

Cambridge City and South Cambridgeshire Local Plan Examination

Matter PM1A Objectively Assessed Housing Need (OAHN)

Statement by Boyer on behalf of RLW Estates (Respondent 1284)

PM1A.1: Does the further work on objectively assessed housing need (OAHN), carried out by Peter Brett Associates (PBA) for the Councils (RD/MC/040) ensure that the methodology used is now generally compliant with Planning Practice Guidance (PPG)?

NB Following their letter to the Councils of 29th March 2016 the Inspectors expect this to have been addressed through the preparation of a Statement of Common Ground, which will form the basis for the discussion of any areas of disagreement at the hearings.

- 1.1 Strengthening of the evidence base in relation to the issue of the OAHN through the PBA report (RD/MC/040), and in turn their subsequent Response to Objectors (RD/MC/041), is welcomed.
- 1.2 It is considered that the report brings the evidence base up to date in terms of reflecting the 2015 release of information relating to the 2012 based household projections, and also that the methodology adopted by PBA within the report is now broadly in line with the requirements of the relevant sections of the PPG. On this basis it is felt that the methodology could be regarded as being “broadly compliant” as set out in this question.
- 1.3 However, it is still considered that too much emphasis has been given to the trend-based household projections, and insufficient weight to relevant economic growth forecasts, that are particularly relevant in light of the role of Cambridge and the wider sub-region as a key driver within the national and regional economy.
- 1.4 See response to Statement of Common Ground on behalf of RLW Estates for thoughts on other technical aspects of this issue, as requested.

PM1A.2: Bearing in mind that PPG notes that no single approach will provide a definitive answer, do the OAHN figures of 14,000 new dwellings for Cambridge City and 19,500 new dwellings for South Cambridgeshire provide a robust basis to underpin the provision on new housing in the Local Plans. If not, why not and why are alternative figures to be preferred?

- 2.1 Within our response to the Inspector’s invitation to comment on the implications of the 2012 based household projections on calculation of OAHN we set out our stance that the correct figure across both local authorities combined should be 34,600.

- 2.2 In summary RLW Estates considers that objectively assessed housing needs, and therefore the level of housing provision included within the South Cambridgeshire Local Plan should be increased from 19,000 dwellings (950 dwellings per annum) as indicated by the SHMA, to 20,600 dwellings (1,030 dwellings per annum) as indicated by the EEFM “High Migration” economic growth forecast for Cambridge and South Cambridgeshire combined. The level of housing provision within the Cambridge Local Plan (14,000 dwellings) should remain unchanged, reflecting the considerable constraints which exist. The increase in the trend-based 2012 based projections (when compared to the 2011-based projections) only serves to reinforce the need for this change, particularly when taking into account the existing backlog in affordable housing need, and Cambridge being the focus of economic growth within the Housing Market Area.
- 2.3 Whilst maintaining the view that the higher figure of 20,600 should be adopted within the plan, it is noted that the difference between this and the marginally increased figure of 19,500 contained within the Main Modifications is relatively small (at 1,100, an average of just 55 dwellings per annum). On this basis it is considered that the approach, or at least the overall conclusions arrived at, are generally robust.
- 2.4 Furthermore it is noted that the PBA report highlights the fact that South Cambridgeshire District Council has in fact made provision for development of 21,091 dwellings over the plan period, allowing a degree of flexibility in line with the requirement at Para. 14 of the NPPF to provide scope for **“flexibility to adapt to rapid change”**. Clearly the degree of flexibility is less than claimed if our marginally higher figure were adopted, albeit welcomed that sites sufficient to deliver our higher figure have in fact been identified, including a flexible approach to the timing of delivery at the strategic growth locations, such as the new town north of Waterbeach, no longer constrained in this regard.

PM1A.3: The OAHN figures are also the housing requirement figures in both plans. What is the relationship between these figures and the 1,000 extra homes which are part of the City Deal.?

- 3.1 It is noted that a paper on the relationship of the City Deal to the Cambridge and South Cambridgeshire Local Plans is included within the Examination Reference Library (Ref: RD/MC/110) dated March 2016. Whilst this takes the form of a position statement on the support which City Deal provides to delivery of the development strategy of the Local Plans it is silent on the status of the 1,000 additional dwellings that have previously been referred to in the context of the City Deal.
- 3.2 Previous references to this have asserted that this quantum of development is to be provided as **“additional affordable homes on rural exception sites”** (ref: RD/CR/140 – Government Offer, dated 3 April 2014).
- 3.3 It is noted that this aspect is more of a supply-side issue, as opposed to informing quantification of objectively assessed housing need. It is considered that the need for additional affordable housing is clearly evident in the Greater Cambridge area, including a backlog of unmet demand, and therefore this provision should be supported in principle.
- 3.4 Whilst we would not generally support the allocation of significant amounts of dispersed growth to the rural areas, as the lowest level, and least sustainable option, in the development sequence. However it can be seen that this level of specifically affordable housing on exceptions sites would support local communities and assist the viability of services if spread across a sufficient number of locations and targeted where such benefits could be secured.

Boyer
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