

RD/GEN/550



Cambridge Local Plan and South Cambridgeshire
Local Plan

**Further Working Correspondence with
Programme Officer Regarding Main
Modifications (5 Year Housing Land Supply)**

Cambridge City Council and
South Cambridgeshire District Council

20 December 2017

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Mon 27/11/2017 11:13

From: Caroline Hunt

To: Programme Officer

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Attachments: Housing Land Supply Update November 2017 (RD/AD/500) (Note: see separate document); **Five Year Housing Land Supply Main Modifications 27.11.17.doc** (see below)

Dear Gloria,

Cambridge Local Plan and South Cambridgeshire Local Plan

Proposed Modifications

Please find below the Councils' response to the Inspectors' working correspondence of 10 November. We have addressed the issues raised by the Inspectors as follows:

Draft Main Modifications Consultation Document introduction:

We will update the consultation document as indicated by the Inspectors.

Five-year housing land supply:

The Councils have expedited preparation of the housing trajectories and five-year supply calculations that will be included in this year's Annual Monitoring Reports, to be published in December, and these have now been formally agreed by the Councils. We propose this would form an evidence document to the proposed modifications consultation. It is provided with this email.

The Councils have amended and updated the proposed modifications previously provided to the Inspectors in the attachment to the Councils' email of 29 October in order to provide a clear comprehensive set of the modifications we envisage, subject to the Inspectors' approval, will be included in the list for consultation. These need to be read alongside the 2015 Modifications that the Inspectors have advised should not form part of the consultation.

The attached modifications aim to give effect to the Inspectors' request for modifications that include information on five-year housing land supply as well as methodology. We have taken the approach suggested by the Inspectors and provided modifications to include references in the main body of the plans and also included a proposed new appendix to each plan. The proposed appendix to be included in the Local Plans would include:

- the five-year supply methodology
- worked calculations of five-year supply for the five-year periods 2017-22 and 2018-23 as included in the new evidence document, and that will be included in the new Annual Monitoring Report 2017
- rolling five-year supply calculations for the remainder of the plan period
- summary graph showing the housing trajectories for the Councils separately and jointly

- summary housing trajectory table that indicates the main sources of supply, similar to the approach we have seen in a number of other plans.

Whilst dealing with the issues raised by the Inspector, two further modifications to the South Cambridgeshire plan (paragraphs 2.61 and 2.65) are proposed to reflect the current situation.

Land South of Cambridge Biomedical Campus (CBC):

We will incorporate the proposed modifications to allocate land south of CBC within the full list for consultation, including the sentence relating to the access to the site.

The Inspectors' comments in relation land south of Fulbourn Road are noted and paragraph 1.6 of the introduction to the draft consultation document will be removed.

Reference to relevant background evidence:

The Inspectors' comment is noted and we will make the clarification. The only new evidence document we propose is the new housing supply document attached.

Affordable Housing:

Noted.

Cambourne West:

Noted.

South Cambridgeshire Policies Map:

Noted.

South Cambridgeshire Other Minor Issues:

Noted.

Next steps:

We understand from the Inspectors' working correspondence of 10 November that the five-year supply modifications are the final changes to the full list of proposed modifications for consultation the Inspectors are asking the Councils to prepare.

The Councils have a full list of the proposed modifications for consultation ready to share with the Inspectors as soon as the final five-year supply modifications are agreed as requested. If the Inspectors would find it helpful to receive the full list for their consideration alongside the five-year supply modifications, please let me know.

We look forward to hearing from the Inspectors and to moving on to public consultation in the near future on the final list of proposed modifications to be confirmed by the Inspectors.

Kind regards

Caroline

Caroline Hunt | Planning Policy Manager

Five-year housing land supply Main Modifications 27/11/17

South Cambridgeshire Local Plan

Draft Main Modifications related to five year housing land supply in response to the Inspectors Letter of 20 October are included below, including changes proposed to those included in the Councils letter of 29 October highlighted **in yellow**.

Local Plan Page	Policy / Paragraph	Proposed Modification
36	Policy S/12: Phasing, Delivery and Monitoring	<p>Amend Policy S/12 to read:</p> <p>‘1. The Local Plan aims to achieve a continuous high level of housing production throughout the plan period to support predicted and actual jobs growth. <u>The housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development. Five-year housing land supply will be calculated using the Liverpool Method and a buffer of 20%.</u> Housing sites are not <u>deliberately phased, with the exception of:</u></p> <p>a. New town at Waterbeach Barracks — to start delivering housing in 2026, unless otherwise determined through a review of the Local Plan;</p> <p>b. New village at Bourn Airfield — to not start delivering</p>

		<p>housing before 2022, unless an undersupply of housing earlier in the plan period is demonstrated such that it needs to come forward earlier, including to provide an adequate 5 year housing land supply.'</p> <p>2. The Council will provide a 5% buffer as part of its 5-year housing land supply, met mainly through windfalls.</p>
37	Paragraph 2.61	<p>Amend the last sentence of Paragraph 2.61 to read:</p> <p>'The trajectory relies trajectories rely on information about sites which have the potential to deliver dwellings over the next 15 years and beyond, taken from the Strategic Housing Land Availability Assessment and work on Local Plan allocation sites.'</p>
31	Paragraph 2.63	<p>Amend paragraph 2.63 to read:</p> <p>'The Councils has have a record of providing significant levels of housing and has have a significant level of identified housing supply. The Council has also continued to maintain up to date development plans. 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 lead-in periods. The development strategy for Cambridge and South Cambridgeshire has been carried forward from previous plans, and includes two further new settlements. 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 could not demonstrate a 5 year land supply against the Core Strategy 2007 target, particularly impacted by the reducing amount of the plan period to 2016 remaining. Under these circumstances the</p>

		<u>appropriate methodology for calculating five year housing land supply across the two authorities has been confirmed as being the Liverpool methodology. Council considers that the normal 5% buffer is the appropriate buffer for the South Cambridgeshire Local Plan with an end date of 2031. In response to historic levels of delivery, the appropriate buffer is 20%.'</u>
38	Paragraph 2.64	Replace Paragraph 2.64 with: <u>'Appendix Aa sets out the methodology for establishing housing land supply using this approach. The appendix also includes details of the housing land supply position at November 2017. This shows that the Councils both individually and jointly demonstrate a five year housing land supply based on the housing requirement included in the local plans, and that this is anticipated to continue for the remainder of the plan period. The housing supply data will be updated annually and published in the Annual Monitoring Report.'</u>
38	Paragraph 2.65	Amend paragraph 2.65 to read: <u>'The plan will provide sufficient flexibility in the range, size, type and location of housing allocations to enable a 5-year land supply to be maintained. The Council has fully allocated its housing requirement and has not relied on windfall sites even though it is confident that there will be a continuing supply of housing on such sites. Monitoring since 1999 shows that over a period of five years that South Cambridgeshire averages some 208 homes a year from windfall developments.'</u>
40	Paragraph 2.67	Delete paragraph 2.67: 'The housing trajectory shows that delivery above the annualised average is anticipated for the early years of the Plan that more than compensate for delivery below the annualised average in the middle years. Any slippage in the early years provision would smooth out the overall rate of delivery. This is without including any allowance for windfalls, which provide greater reassurance that delivery rates will

		be achieved.'
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Note: Modification referring to additional text after paragraph 2.67 no longer included, as methodology would be addressed in a new appendix.

258	After Appendix A: Supporting Studies and Evidence Base	Add a new Appendix Aa after Appendix A. <i>Refer to new appendix at the end of this schedule</i>
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Cambridge Local Plan

Draft Main Modifications related to five year housing land supply in response to the Inspectors Letter of 20 October are included below, including changes proposed to those included in the Councils letter of 29 October highlighted in yellow.

Local Plan Page	Policy/Paragraph	Mod Ref.
	Policy 3: Spatial strategy for the location of residential development	<p><i>Amend second paragraph of Policy 3 to read:</i></p> <p>Provision will be made for the development of not less than 14,000 additional dwellings within Cambridge City Council's administrative boundary over the period from April 2011 to March 2031 to meet the objectively assessed need for homes in Cambridge. This will enable continuous delivery of housing for at least 15 years from the anticipated date of adoption of this local plan. <u>Provision includes two small sites to be released from the Cambridge Green Belt at Worts' Causeway, which will deliver up to 430 dwellings. The housing trajectories</u></p>

		<p>for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development. This pProvision includes two small sites to be released from the Cambridge Green Belt at Worts' Causeway, which will deliver up to 430 dwellings. <u>The five year housing land supply will be calculated using the Liverpool methodology and a 20% buffer</u></p>
		<p><i>Add new paragraph after 2.45</i></p> <p><u>The Councils have a record of providing significant levels of housing and have a significant level of identified housing supply. The development strategy for Cambridge and South Cambridgeshire has been carried forward from previous plans, and includes two further new settlements. Under these circumstances the appropriate methodology for calculating five year housing land supply across the two authorities is the Liverpool methodology. In response to historic levels of delivery, the appropriate buffer is 20%.</u></p>
26	After paragraph 2.48	<p>Add new paragraphs after paragraph 2.48 to read:</p> <p><u>Appendix N sets out the methodology for establishing housing land supply using this approach. The appendix also includes details of the housing land supply position at November 2017. This shows that the Councils both individually and jointly demonstrate a five year housing land supply based on the housing requirement included in the local plans, and that this is anticipated to continue for the remainder of the plan period. The housing supply data will be updated annually and published in the Annual Monitoring Report.</u></p>

	After Appendix M: Monitoring and Implementation	Add a new Appendix N after Appendix M: Monitoring and Implementation. <i>Refer to new appendix at the end of this schedule</i>
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New Appendix Aa (South Cambridgeshire Local Plan) and Appendix N (Cambridge Local Plan): Five-Year Housing Land Supply

Five-year housing land supply will be calculated using the Liverpool methodology, which has been determined as appropriate for Cambridge and South Cambridgeshire and which spreads any shortfall in supply at the point of calculation over the remainder of the plan period. A 20% buffer is also included in response to historic levels of delivery.

The methodology for calculating five-year housing land supply is set out in figure A1 below:

Figure A1: Methodology for Calculating Five-Year Supply

(a) Housing requirement in the plan period	Net number of new homes required in the plan period (2011 to 2031) as set out in Policy S/5 of the South Cambridgeshire Local Plan and Policy 3 of the Cambridge Local Plan.
(b) Completions so far in the plan period	Net number of new homes completed so far in the plan period, as set out in the Annual Monitoring Report.
(c) Number of dwellings left to deliver in the plan period (= a - b)	Calculated by subtracting the net number of homes completed so far in the plan period from the housing requirement.
(d) Number of years of plan period left	Number of years of the plan period left in which to deliver the housing requirement.
(e) Annualised average requirement for the remainder of the plan period (= c ÷ d)	Calculated by dividing the number of dwellings left to deliver by the number of years of the plan period left.
(f) Five year supply requirement (= e x 5)	The requirement to meet in the next five year period. Calculated by multiplying the annualised average requirement by five.
(g) 20% buffer to be added to the five year supply requirement (= f x 0.2)	A 20% buffer in addition to the five year supply requirement should be added in response to historic levels of delivery

(h) Five year supply requirement with 20% buffer (= f + g)	Five year supply requirement plus 20% buffer, against which predicted housing supply is assessed.
(i) Number of dwellings predicted to be completed in the five year period	Net number of new homes predicted to be completed in the five year period, as set out in the housing trajectory published in the Annual Monitoring Report.
(j) Five year supply (= i ÷ h x 5)	Calculated by dividing the number of dwellings predicted to be completed in the five year period by the five year supply requirement with the 20% buffer, and then multiplying by five.

Figures A2 and A3 below summarise the housing land supply position for South Cambridgeshire and Cambridge individually and jointly as at November 2017 for the five-year periods 2017-2022 and 2018-2023, as contained in the Annual Monitoring Reports 2017. The Councils both individually and jointly demonstrate a five year housing land supply using the methodology above. The Council's five year supply will be published each year in their Annual Monitoring Reports. These should be consulted for the most up to date position on housing supply.

Figure A2: Five-Year Housing Land Supply Position at November 2017 for 2017-2022

	Cambridge	South Cambridge-shire	Cambridge & South Cambridge-shire
(a) Housing requirement 2011 to 2031	14,000	19,500	33,500
(b) Completions up to 31 March 2017	4,932	3,970	8,902
(c) Number of dwellings left to deliver in the plan period (= a - b)	9,068	15,530	24,598
(d) Number of years of plan period left	14	14	14
(e) Annualised average requirement for the remainder of the plan	648	1,109	1,757

	Cambridge	South Cambridge-shire	Cambridge & South Cambridge-shire
period (= c ÷ d)			
(f) Five year supply requirement (= e x 5)	3,239	5,546	8,785
(g) 20% buffer to be added to the five year supply requirement (= f x 0.2)	648	1,109	1,757
(h) Five year supply requirement with 20% buffer (= f + g)	3,886	6,656	10,542
(i) Number of dwellings predicted to be completed in the five year period (1 April 2017 to 31 March 2022)	4,201	7,235	11,436
(j) Five year supply (= i ÷ h x 5)	5.4	5.4	5.4

Source: Cambridge Annual Monitoring Report 2017 and South Cambridgeshire Annual Monitoring Report 2017

Figure A3: Five-Year Housing Land Supply Position at November 2017 for 2018-2023

	Cambridge	South Cambridge-shire	Cambridge & South Cambridge-shire
(a) Housing requirement 2011 to 2031	14,000	19,500	33,500
(b) Completions up to 31 March 2018	6,267	4,629	10,896
(c) Number of dwellings left to deliver in the plan period (= a - b)	7,733	14,871	22,604

	Cambridge	South Cambridge-shire	Cambridge & South Cambridge-shire
(d) Number of years of plan period left	13	13	13
(e) Annualised average requirement for the remainder of the plan period (= c ÷ d)	595	1,144	1,739
(f) Five year supply requirement (= e x 5)	2,974	5,720	8,694
(g) 20% buffer to be added to the five year supply requirement (= f x 0.2)	595	1,144	1,739
(h) Five year supply requirement with 20% buffer (= f + g)	3,569	6,864	10,433
(i) Number of dwellings predicted to be completed in the five year period (1 April 2017 to 31 March 2022)	3,874	8,197	12,071
(j) Five year supply (= i ÷ h x 5)	5.4	6.0	5.8

Source: Cambridge Annual Monitoring Report 2017 and South Cambridgeshire Annual Monitoring Report 2017

Figure A4 below shows that it is anticipated that based on the housing trajectory as at November 2017 it is anticipated that there will be a rolling five-year housing land supply continuing for the remainder of the plan period. The housing supply data will be updated annually and published in the Annual Monitoring Report.

Figure A4: Rolling Five Year Supply

	2017-2022	2018-2023	2019-2024	2020-2025	2021-2026	2022-2027	2023-2028	2024-2029	2025-2030	2026-2031
Cambridge	5.4	5.4	6.0	6.2	6.2	6.2	5.8	5.3	5.3	5.5
South Cambridgeshire	5.4	6.0	6.3	6.3	6.4	6.5	6.9	7.7	8.9	11.4
Cambridge & South Cambridgeshire	5.4	5.8	6.2	6.3	6.3	6.4	6.5	6.8	7.6	9.1

Source: Cambridge Annual Monitoring Report 2017 and South Cambridgeshire Annual Monitoring Report 2017

Figure A5 below shows past and projected completions for Cambridge and South Cambridgeshire over the plan period (2011/12 to 2030/31). In total, the plans must make provision for a minimum of 33,500 homes over this period, which is represented in the graph by the black 'plan' line (the combined annual housing requirement of 1,675 net homes). It also includes a 'manage' line, which shows the outstanding balance of completions relative to cumulative delivery.

Figure A5: Past and Projected completions 2011/12 to 2030/31

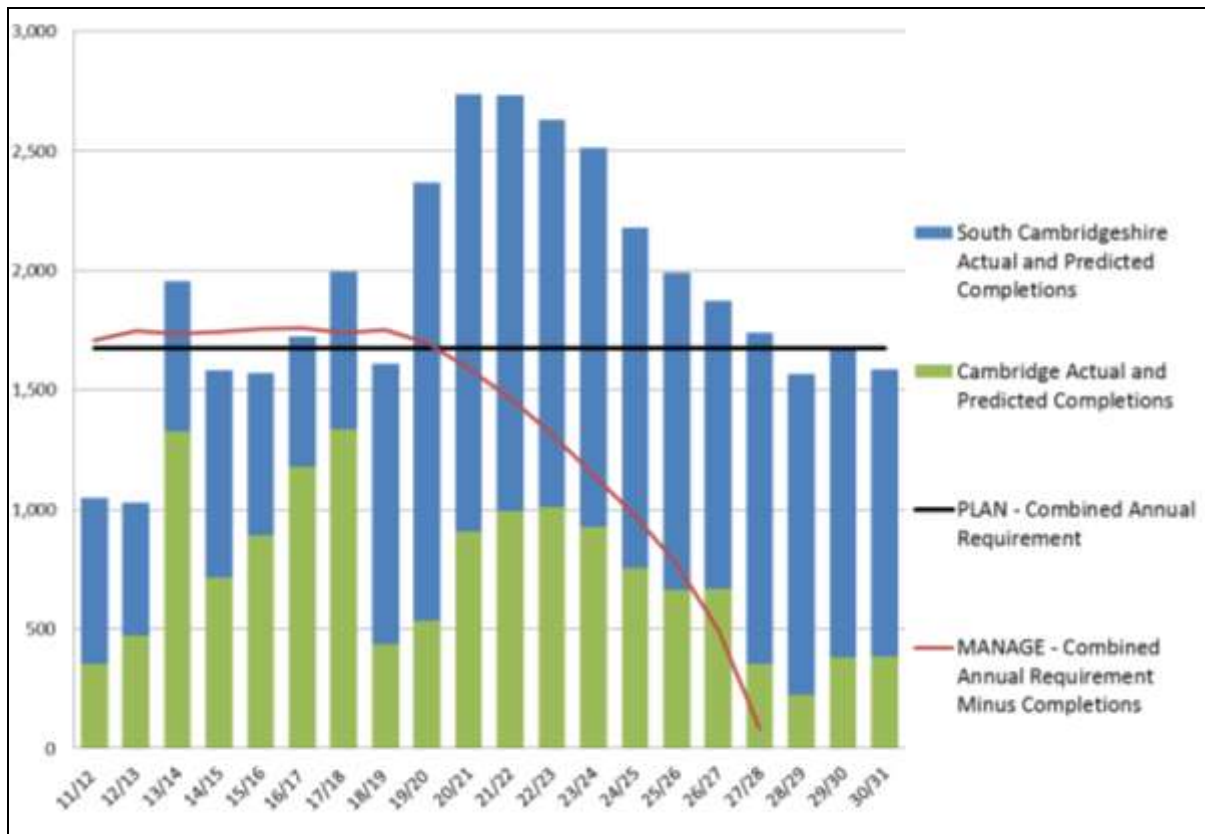


Figure A6 below provides a summary of the broad distribution and main sources of supply of the housing provision set out in the plans.

Figure A6: Distribution and supply of housing provision

	2011/12 - 2015/16	2016/17- 2020/21	2021/22- 2025/26	2026/27- 2030/31	Post 2031	Totals
Actual Completions						
Cambridge	3,754	1,178	-	-	-	4,932
South Cambridgeshire	3,427	543	-	-	-	3,970
Cambridge Urban Area						
Cambridge - existing allocations	-	226	304	289	0	819
Cambridge - new allocations	-	131	613	579	0	1,323

	2011/12 - 2015/16	2016/17- 2020/21	2021/22- 2025/26	2026/27- 2030/31	Post 2031	Totals
South Cambridgeshire - existing allocations	-	42	105	0	0	147
Cambridge Fringe Sites						
Cambridge - existing allocations	-	2,227	2,595	521	0	5,343
Cambridge - new allocations	-	190	240	0	0	430
South Cambridgeshire - existing allocations	-	894	1,879	1,378	250	4,151
New Settlements						
South Cambridgeshire - existing allocations	-	703	1,250	1,250	6,784	3,203
South Cambridgeshire - new allocations	-	0	1,660	2,000	8,840	3,660
Rural Area						
South Cambridgeshire - existing allocations	-	522	100	53	0	675
South Cambridgeshire - new allocations	-	674	1,185	750	935	2,609
Unallocated Sites with Planning Permission or Resolution to Grant Planning Permission						
Cambridge	-	313	40	0	0	353
South Cambridgeshire	-	2,608	613	0	0	3,221
Windfall Allowance						
Cambridge	-	123	553	618	0	1,294
South Cambridgeshire	-	50	900	1,000	0	1,950
	7,181	10,424	12,037	8,438	16,809	38,080

For more details on the individual sites that comprise the above joint housing trajectory, please refer to the latest Annual Monitoring Report for each authority.

Mon 27/11/2017 15:13

From: Programme Officer

To: Caroline Hunt

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Caroline

Thank you for your email and attached documents.

These have been passed to the Inspectors for their attention.

Kind regards

Gloria

Gloria Alexander

Programme Officer

Fri 01/12/2017 12:05

From: Programme Officer

To: Caroline Hunt

5 year housing land supply

The Inspector has sent the following query, for clarification:

Pages 4 and 5 of the Housing Land Supply Update (RD/AD/500), include two tables. The first is headed 'Calculation of five-year supply for 2017-2022', the second is headed 'Calculation of the five-year land supply for 2018 – 2023'.

The rows of the table are labelled a,b,c etc. Row (i) of the first table is labelled 'Number of dwellings predicted to be completed in the five year period (1 April 2017 to 31 March 2022)'. Row (i) of the second table is labelled the same but the numbers in the table are different.

Should that row (i) of the second table have been labelled 'Number of dwellings predicted to be completed in the five year period (1 April 2018 to 31 March 2023)'?

Would the Councils either confirm this, or let us know whatever is the correct explanation for this discrepancy.

Regards

Gloria

Gloria Alexander

Programme Officer

Fri 01/12/2017 12:16

From: Caroline Hunt

To: Programme Officer

RE: 5 year housing land supply

Gloria

We have checked the table and confirm that the inspector has helpfully identified a typographical error in row (i) of the second table, which should be labelled to apply to the period 2018-2023. This amendment to the table would apply in both the modification and the evidence document. I hope that clarifies the situation.

Caroline

Fri 01/12/2017 12:45

From: Programme Officer

To: Caroline Hunt

RE: 5 year housing land supply

Caroline

Thank you for your reply, I shall pass that on and get back to you if needed.

Regards

Gloria

Fri 01/12/2017 16:44

From: Programme Officer

To: Caroline Hunt

RE: Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Caroline

The Inspector advises that she has had a limited opportunity to consider the proposed modifications and the accompanying Housing Land Supply Update, but in the interests of expediency she is content that the proposed modifications should be included in the forthcoming consultation (subject to correction of the typo drawn to your attention earlier) and that document RD/AD/500 should be added to the reference document library.

Please provide the final proposed main modifications schedule both electronically and in printed form (3 copies). I shall pick these up on my return from leave on confirmation that they are available, and get them to the Inspectors for their attention and confirmation that it can be published for consultation.

Kind regards

Gloria

Gloria Alexander

Programme Officer