

## PETERBOROUGH LOCAL PLAN EXAMINATION

### Matter 2– Duty to co-operate

**Issue: Whether the Council has complied with the duty to cooperate in the preparation of the Plan.**

#### **Overall housing provision**

**5. Are there issues of unmet need from within the wider HMA or other authorities? If so how are these being addressed?**

The Council have agreed that there are unmet needs arising within East Cambridge and Fenland and have committed to delivering additional homes in order to meet these needs. Whilst we welcome the Council's decision to take on the needs of other authorities we would question the decision to reduce these by 25% to reflect a shorter plan period. Unless it can be shown that additional allocations have been made elsewhere to meet these needs then there is no justification for the reduction. If there are no additional allocations elsewhere then the reduction would mean that 625 homes that had formed part of East Cambridgeshire and Fenlands housing need will not be delivered. The approach taken would appear to be as a result of using the Standard Methodology (an approach that has also been taken by East Cambridgeshire District Council (ECDC)) and shows the difficulty of trying to apply the draft policy Framework before it has been adopted and the impacts fully considered.

It should be noted that ECDC have submitted a plan that rebased the start date to their plan from 2014 to 2016. In doing so a backlog of 850 homes arising from this period were discounted. We consider ECDC's position to be unsound and have made representations to the EIP of their Local Plan to this effect. However, it also suggests that the decision to reduce Peterborough's contribution to meeting the needs will mean that the needs of ECDC will not be met as has been agreed.

**6. Is the MOU with Cambridgeshire still relevant and up to date, given that it is based on the 2012 SHMA, or does it need reviewing? Has Peterborough been providing for this need in the period between the MOU and the Plan date? If not, how has this been met?**

We would suggest that a clearer understanding of how the 2012 MOU should be applied is needed given that authorities across Cambridgeshire have started to prepare new SHMAs and, as is the case for East Cambridgeshire, seek to adopt the standard methodology prior to its full introduction. As set out above it would seem that a confused picture is arising across the sub region covered by the MOU as to the level of housing needs and where those needs are being met. This needs to be addressed by a clear statement from all the authorities involved, including the Combined Authority, as to the

next steps in delivering a co-ordinated approach to meeting housing needs. Until such a statement is forthcoming we would recommend that no reduction is applied to agreed position on the unmet needs of East Cambridgeshire and Fenland to ensure housing needs are met.

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