



**HEARING STATEMENT
FOR MATTER 4 :
HOUSING AND
EMPLOYMENT LAND
REQUIREMENT
ON BEHALF OF LINDEN
HOMES MIDLANDS**

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?

Housing

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?

Policy LP2 sets out the level and distribution of growth over the plan period for the District. This Policy outlines that over the plan period 2016-2036, the Local Plan will facilitate the delivery of 10,835 new dwellings. Objection is raised to the level of housing growth identified within Policy LP2 as it is considered that it does not meet the Objectively Assessed Housing Needs of the District in full within the Housing Market Area (HMA) and is therefore inconsistent with paragraph 47 of the NPPF.

As referred to in Question 32 below, Linden Homes Midlands are concerned regarding the proposed continued reliance within the Local Plan Proposed Submission on Peterborough City Council to provide 1,125 of the overall housing requirement, rather than these being provided for within East Cambridgeshire itself.

Linden Homes Midlands are also concerned regarding the Council's adoption of the Standard Methodology and the amendment to the plan period which has ignored the unmet needs arising during 2014/5 and 2015/6.

To address these concerns, it is therefore considered that the District's housing requirement to be delivered within the Local Plan period should commit to ensuring the delivery of 12,900 homes, over the Plan period 2014 – 2036, as originally set out in the Further Draft Local Plan (January 2017).

It is also important to take a flexible and positive approach and be clear that the Local Plan does not impose a ceiling on the amount of housing development that may come forward. Policy LP2 does not make it clear that the housing provision figures are regarded as a minimum. In this respect it does not take a sufficiently flexible approach and is therefore not effective, as required by the NPPF (paragraph 182). The proposed Policy wording to Policy LP2 should therefore be amended so that it requires the delivery of a minimum number of new dwellings during the plan period.

In addition, and as referred to in previous representations on behalf of Linden Homes Midlands, Policy LP2 should be modified to refer to the Sedgefield Method for addressing any backlog of housing delivery having regard to the requirements of paragraph 47 of the NPPF for identifying

and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against the Council's housing requirements.

The Planning Practice Guidance expresses a clear preference for the 'Sedgefield' approach. In the 'How should local planning authorities deal with past under-supply?' section of the Planning Practice Guidance, at Paragraph 035 (ID: 3), it states in part:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible....."

The 'Sedgefield' approach is consistent with national guidance that seeks to boost significantly the supply of housing, and also seeks to address any housing shortfall as quickly as possible.

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?

Unlike neighbouring South Cambridgeshire, only 6% of East Cambridgeshire (1910 ha) is designated as Green Belt, concentrated in the south-west of the district to prevent coalescence of villages with Cambridge. East Cambridgeshire is also not subject to any AONB. Therefore, there are no significant constraints on development across the District that should limit the supply of land that could be promoted for housing development. On this basis, there is also no justification or strategic need for East Cambridgeshire to meet its OAN outside the local authority boundary. The Council are currently proposing to discount the OAN figure by 1,125 and to rely on Peterborough to contribute to the delivery of East Cambridgeshire's needs. This conflicts with the NPPF and PPG, and is unsound (further commentary provided under question 32 below).

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?

Linden Homes Midlands consider there is no 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.

The exportation of 1,125 dwellings to Peterborough, beyond the Housing Market Area (HMA), does not comply with paragraph 47 of the NPPF or the PPG, and is unsound. The approach is not sustainable and will have significant negative economic, social and environmental effects.

Reliance on Peterborough is formalised within a Memorandum of Co-operation relating to growth across Peterborough and Cambridgeshire. Established with reference to paragraph 181 of the NPPF, it sets out that East Cambridgeshire will redistribute 1500 of its housing need to Peterborough between 2011-2031. Para 158 of the NPPF explains that;

“each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social, environmental characteristics of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated and that they take full account of relevant market signals.” (emphasis added)

Furthermore para 181 of the NPPF makes reference to cross boundary co-operation being for the purpose of planning “*for issues with cross-boundary impacts.*”

Yet no technical justification of this redistribution is provided to support either the Memorandum or the draft Local Plan Policy LP2. No justification is given of how homes provided in Peterborough can meet East Cambridgeshire’s needs. Indeed, consideration of 2011 Census data, as relied on in PE6, shows weak economic links in terms of cross boundary commuting between the two locations. Instead, East Cambridgeshire’s economy and housing markets are closely intertwined with Cambridge and South Cambridgeshire, and six other local authorities that have greater numbers of commuters from East Cambridgeshire than Peterborough. This reflects the geography of the Housing Market Area within which East Cambridgeshire is located. As such, it is hard to understand how housing provided in Peterborough can meet the housing needs of East Cambridgeshire and for this reason it is considered that the Plan is unsound.

- 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?**

Linden Homes Midlands are concerned regarding the over reliance on windfall developments and unallocated Community Land Trust sites as a source of future housing within the plan period. Whilst some of the sites may come forward and successfully deliver some housing, our opinion is that a considerable number – a majority - will not come forward and, therefore, cannot be relied upon.

Recommendation on Matter 4

Linden Homes Midlands object to the level of housing growth identified within Policy LP2 as it does not meet the full Objectively Assessed Need for Housing within the District. The exportation of 1,500 dwellings to Peterborough, outside the HMA, conflicts with the NPPF and PPG, and is unsound. The level of housing growth should therefore be amended to refer to a minimum of 12,900 homes being delivered over the Plan period. Policy LP2 should also be modified to refer to the Sedgefield Method for the purposes of calculating the housing land supply position.