



**Independent Examinations Cambridge City and South Cambridgeshire Local Plan - Matters 8A & 8B - Housing Supply and Delivery**

**Barratt Eastern Counties/NW Cambridge Consortium of Landowners (17788) Endurance Estates (19174) and Bidwells (17324)**

**January 2015**



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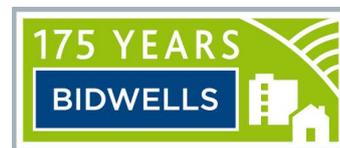
Appendix 1 Review of Housing Supply within Cambridge and South Cambridgeshire

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## 1 Matter 8A – Are the housing trajectories realistic; will they deliver the number of new homes expected, within the Plan period?

### i. Are the expectations for existing permissions and new allocations reasonable?

- 1.1 It is considered that the housing trajectories are not realistic and will not deliver the planned number of homes expected within the Plan period since they are based on a number of unreasonable and unrealistic assumptions regarding future delivery on a number of key sites.
- 1.2 In particular, we have a number of concerns regarding the number of homes that can be delivered at the proposed new settlements during the Plan period, along with the deliverability of a number of urban allocation sites within Cambridge City.
- 1.3 The South Cambridgeshire Plan is heavily reliant on delivery of new housing at the new settlements as part of its housing strategy. The reliability of assumptions for delivery at the new settlements are therefore fundamental to the delivery of the overall strategy.
- 1.4 Northstowe is currently expected to consistently deliver 400 dwellings per annum from 2018/19 onwards. Given the significance of Northstowe to the Council's housing supply it is critical that assumptions regarding its delivery are realistic and robust.
- 1.5 However, as evidenced in our Review of Housing Supply with Cambridge and South Cambridgeshire enclosed at **Appendix 1**, these delivery rates are not consistent with the housing delivery rates delivered at other similar new settlements and are not realistic. For instance, Cambourne has delivered approximately 235 dwellings per annum since 1999 and only achieved a completion rate in excess of 400 dwellings per annum once (2003-2004) during this period.
- 1.6 This demonstrates that Strategic sites such as Northstowe cannot be relied upon to deliver consistently high levels of housing completions due to their complexity and the fact that, being delivered over long time frames, they will inevitably be affected by fluctuations in the economic cycle.
- 1.7 Similarly, it is considered that, given the proximity of Cambourne West and Bourn Airfield New Village this will limit potential housing delivery from these two sites. The peak housing delivery currently forecast for these two sites is 370 dwellings per annum. This is also considered unrealistic based on the evidence of past delivery.
- 1.8 Whilst of less significance to the SCDC's housing trajectory during the current Plan period, the delivery of 400 dwellings per annum at Waterbeach for the final 3 years of the Plan period is also considered to be unrealistic and not supported by the evidence of past delivery, particularly in the early phases of development.
- 1.9 Consequently, it is considered that the housing trajectories for these strategic sites are based on unrealistic delivery rates and unduly optimistic. This approach is contrary to paragraphs 14 and 47 of the NPPF. As a result, the housing trajectory should be amended to assume delivery of a maximum of 250 dwellings per annum for Northstowe and Waterbeach which is more consistent with historic average annual delivery rates at Cambourne and taking account of fluctuations in the economic cycle. Consequently, it would provide a more robust and realistic measure of deliverable housing supply over the Plan period.
- 1.10 Similarly, as highlighted in Appendix 1 (Section 8) we have concerns regarding a number of the urban allocation sites within Cambridge City where sites are in active use and require the relocation of these existing commercial activities for the site to become available.



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- 1.11 It is considered that this, in addition to the Cambridge Plan's heavy reliance on windfall sites and lack of any flexibility in supply will place at risk the Plan's ability to deliver the number of dwellings envisaged within the Plan period and it is therefore unlikely to meet the housing requirement of 14,000 dwellings.

**Is there too much reliance on new settlements and will this prejudice the delivery of new housing in the plan period?**

- 1.12 It is considered that the South Cambridgeshire Plan is unduly reliant upon delivery of new housing within new settlements and that this would place at risk the Plan's ability to meet its housing requirement in full with wider implications for any combined trajectory should the Major Modifications be adopted.

The degree to which the Plan is reliant on the delivery of housing within new settlements is illustrated in the table below. It is clearly evident that the proposed development strategy now relies on nearly half of all the dwellings required to meet South Cambridgeshire's housing needs within new settlements.

**Table 1: Proposed New Settlement Housing Delivery**

	Existing Completions and Commitments	New Sites South Cams	Total	South Cams Local Plan %	Combined Local Plan %
New Settlements	5,595*	4,300	9,895	44.4	27.2

\* the latest AMR assumes a reduction in delivery of dwellings at Northstowe of 370 dwellings during the Plan period compared to that assumed in the Submission Local Plan

- 1.13 The significant reliance on new settlements places the Plan in a precarious position as any difficulties or delays to the delivery of one or more such developments will inevitably expose the Council to a significant shortfall in housing supply. This risk is further exacerbated by the over-optimistic assumptions regarding delivery on these sites highlighted above. As a result it is considered that there will be insufficient flexibility within the strategy to enable the Plan to adapt to changes in market conditions and ensure a rolling 5-year supply of housing land can be maintained.
- 1.14 This risk is illustrated by the delays in the delivery of Northstowe since it's identification for growth in the 2003 Structure Plan and the resultant impact on the Council's annual housing delivery and 5-year housing land supply position. It is evident from the Council's Annual Monitoring Reports that the housing delivery assumptions for Northstowe have had to be revised down every year since the allocation of the site in the Core Strategy and that, as a consequence, housing delivery has fallen short of expectations and the Council's target every year since 2008/9.
- 1.15 The increasing reliance now placed on new settlements as part of the development strategy will only serve to increase the risks of this situation continuing to occur over this Plan period. As a result, it is concluded that the South Cambridgeshire Plan is unlikely to deliver the number of dwellings envisaged within the Plan period and will not meet the Councils' housing target of 19,000 dwellings.

**ii. Is there sufficient flexibility to deal with changing circumstances and/or uncertainty over when allocations will come forward for development?**

- 1.16 We consider that the plans provide insufficient flexibility in terms of housing site allocations and delivery in order to respond to changing circumstances with regard to the delivery of strategic sites and the new settlements in particular. The over-reliance on strategic sites and new settlements within the two plans and the optimistic assumptions regarding delivery at the new settlements will mean that there is little scope to bring forward alternative sites more quickly to address any delays on such sites coming forward.



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- 1.17 Paragraph 14 of the NPPF requires Local Plans to meet objectively assessed needs, "with sufficient flexibility to adapt to rapid change." Similarly, paragraph 173 of the NPPF advises that Plans should be deliverable. We consider that the development strategy's over-reliance on delivery of housing development within new settlements is not robust or deliverable and will put at risk housing delivery within South Cambridgeshire over the Plan period.
- 1.18 Whilst paragraph 2.66 of the South Cambridgeshire Plan suggests that there would be scope to bring forward development at Waterbeach and Bourn earlier in the Plan period if necessary in response to such issues, that the evidence of Northstowe and Cambourne is that it is difficult to bring such sites forward quickly and that this is not a realistic and deliverable option.
- 1.19 We therefore consider that the Submission Local Plans provide insufficient flexibility to adapt to changing circumstances and any delays in the delivery of strategic sites will compromise the ability of the Plans to meet their housing targets in full and significantly boost the supply of housing as required by the NPPF.

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## 2 Matter 8B - Will the Plans ensure a rolling five year supply of specific deliverable sites in accordance with paragraph 47 of the Framework?

### iii. Does the Memorandum of Understanding (RD/Strat/350) reflect an acceptance that, individually, the two plans will not provide a rolling five year supply across the plan period?

- 2.1 It is considered that the Memorandum of Understanding (MoU) provides an implicit recognition by the two Authorities that their Plans will not provide a rolling five year land supply across the Plan period.
- 2.2 The Waterbeach appeal decisions (RD/Strat/330 and RD/Strat/340) clearly demonstrated that South Cambridgeshire District Council (SCDC) was not able to demonstrate a robust 5-Year Housing Land Supply for the period 2013/14 to 2018/19 having only 3.9 years' supply of housing land.
- 2.3 Our updated assessment of SCDC's 5-year land supply position for the period 2014/15 to 2019/20 enclosed at Appendix 1 (Section 7) confirms that this remains the case with the Council currently having between 4.1 and 4.4 years' supply.
- 2.4 Whilst SCDC maintain that this is not the case, based on their preferred method of calculation, this ignores the Waterbeach Inspectors' conclusions with regard to the appropriate buffer and addressing past under-delivery within the first five years. Indeed, it is evident from Table 2 of the Councils Housing Topic Paper and the second table on page 44 of their 2014 AMR (RD/AD/370) that they acknowledge that they would have a shortfall if calculated on this basis.
- 2.5 Moreover, looking beyond the current 5-year period it is evident that, whilst supply is expected to increase in South Cambridgeshire such that these issues would be overcome from 2016/17 onwards, it is evident from the Housing Trajectory Summary Table for Cambridge City enclosed at Appendix D of their AMR (RD/AD/360) that whilst they are likely to maintain a 5-year housing land supply in the period to 2020/21, delivery rates within Cambridge City are expected to fall significantly thereafter resulting in an undersupply for the last 10 years of the Plan period. Indeed, the limited extent of delivery within Cambridge City over the latter part of the Plan period is such that there would be an undersupply relative to the combined annual average delivery requirement for the last 7 years of the Plan period even based on the two Council's combined housing trajectory.

### If so, will the planned MMs (Appendix 3 of the Councils' statement to Matter 1), which would rely on a combined housing trajectory for Greater Cambridge, ensure compliance with paragraph 47 of the Framework? Bearing in mind the Inspector's rejection of this approach in the Waterbeach appeals, are the Councils able to draw my attention to any cases where such an approach has been supported (other than where joint plans have been prepared)?

- 2.6 We consider that the planned Major Modifications incorporating a combined housing trajectory for Greater Cambridge would not be compliant with the requirements of Paragraph 47 of the NPPF which requires that "to boost significantly the supply of housing local planning authorities should.....identify and update annually a supply of specific deliverable sites to meet their housing requirements..." and that "for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy.....describing how they will maintain delivery of a five year supply of housing land to meet their housing target."
- 2.7 It is therefore clear that the Councils' housing trajectories should demonstrate how they will each maintain the delivery of their own Five Year Housing Land Supply with reference to the individual housing requirements set out within their own Plans.
- 2.8 The MoU suggests that the Council's approach in using a joint trajectory is consistent with Paragraph 035 of the NPPG (ID 3-035-20140306) which confirms that where any undersupply cannot be met in the first 5

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years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.

- 2.9 However, SCDC has not adequately demonstrated through its evidence base that it is not possible to meet the current undersupply of housing within its own administrative boundary and that the impacts of doing so would demonstrably outweigh the benefits. Similarly, Cambridge City has failed to demonstrate through its evidence base why it would not be possible to maintain a rolling 5-year supply of housing within its own administrative boundary during the latter half of the Plan period and that the impacts of doing so would demonstrably outweigh the benefits.
- 2.10 The MoU references the interim conclusions made by the Inspector undertaking East Cambridgeshire District Council's Local Plan Examination that meeting part of the Council's housing need within Peterborough did not conflict with the sustainable development objectives of the NPPF. However, this is irrelevant in this context since, unlike with East Cambridgeshire, the two Councils' Local Plans seek to meet their entire individual housing needs within their own administrative boundaries.
- 2.11 The preparation of the CCC and SCDC Draft Local Plans have not specifically considered the need to adopt a cross boundary approach to meeting the objectively assessed housing needs of the two authorities either through a Joint Local Plan or through the Draft Submission Plans meeting a proportion of one of the authorities housing needs within the neighbouring authorities' boundaries. Indeed, at no point during the consultation process on the Local Plans was this specifically put forward as an option.
- 2.12 The MoU has not been subject to any detailed scrutiny or consultation and is not consistent with paragraph 47 of the NPPF. Consequently, it is not an appropriate basis for addressing the 5-year land supply issues highlighted.

**Would it be a better approach, if supported by the evidence, to have a 'stepped approach' (see, for example, West Lancashire Local Plan) to identifying the five year housing land supply for each Council on an individual basis?**

- 2.13 Whilst a stepped approach could be a better way of addressing variations in delivery during the Plan period, this should not be used as a means of unduly delaying necessary housing delivery or maintaining a reasonable level of housing delivery across the entire Plan period.
- 2.14 The demonstrable evidence of acute housing need previously highlighted in our Matter 3 Statement particularly in relation to housing market signals underlines the need to significantly boost the supply of housing as a matter of urgency and delivery should not be deferred until later in the Plan period. Moreover, the limited supply proposed in Cambridge City is also a matter of concern and a delivery rate close to the average for the Plan period should be maintained.

**iv. Does the evidence on past delivery, (which I have taken to be paragraphs 3.18 -3.19 of RD/Top/070 for CCC and Table 3 of RD/Top/050 for SCDC) justify the use of a 5%, rather than 20% buffer?**

- 2.15 The Councils' evidence on past delivery does not justify the use of a 5% buffer and a 20% buffer should be applied to both authorities' five year housing land supply requirement in order to boost significantly the supply of housing.
- 2.16 Paragraph 47 of the NPPF requires the buffer to be increased to 20% where there has been a persistent record of under-delivery of housing to provide a realistic prospect of achieving the planned supply and ensure choice and competition in the market for land. The history of under delivery within South Cambridgeshire is highlighted in Figure 1 of Appendix 1 to this Statement along with the third table on page 44 of the 2014 AMR which demonstrates that, based on the adopted Core Strategy housing target,

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the Council has a five year land supply of 2.2 years based on a 5% buffer and 1.9 years with a 20% buffer. Consequently paragraph 4.9 of the AMR confirms that by the end of the current Plan Period there would be a 37% deficit against the adopted housing requirement.

- 2.17 Similarly, with regard to Cambridge City, prior to 2013/14 the Council failed to meet its annual housing requirement in any year since 2001. Again, this is considered to represent persistent under-delivery and a 20% buffer should therefore be applied.

**v. Is there compelling evidence with reference to historic delivery rates and expected future trends, as required by paragraph 48 of the Framework that windfalls will contribute to the five year supply? For South Cambs Local Plan, are paragraphs 2.65 and 2.66 consistent with part 2 of Policy S/12?**

- 2.18 The evidence provided by both CCC and SCDC to support the inclusion of windfalls is mainly focussed on past delivery and does not in our view provide adequate consideration and evidence with respect to future delivery. Brownfield sites are a finite resource and it should not automatically be assumed that past delivery rates can be maintained indefinitely.
- 2.19 With specific regard to paragraphs 2.65 and 2.66 of the South Cambridgeshire Plan it is considered that paragraph 2.65 in particular is inconsistent with part 2 of Policy S/12. Given the comments above, it is considered that Part 2 of the policy should be amended along with the housing trajectory to exclude windfall sites from South Cambridgeshire's 5-year supply.

**vi. For each Council what, if any, is the shortfall in delivery from the early years of the Plan period which needs to be accounted for and can this be made up in the first five years, which is the preferred method in Planning Practice Guidance? If not, what are the local circumstances which justify using a longer period (i.e. not the economic recession)?**

Based on the Council's housing trajectories within their AMRs it is evident that South Cambridgeshire already has a shortfall in delivery from 2011 of 977 dwellings whilst Cambridge City is 32 dwellings above their target.

**Table 2: Previous Housing Delivery during Plan Period**

Year	2011-2012		2012-2013		2013-2014*	
	South Cambs	Cambridge	South Cambs	Cambridge	South Cambs	Cambridge
Delivery	678	352	559	481	636	1,299
Requirement	950	700	950	700	950	700
Deficit	-272	-348	-391	-219	-314	+599
Cumulative Deficit	-272	-348	-663	-567	-977	+32

- 2.20 It is considered that SCDC's deficit in housing delivery from the first three years of the Plan period should be made up within the first five years of the Plan period. Both Paragraph 47 of the NPPF and Paragraph 035 of the NPPG make it clear that this should be addressed within the first five years of the Plan period where possible. In this regard, the Council has failed to demonstrate why this deficit could not be made up within the first five years of the Plan through the identification of additional sustainable and deliverable sites.
- 2.21 Moreover, given the objectives of paragraph 47 of the NPPF to boost significantly the supply of housing and ensure choice and competition in the market for land and the clear evidence of acute housing needs



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within the District it is important that the Plan seeks to increase supply as a matter of urgency. Deferring this until later in the Plan period will only exacerbate the imbalance between supply and demand and would run contrary to the objectives of the NPPF.

2.22 We therefore consider that the Sedgefield methodology should be used as the preferred approach to assessing housing land supply. Such an approach would also be consistent with the Inspector's conclusions in the Waterbeach Appeal Decisions.

**vii. How will the extra 1,000 new homes on rural exception sites to be delivered as part of the City Deal be reflected in the housing trajectory / five year housing land supply?**

2.23 Whilst the additional 1,000 dwellings on rural exception sites will provide additional flexibility to help to meet South Cambridgeshire's housing needs during the Plan period, these will be of no benefit to Cambridge City due to its urban nature. Moreover, since no specific deliverable sites have been identified for the delivery of this element of housing it is not possible to rely on it as a source of the Council's five year housing land supply, particularly since these are intended to deliver housing additional to existing windfall assumptions for rural exception sites.



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### **3 Conclusions**

- 3.1 We therefore consider that the planned supply of housing detailed within the Local Plans will not deliver the level of housing required to meet the housing targets within the Plans. As such, the Plans and Policy S/6 of the South Cambridgeshire Local Plan in particular is unsound as it is:
- not positively prepared;
  - not justified having regard to the entirety of the evidence base; and
  - not consistent with National Policy within the NPPF in relation to housing.
- 3.2 Consequently, the Plans should identify further sites to ensure for the delivery of sufficient housing and comply with paragraph 47 of the NPPF. As such, this will ensure that the Plan is Sound in this regard.



# Appendices



# Appendix 1

**Review of Housing Supply within Cambridge and South Cambridgeshire**

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# SCDC & CCC Housing Land Supply Assessment Technical Appendix

Various Clients  
SCDC & CCC Examination In Public - Matters 8A and 8B  
15 January 2015

## Various Clients

SCDC & CCC Examination In Public - Matters 8A and 8B

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**Appendix 3 SCDC & CCC Individual Trajectories**

**Appendix 4 Five Year Housing Land Supply Assessment Methodology**



## 1 Introduction

1.1 This technical appendix has been prepared to support the Statement of Case submitted to the Examination in Public of South Cambridgeshire District Council's and Cambridge City Council's Draft Local Plans. Specifically, the information presented within this assessment relates to Matter 8 Housing Land Supply and Delivery and within this Matter 8B, which asks the question:

*Will the Plans ensure a rolling five year supply of specific deliverable sites in accordance with paragraph 47 of the Framework?*

1.2 Paragraph 47 of the National Planning Policy Framework (NPPF) sets out that Local Authorities should 'boost significantly' the supply of housing through the identification of a supply of specific deliverable sites to meet their housing requirement over the next five years; to be updated annually. On top of this supply, a buffer of either 5% or 20% must be applied depending on the Local Authority's history of housing delivery, or lack thereof. It is this fundamental principle of the NPPF on which the following assessment is founded.

1.3 The Assessment provides a background to the issue of Five Year Housing Land Supply (FYHLS) and the various factors which need to be taken into consideration in undertaking such an assessment. This background covers both National Policy and Guidance as contained within the NPPF and National Planning Practice Guidance (NPPG) as well as looks more closely at specific instances in South Cambridgeshire which provide additional information. Appendix 1 elaborates on this evidence base with a review of pertinent Local Plan Examinations, Appeal Decisions and Secretary of State Decisions which have informed the methodology used within the Assessment undertaken here.

1.4 Reviewing each Council's recent FYHLS assessments as well as other supporting information including the Memorandum of Understanding, this technical appendix sets out an alternative approach based on the background information and supporting evidence reviewed.

1.5 Following on from this short introduction the technical appendix continues as follows:

- Section 2 provides the Policy and Guidance context which has informed the assessment undertaken as well as other pertinent information providing support to the case made;
- Section 3 reviews South Cambridgeshire District Council's assessment of their Five Year Housing Land Supply;
- Section 4 reviews Cambridge City Council's assessment of their Five Year Housing Land Supply;
- Section 5 provides an assessment of the Memorandum of Understanding entered into by the two authorities;
- Section 6 sets out the methodology to the Five Year Housing Land Supply Assessment;
- Section 7 sets out Bidwells assessment of both Authority's Five Year Housing Land Supply;
- Section 8 provides an assessment of each Authority's ability to provide a 'rolling five year housing land supply'; and
- Section 9 concludes the technical appendix.



## 2 Planning Policy Context, Guidance and Other Considerations

- 2.1 The relevant planning policy context and objectives in relation to housing have been identified following an examination of the relevant Government planning policies and guidance. Local planning policy documents have been used to establish the relevant housing targets and delivery requirements. Together these set the context for this assessment of housing land supply and housing delivery.

### National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing in order to meet the housing needs of an area. In order to achieve this, paragraph 47 of the NPPF states that Local Authorities should:

*"identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements..."*

- 2.3 It goes on to state that in addition to this supply, a 5% buffer should be provided 'to ensure choice and competition in the market for land.' In instances where an Authority has a demonstrable history of not achieving its required housing delivery, this buffer increases to 20%.

- 2.4 Furthermore, it is prudent to look carefully at the definition of whether a site is 'deliverable' as specified in paragraph 47 of the NPPF. The footnote to paragraph 47 states:

*"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans." Footnote 11 to Paragraph 47*

- 2.5 Put simply, in order to be considered deliverable, a site must be:

- **Available Now** – available for development now;
- **Suitable** – the site must offer a suitable location for development now; and
- **Achievable** – there must be a realistic prospect that housing will be delivered on the site within five years and in particular that the proposed development is viable.

- 2.6 In instances where an up to date supply of specific deliverable sites cannot be identified to meet the Authority's five year housing land supply requirement, paragraph 49 of the NPPF sets out that:

*"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites."*

- 2.7 This therefore allows for planning applications to be submitted for new housing on unallocated sites or on sites which would otherwise be contrary to the development plan where a local planning authority has a lack of a five year housing land supply.

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### National Planning Practice Guidance

- 2.8 In accompaniment to the NPPF, the Government has formally published the National Planning Practice Guidance website which went live on 6 March 2014.
- 2.9 Within the guidance is further information on how to assess land availability and in particular what factors should be considered when assessing the suitability of sites for development.
- 2.10 In addition to considerations in respect of the Development Plan and status of the policy contained therein, the guidance focuses on ascertaining a site's suitability, availability and viability.
- 2.11 When assessing suitability, the guidance sets out that the following factors should be considered<sup>1</sup>:
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
  - potential impacts including the effect upon landscape features, nature and heritage conservation;
  - appropriateness and likely market attractiveness for the type of development proposed;
  - contribution to regeneration priority areas; and
  - environmental/amenity impacts experienced by would be occupiers and neighbours.
- 2.12 Having regard to availability, the guidance sets out that there should be confidence that there are no legal or ownership problems, including multiple ownerships; ransom strips; tenancies or operational requirements of landowners. This suggests the site will likely be in a single ownership, or owned by a developer, or that the landowner has expressed an intention to sell.
- 2.13 Finally, the economic viability of the site should be assessed insofar as there is a reasonable prospect of a developer completing the site and selling it over a certain period of time.

### South Cambridgeshire District Council Five Year Housing Land Supply Appeal Decisions

- 2.14 The following looks in detail at the two recent appeal decisions issued for residential developments within South Cambridgeshire. Issued in June 2014, these decisions clearly demonstrated that SCDC did not have a demonstrable supply of land to provide five years' worth of housing and in doing so meet their housing requirement. Furthermore, the decisions highlighted that there were unmistakable errors in the calculation of the District's housing requirement, most critically the calculation of the correct buffer to be applied.
- 2.15 The planning landscape in which these Appeals were submitted has evolved following the submission for Examination of the Draft Local Plan as well as the publication of the Memorandum of Understanding, entered into with Cambridge City Council. These Appeal Decisions nonetheless provide important background to the Five Year Housing Land Supply topic and provide important information in the assessment of each Council's current position.
- 2.16 Whilst both of the decisions were issued on the same day, 25 June 2014, the Inquiry for the outline application for the erection of 60 dwellings on land to the west of Cody Road [Ref: APP/W0530/A/13/2207961] was held first and so is addressed first. Set out below are those elements of

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<sup>1</sup> Paragraph: 019 Reference ID: 3-019-20140306

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the decision pertinent to the calculation of Five Year Housing Land Supply. Site specific matters are not addressed.

- 2.17 With regard to Policy, the Inspector sets out early on in their decision (paragraph 12) that only limited weight will be given to Draft Local Plan Policies due to the number of outstanding and unresolved objections in place. This is in accordance with Policy 216 of the NPPF.
- 2.18 When considering the District's housing requirement the Inspector, whilst taking the extant Core Strategy housing requirement as the starting point, finds that due to its derivation from the Structure Plan, changes in the housing market area and the limited Plan Period, the SHMA is a more appropriate measure of need.
- 2.19 At paragraph 19, the Inspector concludes that an annualised requirement of 950 dwellings, or 4,750 dwellings over a given five year period, should be used.
- 2.20 With regard to the five year period to be assessed, the Inspector finds that a base date of 1 April 2013 is appropriate, relying on the evidence presented within the 2012 – 2013 Annual Monitoring Report (AMR).
- 2.21 In the consideration of the Council's existing shortfall, the Inspector considers that in light of previous appeal decisions having regard for Policy 47 of the NPPF, the Sedgefield approach should be implemented. This is to say that any shortfall should be met within the next five year period. This is supported by other decisions set out in Appendix 1 and has been used in the assessment undertaken in section 6 of this document.
- 2.22 The Inspector then goes on to discuss the Council's persistent level of under delivery, as evidenced by the 2012 – 2013 AMR, and concludes that there is clear evidence for this.
- 2.23 The City Deal is raised in both of the appeals with regard to the additional 1,000 houses this may provide the District. However, in both instances it was considered that due to the uncertainty over when and how the City Deal might manifest itself, there can be no confidence that these dwellings will come forward within the five year period.
- 2.23.1 Ultimately the Inspector concludes at paragraph 42 that the Council only has 3.51 years supply of housing land available.
- 2.24 The second of the two Appeal Decisions [Ref: APP/W0530/A/13/2209166] was for the development of up to 90 dwellings on land north of Bannold Road, Waterbeach. Whilst this appeal was heard by the same inspector, there are certain differences in approach based on the evidence presented.
- 2.25 The approaches within the appeals are consist in so far as the SHMA annualised requirement of 950 dwellings per annum, or 4,750 dwellings over any five year period, should be taken as the housing requirement.
- 2.26 The Bannold Road appeal differs, however, in its setting of a base date from which to take the five year period of assessment. In this instance, a date of 1 April 2014 is used. Both the appellant and the Council agreed that whilst figures for the period to 31 March 2014 are only predictions, these can be assumed to be correct. However, the Inspector finds that historic predictions (i.e. 2010 – 2011) were significantly out. This information has informed the scenarios assessed in Section 6 of this report.
- 2.27 When considering the time over which the existing shortfall should be met, the Inspector again concluded that the Sedgefield method should be implemented.
- 2.28 The Inspector attaches significant weight to the AMR and the housing completions and projections contained therein. Referencing the Cotswold District Council case, a summary of which is provided at

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Appendix 1, the Inspector concludes that, considering a reasonable timeframe, there is a record of persistent under delivery of housing.

- 2.29 With regard to SCDC's Updated Five Year Housing Land Supply Position (April 2014) and the engagement with the additional housing provisions with the City Deal, the Inspector finds that there is no sound basis on which to include these numbers in the five year supply calculation.
- 2.30 The Inspector concludes that SCDC has a 3.9 year supply of housing land.
- 2.31 Interestingly, the Inspector did note that the appellant's efforts to assess the supply side trajectories put forward by the Council were a desk based 'mathematical exercise' rather than evidence based. Assessing the larger strategic sites, including North West Cambridge and Northstowe, the Inspector concludes that the Council has a robust basis for its figures and trajectory; agreeing with the Council that *'it is little wonder that the previous Appellant thought better of pursuing points on the trajectory.'*<sup>2</sup>
- 2.32 Following the issuing of these Decisions SCDC has published their updated Annual Monitoring Report (AMR) for the period 1 April 2013 – 31 March 2014. This AMR includes engagement with both the Appeal Decisions discussed above and the Memorandum of Understanding (MoU) entered into between CCC and SCDC. The assessment of five year housing land supply contained within the AMR is reviewed below, whilst the MoU is discussed in more detail in section 5.

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<sup>2</sup> Appeal Ref: APP/W0530/A/13/2209166 – Paragraph 44



### 3 SCDC Assessment of Five Year Housing Land Supply

- 3.1 This section of the Report considers SCDC's assessment of the District's FYHLS requirement.
- 3.2 The most recent assessment of supply is contained within the Council's 2013/14 Annual Monitoring Report (AMR). The AMR not only assesses the five year housing land supply within South Cambridgeshire, but also the five year housing land supply based on the Greater Cambridge area and the collective approach taken to housing supply with Cambridge City Council (CCC) as set out within the Memorandum of Understanding.
- 3.3 As well as reviewing the 2013/14 AMR, attention is also given to the Housing Land Supply Topic Paper (Ref: RD/Top/050) submitted as part of the Council's evidence base to the Examination in Public of the Draft Local Plan.
- 3.4 These documents are taken chronologically to demonstrate the progression of the FYHLS issues within South Cambridgeshire.

#### SCDC Housing Land Supply Topic Paper March 2014 (Ref: RD/Top/050)

- 3.5 The Housing Land Supply Topic Paper sets out the Council's approach to the supply of housing within the Submission Draft Local Plan. The topic paper looks at the background to the identification of available housing land within the District alongside a review of historic delivery, including contributions from windfall sites, before providing an assessment of FYHLS.
- 3.6 In summary, the topic paper sets out the following FYHLS scenarios for the period 2014 – 2019.

**Table 3.1: SCDC Housing Land Supply Topic Paper (March 2014) FYHLS Assessment**

	Liverpool Method		Sedgefield Method	
	5%	20%	5%	20%
SCDC	5.1	4.4	4.4	3.9
SCDC with 1,000 City Deal	5.2	4.6	4.6	4.0
CCC	7.7	6.7	7.6	6.6
SCDC + CCC	6.2	5.4	5.6	4.9
SCDC + CCC with 1,000 City Deal	6.2	5.5	5.7	5.0

Source: SCDC Housing Land Supply Topic Paper (March 2014) Table 2

- 3.7 Supporting these scenarios and the Council's choice to use the 'SCDC with 1,000 City Deal' scenario using the Liverpool Method and incorporating a 5% buffer is a range of information regarding historic delivery and the wider context in which housing has been delivered.
- 3.8 The topic paper sets out at Paragraph 3.2 that whilst the Local Plan does not depend on windfall sites to meet the objectively assessed housing need, the 5 year period from 2014 – 2019 set out within the 2013/13 AMR includes 400 dwellings delivered from such sites. This level of Windfall contribution is founded on an assessment of prior delivery from such sites from 2006 – 2012. On the back of the historic level of windfall delivery in the district, the topic paper goes on to discuss the City Deal and the additional dwellings this could potentially facilitate. With the potential for additional funding to facilitate exception site delivery, SCDC consider a phased introducing of 50-60 additional homes a year from 2016/17 to be achievable and consequently augment their 5 year supply period at that time with an additional 150 homes.

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- 3.9 The use of the City Deal when forecasting housing delivery, specifically when calculating FYHLS, is discussed in more detail in the latter section on the Memorandum of Understanding through which both local authorities seek to give its consideration more weight.
- 3.10 Within the topic paper, SCDC continue to assert that in calculating the FYHLS, the Liverpool Method should be employed incorporating a 5% buffer, based on the Council's historic performance.
- 3.11 Whilst the Council argue at Paragraph 5.8 that the Sedgefield Method is not appropriate due to the 'dispersed spatial settlement pattern' as well as the reversal of the former policy of dispersed growth and the concentration of future growth into urban extensions and new settlements, this has clearly been dismissed within the Appeal Decisions discussed above. It should also be noted that within the CCC Housing Land Supply Topic Paper discussed in section 4, a similar argument is made regarding the Sedgefield Methodology, however this time it is due to the 'tightly drawn Cambridge Green Belt inner boundary around the City'. The two arguments can be considered contradictory.
- 3.12 When considering the appropriate buffer to be used in the calculation of the five year housing land requirement in South Cambridgeshire, the Council consider that the 5% buffer is appropriate due to historic delivery meeting the annualised target 'applying the adopted plan in operation at that time'. The use of annual targets derived from earlier Local Plans when assessing under-delivery is significantly questioned at Paragraph 33 of the Cody Road Appeal Decision (Ref: APP/W0530/A/13/2207961). It cannot therefore be relied upon to be an acceptable measure in this instance either.
- 3.13 The use of the 5% buffer is maintained within the Submission Draft Local Plan in which the Council set out at Paragraph 2.63 that 'The Council has a record of providing significant levels of housing...' and that the lack of delivery in recent years is due to the economic down turn. This is also considered in the Topic Paper, where delivery is aligned with GDP growth in Table 3. The theory being that years in which there was an increase in GDP, there was also an increase in housing delivery.
- 3.14 However, Table 3 uses previous Local Plan targets which are not considered to be an appropriate approach to assessing under delivery. When assessed against the Core Strategy (2007) annual requirement of 1,176 dwellings, the Council fails to meet the target in any year other than 2007 – 2008.
- 3.15 Paragraph 2.63 of the Submission Draft Local Plan also sets out that the current development strategy was 'always expected to deliver fewer than the annualised average number of homes in the first part of its plan period, with higher than the annualised figure in the later years once the major developments come forward...' and that this was curtailed simply by the economic recession. The Topic Paper picks up on this point, setting out at paragraph 4.1 that the period 2002 – 2011 covers periods of both economic boom and recession. However even during the boom, cited as being from 2002 – 2007, the Council only managed to meet their housing target on a single occasion.
- 3.16 Furthermore, whilst not solely related to FYHLS, paragraph 4.1 of the Topic Paper sets out that 'larger developments are likely to be spread over a longer time period.' Given economic circumstances are often seen as cyclical, it could be expected that a further economic downturn could be experienced over the forthcoming plan period. With an over reliance on few large scale strategic sites, this could put the Council's ability to ensure a rolling five year supply of specific deliverable sites in accordance with paragraph 47 of the NPPF in jeopardy and doesn't provide the necessary flexibility required in paragraph 14.

## SCDC 2013/14 Annual Monitoring Report

- 3.17 The 2013/14 AMR provides assessments of five year housing land supply based on both 'Liverpool' and 'Sedgefield' methodologies as well as across the geographic area of the District as well as Greater Cambridge. Whilst detailed break downs of the calculations are not included within the AMR, the following

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tables are provided summarising the Council's considered five year housing land supply position in each instance for the period 2014 - 2019.

**Table 3.2: Five Year Housing Land Supply using the Liverpool Methodology**

	SCDC	Greater Cambridge (CCC & SCDC)
Five Year Supply with 5% Buffer	5.3	6.6
Five Year Supply with 20% Buffer	4.6	5.8

Source: SCDC AMR November 2014 Page 11

**Table 3.3: Five Year Housing Land Supply using the Sedgefield Methodology**

	SCDC	Greater Cambridge (CCC & SCDC)
Five Year Supply with 5% Buffer	4.7	6.1
Five Year Supply with 20% Buffer	4.1	5.4

Source: SCDC AMR November 2014 Page 11

- 3.18 Whilst SCDC has assessed the five year housing land supply using the Liverpool method and 5% buffer, it is considered that given the protracted and demonstrable history of under delivery a 20% buffer should be applied using the Sedgefield method. The Sedgefield method has continually been endorsed at Appeal and by the Secretary of State when deciding five year housing land supply applications.
- 3.19 The supporting text preceding the above tables within the AMR does not explicitly endorse the use of either method of incorporation of either buffer. Paragraph 2.32 of the AMR sets out that the Submission Draft Local Plan 'assumes a 5% buffer and the Liverpool methodology' whilst paragraph 2.33 sets out that 'The appropriate buffer and methodology will be issues for consideration at the Local Plan examination.' This technical appendix clearly demonstrates that a 20% buffer should be accounted for and the Sedgefield Methodology employed.
- 3.20 At Paragraph 2.36 of the AMR, it is stated that when CCC and SCDC trajectories are taken together a sufficient five year housing land supply can be demonstrated overall. This approach is set out in detail within the Memorandum of Understanding. Paragraph 2.36 continues that 'This is a logical and appropriate way of delivering sites to meet the combined objectively assessed housing need across the Greater Cambridge area, consistent with the development strategy contained in both Local Plans'.
- 3.21 However, at paragraph 4.12 the AMR sets out that 'Each Council has produced its own housing trajectory to demonstrate how it is meeting its own housing target within its own Local Plan in full.' This is clearly not the case in South Cambridgeshire where there is a demonstrable deficit in their own five year housing land supply.
- 3.22 SCDC place a heavy reliance on the MoU to meet their housing requirements and in seeking to demonstrate a robust approach to housing delivery. The MoU is discussed in more detail in section 5 of this Assessment.

## 4 CCC Assessment of Five Year Housing Land Supply

### CCC Housing Land Supply Topic Paper March 2014 (Ref: RD/Top/070)

- 4.1 The FYHLS Assessment undertaken within the Topic Paper follows the same approach and methodology to SCDC.
- 4.2 CCC considers that the most appropriate approach to the assessment of FYHLS is using the Liverpool methodology and implementing a 5% buffer due to the historical nature of delivery.
- 4.3 At paragraph 3.17 of the Topic Paper it is set out that due to the tightly drawn nature of the Cambridge Green Belt the Sedgfield methodology is not appropriate. It is considered that the '...sites identified in the plan along with the assumed windfall completions represent the maximum capacity of Cambridge to accommodate residential growth.' However, as has been demonstrated in section 2 and the evidence provided at Appendix 1, the Sedgfield methodology has gained significant traction with Planning Inspectors and the Secretary of State when determining how to deal with any historic under delivery.
- 4.4 When considering the appropriate buffer to its FYHLS assessment CCC outline, at paragraph 3.19, that the economic downturn pushed the delivery of strategic sites back whilst two further sites (Cambridge East and Northern Fringe East) are no longer available for development. With these factors firmly outside of the Council's control, it considers that a 5% buffer is the most appropriate. However, much like in South Cambridgeshire, such factors are not considered to represent sufficiently strong reasons not to provide a 20% buffer, should a demonstrable deficit exist.

**Table 4.1: Five Year Supply for Cambridge based on both Liverpool and Sedgfield Methods**

Dwelling Completed April 2011 – March 2014	2,021	
Dwelling Predicated to be completed April 2014 – March 2019	5,705	
Annual Requirement April 2011 – March 2013	700 (= 14,000 / 20)	
	<b>Liverpool Method</b>	<b>Sedgfield Method</b>
Annual requirement April 2014 – March 2031 taking into account past completions	704.65	715.80
Number of years' supply assuming a 5% buffer	7.71	7.59
Number of years' supply assuming a 20% buffer	6.75	6.64

Source: CCC Housing Land Supply Topic Paper (March 2014) Table 3.3

- 4.5 According to the above table even if implementing a 20% buffer and using the Sedgfield Methodology CCC can demonstrate a deliverable supply of available housing land to meet their five year housing land requirement.
- 4.6 Similarly to SCDC, CCC has a history of providing a significant level of housing through windfall sites as demonstrated in Tables 3.1 and 3.2 of the Topic Paper. As a result of this historic delivery, 123.3 windfall completions per annum have been added to the Council's trajectory for the period 2016/17 – 2030/31. This amounts to 1,850 dwellings over the plan period.

### CCC Annual Monitoring Report December 2014

- 4.7 The CCC AMR 2014 mirrors the Topic Paper submitted as part of the evidence base for the Submission Draft Local Plan in so far as it set out the Council's position in respect of housing delivery and five year housing land supply. However, having been published 10 months after the Topic Paper, revised FYHLS figures are provided.

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	Financial Year					
	14/15	15/16	16/17	17/18	18/19	Total
<b>Housing Trajectory – Predicted Completions</b>	612	1,012	1,781	1,472	1,348	6,225
<b>Local Plan 2014: Proposed Submission Annual Housing Target</b>	700	700	700	700	700	700
<b>Under/ Over Supply in relation to Local Plan 2014</b>	2,725					
<b>Five Year Supply Calculation Methods (Taking into account a surplus of 37 dwellings completed between 2011/12 and 2013/14)</b>						
	Five-year Supply as a Percentage		Five-year supply represented in Years			
Liverpool Method with 5% Buffer	170		8.49			
Liverpool Method with 20% Buffer	149		7.43			
Sedgefield Method with 5% Buffer	171		8.55			
Sedgefield Method with 20% Buffer	150		7.48			

Source: CCC AMR December 2014 Figure 4 – N.B. Surplus identified within Housing Trajectory Summary Table is 32

- 4.8 Having set out the above approaches to calculating FYHLS, CCC references the MoU with SCDC and the collaborative approach to the phasing of delivery between the two authorities over the plan period.
- 4.9 Following on from this, CCC also set out an assessment of FYHLS across 'Greater Cambridge'. This table replicates that already set out above in Tables 2 & 3.
- 4.10 This approach to phasing is seen to follow a logical progression from the strategies set out in either Authority's adopted Development Plans. The sequence sees sites within and on the edge of Cambridge being built out first before the identified new settlements then begin to deliver later in the plan period, therefore accommodating their longer lead in time.
- 4.11 Within the AMR CCC make specific reference to the fringe sites allocated within the current Local Plan that are now coming forward and delivering significant amounts of new housing as well as jobs.
- 4.12 As will be demonstrated, the MoU cannot be relied upon to bring together the two Authority's housing trajectories with a view to jointly meeting the housing needs across both areas.

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## 5 Memorandum of Understanding between SCDC and CCC

- 5.1 In September 2014, a Memorandum of Understanding (MoU) was agreed by Members at SCDC, Cambridge City Council and Cambridgeshire County Council, aimed at underpinning the Duty to Co-operate in light of several events following the submission of the Draft Local Plans in March.
- 5.2 The MoU seeks to support the phasing of housing delivery across the Greater Cambridge Area to meet both Councils' objectively assessed housing need over the Plan Period. It states that it is without prejudice to the consideration of housing supply issues at the current Examination.
- 5.3 At the beginning of the MoU it is set out that the agreement between SCDC and CCC is consistent with the NPPG is so far as Paragraph 035<sup>3</sup> sets out that *Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.*
- 5.4 However SCDC has not formally declared that it cannot meet the current undersupply, stating within the Submission Draft Local Plan that it still considers itself a delivering authority, nor has the Council set out why it cannot meet this undersupply within its own administrative area.
- 5.5 Within the MoU the Councils cite four principal reasons for the publication of the document and the collective approach that the Councils are seeking to maintain a Five Year land supply:
- 1) The City Deal agreement was signed by CCC, SCDC, the County Council, Cambridge University and the Cambridgeshire and Peterborough Local Enterprise Partnership on 19 June 2014. This defines the CCC and SCDC area as 'Great Cambridge'. As part of this deal, the Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019.
  - 2) The Waterbeach Appeal's findings in relation to South Cambridgeshire's Five Year housing land supply and, in particular, that the Inspector did not consider it appropriate to take account of the housing supply situation in Cambridge. Furthermore, the Inspector also concluded that there was no sound basis for taking the City Deal into account as it had not been signed at the time the Appeals were decided.
  - 3) National Planning Policy Guidance (NPPG) published on 6 March 2014 provides for LPAs to seek agreement with neighbours under the Duty to Co-operate to meet five year housing land supply (paragraph 035).
  - 4) The East Cambridgeshire Local Plan. The Inspector's interim conclusions included an acknowledgement that meeting part of East Cambridgeshire's objectively assessed needs within Peterborough under the Duty to Co-operate did not conflict with the NPPF.
- 5.6 It is made clear within the document that the MoU is focused on when housing will be delivered, i.e. phasing, but not where. The MoU sets out that sites within and on the edge of Cambridge City will be brought forward in the short to medium term, whilst new settlement sites will be delivering housing in the medium to longer term.
- 5.7 A copy of the proposed joint trajectory is provided at Appendix 2 for reference.
- 5.8 However, we do not consider that this approach complies with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply

<sup>3</sup> NPPG Paragraph 035 - Reference ID: 3-035-20140306

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of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

- 5.9 With regard to the City Deal, this defines the CCC and SCDC area as 'Greater Cambridge' with the Councils agreeing to prepare a joint Local Plan and Transport Strategy starting in 2019. This date is still some way off and at the current time the two Councils are still proceeding with separate Plans for each administrative area, with separate identified sites to meet their housing requirement.
- 5.10 The City Deal, whilst potentially bringing a number of benefits to Cambridge and the surrounding area, is dependent on a number of external factors. Much of the funding associated with the City Deal is predicated on meeting certain triggers at some point in the future. There is, therefore, considerable uncertainty as to how the City Deal will evolve and impact on housing delivery across either CCC or SCDC. Furthermore, with the joint Local Plan not due to begin until 2019, there is a considerable amount of background and evidence base work to be undertaken before such a plan can be brought forward.
- 5.11 It is therefore considered that it is still too early and there is still too much uncertainty as to how the City Deal will evolve for it to be taken into consideration within any five year housing land supply assessment. Whilst the City Deal had not been signed at the point of the Waterbeach Appeal's determinations, the Inspector's concerns are still considered to be valid.
- 5.12 Points 2, 3 and 4 are interrelated as they each deal with the use of the duty to co-operate and delivery of housing. Within the recent Appeal Decisions, looked at in more detail in Section 4 of this Assessment, the Inspector found that there was no sound basis for taking the City Deal into consideration or that it would be correct to take account of Cambridge City's housing supply within SCDC.
- 5.13 The Draft Local Plans were submitted on 28 March and were therefore unable to take account of Guidance within the NPPG, published on 6 March, on five year housing land supply. However, the duty to co-operate is contained within the NPPF along with a clear direction as to its potential use.
- 5.14 Lastly, the supporting text to the MoU references the interim conclusions made by the Inspector undertaking the East Cambridgeshire District Council's Local Plan Examination; specifically that meeting part of the Council's housing need within Peterborough did not conflict with the sustainable objectives of the NPPF. However, this is irrelevant in this context since the two Councils' Local Plans seek to meet their entire individual housing needs within their own administrative boundaries. As such, unlike with East Cambridgeshire, their housing requirement as set out within their Draft Submission Plans remains unchanged. It is clear from Paragraph 47 of the NPPF that the local planning authorities' Five Year Housing Land Supply requirements must be calculated with reference to the individual housing requirements set out within their own Plans.
- 5.15 Going back to Paragraph 035 of the NPPG, SCDC has not specifically detailed why it cannot accommodate the existing housing undersupply within its own administrative boundary over the next five years. Paragraph 4 of the MoU sets out that "*...Cambridge City and South Cambridgeshire District Councils have committed to the development strategy for the Greater Cambridge area and to meeting their respective needs in full in their Local Plans.*" If each authority can meet their respective needs in full in their Local Plans then the need to combine each authority's trajectory surely does not arise.
- 5.16 The important point here is that the preparation of the CCC and SCDC Draft Local Plans has not specifically engaged with the meeting of housing need cross-boundary either through a Joint Local Plan or through the Draft Submission Plans meeting a proportion of one of the authorities housing needs within the neighbouring authorities' boundaries. Paragraph 5 of the MoU specifically sets out that "*The Councils considered that the approach they followed in the preparation of the submitted Local Plans already supported the approach to consider the two housing trajectories together.*" However, at no point during the consultation process on the Draft Local Plans was this specifically put forward as an option based on an

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acknowledgement that there was a five year housing land supply deficit that could not be met within either authorities administrative boundary.

- 5.17 Furthermore, within the Greater Cambridge Housing Trajectory there is no consideration of the Councils' respective buffers and how these additional requirements will be met. This trajectory does not change the historic nature of either Council's under supply of housing and the impact this will have on the housing requirement for the next five years.
- 5.18 The MoU has not been subject to any detailed scrutiny, consultation or examination and therefore cannot be given any meaningful weight in the calculation of the available five year housing land supply in either administrative area.



## 6 Assessment Methodology

6.1 This chapter looks at the reasoning behind the methodology employed in the Bidwells' assessment undertaken of both SCDCs and CCCs five year housing land supplies. The chapter looks at each stage of the assessment process for each authority, providing justifications for the approach taken at each stage.

### 1) The Housing Requirement

#### South Cambridgeshire District Council

6.2 The starting point for the assessment is to establish the appropriate housing requirement for the District's five year period. The current Core Strategy in South Cambridgeshire was adopted in 2007.

6.3 Within the decisions for both of the appeals discussed in Section 2 of this Assessment, the Inspector found that the housing requirement within the Draft Local Plan, based on the updated SHMA, should be used over that contained within the extant Core Strategy. The Inspector considered that due to the age of the Core Strategy and its foundation on the RSS, it did not represent a robust basis on which to undertake a five year housing land supply assessment going forward. As such, the Council's housing requirement, as set out within the Submission Draft Local Plan has been used in this assessment.

6.4 In calculating the FYHLS requirement, LPA's must take account of any existing shortfall (or surplus) of housing supply against annual targets if they have been accumulated since the start of the plan period. The annual targets for the remainder of the plan period, and the five year land supply target, should then be adjusted accordingly. The supply and subsequent deficits of the Submission Draft Local Plan have therefore been considered to ascertain the appropriate housing requirement.

**Table 6.1: SCDC Actual Housing Delivery against Draft Local Plan Housing Requirement of 950**

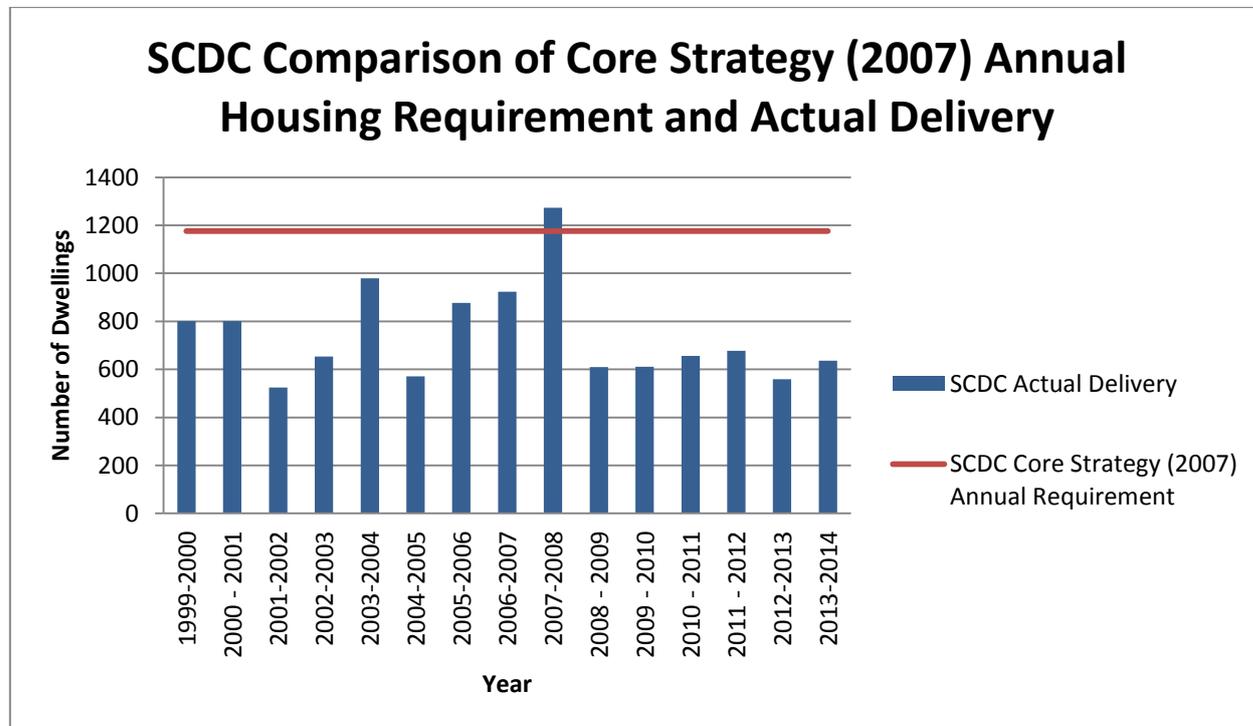
Year	2011-2012	2012-2013	2013-2014
Delivery	678	559	636
Requirement	950	950	950
Deficit	-272	-391	-314
Cumulative Deficit	-272	-663	-977

Source: SCDC AMR November 2014

6.5 Table 5 above sets out the annual housing requirements since the start of the Plan Period in 2011 and the actual delivery achieved in each monitoring year. The final row provides a running total of the accumulated housing deficit, which will need to be taken forward into the FYHLS Assessment. In the case of SCDC, this deficit is 977 dwellings.

6.6 Based on the historic shortfall in housing delivery, it is then necessary to ascertain the appropriate buffer to be used in the assessment. Due to the overlap of the Core Strategy and Submission Draft Local Plan consideration of housing shortfall against both requirements must be had to ascertain the correct NPPF compliant buffer requirement. The protracted history of under delivery is highlighted in the table included with Figure 4.1 within the AMR. This is illustrated in Graph 1 below, with an assessment of housing supply against the extant adopted Core Strategy annual requirement of 1,176 dwellings.

Figure 1: SCDC Actual Housing Supply Against Core Strategy (2007) Housing Requirement



Source: SCDC AMR November 2014

- 6.7 It is evident from this table that since the 99/00 monitoring year, SCDC have only met their housing requirement in one year, whilst the largest deficit in a single year stands at 651 dwellings in 01/02. Under Paragraph 47 of the NPPF such evidence demonstrates 'a record of persistent under delivery of housing' and therefore the Council are required to increase their buffer over the five year period to 20% so as to be able to 'provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market.'
- 6.8 When considering FYHLS, this position is brought in to clearer focus within the 13/14 AMR through the following table assessing the supply based on the adopted Core Strategy.

Table 6.2: Five Year Housing Land Supply Based on Core Strategy (2007)

	Liverpool Method	Sedgefield Method
Five Year Supply with 5% Buffer	2.2	2.2
Five Year Supply with 20% Buffer	1.9	1.9

Source: SCDC AMR November 2014 Page 12

- 6.9 The 2007 Core Strategy set out to provide 20,000 dwellings over the period 1999 – 2016. Whilst the AMR does not provide a detailed breakdown of the assessment undertaken to reach these figures, a five year housing land supply of only 1.9 years demonstrates the Council's poor performance over the period of the adopted Plan. It is further set out at paragraph 4.9 of the AMR that by the end of the current Plan Period there would be a 37% deficit against the adopted housing requirement.

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- 6.10 The Council acknowledges that it has not delivered the necessary level of housing in the Draft Local Plan at paragraph 2.63. Whilst it is also asserted that 'The Council has a record of providing significant levels of housing...' this does not reconcile the fact that delivery has consistently fallen short of the annual requirement.
- 6.11 In order to accurately calculate the current five year housing land supply position in South Cambridgeshire, the current deficit of 977 must be met over the next five years on top of a 20% buffer to account for the historic under supply identified.

### Cambridge City Council

- 6.12 Taking the same approach to the calculation of the existing deficit or surplus within the Plan Period 2011 – 2031 identified within the CCC Submission Draft Local Plan, the following table provides the current position.

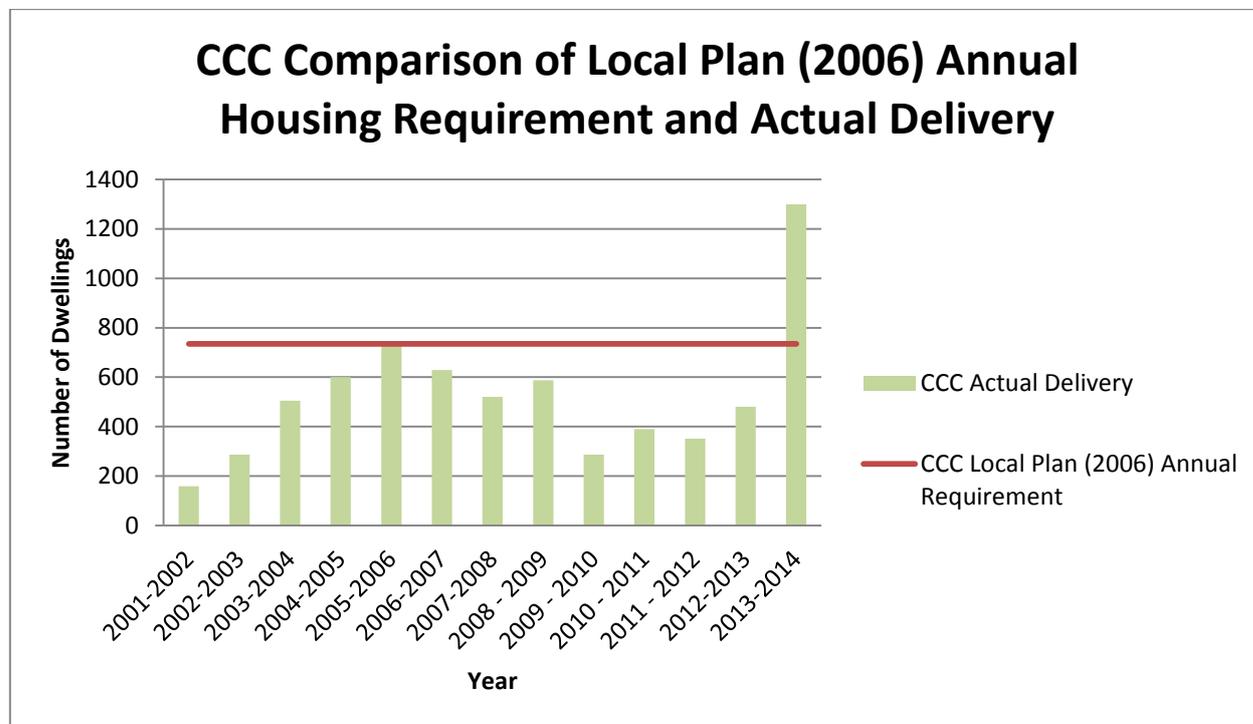
**Table 6.3: CCC Actual Housing Delivery against Draft Local Plan Housing Requirement of 700**

Year	2011-2012	2012-2013	2013-2014
Delivery	352	481	1,299
Requirement	700	700	700
Deficit	-348	-219	+599
Cumulative Deficit	-348	-567	+32

*Source: CCC AMR December 2014*

- 6.13 Due to a very strong year of delivery in 2013/ 14, CCC currently has a small surplus of housing delivery based on its Submission Draft Local Plan. This surplus would therefore be discounted from the housing requirement over the next five years.
- 6.14 However, a current surplus does not necessarily mean that a Local Authority can be considered to be 'delivering'. As has been demonstrated through the contextual information provided at Appendix 1 of this Assessment, delivery over the previous 5 years can be considered to be a robust approach to assessing whether a Local Authority has delivered sufficient housing for the purposes of calculating an appropriate buffer. Taking the same approach used to assess the buffer requirement in South Cambridgeshire above, the following table assess the delivery in Cambridge City since 2001/ 02.

**Figure 2: CCC Actual Housing Supply Against Local Plan (2006) Housing Requirement**



Source: CCC AMR December 2014

- 6.15 It is clear from the above table that whilst CCC had a very high delivering year in 2013/ 14, this has not been replicated at any point over the past ten years. Throughout years of economic growth as well as recession, CCC has continually missed its housing targets.
- 6.16 Based on the contextual information presented within this document, CCC should be considered a 'non-delivering authority' and therefore required to incorporate a 20% buffer within their FYHLS assessment.

**2) Identify Timescale over which Deficit is to be met**

- 6.17 There are two approaches to dealing with any current deficit within the FYHLS assessment commonly known as the 'Liverpool' and 'Sedgefield' Methods.
- 6.18 The Liverpool Method takes the current deficit, built up over the term of the Local Plan to date, and distributes it over the remainder of the plan period. For the majority of the Plan Period, this approach consequently spreads the current deficit over a longer timeframe than the five year period being assessed at that point in time. This reduces the additional housing a Local Authority will be required to deliver within the next five year period.
- 6.19 The Sedgefield Method take a more immediate approach to dealing with undersupply. The deficit built up over the term of the Local Plan to date is incorporated in its entirety into the FYHLS Assessment, increasing the level of housing a Local Authority would need to provide over the five year period being assessed.
- 6.20 Both SCDC and CCC consider that the Liverpool Method is the most appropriate way in which to account for the current under supply of housing within their respective Draft Local Plans and Annual Monitoring Reports, although for differing reasons.

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### South Cambridgeshire District Council

- 6.21 SCDC sets out at paragraph 5.5 within the Housing Supply Topic Paper (March 2014) RD/Top/050 that the Liverpool Method has always been used by the authority 'since the requirement to demonstrate a 5 year supply was first introduced.' The Paper goes on to set out that there is no preferred methodology for how to calculate five year housing land supply within the NPPF of NPPG.
- 6.22 The Topic Paper references Paragraph 035 (Ref ID: ID: 3-035-20140306) of the NPPG which sets out that where an Authority cannot meet its undersupply within the first five years of the plan period, it will need to work with neighbouring authorities under the 'Duty to Cooperate'. SCDC maintain that there is no backlog of housing to provide prior to 2011 and that the NPPG provides no support for the Sedgefield Methodology.
- 6.23 Additionally, SCDC considers that the Sedgefield Method is inappropriate for the District given its 'dispersed spatial settlement pattern' and the development strategy currently being followed through the extant and Draft Local Plans.
- 6.24 There are clear deficiencies with this argument and clear support for the use of the Sedgefield Methodology in calculating the District's FYHLS requirement.
- 6.25 The 'dispersed spatial settlement pattern' within the District and the development strategy currently being followed are considered to be immaterial to the time frame over which the current undersupply of housing should be met. Furthermore when examining the existing undersupply of housing since 2011 SCDC have given no indication as to why it cannot meet this undersupply within the five year period in its own administrative area and the factors which have led to this conclusion.
- 6.26 Paragraph 47 of the NPPF sets out that Local Authorities should seek to 'boost significantly' the supply of housing. This is a point which was picked up on in the Honeybourne, Worcestershire Appeal Decision (Ref: A/12/2171339) included as part of the contextual information at Appendix 1. In this instance, given the onus of Paragraph 47 the inspector considered that any shortfall should be met within the five year period. A similar conclusion was also reached in the Todenham Road, Moreten in Marsh Appeal Decision (Ref: A/10/2130320) also included at Appendix 1.
- 6.27 More locally, in the examination of the East Cambridgeshire Local Plan (2013) the Inspector saw 'no reason not to use the Sedgefield method of apportioning past shortfalls'.
- 6.28 There is clear support for the use of the Sedgefield methodology which seeks to meet the aims and objectives of the NPPF in 'boost significantly' the supply of housing. Additionally, the use of the Liverpool method has been identified to risk never meeting past undersupply through the continual 'rolling forward' of any accumulated deficit. SCDC have identified that at the end of the current Core Strategy plan period 1999 – 2016 there will be a 37% shortfall on the adopted housing target, amounting to approximately 7,400 dwellings.
- 6.29 Ultimately the implementation of the Sedgefield Methodology provides the only way to engage positively and proactively with the existing and any future deficit to ensure that every effort is made to meet the Draft Local Plan's housing trajectory.

### Cambridge City Council

- 6.30 Within the Housing Land Supply Topic Paper (March 2014) (Ref: RC/ToP/070) submitted by CCC in support of their Draft Local Plan it is argued that the Liverpool Method should be employed in determining the Council's FYHLS requirement, much like in South Cambridgeshire.

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- 6.31 Again, CCC set out that the Liverpool Method has been used consistently to calculate FYHLS in the City and that the Sedgefield Method is not the most appropriate method 'taking account of the tightly drawn Cambridge Green Belt inner boundary...'. This argument seems to be at odds with that being made in SDCD based on the dispersed settlement pattern.
- 6.32 The nature of the Cambridge Green Belt is immaterial to the implementation of either the Liverpool or Sedgefield method. It may, with sufficient evidence, be a consideration in how the five year requirement is met, but it cannot be used to influence the requirement itself.
- 6.33 The Sedgefield Method, as set out above, has gained significant traction and weight with Inspectors at both Appeal and Examination. Such a methodology, used to ascertain the FYHLS requirement itself, should be applied irrespective of geography and spatial patterns of settlement distribution. Only once the full requirement has been identified can such factors be given consideration and even then they must be supported by sufficient and robust evidence.
- 6.34 It is therefore considered that the Sedgefield Method should be implemented in the calculation of CCCs FYHLS requirement.

### 3) Identify Potential Sites

- 6.35 Both Authorities include Housing Trajectories within their respective Annual Monitoring Reports which represent the most up to date forecasting for housing delivery over the remainder of the Plan Periods. Both Plans run from 2011 – 2031.
- 6.36 Paragraph 47 of the NPPF sets out that Local Authorities must 'identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing...'. Provided at Appendix 3 are copies of the Housing Trajectories contained within each Authority's most recent AMR for reference, which are considered to represent the most up to date information with regard to housing land supply.
- 6.37 As set out in section 2, in order to be considered deliverable site must be:
- 6.38 Put simply, in order to be considered deliverable, a site must be:
- **Available Now** – available for development now;
  - **Suitable** – the site must offer a suitable location for development now; and
  - **Achievable** – there must be a realistic prospect that housing will be delivered on the site within five years and in particular that the proposed development is viable.
- 6.39 The forecast supply of sites for each Authority has been reviewed and an assessment made of each site based on the criteria above.

### South Cambridgeshire District Council

- 6.40 Of principle concern in the SCDC trajectory is the reliance on Northstowe to deliver a consistent level of housing over a 12 year period never before seen in the District.
- 6.41 A detailed assessment of this forecast delivery is provided in section 8. In summary, it is considered that the levels of delivery forecast are unrealistic based on past experiences at strategic sites such as Cambourne. Using the average annual delivery at Cambourne of approximately 235 dwellings, it is considered that the proposed figures for Northstowe are not achievable and a more realistic trajectory for Northstowe is 250 dwellings per annum.

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6.42 If an annual delivery of 250 dwellings per annum is applied, the available supply is affected as follows:

**Table 6.4: Discounting Northstowe Delivery**

	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/20	Total
SCDC Trajectory Northstowe (Phases 1 + 2)	0	10	216	264	305	400	1,195
Amended Trajectory Northstowe (Phases 1 + 2)	0	10	216	250	250	250	976
Difference	0	0	0	-14	-55	-150	-219

6.43 The available supply in South Cambridgeshire is therefore reduced by 69 and 219 dwellings over the five year periods being assessed respectively.

### Cambridge City Council

6.44 Given the nature of the housing supply in the City, it has not been altered for the purposes of this assessment.

6.45 In Summary, to ensure that the correct target is calculated it is necessary to:

- Deduct the completions to date (from the beginning of the Plan Period) from the set target contained in the Submission Draft Local Plan over the same period. This will give the current housing shortfall;
- Take the annual target from the Submission Draft Local Plan and multiply this figure by five;
- Incorporate the correct NPPF Paragraph 47 buffer, in this instance 20%; and
- Add the current housing shortfall to this final figure to calculate the housing requirement over the next five years.

6.46 This calculation is based on the Sedgefield methodology which has gained significant traction over the past year and the preferred approach to assessing housing land supply. It was also the preferred methodology in both of the recent Waterbeach Appeal Decisions. It is therefore used here also. It is not considered necessary to engage with the Liverpool Methodology.

6.47 The methodology used in the calculation of the current Five Year Housing Land Supply Positions for SCDC and CCC is contained at Appendix 4.

## 7 Bidwells' Assessment of Five Year Housing Land Supply

### Assessment

- 7.1 The five year land supply of deliverable housing sites needs to have regard to the NPPF, the existing and emerging Development Plan Policies and other material planning considerations. We set out below the approach that Bidwells has adopted in calculating South Cambridgeshire's Five Year Housing Land Supply having regard to Government guidance and best practice.

### Five Year Housing Land Requirement

- 7.2 Based on the information contained within section 6 of this report, the following five year housing land requirements have been identified for each Local Authority.

**Table 7.1: SCDC Five Year Housing Land Requirement**

SCDC Requirement 2011 - 2014	2,850
SCDC Delivery 2011 - 2014	1,873
SCDC Deficit 2011 - 2014	- 977
SCDC Five Year Housing Land Requirement	4,750
SCDC Five Year Housing Land Requirement + 20%	5,700
SCDC Five Year Housing Land Requirement + 20% & Deficit	6,677

- 7.3 The Five Year Housing Land Requirement for SCDC is therefore 6,677 dwellings.

**Table 7.2: CCC Five Year Housing Land Requirement**

CCC Requirement 2011 - 2014	2,100
CCC Delivery 2011 - 2014	2,132
CCC Surplus 2011 - 2014	+32
CCC Five Year Housing Land Requirement	3,500
CCC Five Year Housing Land Requirement + 20%	4,200
CCC Five Year Housing Land Requirement + 20% & Surplus	4,168

- 7.4 The Five Year Housing Land Requirement for CCC is therefore 4,168 dwellings.

### Scenarios

- 7.5 A number of different scenarios have been assessed to provide a range of possible five year housing land supply outcomes for both SCDC and CCC.
- 7.6 The most recent AMR for each authority was published at the end of 2014 with data taken up to April of the same year. To account for the time that has elapsed since this point in time and to provide something of a 'stress test' to assess whether short term supply is projected to increase or decrease the scenarios have been assessed across two time periods, 2014 – 2019 and 2015 – 2020.

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7.7 Based on the evidence presented within this technical appendix it is considered that the provision of a 5% buffer and use of the Liverpool Method are not suitable. Therefore they have not been included. All scenarios are based on the provision of a 20% buffer and use the Sedgfield Method.

7.8 The following scenarios have therefore been assessed:

- 2014 – 2019: SCDC Supply;
  - This is an assessment based on the trajectory contained within the 2013/ 14 AMR.
- 2014 – 2019: CCC Supply;
  - This is an assessment based on the trajectory contained within the 2013/ 14 AMR.
- 2014 – 2019: Greater Cambridge Supply;
  - This is an assessment based on the trajectories contained within both Authority's 2013/ 14 AMRs.
- 2014 – 2019: SCDC Bidwells Supply;
  - This is an assessment based on the SCDC trajectory amended by Bidwells.
- 2014 – 2019: Greater Cambridge Bidwells Supply;
  - This is an assessment based on the CCC trajectory contained within the 2013/ 14 AMR and the SCDC trajectory amended by Bidwells.
- 2015 – 2020: SCDC Supply;
  - This is an assessment based on the trajectory contained within the 2013/ 14 AMR.
- 2015 – 2020: CCC Supply;
  - This is an assessment based on the trajectory contained within the 2013/ 14 AMR.
- 2015 – 2020: Greater Cambridge Supply;
  - This is an assessment based on the trajectories contained within both Authority's 2013/ 14 AMRs.
- 2015 – 2020: SCDC Bidwells Supply;
  - This is an assessment based on the SCDC trajectory amended by Bidwells.
- 2015 – 2020: Greater Cambridge Bidwells Supply;
  - This is an assessment based on the CCC trajectory contained within the 2013/ 14 AMR and the SCDC trajectory amended by Bidwells.

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**Table 7.3: Five Year Land Supply Assessment Scenarios**

Scenario	Plan Period	Housing Requirement	Assessment Period	Completions During Plan Period to Date	Current Housing Shortfall	Five Year Requirement with Buffer	Five Year Requirement with Deficit	Supply	Five Year Supply	Deficit/ Surplus
2014 – 2019 SCDC Supply	2011 - 2031	19,000	2014-2019	1,873	977	5,700	6,677	5,604	4.2	-1,073
2014 – 2019 CCC Supply	2011 – 2031	14,000	2014-2019	2,132	+32 (Surplus)	4,200	4,168	6,225	7.5	+2,057
2014 – 2019 Greater Cambridge Supply	2011 – 2031	33,000	2014-2019	4,005	945	9,900	10,845	11,829	5.5	+984
2014 – 2019 SCDC Bidwells Supply	2011 – 2031	19,000	2014-2019	1,873	977	5,700	6,677	5,535	4.1	-1,142
2014 – 2019 Greater Cambridge Bidwells Supply	2011 - 2031	33,000	2014-2019	4,005	945	9,900	10,845	11,760	5.4	+915
2015 – 2020 SCDC Supply	2011 - 2031	19,000	2015 – 2020	2,577	1,223	5,700	6,923	6,360	4.6	-563
2015 – 2020 CCC Supply	2011 - 2031	14,000	2015 – 2020	2,744	56	4,200	4,256	5,613	6.6	+1,357
2015 – 2020 Greater Cambridge Supply	2011 - 2031	33,000	2015 – 2020	5,321	1,279	9,900	11,179	11,973	5.4	+794
2015 – 2020 SCDC Bidwells Supply	2011 - 2031	19,000	2015 – 2020	2,577	1,223	5,700	6,923	6,141	4.4	-782
2015 – 2020 Greater Cambridge Bidwells Supply	2011 - 2031	33,000	2015 – 2020	5,321	1,279	9,900	11,179	11,754	5.3	+575

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- 7.9 From the table above, it is clear that CCC have the strongest forecast supply over both five year period assessed. However, across both periods SCDC maintain a significant deficit. The Appeal Sites discussed in section 2 of this report have been incorporated into SCDCs Trajectory within the 2013/ 14 AMR and are therefore accounted for within the above figures, demonstrating further sites are required to be brought forward. Whilst supplies across Greater Cambridge have also been assessed, it is not considered that this presents a defensible approach to the calculation of FYHLS.
- 7.10 Ultimately it is considered that each Authority should be required to meet their full five year housing land requirement within their own administrative areas, in line with the approaches taken by both authorities throughout the production of their respective Local Plans.
- 7.11 Whilst CCC are able to demonstrate between **6.6** and **7.5** years land supply, depending on the time period assessed, Bidwells consider that SCDC are only able to demonstrate between **4.1** and **4.4** years supply depending on the time period assessed and taking account of the overly ambitious supply at Northstowe.
- 7.12 A review of the Council's Planning Application Search portal has also been undertaken and the following applications still to be determined have been identified, which do not factor into the above figures.

**Table 7.4: Current FYHLS Applications being Determined by SCDC**

Application Reference	Site Location	Description of Development
S/2365/14/OL	Former CEMEX Cement Works, Barrington Cement Plant, Haslingfield Road, Barrington, Cambridge, Cambridgeshire, CB22 7RQ	Outline application for [inter alia] the demolition of all existing buildings and structures, and redevelopment to provide up to 220 residential units.
S/2273/14/OL	Land at Teversham Road, Fulbourn	High quality residential development of up to 110 dwellings with areas of landscaping and public open space, one access point and associated infrastructure works.
S/2791/14/OL	Land to the East of New Road, Melbourn	Outline planning application (including approval of access) for residential development of up to 199 dwellings plus a care home of up to 75 beds.

- 7.13 All of these applications are for large developments which, if granted, are not guaranteed to deliver to their full capacities within the five year period when accounting for their outline nature and the need to submit subsequent Reserved Matters Applications prior to commencing construction. This is assuming that the applications are approved at Planning Committee. Should they be refused and need to go through the Appeal process, there would be a further delay in their potential delivery.
- 7.14 Additionally the application for the redevelopment of the Barrington Cement Plant will involve substantial demolition and remediation before any works can take place on the site. This could delay the delivery of housing beyond the current five year period.
- 7.15 Ultimately, these sites cannot be considered within the Council's supply of housing land until such time as they might be approved. Even in the eventuality that each of the applications did receive consent, a considered view would then need to be taken as to the timescales over which they can realistically be delivered.

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## 8 Rolling Five Year Housing Land Supply

8.1 Paragraph 47 of the NPPF set out that Local Authorities should '...identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing...'. Already looked at in detail within this Assessment is the current FYHLS period. However, each Authority will be expected to continue to roll this five year period forward and continually update their supply for the subsequent five years. We have therefore reviewed both Council's housing trajectories in detail in order to consider how realistic the assumptions are with regard to housing delivery and the ability of the two authorities to maintain a rolling 5-year land supply in accordance with the NPPF.

8.2 From our review of the Councils' housing trajectories we have a number of concerns regarding the number of homes that can be delivered at the proposed new settlements during the Plan period, along with the deliverability of a number of brownfield allocation sites within Cambridge City. We consider these in detail in turn below.

### New Settlements

8.3 The Development Strategy set out within the Submission Draft Local Plan and accompanying housing trajectory demonstrate that SCDC is clearly heavily reliant on large scale strategic sites to deliver at consistently high levels for much of the plan period. Northstowe is forecast to deliver 400 dwellings a year for 12 consecutive years, something which has not been achieved on a single site of this nature before in the District.

8.4 The delivery of strategic sites is something that the District has faced difficulties with for a long time and this overreliance on a period of sustained high output from such sites is clearly questionable. When looking at precedence and examples of delivery on large strategic sites, Cambourne provides possibly the only case in the District which can be drawn upon.

8.5 Cambourne has delivered 3,518 dwellings since dwellings first started being delivered in 1999, equivalent to approximately 235 dwellings per annum over the fifteen year period. Housing delivery peaked at 620 dwellings per in 2003-2004 but reached a low of 102 dwellings in 2011-2012. This low point in delivery was at a time of difficult economic conditions. Cambourne only achieved a sales rate in excess of 400 dwellings per annum once (2003-2004) during the 15 years since housing delivery commenced. Indeed, the average delivery rate for the next 5 years (2009-2014) is 148 dwellings per annum.

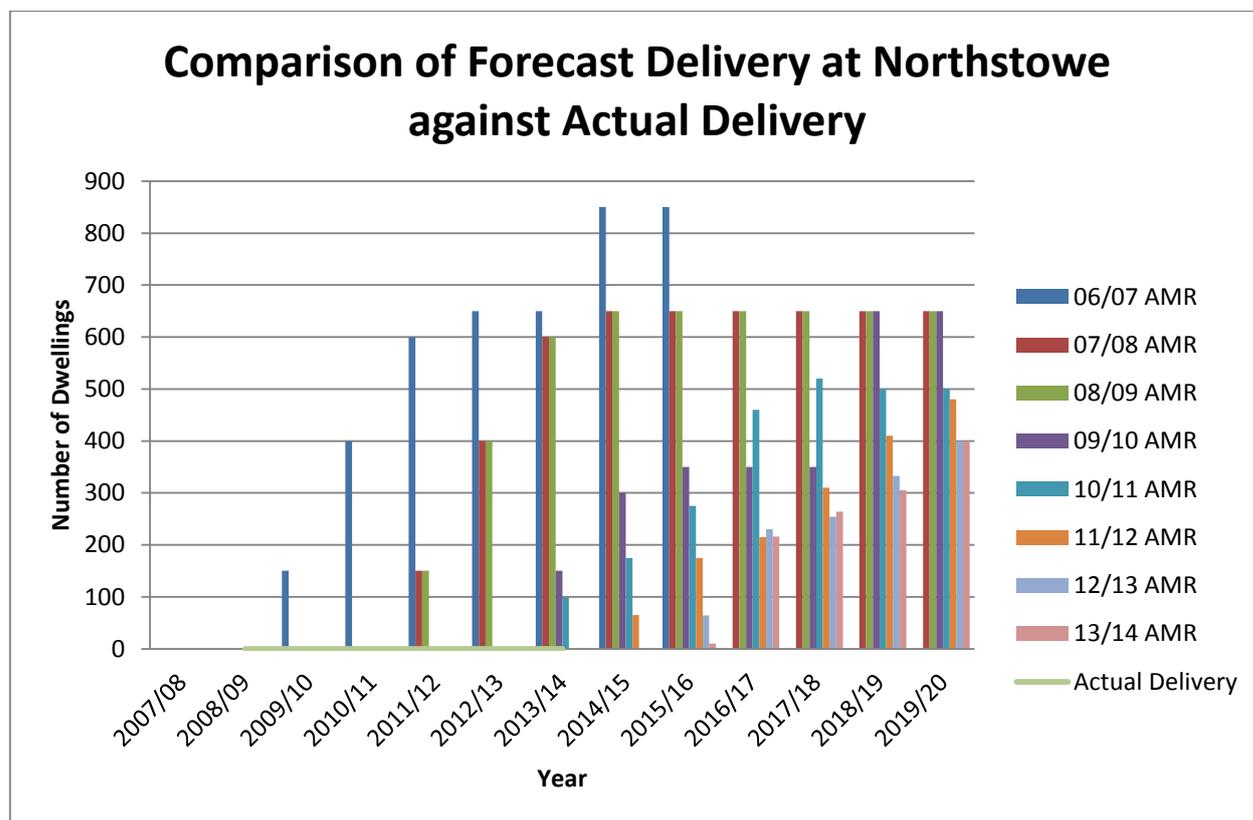
8.6 This demonstrates that Strategic sites such as Northstowe cannot be relied upon to delivery consistently high levels of housing completions due to their complexity but also the fact that being delivered over long time frames means that they will inevitably be affected by fluctuations in the economic cycle.

8.7 Northstowe, which is similar to Cambourne in many respects (albeit larger), is currently expected to consistently deliver 400 dwellings per annum from 2019/20 onwards. It is considered that these delivery rates are not consistent with the housing delivery rates delivered at Cambourne or other similar settlements such as Bar Hill and is not realistic. Given the significance of Northstowe to the Council's housing supply both individually and as part of any combined trajectory for Greater Cambridge it is critical that assumptions regarding its delivery are realistic and robust. The consequences of the Council's over-optimistic assumptions regarding delivery at Northstowe are that insufficient flexibility within the strategy to enable the Plans to adapt to changes in market conditions and ensure a rolling supply of housing land can be maintained.

8.8 Indeed, the consequences of this over-reliance on delivery at Northstowe and the over-optimistic assumptions regarding delivery there are illustrated by a comparison of the current and previous Annual Monitoring Reports. This is detailed in Figure 3 below. It is quite clear from this that delivery assumptions for Northstowe have had to be revised down every year since the allocation of the site in the 2007 Core

Strategy and that, as a consequence, housing delivery has fallen short of expectations and specifically the Council's target every year since 2007/8.

**Figure 3: Comparison of Forecast Delivery at Northstowe against Actual Delivery**



- 8.9 Similarly, it is considered that, given the proximity of Cambourne West and Bourn Airfield New Village this will limit potential housing delivery from these two sites due to completion and proximity limiting market absorption and demand. In this context, it should be noted that Cambourne has not historically had to compete with other new settlements within the District. The peak housing delivery for these two sites is 370 dwellings per annum which is also considered unrealistic based on the evidence of past delivery.
- 8.10 Whilst of less significance to the Council's housing trajectory during the current Plan period, it is also evident that it has been assumed that 400 dwellings per annum will be delivered at Waterbeach New Town for the final 3 years of the Plan period. Again, this is considered to be unrealistic and not supported by the evidence of past delivery, particularly in the early phases of development.
- 8.11 As a result, it is considered that the housing trajectories for these strategic sites are based on unrealistic delivery rates and unduly optimistic. This approach is contrary to guidance at paragraphs 14 and 47 of the NPPF. As a result, the housing trajectory should be amended to assume delivery of a maximum of 250 dwellings per annum for Northstowe and Waterbeach which is more consistent with historic average annual delivery rates at Cambourne and takes more account of fluctuations in the economic cycle. This would provide a more robust and realistic measure of deliverable housing supply over the Plan period. This would necessitate the identification of additional housing sites to make up the shortfall and ensure that housing supply is more flexible and able to respond to rapid change.

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**Cambridge City Allocations**

8.12 Similarly, we have concerns regarding a number of the urban allocation sites within Cambridge City where sites are in active use and require the relocation of these existing commercial activities for the site to become available. Table 8.1 below provides a detailed review of the various retained allocation sites within the Cambridge City Submission Local Plan.

**Table 8.1 Assessment of Retained Cambridge City Allocation Sites within Urban Area**

Allocation No.	Site Address	Dwelling Allocation (Dwellings in Trajectory if different)	First Allocated	Trajectory for Delivery	Principal Constraint
R7	The Paddocks Trading Estate, Cherry Hinton Road	123	2006 Local Plan	6-11	Occupied under multiple leases
R14	British Telecom, Long Road	76 (55)	2006 Local Plan	6-11	Operation requirement. Relocation is unviable due to fibre optic cables
R2	Willowcroft, Histon Road	78	1996 Local Plan	6-11	ATS Commercial Unit – business relocation
M4	Police Station, Parkside	50	1996 Local Plan	6-11	Operational requirement
R12	Ridgeons, Cavendish Road and Cromwell Road	245(28)	1996 Local Plan	6-11	Ridgeons Commercial Unit – business relocation but part may become available
R4	Henry Giles House, Chesterton Road, CB4	48	2006 Local Plan	6-11	Existing Use Value exceeds Market Value for residential development
R1	295 Histon Road	32	2006 Local Plan	6-11	Leased to the Squash Club
R21	Magnet Warehouse, 315-349 Mill Road	30	2006 Local Plan	6-11	Part of site has planning permission for a Mosque and part subject to imminent student accommodation application
M1	379-381 Milton Road	95	2006 Local Plan	11-15	Currently car dealership – business relocation
R10	Mill Road Depot and adjoining properties	167	1996 Local Plan	11-15	Operational requirements and occupied under multiple leases

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- 8.13 It is evident from the table above that there are a number of sites where the developability of the sites is highly questionable. We have particular concerns with 10 sites and their ability to deliver 706 dwellings within the Plan period by 2031 as they have historically been allocated and have not delivered for the reasons set out above.
- 8.14 Table 8.2 below provides a similar assessment in relation to the new housing allocation sites proposed within the Cambridge City Submission Local Plan.

**Table 8.2 – Assessment of Cambridge City new Allocation Sites within Urban Area**

Allocation No.	Site Address	Dwelling Allocation (Dwellings in Trajectory if different)	First Allocated	Trajectory for Delivery	Principal Constraint
R5	Camfields Resource and Oil Depot, 137-139 Ditton Walk	35	2014 Proposed Local Plan	6-11	Currently fuel depot – operational requirements and possible contamination
R16	Cambridge Professional Development Centre, Foster Road	67	2014 Proposed Local Plan	6-11	Operational requirement
R17	Mount Pleasant House, Mount Pleasant	50	2014 Proposed Local Plan	6-11	Existing Use Value exceeds Market Value for residential development
R6	636-656 Newmarket Road, Holy Cross Church Hall, East Barnwell Community	75	2014 Proposed Local Plan	11-15	Operational requirement
R8	149 Cherry Hinton Road & Telephone Exchange, Coleridge Road	33	2014 Proposed Local Plan	11-15	Operational requirement – business relocation
R11	Horizon Resource Centre, 285 Coldham's Lane	40	2014 Proposed Local Plan	11-15	Operational requirement
M2	Clifton Road Area	550	2014 Proposed Local Plan	11-15	Occupied under multiple leases
M5	82-88 Hills Road & 57-63 Bateman Street	20	2014 Proposed Local Plan	11-15	Existing Use Value does not exceed Market Value for residential development

- 8.15 Again, it is evident from the above table that there are significant constraints in relation to a number of the new allocation sites that call into question their developability. In total, we have concerns regarding the developability and deliverability of 8 sites and their ability to deliver 870 dwellings during the Plan period to 2031.
- 8.16 This is exacerbated by windfall sites forming over 12% of the Council's housing supply within their trajectory for the Plan period. We would stress that, unlike cities in decline, where there is an increasing

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supply of brownfield sites, Cambridge's growth means that there are a limited number of brownfield sites coming forward and it is not realistic to expect an acceleration in the delivery of units built on brownfield sites.

- 8.17 Moreover, it is evident from the Housing Trajectory Summary Table for Cambridge City enclosed at Appendix D of their AMR that whilst they are likely to have a 5-year housing land supply in the period to 2020/21, delivery rates within Cambridge City are expected to fall significantly thereafter resulting in an undersupply for the last 10 years of the Plan period. Indeed, the limited extent of delivery within Cambridge City over the latter part of the Plan period is such that there would be an undersupply relative to the combined annual average delivery requirement for the last 7 years of the Plan period even based on the two Council's combined housing trajectory.
- 8.18 It is therefore considered that this, in addition to the Council's heavy reliance on windfall sites and lack of any flexibility in supply will place at risk the Submission Local Plan's ability to deliver the number of dwellings envisaged within the Plan period and it is therefore unlikely to meet the' housing requirement of 14,000 dwellings.

## 9 Summary and Conclusions

9.1 This Five Year Housing Land Supply Assessment has been prepared as a technical appendix to support the Statement of Case submitted to the Examination in Public of South Cambridgeshire District Council's and Cambridge City Council's Draft Local Plans. Specifically, the information presented within this assessment relates to Matter 8 Housing Land Supply and Delivery, and within this Matter 8B, which asks the question:

*Will the Plans ensure a rolling five year supply of specific deliverable sites in accordance with paragraph 47 of the Framework?*

9.2 The assessment has reviewed current national Policy and Guidance as well as pertinent Appeal Decisions and Examination material from other authorities which have informed the approach taken within this document.

9.3 As has been clearly demonstrated, both South Cambridgeshire District Council and Cambridge City Council are non-delivering authorities and must therefore incorporate a 20% buffer within their five year housing land supply calculations so as to maintain compliance with the NPPF. Furthermore, each Authority should be using the Sedgefield Methodology in their reconciliation of any current deficit caused by historic under delivery. This has been demonstrated to be the preferred methodology to be utilised to ensure parity with Paragraph 47 of the NPPF by Inspectors at both Appeal and Local Plan Examination. The geographic nature of settlement patterns is not a consideration in these matters.

9.4 With regard to the use of the 'Greater Cambridge' area through which to forecast housing delivery and assess five year housing land supply, there are clear deficiencies with the Memorandum of Understanding and proposed approach which mean that it cannot be relied upon to demonstrate sufficient land is available to meet the requirements of both Authorities. Furthermore, both Authorities have undertaken their Draft Local Plan preparations on the basis that each is meeting its own housing need within its own administrative area. This is demonstrated at all stages of the consultation process.

9.5 Based on the assessment undertaken within this technical appendix CCC are able to demonstrate between **6.6** and **7.5** years land supply, whereas Bidwells consider that SCDC are only able to demonstrate between **4.1** and **4.4** years supply. These are considered to be the most appropriate and NPPF compliant figures that can be used at this point in time.

9.6 Further to the assessment of FYHLS over the next five years, there is continued concern about the ability of both authorities to provide a 'rolling supply' of housing land to meet their requirements later in the plan period. In the case of SCDC, the overreliance on large strategic sites and overly optimistic delivery rates puts at serious risk the Council's ability to 'adapt to rapid change' in compliance with the NPPF.

9.7 There are similar concerns with regard to CCC and delivery later in the Plan Period. The current trajectory relies on Sites which have significant barriers to development which could foreseeably curtail their delivery over the forecast time period. This is exacerbated by the inclusion of a consistent supply of windfall sites, accounting for 12% of the Council's trajectory in a constrained city which is already seeing large amounts of brownfield land being developed. This is not an endless supply.

9.8 Ultimately it is considered that SCDC need to allocate more, smaller sites within Villages to provide early delivery and ensure flexibility throughout the Plan Period to ensure that the identified housing target can be met should the larger strategic sites not deliver as expected or incur further delays.

9.9 CCC need to provide additional allocations, within the Green Belt if required, to ensure flexibility in delivery throughout the Plan Period and mitigate for an ambitious windfall contribution as well as a reliance on sites which have clear barriers to development.



# Appendices



# Appendix 1

## Contextual Evidence

The following appendix provides a summary of a number of Local Plan Examinations and Appeal Decisions which have informed the approach to the Five Year Housing Land Supply Assessment. Each of the cases set out below is considered to provide further weight to the assumptions and considerations made within the Assessment, demonstrating that within the wider planning landscape there is a consistency of thought regarding the process of assessing Five Year Housing Land Supply. Alongside these summaries is a commentary drawing parallels with the situation in SCDC.

### **Local Plan Examinations**

In the examination of Bath and North East Somerset's (BANES) Core Strategy (2012), the Inspector raised a number of concerns through his Preliminary Conclusions over the approach to housing delivery.

Focusing firstly on 5-Year Supply, the Inspector raised concerns over the existing shortfall in housing delivery and the consequential need for a 20%, not 5%, buffer to be accommodated.

The BANES Local Plan Inspector also raised concerns that whilst a significant need for affordable housing had been identified, this was not adequately reflected in the Council's housing targets; a scenario which is also presenting itself within SCDC.

The issue of rear loading was highlighted in the Salford City Council Core Strategy Examination. Ultimately being withdrawn, the Core Strategy was seen as being deficient as it relied too heavily on housing delivery picking up later in the Plan Period, when in fact delivery should be front loaded with a view to it slowing down later when further site reviews would be undertaken.

SCDC took the same approach in their 2007 Core Strategy, with delivery expected to pick up towards the end of the plan period to make up for earlier shortfalls. Even before the economic downturn, the District's shortfall was significant and this temporary economic situation cannot be held responsible for the Council consistently missing their housing targets since 1999. Despite this historic evidence and experience, the Council are not providing a suitable buffer to reflect this deficit and are furthermore not addressing the shortfall early enough in the plan period.

More recently, the Inspector undertaking the Examination of the East Cambridgeshire Local Plan has raised concerns over the reliance on large strategic sites to deliver the Council's housing requirements and endorsed the use of the Sedgfield method (i.e. dealing with the shortfall over the 5-year period, not spreading it out over the plan period) in apportioning historic housing delivery shortfall.

At paragraph 3 (e) of the Inspector's Post Hearing Note, dated 19 February 2014, it is asserted that:

*"As discussed at hearing session 1, I see no reason not to use the 'Sedgfield' method of apportioning past shortfalls. At that session I also raised a concern that assumptions on housing delivery from allocated sites – notably ELY1 – appeared unduly optimistic."*

It is clear that SCDC are also erring in their approach to addressing their considerable historic deficit as well as in their approach to the strategic delivery of housing throughout the Draft Local Plan Period. There is an overreliance on strategic sites which have historically not delivered the rates of housing forecast by the Council.

### **Appeals and Judicial Reviews**

Both prior to and following the adoption of the NPPF, a number of appeals have been lodged and decided based on Local Authorities lack of a demonstrable and robust five year housing land supply. The following examples demonstrate the approach taken by Inspectors, the Secretary of State and Judges in the determination of such applications, appeals and judicial reviews.

### **Todenham Road, Moreten in Marsh – SoS Appeal Decision [REF: A/10/2130320]**

In a decision issued prior to the adoption of the NPPF, in April 2011, the Secretary of State, whilst dismissing the appeal and refusing permission, agrees wholly with the Inspector<sup>1</sup> that *"on the basis that any shortfall in housing provision ought to be addressed promptly rather than be allowed to run on for potentially twenty years, I prefer the appellant's approach of including the residual figure in the requirement for the next five years' provision."* (Paragraph IR174).

The final decision is of little consequence, given the individual and unique nature of the planning landscape within which each application and appeal is submitted. What is critical here, is the credence given to addressing any deficit over the next five years to ensure that it does not 'run on', potentially, for the remainder of the plan period.

Given the situation in SCDC, where there is a considerable historic deficit present from the Core Strategy Plan Period, there is a very real need to ensure that any deficit present within the forthcoming Local Plan is addressed within the earliest possible time frame.

### **Picket Piece, Andover – SoS Appeal Decision [REF: A/10/2140962]**

Similarly, this decision was issued prior to the adoption of the NPPF, in June 2011, although in this instance the appeal was upheld and permission was granted.

In paragraph 11 of the Secretary of States' decision letter, explicit agreement is given to the conclusions of the Inspector, drawing in paragraphs 159 – 170 of his report, that any shortfall in housing delivery should be met over the short to medium term.

Given these decisions, it is clear that SCDC is not only not following national Guidance in the application of a suitable buffer to their 5-year housing land supply, but that it is also not considering Secretary of State Decisions where other authorities have already been criticised on this procedural error.

### **Honeybourne, Worcestershire – Appeal Decision [REF: A/12/2171339]**

Specifically referencing the above cases within this decision in August 2012, the Inspector makes explicit reference for the justification in using the Sedgfield method for dealing with historic housing shortfall:

*"The Council considers that the residual method for assessing housing needs should be preferred over that of the Sedgfield approach. It is common ground that the NPPF is silent on the matter. However, the Council was unaware of any post NPPF decision which followed the residual approach. Recent pre-NPPF decisions by the SoS expressly approve the Sedgfield approach at Andover and Moreton in Marsh. In my view, it is inconsistent with Planning for Growth and the NPPF paragraph 47 to meet any housing shortfall by spreading it over the whole plan period. Clearly it is better to meet the shortfall sooner rather than later. Moreover, if the buffers are brought forward into the first 5 years as in the NPPF, so also should the shortfall. I cannot agree with the Council's use of the residual method. In my view the Sedgfield approach should be used for the reasons outlined."* Paragraph 36.

Furthermore at paragraph 38, the Inspector states that:

*"Moreover, it cannot be right to blame the slump in the property industry for under performance so long as there is not a 5 year supply of sites available now as required by paragraph 47 of the NPPF."*

Within South Cambridgeshire District Council's Proposed Submission Draft Local Plan at paragraph 2.63 it is stated that:

*"The development strategy in the Local Development Framework 1999-2016 was always expected to deliver fewer than the annualised average number of homes in the first part of its plan period, with higher than the annualised figure in the later years once the major developments come forward, taking account of their longer*

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<sup>1</sup> Paragraph 12 of the Secretary of State's Decision Letter

*lead-in periods. That was beginning to occur when the recession hit in 2008 and progress on the major sites stalled temporarily. The severe slow down in the house building industry had the effect that in recent years the Council has not had a 5-year land supply against the Core Strategy 2007 target, particularly impacted by the reducing amount of the plan period to 2016 remaining.*" [Emphasis added].

It is therefore considered that the Council's approach is fundamentally flawed. The slow-down in the housing industry is also a recent phenomenon when considered against the extant Core Strategy Plan Period from 1999 – 2016 over which period the Council has only once met their required annual housing target.

### **Cherwell District Council – Secretary of State Decisions**

During 2013, two appeals were recovered for the Secretary of State's determination within Cherwell District which were allowed and are of particular significance here.

The first, for a development of up to 145 dwellings in Banbury (APP/C3105/A/12/2178521), was appealed on grounds of non-determination. The SoS granted permission for the development, on a greenfield site, as it would make a significant contribution towards the District Council's housing deficit.

Similarly, an appeal against refusal for up to 75 dwellings in Bloxham (APP/C3105/A/13/2189890) was upheld as whilst the proposals were for a site outside of the development boundary, the housing would contribute to the District's deficit.

Both of these decisions demonstrate that the lack of a robust 5-year housing land supply outweighs other considerations and, as set out in the NPPF, extant policies should be considered out of date in light of the presumption in favour of sustainable development.

### **Shropshire County Council – Appeal Decision [REF: A/13/2198906]**

More recently, in January 2014, an inspector overturned a Planning Committee refusal (which was against Officer Recommendation) for the development of 15 dwellings in an edge of settlement location.

The main reason for refusal was that the development was unsustainable insofar as it represented sporadic development in the Countryside outside the settlement boundary.

In the Inspector's report it was asserted, at paragraph 13, that the site would extend the built up area of the Village and therefore would not be sporadic. Furthermore, the Inspector determined that as most facilities would be within a 10-15 minute walk of the site, it can be considered a sustainable location<sup>2</sup>.

This decision makes it clear that in the absence of a 5-year housing land supply, such policies regarding settlement boundaries and the restriction of development should be considered out of date. If, indeed, such a site is still a sustainable location, then permission should be granted, as it has been in this instance. This is of particular importance given the Application Site's location directly abutting, but being outside, the Village Framework.

### **Cotswold District Council v (1) Secretary of State for Communities and Local Government (2) Fay and Son Limited [2013]**

This recent decision most importantly provides an indication of what can be considered a 'persistent' under-delivery of housing.

The presiding judge accepted that the Secretary of State's decision to use the preceding five years in the Plan Period to assess the Council's under delivery, was correct, reflecting at paragraph 47 and 48 of the Judgement that this is consistent with the approach of the NPPF.

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<sup>2</sup> Paragraph 11, page 3, Appeal Decision A/13/2198906

Reference was made in the decision to the fact that a decision maker would need to have regard for a 'reasonable period of time' rather than only take a single specific point in time when considering the case for under delivery.

When considering that SCDC has persistently under delivered on its housing requirement for the past ten years, it is clear that a 20% buffer must be provided and clearly accounted for.



# Appendix 2

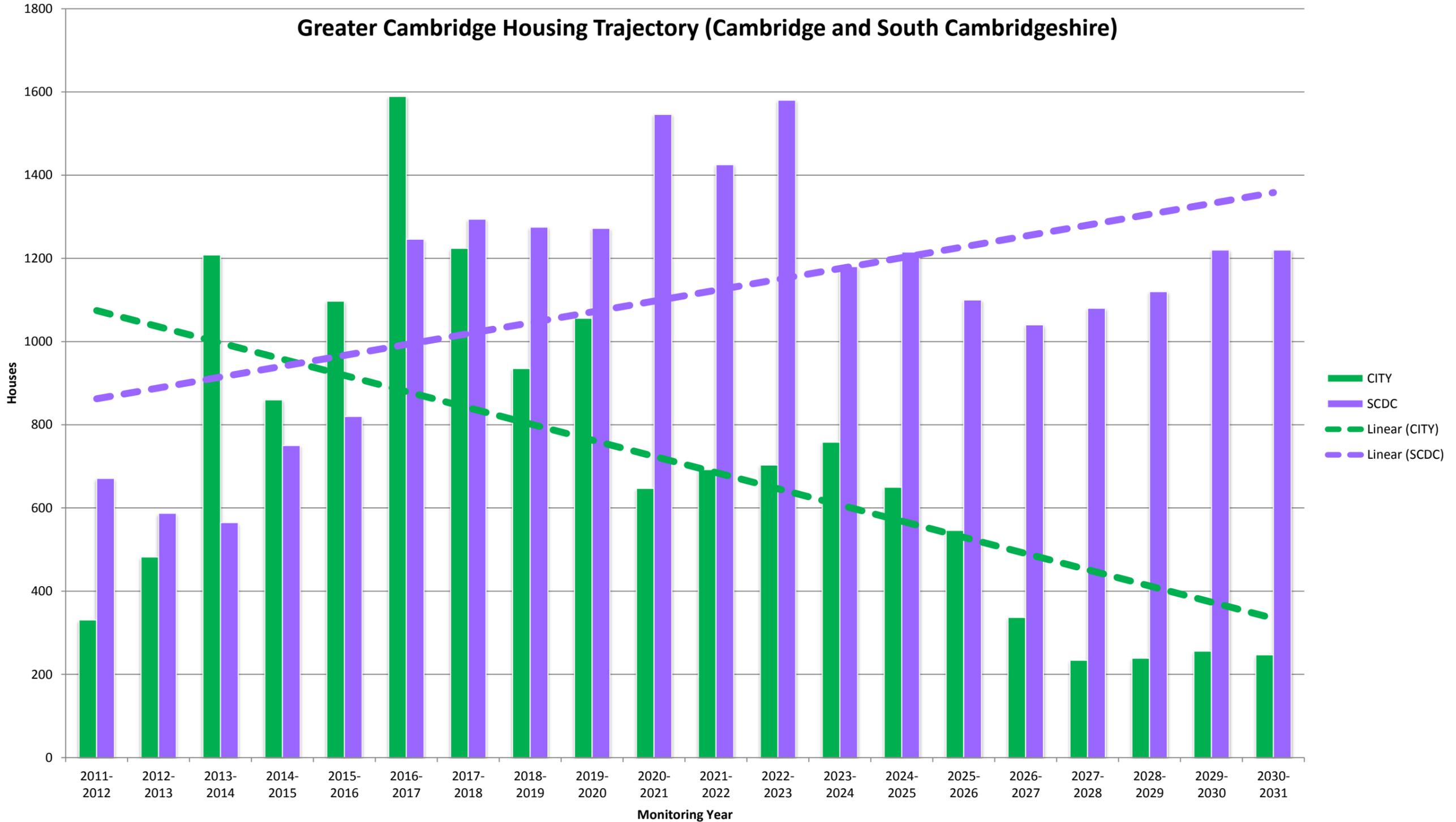
SCDC & CCC Joint Trajectory

Greater Cambridge Housing Trajectory (Cambridge and South Cambridgeshire)

Year	COMPLETIONS			PROJECTED COMPLETIONS																
	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
SCDC	671	587	565	750	820	1,246	1,294	1,275	1,272	1,546	1,425	1,580	1,180	1,215	1,100	1,040	1,080	1,120	1,220	1,220
CITY	331	482	1208	860	1097	1589	1224	935	1056	647	692	703	758	650	546	337	234	239	256	247
Total	1,002	1,069	1,773	1,610	1,917	2,835	2,518	2,210	2,328	2,193	2,117	2,283	1,938	1,865	1,646	1,377	1,314	1,359	1,476	1,467

Greater Cambridge Housing Trajectory (Cambridge and South Cambridgeshire)

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# Appendix 3

SCDC & CCC Individual Trajectories

Figure 4.8: Housing trajectory for South Cambridgeshire ( Indicator CO-H2c ; Indicator CO-H2d ; Indicator M1 )

			HISTORIC COMPLETIONS <sup>1</sup>													PROJECTED COMPLETIONS													TOTALS										
			1999-2000 <sup>2</sup>	2000-2001 <sup>2</sup>	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	Post 2031	1999-2016	2011-2031	2014-2019	
<b>Historic Completions</b>			801	801	525	653	979	571	877	924	1,274	610	611	656	678	559	636	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11,155	1,873	0	
<b>Adopted allocations without planning permission</b>	<b>Edge of Cambridge</b>	Cambridge East - north of Newmarket Road	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	85	140	140	140	140	140	140	140	140	95	0	0	0	0	0	1,300	85		
		Cambridge East - north of Cherry Hinton	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	20	30	20	20	20	0	0	0	0	0	0	0	0	0	0	0	110	50	
		Cambridge East - north of Cherry Hinton (includes proposed extension (NIAB 3 or Darwin Green 2))	<sup>3</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	75	150	150	150	150	150	150	25	0	0	0	0	0	0	0	1,000	75	
		Orchard Park - parcel K1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40	40	
		Orchard Park - additional land parcels (L2 & Com4)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	50	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	80	80	
	<b>New Settlements</b>	Northstowe - phase 2 and later phases	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	50	92	232	232	289	400	400	400	400	400	400	400	400	4,405	0	4,095	50	
		Fulbourn & Ida Darwin Hospitals	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	30	100	50	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	230	180
<b>Village Sites</b>	Papworth Everard West Central	<sup>4</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	8	29	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	67	67		
	Trumpington Meadows (Cambridge Southern Fringe)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	29	0	160	100	150	150	0	0	0	0	0	0	0	0	0	0	0	0	0	29	589	439	
<b>Existing Planning Permissions (at 31 March 2014)</b>	North-West Cambridge (University site)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	20	70	195	105	90	185	150	250	90	0	0	0	0	0	0	0	0	20	1,155	390		
	Orchard Park - additional land parcels (Q, former HRCC site & Com2) including local centre	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	65	35	35	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100	140	140	
	Northstowe - phase 1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	10	216	264	255	308	168	168	111	0	0	0	0	0	0	0	0	0	0	10	1,500	745	
	Cambourne (additional 950 dwellings)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	175	175	175	120	94	0	0	0	0	0	0	0	0	0	0	0	0	0	0	350	739	739	
	Former Bayer Cropscience site	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	30	60	60	60	60	60	15	0	0	0	0	0	0	0	0	0	0	0	0	30	285	210
	Historic Rural Allocations with planning permission	<sup>5</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	51	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	131	171	171	
	Windfall Sites: Estate sized (9 or more dwellings)	<sup>6</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	223	154	77	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	377	464	464
	Windfall Sites: Small Sites (8 or less dwellings) already Under Construction	<sup>7</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	91	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	121	121	121
	Windfall Sites: Small Sites (8 or less dwellings) Not Under Construction	<sup>8</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	20	50	71	40	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	70	201	201
	Planning applications for 9 or more dwellings where decision to grant planning permission either awaiting the signing of a s106 agreement or resolution of outstanding issues (at 31 March 2014)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	10	10
<b>New Local Plan Allocations</b>	<b>Strategic Sites</b>	Land between Huntingdon Road, Histon Road & A14 (NIAB 3 or Darwin Green 3)	<sup>3</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
		Northstowe Reserve	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		Waterbeach New Town	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	100	200	300	400	400	6,600	0	1,400	0	
		Bourn Airfield New Village	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	0	0	0	60	100	220	220	220	220	220	220	220	1,800	0	1,700	0		
		Cambourne West	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	30	70	100	150	150	150	150	150	100	0	0	0	0	0	0	0	0	1,200	200	
	<b>Village Sites</b>	Dales Manor Business Park, Sawston	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	10	50	50	20	0	10	50	10	0	0	0	0	0	0	0	0	0	200	110	
		Land north of Babraham Road, Sawston	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	20	40	20	0	0	0	0	0	0	0	0	0	0	0	0	0	80	60	
		Land south of Babraham Road, Sawston	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	55	55	50	50	50	0	0	0	0	0	0	0	0	0	0	260	55	
		Land north of Impington Lane, Impington	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	10	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	25	
		Land west of New Road, Melbourn	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	10	30	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	65	65
<b>Parish Council Proposals</b>	Green End Industrial Estate, Gamlingay	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	90	90		
	Land at Bennell Farm, West Street, Comberton	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	15	30	30	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	90	90	
	East of Rockmill End, Willingham	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	10	25	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	50	50	
	Land at Linton Road, Great Abington	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	10	15	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	35	35	
	Land at junction of High Street & Pampisford Road, Great Abington	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	12	12	
<b>Windfall Sites</b>	Land at Bancroft Farm, Church Lane, Little Abington	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	6	6		
	Land at Toseland Road, Graveley	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	6	6	
<b>Planning Permissions Granted between 1 April and 31 August 2014</b>	Windfall Sites: Estate sized (9 or more dwellings)	<sup>6</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21	75	85	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	96	187	187	
	Windfall Sites: Small Sites (8 or less dwellings)	<sup>8</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	5	15	20	14	5	0	0	0	0	0	0	0	0	0	0	0	0	0	5	59	54	
Planning applications for 9 or more dwellings where decision to grant planning permission either awaiting the signing of a s106 agreement or resolution of outstanding issues (between 1 April and 31 August 2014)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	49	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	49	52	52		
<b>Projected Completions Total</b>			-	-	-	-	-	-	-	-	-	-	-	-	-	-	704	799	1,308	1,365	1,428	1,460	1,310	1,270	1,450	1,240	1,260	1,085	1,060	1,115	1,120	1,220	1,220	12,805	1,503	20,414	5,604		
<b>TOTAL: HISTORIC AND PROJECTED COMPLETIONS</b>			801	801	525	653	979	571	877	924	1,274	610	611	656	678	559	636	704	799	1,308	1,365	1,428	1,460	1,310	1,270	1,450	1,240	1,260	1,085	1,060	1,115	1,120	1,220	1,220	12,805	12,658	22,287	5,604	
<b>Housing Requirement as set out in: Core Strategy Policy ST/2 (January 2007) and Submission Local Plan Policy S/5 (March 2014)</b>																																				20,000	19,000		
<b>Core Strategy</b>	Annualised requirement over 17 years		1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176	1,176																						
	Annual requirement taking account of past / forecast completions		1,176	1,200	1,227	1,277	1,325	1,353	1,425	1,479	1,541	1,574	1,827	1,896	2,144	2,510	3,160	4,423	8,141																				
<b>Submission Local Plan</b>	Annualised requirement over 20 years													950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950	950		
	Annual requirement taking account of past / forecast completions																																						

## Cambridge City Council Housing trajectory - Housing Trajectory Summary Tables

Housing Trajectory Summary 2011/12 to 2030/31																					
	Target number of dwellings on site	Built to date (up to 2013/14)	Outstanding dwellings	2014/15 year 1	15/16 year 2	16/17 year 3	17/18 year 4	18/19 year 5	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	Total Estimated Completions (2014/15-2030/31)
Urban Extensions	7371	890	6481	402	819	1330	1009	860	773	521	490	203	40	0	34	0	0	0	0	0	6481
Sites Allocated in the Local Plan	2525	1143	1382	121	112	169	178	142	194	109	40	91	69	62	40	55	0	0	0	0	1382
Large Sites Over 50	143	0	143	0	35	108	0	0	0	0	0	0	0	0	0	0	0	0	0	0	143
Small Sites 10-49 Dwellings	287	101	186	89	36	36	0	11	0	14	0	0	0	0	0	0	0	0	0	0	186
New Allocations in the Local Plan 2014	3778	0	3778	0	10	138	285	335	269	188	209	230	273	313	296	256	234	239	256	247	3778
<b>Total</b>	<b>14104</b>	<b>2134</b>	<b>11970</b>	<b>612</b>	<b>1012</b>	<b>1781</b>	<b>1472</b>	<b>1348</b>	<b>1236</b>	<b>832</b>	<b>739</b>	<b>524</b>	<b>382</b>	<b>375</b>	<b>370</b>	<b>311</b>	<b>234</b>	<b>239</b>	<b>256</b>	<b>247</b>	<b>11970</b>
<b>Housing Trajectory Five Year Supply Total</b>																					<b>6225</b>

Previous Years Completions and Predicted Totals																																	
	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	2014/15 year 1	15/16 year 2	16/17 year 3	17/18 year 4	18/19 year 5	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	Totals		
<b>Core Output Indicators</b>																																	
Total Completions - Indicators H2 (a & b)	159	287	505	601	731	629	521	588	287	390	352	481	1299																	<b>6830</b>			
Cumulative Completions	159	446	951	1552	2283	2912	3433	4021	4308	4698	5050	5531	6830																				
Projected Completions - Indicator H2c														612	1012	1781	1472	1348	1236	832	739	524	382	375	370	311	234	239	256	247	<b>11970</b>		
Cumulative Future Completions														612	1624	3405	4877	6225	7461	8293	9032	9556	9938	10313	10683	10994	11228	11467	11723	11970			
Cumulative Actual & Future Completions (H2 a & b + H2c) 2001/2 to 2030/31	159	446	951	1552	2283	2912	3433	4021	4308	4698	5050	5531	6830	7442	8454	10235	11707	13055	14291	15123	15862	16386	16768	17143	17513	17824	18058	18297	18553	18800			
<b>Local Plan 2014 Housing Target</b>																																	
Local Plan 2014 Annualised Housing Target. April 2011 to March 2031 (14,000 divided by 20 years = 700pa)														700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	<b>14000</b>			
Cumulative Local Plan 2014 Requirement														700	1400	2100	2800	3500	4200	4900	5600	6300	7000	7700	8400	9100	9800	10500	11200	11900	12600	13300	14000
Annual Difference: Cumulative Actual and Predicted Completions (H2 a, b & c) minus Local Plan 2014 Annualised Housing Target																																	
Managed Delivery Target in relation to draft Local Plan 2014 (H2 d)																																	
1) Cumulative completions actual and projected 2011/12 to 2030/31														352	833	2132	2744	3756	5537	7009	8357	9593	10425	11164	11688	12070	12445	12815	13126	13360	13599	13855	14102
2) Cumulative required completions														700	1400	2100	2800	3500	4200	4900	5600	6300	7000	7700	8400	9100	9800	10500	11200	11900	12600	13300	14000
3) Cumulative under/oversupply														-348	-567	32	-56	256	1337	2109	2757	3293	3425	3464	3288	2970	2645	2315	1926	1460	999	555	102



# Appendix 4

## Five Year Housing Land Supply Assessment Methodology

## Formula References

Input	Formula Reference
Housing Requirement Over Plan Period to Date	A
Completions During the Plan Period	B
Delivery Deficit	C
5-Year Requirement Including Buffer	D
5-Year Requirement Including Historic Shortfall	E
Available Supply of Housing	F
Resulting Number of Years of Housing Supply	G

## Sedgefield Method Calculation Working

Working	Notes
$A - B = C$	'C' being the housing supply shortfall over the Plan Period to date. In this instance, 2011 – 2014.
D	This is the Council's projected requirement over the next five years, in this instance 2014 – 2019. This figure includes the 20% buffer required due to the protracted and demonstrable history of under delivery in the District.
$C + D = E$	The Sedgefield Method includes the total shortfall over the 5-year period and so all of 'C' is brought forward. The buffer does not apply to the existing shortfall.
F	This is the available supply of housing over the next five years, taken from the Council's trajectory over the period 2014 – 2019.
$F \div (E \div 5) = G$	To identify the actual number of years of housing land supply available it is necessary to determine the annual requirement needed to meet the figure calculated at 'E' and then express this as a proportion of the supply identified by the Council.

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