

---

# Peterborough Local Plan Examination

Inspector: Louise Crosby MA MRTPI

---

Programme Officer: Hannah Charlish

---

22 August 2018

Dear Mr Kay

## **Examination of the Peterborough Local Plan**

### **Inspector's post hearings advice following stage 1 hearings**

Further to the hearing sessions held between the 7 and 9 August 2018, I set out below my initial findings in relation to the objectively assessed needs for housing and the 2013 Memorandum of Co-operation (MoC) between the Cambridgeshire authorities.

The reasons for my conclusions will be contained within my final report. The conclusions set out below may not necessarily be my final conclusions on these matters. This is because they may change as a result of evidence that is presented during the rest of the Examination.

Whilst I am seeking a response from the Council, I am not inviting comments from the Council or from others on the content of this letter.

Having regard to all of the evidence before me, including what I heard at the hearing sessions last week, I consider that this Plan's housing requirement should be based on the OAN figure identified through the up-to-date 2017 SHMA and not the local housing need method used in the Plan.

The reason for this is, the Government has very recently said in relation to the local housing need methodology,

*"A number of responses to this question provided comment on the proposed local housing need method. The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018.*

---

Email: [Programmeofficer@peterborough.gov.uk](mailto:Programmeofficer@peterborough.gov.uk)

Tel: 07920 160203

Miss Hannah Charlish, Local Plan Programme Officer,

C/o Peterborough City Council,

Sand Martin House

Bittern Way

Fletton Quays

Peterborough PE2 8TY

Website: [www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination](http://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination)

---

# Peterborough Local Plan Examination

Inspector: Louise Crosby MA MRTPI

---

Programme Officer: Hannah Charlish

---

*In the [housing white paper](#) the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time.*

*It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in [Planning for the right homes in the right places consultation](#) and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020s."*

So, it could be that the methodology that the Council has relied upon is amended in the near future.

I am aware that the Inspector examining East Cambridgeshire's Local Plan has come to a different finding in relation to the use of the standard housing method in their Plan. However the circumstances there are materially different, for instance their SHMA is not up-to-date.

Regarding the MoC between the Cambridgeshire authorities, the Inspector examining the East Cambridgeshire Local Plan has said in her interim findings letter that *"I am not convinced by the evidence before me, for the purposes of this examination, that it is appropriate to continue to attribute significant weight to the Cambridgeshire and Peterborough Memorandum of Co-operation (2013) (PE02) and the Joint HMA Statement on Housing Redistribution 2017 (PE04) and to continue to discount the district's housing figures. This is particularly the case as the Council has chosen to submit a plan whose housing figures are predicated on the standard method which is calculated on a district wide basis, independent of the wider Housing Market Area, or any historic agreed sub-regional approach. Therefore, in the absence of any substantial constraints which would preclude East Cambridgeshire making provision for the requisite level of housing, or a spatial plan which takes a pan regional approach, its needs, as calculated by the standard method, should be catered for within East Cambridgeshire"*.

---

Email: [Programmeofficer@peterborough.gov.uk](mailto:Programmeofficer@peterborough.gov.uk)

Tel: 07920 160203

Miss Hannah Charlish, Local Plan Programme Officer,

C/o Peterborough City Council,

Sand Martin House

Bittern Way

Fletton Quays

Peterborough PE2 8TY

Website: [www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination](http://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination)

---

# Peterborough Local Plan Examination

Inspector: Louise Crosby MA MRTPI

---

Programme Officer: Hannah Charlish

---

Given these findings, and providing East Cambridgeshire advances changes to meet its own needs in full, this unmet need could be deleted from Peterborough's housing target in its Plan. In light of this and my views set out in this letter it would be helpful to both examinations if Peterborough and East Cambridgeshire Councils were able to agree a joint approach on this matter and set out their position, going forward, in a statement of common ground.

In terms of Fenland, the housing target in their 2014 adopted Plan assumes that Peterborough is providing for some of its housing need. This arrangement was accepted by the Inspector examining that Plan to be sound. This is materially different to the position of East Cambridgeshire as their Plan is currently being examined. While Fenland's Plan will be reviewed at some point, it is a Plan adopted in 2014, having being found sound. Taking into account all of this and the geographical proximity of Fenland to Peterborough I find that the most reasonable option is for Peterborough to carry on providing for Fenland's current unmet need for the period 2011-2036, as set out in the MoC.

On the basis of these findings can the Council please provide me with an updated version of tables 2, 3 and 5 of the Plan. This work will need to take into account the fact that the base date of the Plan will need to be adjusted from 2016 to 2011 as the 2017 SHMA is predicated on a 25 year Plan period of 2011-2036. It will also need to factor in completions and any undersupply from 2011. Once a revised housing target is arrived at the Council will also need to consider whether it has sufficient housing allocations to meet the revised target and whether it will be able to provide a 5 year supply of deliverable housing sites on adoption of the Plan and throughout the Plan period.

This change in position will also need to be factored into the housing trajectory that was provided at the hearing sessions last week and also the housing implementation strategy I requested.

I do not anticipate that this work will take too long to complete, so I would appreciate it if the Council is able to respond to my letter by the close of play on 29 August 2018. Once I receive this information, I can timetable the Stage 2

---

Email: [Programmeofficer@peterborough.gov.uk](mailto:Programmeofficer@peterborough.gov.uk)  
Tel: 07920 160203  
Miss Hannah Charlish, Local Plan Programme Officer,  
C/o Peterborough City Council,  
Sand Martin House  
Bittern Way  
Fletton Quays  
Peterborough PE2 8TY

Website: [www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination](http://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination)

---

# Peterborough Local Plan Examination

Inspector: Louise Crosby MA MRTPI

---

Programme Officer: Hannah Charlish

---

Hearings. If the Council considers that it needs longer to respond then please let me know as soon as possible with an indication of timescales.

Should you have any questions regarding any of the above please do not hesitate to contact me via the programme officer.

Yours Sincerely

*Louise Crosby,*  
Inspector

---

Email: [Programmeofficer@peterborough.gov.uk](mailto:Programmeofficer@peterborough.gov.uk)

Tel: 07920 160203

Miss Hannah Charlish, Local Plan Programme Officer,

C/o Peterborough City Council,

Sand Martin House

Bittern Way

Fletton Quays

Peterborough PE2 8TY

Website: [www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination](http://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-examination)