

Talk by David Shaw , April 30 2025

Good evening

For protocol I should explain that I am a Castor Parish Council and also a Member of the Royal Town Planning Institute. (retired)

This evening I will try and explain what I see as some of the key points about the Local Plan procedure. Explain some of the things we can not change, and explain some of the things it is probably best to focus on and how they are ultimately judged.

Just to remind ourselves The plan is basically a land use plan for Peterborough which dictates where development should take place, with some added policies about how.

A local plan is meant to be prepared every 5 years and last for a minimum of 15 years.

There are two key stages remaining for this Review

Firstly there is commenting on the current Draft out for consultation ,by 29th May, . Comments made go back to the City Council and the planning officers will make any alterations they think are justified. The revised Plan is put back to city council politicians, sometime probably in October. It is therefore now, at this stage, that comments need to be directed at the city council.

The Second stage is when this revised Plan, approved by the City Council, is then subject to a further 6 weeks of consultation . This is scheduled for Nov/Dec this year. The comments received at that stage are forwarded . along with the Plan , to the Secretary of State who then organises an **examination in public** expected between April and October next year. It is at this stage that the issues you raise should move from being directed at the city council to being directed to the Secretary of state and is all about whether the plan is sound or not. I will come to this again later.

So those are the two key remaining stages.

A important starting point is that central government dictates that the Plan must be in accordance with the National Planning Policy Framework, and that Peterborough , and this is the critical point, must plan for at least 1006 houses a year for at least the next 15 years.

Often these processes end up with arguments between different locations about where house building should or should not take place. There is no right or wrong answer. What goes into the plan (apart from the numbers I have just mentioned) is decided by the City Council leading politicians. (The first stage I mentioned earlier.) What stays in the plan during an examination process is a decision made by a Planning Inspector, but with strong political guidance from central government. This is often referred to as the Examination stage

So that is the process

I am now going to look firstly at things which you can not change, and secondly at matters you could perhaps change

So firstly what can not be changed through the Local Plan process. I am mentioning this because it makes it clearer about those issues you can try and change. . And it also allows me to mention things which may be very annoying.

So what issues can not be changed (unless of course you try and change the government)

As I mentioned last time I spoke to you Peterborough has been growing fast for not just for 10, 20 or even 50..... but for over 100 years. The second fastest growing city in the UK after Coventry. If everywhere else in the UK grew as fast as Peterborough had done then we would have an extra 16 million homes in the UK, not just an extra 1.5 million that the government wants.

For much of this time, until about 10-20 years ago, it is difficult to be precise, this has had some benefits. These include gaining important new infrastructure, good new jobs and good new houses. At any time there were always some residents who felt they had lost out, but on the whole the majority supported the growth.

In the past 10-20 years his has all gone wrong

What has happened in the past 10-20 years.

One the growth in the past has been because Peterborough, almost unanimously, wanted it. When Peterborough grew in the early 1900 s it was because Peterborough welcomed the engineering companies up from London such as Peter Brotherhoods. Very importantly the new town came in the 1970s and 80s because Peterborough (with a cross party group of Councillors) went to central government and successfully argued that the growth should come here and not Ipswich. Peterborough wanted to be part of the solution to the then **national** problem of severe housing problems and congestion in London, in return for getting very substantial government investment.

What **Peterborough did not argue for** was that the growth should continue add nauseam.

The new town Master Plan stated..... ‘ beyond the expansion period the situation will of course be radically changed, for there will be little room left within the designated area even for continuing natural increase of Greater Peterborough’s own population..... any hope of preserving a truly rural setting for all this urban growth will soon be lost if the extended sub region is not structurally planned’.

The deal to help with a national housing problem in the 70s and 80 was that once the New Town was completed it would not simply continue. The government has thrown this promise out of the window.

The second thing that has gone wrong.....

Once the Development Corporation had gone the City has not gained sufficient new infrastructure to go with the growth. We have achieved, at long last, the establishment of a university. But that is about all. The remaining infrastructure of transport, education, health, public spaces, and vibrant city centre has not kept pace. This is because public spending on these items has been too low, or even non existant.

With the current state of the public finances it seems pretty clear to me that there is not likely to be much new infrastructure comes along in the next few

years. So as we continue to have a fast growing population we are having to cope with much the same infrastructure as 20 years ago. Also because of the lack of money much development is low quality.

The third thing that has gone wrong

We keep growing too fast (I would emphasise that I am not suggesting no growth, just a sustainable rate of growth). The government have given up on any strategic national planning policy and simply said **everywhere must have more houses**. This is not based on where new jobs are most likely to be created, or where new infrastructure could be most efficiently provided. I exaggerate a little because there is a plan for the Oxford Cambridge Arc. This is a very good idea and if the government concentrated on it then it could be a real economic winner, but I suspect it will fail because the government is trying to make everywhere else grow fast at the same time,

But back to the growing too fast issue. The need for so much more housing is not based on the need for housing our existing population. The ONS states in its January 2025 population projections

“By mid-2029, in 5 years time, deaths in the UK will outnumber births, while net international migration will become the only source of population growth.” So after 2029 much of the new housing is only needed to resolve problems outside the UK which immigrants are running away from. It is not to resolve problems in our country.

The Fourth thing that has gone wrong:

We can demonstrate that **housing growth does not provide the economic growth** that this government is so keen on. We showed this graphs before as it demonstrate the problem so well.

Which cities' or large towns' population has been growing the most or the least?

Figure 13: Population percentage change, 2012 - 2022 (%)

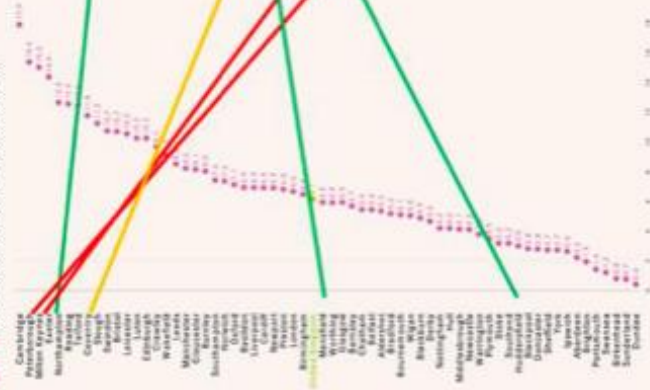


Figure 5: Since 2010, only London saw disposable income growth outstripping that seen at the national level between 1998 and 2010

Real change in gross domestic household income per head, 2010 - 2021 (2022 prices)



Household Income pp only increased £395 in 10 years!
5th worst in UK
Significantly below comparable locations



We may be nearly the fastest growing city in the uk for 100 years but we have gone down the table, very drastically, in terms of education standards, health standards and economic standards. Fast Housing growth does not equal economic growth or growth in living standards. Indeed it seems to be the opposite.

To summarize : we have already done much much more than our share and the result has been declining benefits.

So Now to move on to what we can possibly do, given that we can not change the 1006 homes dictate from central government

We can :

FirstlyRestrict the time of the local plan to 15 years. This is the only way to try and limit the housing numbers in the plan. The number of houses per year is not up for negotiation.

15 years is all that is required in the NPPF. The city council planning officers keep wanting to extend the plan to 2044. But it is perfectly within the guidelines of the NPPF to look only 15 years ahead. Given the starting point that means the plan only needs to go to 2041. At present no genuine reason has been given for why PCC wants 2044, but it seems to be because they want to increase the total housing numbers so they have plenty of room for problems. By reducing the time period to 15 years then a couple of thousand homes are knocked off the housing need total. I see no reason for this when the population growth is slowing down after 2040, and the Local Plan needs to be revised in 5 years time.

In addition to reducing the time period we can also try and reduce the housing need buffer. The Local Plan includes a buffer of 10% which is about 2000 homes. The NPPF only requires a buffer of 5% for Peterborough. So that is an extra 1000 homes we do not need to plan for yet.

An additional key point here is that Local Government is going to be reorganised in 2028 and Peterborough is going to disappear. This is already an edict from central government. There will either be one or two authorities

covering Cambridgeshire in 2028, so why commit future authorities to plans for old regimes.

Secondly, in terms of what we can do: Support the basic principles of the Local Plan which is making a more sustainable Peterborough . This should be achieved through more regeneration of areas that already have all the infrastructure : areas such as the city centre and township centres, and increasing density in those areas already planned, There is a report by consultants Tibbalds, produced just last year, on areas which can take more housing in the urban area, but the release of the report has been stopped by the city council .

Thirdly in terms of what we can do ; Support the landscape character policy and the John Clare Countryside. This policy should make Peterborough a more attractive environment. The John Clare Countryside is a very positive planning idea and one which I believe meets the soundness criteria I am coming onto shortly and has great environmental, social and economic benefits.

Fourthly check the **details for sites** proposed for development and check that the evidence is accurate. And if you think that extra infrastructure is needed (for roads, schools, healthcare, open space, etc) then make this point loud and clear with as much evidence as you can find.

Finally I want to go over how an inspector will determine whether the Plan is sound or not. This is what an inspector is required to determine by law; the soundness of the plan

When the Plan gets to the examination stage Any objection to the plan will only be accepted if you can demonstrate that the part of the plan you are objecting to is unsound

What is a sound plan. This is defined in the NPPF

There are 4 elements

(a) It must be Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and that means for not just houses but employment land and other facilities and services (and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development);

(b) It must be Justified – an appropriate strategy, taking into account the **reasonable alternatives**, and based on **proportionate evidence**; (so detailed technical minutiae do not really count)

(c) It must be Effective – deliverable over the plan period, This is mainly concerned with availability of sites and viability of sites. **So a site which a land owner has said is not available , or a site which is too expensive to develop, would make the plan NOT EFFECTIVE.** And therefore NOT SOUND. (Effective joint working on cross-boundary strategic matters that must be evidenced by a statement of common ground); and

(d) It must be Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

This does not have to be the best plan, just one that can be expected to be delivered.

In summary

My advice is therefore to concentrate on matters which can be changed, to bear in mind that the current stage objections should be directed at the City Council and that at the examination stages they should concentrate on the Soundness of the Plan.

I hope this has been of some interest.