City Council is actively seeking to provide the dwellings agreed under the MOC and are the circumstances to redistribute development to Peterborough still so compelling to justify this redistribution, especially as the most significant demand is in the south of the District?

The implementation of the windfall allowance needs to be treated with caution as no compelling evidence has been provided to demonstrate that they will continue to provide a reliable source of supply.