

Reference ID 1118740

Larkfleet Homes

# Huntingdonshire Local Plan Examination

Matter 2: The Duty to Co-operate

**Issue 2: The duty to co-operate****Question 1: General****1) What are the genuinely strategic matters as defined by S33A(4) of the Planning and Compulsory Purchase Act?**

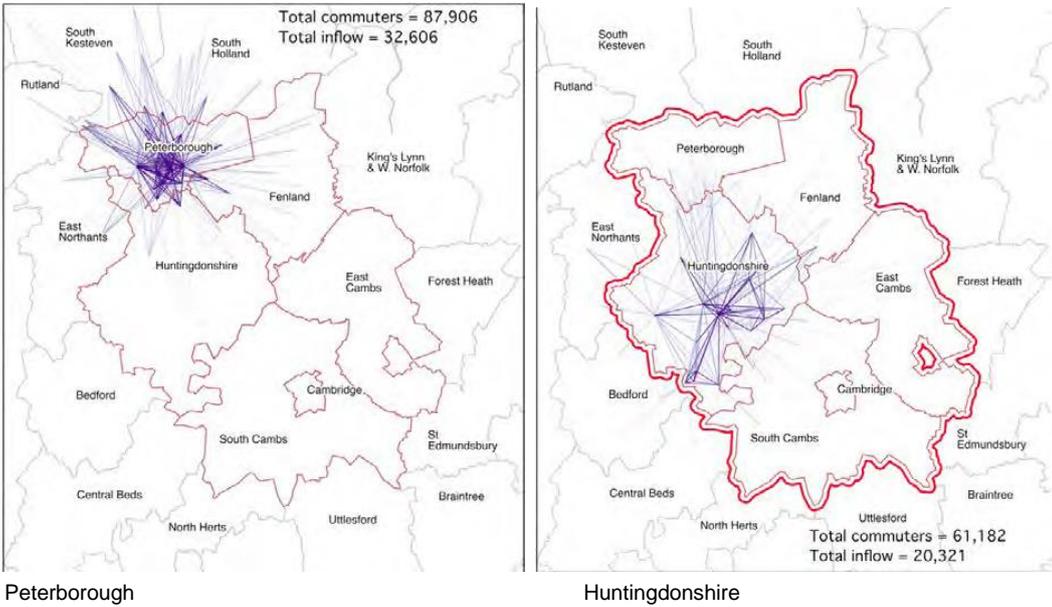
1. Under S33A of the Planning and Compulsory Purchase Act (2004), the Council must co-operate with other bodies, including local authorities, to maximise the effectiveness of plan making. The Duty to Co-operate (DtC) requires the Council to “*engage constructively, actively and on an ongoing basis*” (S33(2)a).
2. It is also the case that the DtC forms part of the tests of soundness in that to be “positively prepared” a plan must be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and to be “effective” a plan must be based on effective joint working on cross boundary strategic priorities. Local planning authorities need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters (RPS emphasis).
3. The definition of strategic matters is set out in Section 33A(4) of the Planning and Compulsory Act. This includes sustainable development or use of land that has or would have a significant impact on at least 2 planning areas, in particular in connection with strategic infrastructure.
4. One of the genuinely strategic matters in the context of the Huntingdonshire Local Plan is the provision of housing and infrastructure needs and the extent to which these will be met within Huntingdonshire and within the sub regional Housing Market Areas (HMAs). This includes the Cambridge sub regional HMA and the Peterborough sub regional HMA, which Huntingdonshire retains strong functional linkages with.
5. The DtC requires evidence of constructive engagement between prescribed bodies on an ongoing basis over what the housing and infrastructure needs are and how they could be accommodated. Prescribed bodies include that the Greater Cambridge Peterborough Local Enterprise Partnership (GCGPLEP) and Cambridge and Peterborough Combined Authority (CPCA).
6. RPS considers that there is no up to date agreement between relevant authorities as to the level of overall housing need within the HMAs and no up to date agreement on how this need would be accommodated.
7. Furthermore, the inherent functional relationship of Huntingdonshire with Peterborough has been ignored, both in respect of any genuine joint working between these two authority areas to establish / meet housing needs but also in respect of Huntingdonshire’s Local Plan Strategy, which seeks to deliver all major growth to the southern part of the District and therefore does not recognise the inter-relationship, economic geography or status of Peterborough as a strong regional centre.

*Overall housing provision***2) Who has the Council engaged with in terms of overall housing provision and what form has this taken?**

8. This question is best left for the Council to respond. The Council's Soundness Self-Assessment Checklist (Core Document 14) states that "Extensive co-operation has been undertaken with partners with common interests within Huntingdonshire as well as those involved in cross-border or more strategic scale matters."

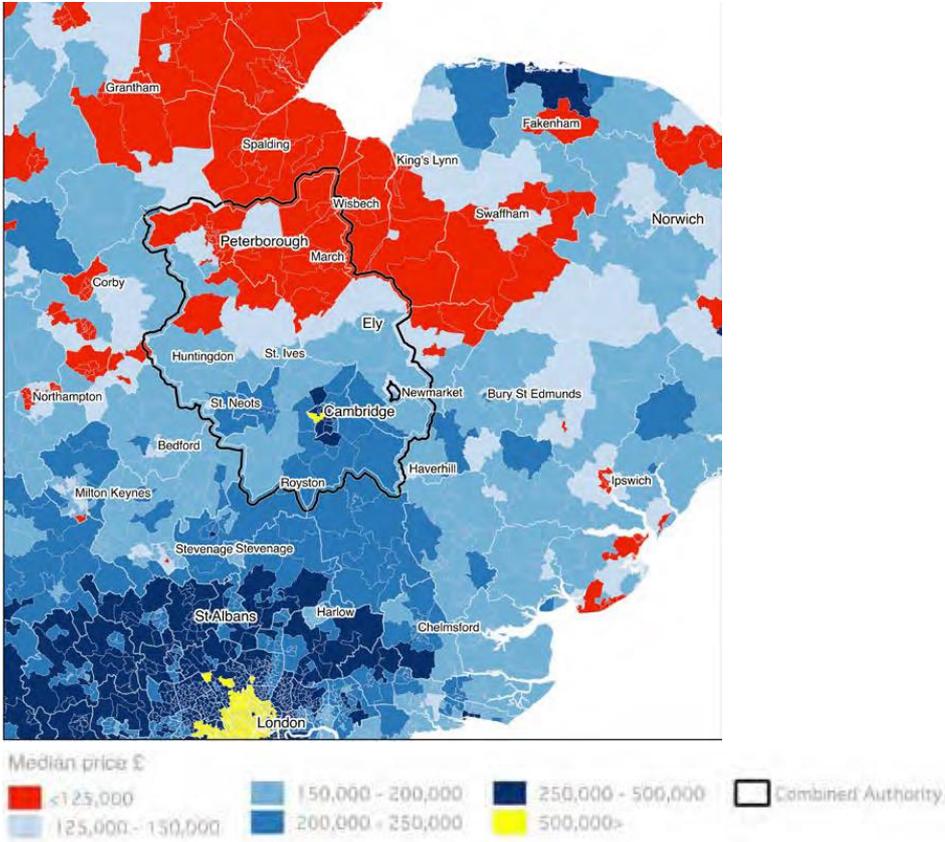
**3) What are the inter-relationships with other authorities in terms of migration, commuting and housing markets?**

9. Huntingdonshire is a member of the Cambridge sub region HMA, which includes the administrative areas of seven city and district Councils comprising Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Forest Heath District Council, Huntingdonshire District Council, South Cambridgeshire District Council and St Edmundsbury Borough Council.
10. However, as the 2013 SHMA (Core Document HOUS.07) attests to, there is considerable variation across the district in terms of housing markets and commuting patterns. In broad terms, there is lower prosperity and skills in the north of the district than the south and for many parts of Huntingdonshire there is a stronger economic relationship with Peterborough than Cambridge.
11. Strong ties to Peterborough are referred to in the Peterborough SHMA (Core Document HOUS.08) which indicates that a) there is significant localised overlap in terms of housing market area between northern Huntingdonshire and Peterborough (p25, para2.10), b) some of the highest regional migration flows exist between Huntingdonshire and Peterborough (p33 para 2.32) and c) ONS data indicates that a stronger commuting relationship exists between Huntingdon and Peterborough than Huntingdon and Cambridge (p35,para 2.42 & 2.50).
12. The Cambridge and Peterborough Independent Economic Review Interim Report (CPIER), published in May 2018 states that Huntingdonshire is made up of several different regional economies, with the northern part of the district forming a separate regional economy that is functionally very strongly linked to Peterborough. The strong commuting patterns between Huntingdonshire and Peterborough are reflected in the graphics below, taken from the CPIER Report.



13. As is common where there is more than one sub regional economy operating, there is also more than one housing market evident within the district, with house prices in the south more closely aligned with Cambridge and house prices in the north more closely aligned with Peterborough. This is reflected in the graphic below, showing median house prices for terraced properties, also taken from the CPIER Report.

Median price paid for terraced properties: 2010-2015



14. Overall, the economic structure shows high levels of economic integration with Peterborough in terms of the labour market and travel to work areas.
- 4) How have these been taken into account in preparing the Local Plan and specifically in terms of the Objectively Assessed Need for housing (OAN)?**
15. This is a question best answered by the Council. In RPS view, there is limited evidence to demonstrate that the varied economies, commuting patterns or inherent links to Peterborough have been considered in preparing the Local Plan. In terms of OAN, as Huntingdonshire and Peterborough are each proposing a different methodology (with Peterborough advancing an OAN for housing based on the standardised methodology), the two authorities cannot be seen to be working together to agree on the housing requirement across the HMA and how this will be met.
- 5) What is the basis for updating the OAN for Huntingdonshire, rather than the wider Cambridge Sub Region Housing Market Area (HMA)? Is this an appropriate approach and how does it affect other authorities?**
- 6) Are there issues of unmet need from within the wider HMA or other authorities? If so how are these being addressed?**
- 14 The NPPF at paragraph 178 makes it clear that the *“Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities”*, and paragraph 179 refers to authorities *“working together to meet development requirements which cannot be met within their own areas”*. Paragraph 47 of the NPPF refers to *“ensuring that the Local Plan meets the full OAN for market and affordable housing in the housing market area...”*
- 15 Huntingdonshire has taken an approach to review and update its OAN based on the 2014 household projections. However, Huntingdonshire is a signatory member of the Cambridgeshire & Peterborough Memorandum of Co-operation (the MoC) (Core Doc PREP.09) published in 2013. The MoC sets out an agreed level of housing across the sub region between 2011-2031 and established the OAN for the seven Councils across the Cambridge HMA based on the 2013 SHMA. The total housing requirement across the HMA at the time was 93,000 homes to cover the period 2011 to 2031.
- 16 This figure was reduced to 90,500 on account of Peterborough, *“due to its historic and functional ties with Cambridgeshire, plus its own housing market area overlapping with the Cambridge Housing Market Area” (MoC para2.1)* agreeing that 2,500 homes could be accommodated within its administrative boundary.
- 17 The MoC / housing requirement overall figure within the HMA has not been updated since 2013 despite a number of authorities within the HMA, including Huntingdonshire, advancing differing OAN figures within their Local Plans based on more recent evidence and reflecting different plan periods. Furthermore, the emerging Peterborough Local Plan seeks to reduce the number

of dwellings being accommodated from the Cambridge HMA to 1,825 to account for a reduced Plan Period. This shortfall of 625 should be met within the Cambridge HMA, in accordance with para 47 of the NPPF. Overall, it is unclear why the 2,500 shortfall across the Cambridge HMA should not be met within Huntingdonshire, given it is located within the HMA and has clear functional links to Peterborough as the regional centre. The MoC refers to a net daily in-commute from Cambridgeshire into Peterborough of 7,000 people.

- 18 In terms of question 6, there is a potentially significant issue with unmet need in Peterborough that is not being addressed. Peterborough has recently published a Statement of Compliance with the Duty to Cooperate January 2018. This details correspondence between the Peterborough and the Cambridgeshire HMA Authorities agreeing to a total of 27,635 homes being provided in Peterborough 2011-2036, inclusive of the 2,500 being provided through the MoC. The latest Peterborough SHMA, published March 2017, indicates Peterborough's housing requirement 2011-2036 is actually 32,050 dwellings, (34,550 inclusive of the MoC commitment).
- 19 However, Peterborough's emerging Local Plan, due for Examination in August 2018, opts to utilise the new standardised methodology for calculating housing need. The Plan proposes a new housing requirement, based on a new plan period 2016-2036, of 21,314. This is subject to significant unresolved objections. This is clearly a significant reduction in housing provision and it is unclear how the shortfall arising from the discrepancy between the SHMA figure and the Local Plan figure will be met.
- 20 There is no up to date agreement between Peterborough and the Cambridgeshire Authorities on the housing requirement. It is imperative that the MoC is updated to reflect an up to date agreement of the housing requirement across the HMA including Peterborough and how this will be met. At present there is the potential for significant unmet need arising from Peterborough and the Huntingdonshire Local Plan should be embedded with suitable flexibility to account for this given the strong economic links and commuting patterns. This would be reflective of the requirements of Paragraph 14 of the NPPF which requires Plans to be flexible and capable of adapting to change.
- 21 At the current time, in RPS view, there can be no sense that the DtC has been complied with because of the requirement to engage constructively on an ongoing basis.

- 7) Does the overall housing provision being planned in the Local Plan for Huntingdonshire have any implications for other authorities? If so, what are they and how are these being addressed?**
- 8) What is the position of other authorities in the HMA and elsewhere in terms of the planned level of housing in Huntingdonshire? Have specific concerns been raised through duty to co-operate discussions or representations?**
- 9) In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What**



**has been the outcome of co-operation and how has this addressed the issue of housing provision?**

Please see response to Q.6.