

Cambridge City and South Cambridgeshire Local Plan Examinations

MATTER 8 – Housing Land Supply and Delivery

On behalf of Countryside (ID21303)

January 2015

Prepared by

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CAPL/254017/A6



8 Housing land supply and delivery

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

1. We have a number of concerns regarding the strategies.
 2. In 2016/17 North West Cambridge is due to deliver 590 homes (520 in the city and 70 in South Cambs). Given that is the first year of completions and that completions decline after that, we consider that is extremely optimistic. We are not aware of any site in the UK having can achieve that level of development in its first year, let alone in subsequent years. As matter stand at January 2015, details have been approved for 349 homes. A further 241 homes need to be approved, to get on site and undertake infrastructure works and the build homes in order to achieve that level of completions. Experience of major sites suggests that around 300 homes a year can be sustained with a number of developers working in tandem. We consider that it would be prudent to reduce the contribution this site makes to the five year supply by around 250 homes.
 3. In South Cambs, in last few years of the plan, supply is reliant on 3 new settlements to deliver 1,000 homes out of 1,200 a year being delivered. That is coupled with the low rates of delivery in Cambridge City means very few sites will be being developed. We consider that in order to achieve high levels of development a wider range of sites are required.
- ii. Is there sufficient flexibility to deal with changing circumstances and/or uncertainty over when allocations will come forward for development?*
4. In South Cambs, in last few years of the plan, supply is reliant on 3 new settlements to deliver 1,000 homes out of 1,200 a year being delivered. If any one of those sites were to be delayed the effect on supply would be significant. There is no provision made for additional sites in the event that current sites in the plans experience unforeseen difficulties in coming forward there are not sites in sustainable locations readily available to meet needs.

Matter 8B

Will the plans ensure a rolling five year supply of specific deliverable sites in accordance with para 47 of the NPPF?

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? If so, will the planned MMs (appendix 3 of Councils' Statement to Matter 1), which would rely on a combined housing trajectory for Greater Cambridge, ensure compliance with para.47 of the NPPF? Bearing in mind the inspector's rejection of this approach in the Waterbeach appeals, as 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)? Would it be a better approach, if supported by the evidence, to have a stepped approach (see, for example, West Lancashire) to identifying the five year supply for each Council on an individual basis?*

5. Yes, the MOU is an acceptance that there is not a five year supply in each area.
6. We do not consider that the MOU would comply with NPPF. The NPPF says that LPAs should identify and update annually a supply of sites sufficient to provide five years worth of housing against "their" housing requirements (Para. 47 2nd bullet). The Memorandum of Understanding (MoU) is not consistent with the submission Local Plans:
 - paragraph 2.37 of the Cambridge Local Plan states the City will meet its need within its area
 - paragraph 2.11 of the Submission South Cambridgeshire Local Plan states that the SHMA identifies an objectively assessed need for 19,000 new homes in South Cambridgeshire.
7. Given both plans are said to be meeting their own objectively assessed needs, there can be no reason for a joint trajectory.
8. We do not agree with a "stepped approach". There is a pressing need to deliver more homes in the Plan areas to tackle affordable housing need and affordability. The area experiences significant rising house prices and therefore it is urgent that any shortfall in housing is eliminated as quickly as possible. One of the key purposes of the NPPF is to significantly boost housing supply in order to support the economy and tackle precisely the issues the Cambridge area faces. Not to plan to deliver the plan rates from the outset of the plan period would be contrary to the objectives of the NPPF.
9. In South Cambridgeshire, in the first three years of the plan period 504 affordable homes were delivered.
10. Cambridge City Annual Monitoring Reports for 2012 and 2013 state that 67 and 135 affordable homes were built in those 2 years. The 2014 report states that 447 were built in 2012/13 – we assume this is should say 2013/14. In total 649 affordable homes were delivered in Cambridge City.
11. More homes are needed now and therefore the plans should aim to deliver the annual average plan rate from the outset.
- iv. *Does the evidence on past delivery (paras 3.18 to 3.19 of RD/Top/070 for City and Table 3 of RD/Top050 for SCDC) justify the use of a 5% rather than 20% buffer?*
12. No. The current adopted development plan target for Cambridge city is 12,500 homes between 1999 and 2016. That equates to an annual average of 735 homes. Only once since the local

plan was adopted in 2006 has that target been met. In 7 out of the last 8 years the target has not been achieved.

13. Arguably, since 2008 delivery within the City Council area should be measured against the East of England Plan, requiring 1,110 homes a year to be achieved. Clearly the achieved rate falls significantly below this.
14. In South Cambridgeshire the adopted plan rate is 1,176 homes pe year. Only once since 199h has that rate been achieved (2007/08). In the last six years the rate achieved has been has been around 60% of that.

Year	Development Plan Target	Completions	Percentage
1999-2000	1,176	801	68%
2000/01	1,176	801	68%
2001/02	1,176	525	45%
2002/03	1,176	653	56%
2003/04	1,176	979	83%
2004/05	1,176	571	46%
2005/06	1,176	877	75%
2006/07	1,176	924	79%
2007/08	1,176	1274	108%
2008/09	1,176	610	52%
2009/10	1,176	611	52%
2010/11	1,176	656	56%
2011/12	1,176	678	58%
2012/13	1,176	559	48%
2013/14	1,176	636	54%

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

15. There is no evidence regarding the reliability of supply from windfalls moving forward. Both local plans include polices which will in effect make it difficult for windfalls to continue to come forward at those rates
16. In Cambridge the policy on loss of industrial and storage land has been tightened up. Policy 7/3 of the adopted local plan protected industrial and storage space identified on the proposals map. It include criteria against which to assess other industrial sites.
17. Policy 41 of the Submission City Local Plan now introduces a “*presumption against*” loss of any employment sites outside industrial sites and extends protection to office and research uses, including those which are *Sui generis*. Given that the Local Plan allocate some industrial sites for redevelopment based one the outcomes of the Employment Land review, it is unlikely that other sites will be able to meet the strict criteria in Policy 41 to permit their redevelopment.
18. Both plans are based on comprehensive SHLAAs. The output of those SHLAAs are allocations for development. It is unlikely that there is a significant source of supply available which is as yet unknown. Further evidence is required to support the windfall rates.

- 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 the is the preferred method in the Planning Practice Guidance? If not, what are the local circumstances which justify using a longer period (ie not the economic recession).*
19. Since the start of the Plan period in 2011 in Cambridge City by April 2013/14 2,132 homes were delivered against a target of 2,100 homes (+32). It is worth noting that the 2013 AMR (RD/AD/350) identified that in the first two years of the Plan period 331 and 813 homes were completed, whereas in the 2014 AMR these figures are 352 and 833.
20. Since the start of the Plan period in 2011 in South Cambridgeshire by April 2013/14 1,873 homes were delivered against a target of 2,850 homes (-977). It is worth noting that the 2012/13 AMR (RD/AD/270 identified that in the first two years of the Plan period 671 and 587 homes were completed, whereas in the 2013/14 AMR these figures are 678 and 559.
21. There is a pressing need to deliver more homes in the Plan areas to tackle affordable housing need and affordability. The area experiences significant rising house prices and therefore it is urgent that any shortfall in housing is eliminated as quickly as possible. One of the key purposes of the NPPF is to significantly boost housing supply in order to support the economy and tackle precisely the issues the Cambridge area faces. Not to plan to eliminate the shortfall as soon as possible would be contrary to the objectives of the NPPF.
- vii. *How will the extra 1,000 homes on rural exception sites to be delivered as part of City Deal be reflected in the housing trajectory/five year land supply?*

Conclusions

22. The trajectories result in an unbalanced strategy which is likely to have significant implications for affordability and affordable housing needs.
23. There is insufficient flexibility and additional land should be identified for development, and if necessary safeguarded for development beyond 2031.
24. The notion of a joint trajectory is contrary to the NPPF. Each LPA should have its own housing trajectory.
25. There has been significant under delivery in both areas and a 20% buffer is required. Any shortfall to date should be made up within the five year period – to do otherwise would be the antithesis of the NPPF.