

PM1/CCC & SCDC – Supplement 1



South
Cambridgeshire
District Council

Examination into the Soundness of the
Cambridge Local Plan and
South Cambridgeshire Local Plan

**Matter PM1 – Supplement 1 – Objectively Assessed
Housing Need (OAHN)**

Cambridge City Council and
South Cambridgeshire District Council

June 2016

1. This document supplements the Councils' PM1 Housing Statement. At paragraph 12 of that statement, the Councils indicated that they would review the contributions made by participants to the SOCG¹ and respond to points which have received greater emphasis in the SOCG than in previous representations. The points are limited to ones which have not previously been addressed in the Councils' responses to representations² and are produced to assist the examination process and save hearing time. This statement addresses three issues:
 - The definition of the Cambridge Sub Region SHMA Housing Market Area;
 - The adopted and emerging East Cambridgeshire Local Plan; and
 - Evidence of duty to co-operate engagement with districts to the south of the existing Cambridge Housing Market Area.

Definition of the Cambridge HMA

2. Objectors state that the HMA boundary is not justified in regard to commuting and migration patterns, and that much of the existing Cambridge Sub Region HMA (here referred to as the Cambridge HMA) lies outside the October 2015 Cambridge Travel to Work Area (TTWA³). Some say that Cambridge and South Cambridgeshire should form their own HMA but possibly also including East Cambridgeshire and others that areas to the south should be included.
3. The NPPG at paragraph 11 ID: 2a-011-20140306 states that HMA can be defined by using three different sources of information:
 - House prices and rates of change in house prices
 - Household migration and search patterns
 - Contextual data (for example TTWA boundaries, retail and school catchment areas).
4. Only the second source includes a numerical threshold, in this case relating to household moves, where 70% of moves will typically be within the HMA.
5. Objectors have focussed their attention on new contextual data as the new Cambridge TTWA boundary for 2011, published in October 2015, now includes parts of North Hertfordshire, East Hertfordshire, Harlow, and Uttlesford to the south (in addition to Cambridge, South Cambridgeshire and East Cambridgeshire)⁴. The previous 2001 Cambridge TTWA was smaller and limited to the districts of Cambridge, South Cambridgeshire and East Cambridgeshire.
6. The growth in the size of the Cambridge TTWA reflects the loss of the separate Harlow and Bishop's Stortford TTWA. This reflects a trend for larger and fewer TTWA nationally with the number declining from 243 in 2001 to 228 in 2015.

¹ RD/SC/430 Statement of common and uncommon ground regarding OAHN

² Proposed Modifications Report on Consultations RD/MC/120

³ TTWAs are defined to approximate self-contained local labour market areas, where the majority of an area's resident workforce work, and where the majority of the workforce live.

⁴ Excluding very small areas of Epping Forest and Braintree districts.

<http://www.cambridgeshireinsight.org.uk/blog/10092015-1128/latest-travel-work-areas-released>

7. Commuting data from the 2011 Census allows a comparison to be made of commuting self containment in the existing HMA compared to other potential HMAs. The following table clearly demonstrates that the highest level of commuting self containment is achieved within the existing HMA. A note on the way this table has been assembled, using whole districts as the most appropriate way of defining HMAs, can be found at Appendix 1 to this supplement.

| Commuting Self Containment | | |
|---|---|--------------------------------------|
| Area | % of Area's Employed Residents who Work in Area | % of Area's Workers who Live in Area |
| Greater Cambridge | 82.5% | 67.8% |
| Cambridge HMA | 84.2% | 83.7% |
| 2011 Cambridge TTWA | 75.9% | 75.4% |
| Greater Cambridge and East Cambridgeshire (2001 TTWA) | 82.6% | 75.4% |
| Greater Cambridge and Uttlesford | 78.8% | 67.7% |
| Greater Cambridge, Uttlesford and East Hertfordshire | 73.7% | 69.4% |

Note: Greater Cambridge – Cambridge and South Cambridgeshire
Cambridge HMA – the existing SHMA HMA
2011 TTWA – Greater Cambridge, East Cambs, East Herts, Harlow, and Uttlesford

8. Looking at the household migration patterns (set out in the table below), which is the second source of information referenced in the NPPG, it is clear that the existing HMA has a higher level of migration self containment than any of the other potential HMAs. None of the geographies reach the 'typically 70%' guide referenced in the NPPG but the existing HMA provides the closest fit. A note on the way this table has been assembled, using whole districts as the most appropriate way of defining HMAs, can be found at Appendix 1 to this supplement.

| Migration Self Containment | | |
|---|------------|-------------|
| Area | "In Moves" | "Out Moves" |
| Greater Cambridge | 56.0% | 55.9% |
| Cambridge HMA | 65.8% | 66.8% |
| 2011 Cambridge TTWA | 60.8% | 60.3% |
| Greater Cambridge and East Cambridgeshire (2001 TTWA) | 59.2% | 59.4% |
| Greater Cambridge and Uttlesford | 55.2% | 55.4% |
| Greater Cambridge, Uttlesford and East Hertfordshire | 56.5% | 56.1% |

9. It follows from consideration of both commuting and household migration that the existing HMA definition remains an appropriate geography on which to assess OAHN in an objective, policy-off approach.

The adopted and emerging East Cambridgeshire Local Plan

10. Some objectors argue that the East Cambridgeshire Local Plan adopted in 2015 is not as supportive of the Greater Cambridge area in terms of providing homes for workers in Cambridge and South Cambridgeshire as the SHMA 2013 envisaged. The Councils do not agree with this view.
11. The SHMA and its supporting Technical Report provided for 13,000 dwellings (650 per year) and 7,000 jobs (350 per year) between 2011 and 2031, a ratio of jobs to homes of 0.54 (see the table below).
12. By agreement with Peterborough as part of the HMA wide Memorandum of Cooperation⁵, 1,500 of the homes identified in the SHMA were to be provided in Peterborough leaving a total to be provided in East Cambridgeshire of 11,500 (575 per year), which was included in the adopted 2015 Local Plan. The 2015 Local Plan also set an ambitious jobs target of 9,200 (460 per year) to provide a jobs/homes ratio of 0.8, considerably more jobs than the SHMA forecast.
13. East Cambridgeshire is at early stage of preparing a new Local Plan (plan period 2014-2036) with adoption planned for February 2018. The SHMA 2013 is supported by new additional OAHN evidence, which identifies a housing need of 14,300 homes (650 per year). This is the same annual dwellings rate as the SHMA, over a different plan period. Their agreement with Peterborough under the duty to co-operate⁶ is maintained for 1,500 homes reducing overall provision to be made in the district to 12,800 homes over the plan period (582 per year). This is a very similar annual dwellings rate to the adopted plan.
14. The job growth target in the draft plan (based on 2014 based EEFM forecasts) is for 7,100 jobs (323 per year) for the period 2014-2036. This represents a significant jobs reduction from the ambitious target in the adopted 2015 Local Plan yielding a jobs per home of 0.55, almost exactly the same as the 0.54 jobs per home ratio set out in the SHMA 2013 / Technical Report.
15. It is therefore clear that the emerging East Cambridgeshire Local Plan will continue to provide homes that will help support jobs growth in Cambridge and South Cambridgeshire over the long term and reflecting established commuting patterns.

⁵ Memorandum of Cooperation (May 2013) RD/Strat/100

⁶ Memorandum of Cooperation (May 2013) RD/Strat/100

| East Cambridgeshire Homes and Jobs | | | | | | |
|------------------------------------|--|-------|---|-------|---|-------|
| | SHMA 2013 / Technical Report (2011-2031) | | Local Plan 2015 (2011-2031) | | Emerging Local Plan Feb 2016 (2014-2036) | |
| | Dwellings | Jobs | Dwellings | Jobs | Dwellings | Jobs |
| | 13,000 | 7,000 | 11,500 in East Cambs plus 1,500 in Peterborough under DTC (total 13,000) | 9,200 | 12,800 in East Cambs plus 1,500 in Peterborough under DTC (total 14,300) | 7,100 |
| Dwellings pa | 650 | | 575 (650) | | 582 (650) | |
| Jobs pa | | 350 | | 460 | | 323 |
| Ratio of jobs to dwellings | 0.54 | | 0.8 | | 0.55 | |

Evidence of duty to co-operate engagement with districts to the south of the existing Cambridge Housing Market Area

16. Some objectors argue that there is no evidence of duty to co-operate engagement with districts to the south of the existing Cambridge Housing Market Area. This is incorrect. As set out in the Councils' Matter 1 statement⁷, SOCG have been agreed by South Cambridgeshire with Uttlesford⁸ and North Hertfordshire⁹ under which both districts agree to meet their own OAHN within their own district. No duty to co-operate requests have been made with East Hertfordshire, or Harlow, although there is ongoing engagement with authorities to the south west through the Joint Strategic Planning Unit, as those authorities progress their plan making.

⁷ Councils' Matter 1 statement, paragraph 30

⁸ RD/SCG/030

⁹ RD/SCG/040

Appendix 1: Commuting and migration - Note on methodology

17. Commuting and migration flows between and within local authority areas can be explored via the Census 2011 origin destination data, available via NOMIS. Commuting data uses the dataset WU01UK - Location of usual residence and place of work by sex. Migration data uses the dataset MU01BUK_ALL - Origin and destination of migrants by age (grouped).
18. The calculations were based on whole districts because it is not practical for HMA areas to intersect local authority boundaries. The following table shows how each district's inclusion was worked out - only 19% of the total area of North Hertfordshire lies within the TTWA, so it was excluded. Similar principles apply to Epping Forest, Braintree and the West Suffolk authorities.

| District Name | District Area (ha) | Area within Cambridge TTWA (ha) | % within TTWA | Majority within TTWA? |
|----------------------|--------------------|---------------------------------|---------------|-----------------------|
| Cambridge | 4,055.9 | 4,055.9 | 100.0% | YES |
| East Cambridgeshire | 64,940.6 | 64,940.5 | 100.0% | YES |
| Harlow | 3,043.6 | 3,017.8 | 99.2% | YES |
| South Cambridgeshire | 89,861.4 | 88,232.3 | 98.2% | YES |
| East Hertfordshire | 47,410.2 | 35,226.4 | 74.3% | YES |
| Uttlesford | 63,896.7 | 41,209.6 | 64.5% | YES |
| North Hertfordshire | 37,416.0 | 7,224.5 | 19.3% | NO |
| St. Edmundsbury | 65,450.9 | 12,010.0 | 18.3% | NO |
| Forest Heath | 37,632.0 | 5,094.3 | 13.5% | NO |
| Epping Forest | 33,785.1 | 3,210.7 | 9.5% | NO |
| Braintree | 60,948.7 | 3,060.1 | 5.0% | NO |