



Cambridge City and South Cambridgeshire Local Plan Examinations

Prepared by **Nathaniel Lichfield & Partners on behalf of CEG**
Date **11 May 2016**

Matter PM1 - Housing

1.0 Matter PM1A: Objectively Assessed Housing Need

PM1A.1 – Does the further work on objectively assessed housing need (OAHN), carried out by Peter Brett Associates (PBA) for the Councils (RD/MC/040) ensure that the methodology used is now generally compliant with the Planning Practice Guidance (PPG).

- 1.1 No, the evidence on OAHN put forward by the Councils does not comply with the broad approach set out in the PPG. Specific problems arise from:
- A failure to define and justify the relevant Housing Market Area, and not to assess OAHN across the Cambridge Sub-Region using the 2012-based DCLG Projections. There can be no confidence that housing needs are “*clearly understood*” or “*being met*” across the housing market area (HMA), in line with the Framework;
 - Flaws in the approach to OAHN in respect of necessary adjustments to the household representative rates, consideration of employment growth, and affordable housing needs.

An unjustified approach to defining the Housing Market Area

- 1.2 NPPF para 47 identifies the need to ensure that full objectively assessed needs for market and affordable housing are met in the “*housing market area*”.
- 1.3 The Councils appear to maintain that the HMA is that comprising the authorities assessed by the Cambridge Sub-Region SHMA (2013) (RD/STRAT/090); however insofar as the HMA was ever justified (CEG’s submissions to the previous hearings were that it was not) the SHMA’s definition of the HMA is both weak and now significantly out-of-date. More recent evidence is now available¹ but this has not been considered².

¹ Notably the ONS 2011 Travel-to-Work areas (TTWAs) released on 19 August 2015 show that commuting patterns around Cambridge are contained broadly within South Cambridgeshire and East Cambridgeshire (with the remaining authorities of the SHMA forming their own TTWAs);

² See section 2.2. of the 2013 SHMA. The analysis in Appendix 3 of M3/CCC & SCDC is superficial and only considers the commuting rates for the two local authorities. It pre-dates the new TTWAs;

1.4 All the evidence³ (both commuting and migration patterns) points to Cambridge and South Cambridgeshire (potentially with East Cambridgeshire) being treated as its own HMA and the Councils have no credible evidence that the Cambridge Sub-Region remains (or ever was) the appropriate functional economic and market area.

Failure to demonstrate “clear understanding of housing needs” or “meet full OAN in the housing market area”

1.5 Alongside the NPPF requirement to meet needs across the HMA (para 47), para 159 requires LPAs to have a “**clear understanding of housing needs in their area.**” Unfortunately, the Council cannot rely on the 2013 SHMA to support the assertion that housing needs are either “*clearly understood*” or that “*needs are being met across the HMA*”. It therefore fails the Framework.

1.6 Firstly, the 2013 SHMA has not been updated⁴. The only new evidence produced by the Councils is for the CCC and SCDC. Insofar as the Councils seek to rely on the 2013 SHMA – which they do for employment and affordable need elements being met – it is not a reliable basis for doing so.

1.7 Secondly, the SHMA is not a sound basis for demonstrating that local employment growth can be supported, due to the unjustified notion that the whole Cambridge sub-region is the HMA or that sustainable commuting patterns will enable the types of travel to work necessary to provide sufficient workers and ensure business resilience. Housing provision in many parts of the SHMA area falls outside the relevant 2011 TTWAs. Needs from East Cambridgeshire (the only other Cambridgeshire authority within Cambridge’s TTWA) have been ‘exported’ to Peterborough and it is unclear how these would support Cambridge jobs, given the geographical area crosses a number of TTWAs. Furthermore, East Cambridgeshire is planning for more jobs than in the 2013 SHMA through ‘clawing-back’ in-commuters, reducing the available labour force for Cambridge and South Cambridge. The Councils have not considered the effect of this on the Local Plans’ job targets.

1.8 Nor is it evident that the Councils are working with authorities whose areas overlap with the southern part of the Cambridge TTWA (East Hertfordshire, Uttlesford, North Hertfordshire, Harlow) to assess needs across the area. If the Councils maintain their assertion that the housing requirement is sufficient to support employment growth, new evidence on OAHN which takes into account all the relevant factors (in line with the PPG) across a revised HMA drawing on the new TTWA(s) will need to be put forward to justify this. The Councils’ original work on HMAs was badly formed, and its problems have not been

³ For example see migration analysis in CEG’s previous representations - October 2014, Para. 4.6 onwards and TTWA analysis, CEG representations - January 2016 – Appendix 2, Para. 4.11 onwards)

⁴ For example, to address the 2012-based household projections.

redressed to reflect new data releases, policy changes and Local Plan progress..

Omissions in the approach to OAHN within the Further Evidence

- 1.9 The Further Evidence put forward does not represent a full, objective assessment of housing needs. This is because:
- 1 It does not make appropriate adjustments to household formation rates which are inherently a product of past trends, and show a significant downward trend for young adults. The PPG advises⁵ that representative rates may require adjustment (for example in response to affordability) But by accepting the official projections 'as is', the Councils are planning for a scenario in which fewer young adults form their own household and more live in multiple adult households.. The Councils do not provide proper analysis, and (in RD/MC/041) simply cites a number of generic academic studies to explain why they do not follow the step that the PPG says should be considered. However these have no formal status and approach matters from an academic rather than planning perspective.. To not make such adjustments would not be in line with the NPPF⁶"
 - 2 No analysis has been put forward to show that the level of housing proposed in the Plans would support the 44,000 jobs target⁷. Cambridge and South Cambridgeshire have high levels of self-containment⁸ and form (along with East Cambridgeshire and parts of authorities to the south) the Cambridge TTWA; i.e. the area in which most people live and work. There was actually a modest reduction⁹ in the relative balance of commuting between the two local authorities and the rest of the purported HMA, and yet now the Councils rely upon a major reversal of that trend in order to support employment growth. It is fundamental that the alignment of housing and jobs strategies within the Plans is adequately considered. If this is not the case, this could lead to the adverse consequences identified in the PPG¹⁰. Analysis on behalf of

⁵ ID 2a-015-20140306

⁶ For example, paragraph 9 states that "*Pursuing sustainable development involves seeking positive improvements ... to improve people's quality of life ... including... widening the choice of high quality homes*". Paragraph 47 seeks to "*boost significantly the supply of housing*" and paragraph 50 seeks to "*widen opportunities for home ownership*".

⁷ For the reasons set out in paras 1.2-1.8, the 2013 SHMA cannot be relied upon for demonstrating the housing/jobs alignment across the Sub-Region given the changes which have occurred since its publication.

⁸ 67.7% as reported in Appendix 3 of M3/CCC & SCDC

⁹ From 19.6% to 19.3% as reported in Appendix 3 of M3/CCC & SCDC

¹⁰ The NPPG identifies that a mismatch could lead to "*unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses [meaning that] plan makers will need to consider how the location of new housing or infrastructure development could help address these problems*" PPG ID: 2a-018-20140306

CEG¹¹ indicates that to support the job growth strategies in the Plans there is a need for just over 40,000 new homes¹²;

- 3 It does not make upward adjustments to address affordable housing need. The evidence states that, at the current level, around half of Cambridge's affordable housing needs would be delivered. The PPG is clear that an increase in the Plan's figures should be considered where it could help deliver the required number of affordable homes, a point reiterated in the 'King's Lynn' High Court Judgment¹³. This also implies that although meeting needs in *full* may produce a number which is simply 'unrealistic', an uplift should be considered up until the point it is considered 'unrealistic' (or 'undeliverable'). In Cambridge, c.40,000 homes would be needed in order to support job growth in the area¹⁴ and there is clear evidence of both demand and an acute housing shortage. Clearly, an uplift above the 33,500 currently proposed in the Plans does not represent an 'unrealistic' or 'undeliverable' scenario given the demand arising from jobs growth. The Council have not put forward any evidence to suggest that it would not be possible to provide more than 33,500 homes, and have not properly considered uplift to help meet needs, contrary to the PPG¹⁵.

Nor does the 2013 SHMA (RD/STRAT/090) satisfy the PPG's requirements in terms of affordable housing need for either Cambridge/South Cambridge or anywhere else within the purported HMA, so the lacuna in the Councils' work¹⁶ is not filled. The 2013 SHMA explicitly states (Section 12.3, p45): "*Due to the different methodologies involved, the affordable need figure should not be compared directly with the forecast demand for all dwellings.*" The Councils' evidence thus does not satisfy paragraph 47 in respect of "*ensuring that their Local Plan meets the full OAN for market and affordable housing in the housing market area*" (NLP emphasis).

Summary

- 1.10 The methodology used by the Councils does not comply with the PPG; not least because it does not have a sufficient grasp of the definition of its HMA. The current basis for the purported HMA was never adequately justified and is

¹¹ See CEG's Representations, January 2016 – Appendix 2, Para 4.5

¹² This is an updated iteration of the 43,000 figure generated for CEG by NLP as cited in the Inspectors' letter of May 2015 with the changes reflecting the new household projections and updated assumptions.

¹³ Kings Lynn and West Norfolk Borough Council v Secretary of State for Communities and Local Government [2015] EWHC 1958

¹⁴ see CEG's Representations, January 2016 – Appendix 2, Para 4.5

¹⁵ The Councils' response to objectors (RD/MC/041) attempts to grapple with this issue are limited to quoting two Inspector's reports that have no bearing on the circumstances of Cambridge, and presents no evidence to justify the judgement made.

¹⁶ Its comment at para 4.16 states, without presenting evidence, that "*it is likely*" that needs will be met in full elsewhere across the HMA

now significantly out-of-date, with the 2011 TTWAs and other migration/commuting data from the 2011 Census, strongly confirming that the HMA is smaller than the entire sub-region, and for Cambridge should be Cambridge and South Cambridgeshire (conceivably with the inclusion of East Cambridgeshire).

- 1.11 If – against the evidence - the Councils continue to maintain the appropriate HMA is the Sub-Region, there is no up-to-date, full, objective assessment of housing need (prepared in line with the PPG) to demonstrate that a) the Sub-Region is the relevant HMA; and b) what full OAN is across the Sub-Region and within each authority.
- 1.12 The area of the Plans should form its own HMA, and on this basis, the Councils have not presented a full, objective assessment of need for the HMA, given that the Councils' Further Evidence report does not give any account to employment-led needs, fails to address downward trends in the household representative rates and relies (without justification) on locations elsewhere meeting affordable housing needs. All of these factors point to a need to increase the level of housing in the Plans.

PM1A.2 – Bearing in mind that the PPG notes that no single approach will provide a definitive answer, do the OAHN figures of 14,000 new dwellings for Cambridge City and 19,500 new dwelling for South Cambridgeshire provide a robust basis to underpin the provision on new housing in the Local Plans. If not, why not and why are alternative figures to be preferred?

- 1.13 The current level of housing provision set out in the Plans does not represent full, objectively assessed need which takes into account all the necessary factors in line with the PPG for reasons set out under PM1A.1. In summary:
- It does not reflect appropriate adjustments to the household projections, with negative impacts in not meeting the needs of younger adults;
 - It does not make an assessment of employment-led need and does not demonstrate that the housing and jobs figures within the Plans are aligned; and
 - The Councils have not demonstrated that provision above 33,500 homes represents an 'unrealistic' level of housing delivery that makes it impossible to address affordable housing need in Cambridge. At the current housing figure the Plans only meet (at best) around half of affordable housing need. Job growth factors alone would justify provision of c.40,000 homes , providing the demand necessary to deliver more affordable homes. The Councils' work is inadequate in its purported justification for why additional supply could not be sustained.

- 1.14 Analysis by NLP on behalf of CEG¹⁷ shows that **40,700** homes would represent full, objectively assessed housing need across Cambridge and South Cambridgeshire for the period 2011-31. This level of housing provision would;
- Address the projected decline in household formation in younger adults;
 - Provide enough homes to support 44,000 jobs and reflect the TTWA;
 - Make a significant (but realistic) upward adjustment to address affordable housing needs.

Way Forward

- 1.15 CEG seeks progression of the Local Plans to adoption. If the Inspectors are minded to agree with any of CEG's representations on OAN, CEG would respectfully request that this be communicated in a short timescale in the form of further interim findings, which would then enable the Councils to carry out any further work and/or make further Main Modifications in parallel with ongoing progression of Examination¹⁸

PM1A.3 – The OAHN figures are also the housing requirement figures in both plans. What is the relationship between these figures and the 1,000 extra homes which are part of the City Deal.

- 1.16 The 1,000 extra homes required as part of the City Deal was a clear 'policy-on' condition of the City Deal (on which the Plans rely for their effectiveness) so should be fully additional to any housing requirement figure necessary to meet FOAN and reflected within the housing trajectory of the Plans. The 'half and half' approach is not sound.

¹⁷ See CEG Representations, January 2016 – Appendix 2, Para. 4.5 onwards

¹⁸ We note the Examination's fifteen blocks identified will, in combination with summer holidays, and - based on current programming assumptions – likely take the examination into 2017, giving ample time for the Council to make good any problems on OAHN and identify new sites for allocation (drawn from options already appraised within the SA) within further Main Modifications without delaying adoption of the Local Plans.

2.0 **PM1B 5 year housing land supply and joint trajectory**

PM1B.1 - The Framework (paragraph 47) states, amongst other things, that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. Planning Policy Guidance Ref 010 2a-010-20140306 advises: *Where there is a joint plan, housing requirements and the need to identify a five year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.*

Are there any local circumstances which justify the use of a joint trajectory without a joint plan? If so what are they?

2.1 Yes. It is necessary to address the absence of a five year housing supply in South Cambridgeshire in the initial phase of the Plan, whereas in the latter stages of the trajectory it is Cambridge City that will face a deficit. The local circumstances that justify being at variance from the PPG are that a joint trajectory is now the only mechanism available to ensure that, in this specific respect, both Plans can be found sound in a timely manner.

2.2 It reflects CEG's earlier submissions that both local authorities would have been better served commencing this process by preparing a Joint Plan.

PM1B.2 - Will the use of a joint trajectory assist in meeting the objectives of the Framework, including the delivery of sustainable development and boosting, significantly, the supply of land for housing?

2.3 A joint trajectory will assist, but does not overcome problems that continue to exist in other aspect of the housing proposals of the plan, as set out under PM1A and PM1B below.

PM1B.3 - Is it clear how this approach would work in practice; i.e how would the five year land supply would be calculated and updated; and is it clear how any failure to provide a five year supply would be resolved?

2.4 There is an absence of details as to how the trajectory would be calculated and updated, particularly in terms of whether assumptions on, for example, persistent under-delivery and use of 'Sedgefield' or 'Liverpool' methods for backlog should be made separately for each LPA or for the combined authorities. The fact that RD/MC/050 (Housing Land Supply Update) does not draw definitive conclusions on this is an indication of the shortcomings..

2.5 It is also does not appear that the Councils have satisfied bullet 4 of paragraph 47 of the Framework¹⁹. There is no housing implementation strategy, and no mechanism in the policies of the plans (or elsewhere) to satisfactorily explain how the Councils will respond to any failure to meet the five year housing land supply (or the Government's housing delivery test once introduced). In this regard, the Plans do not satisfy the requirement for "*sufficient flexibility to respond to rapid change*" (para 14) and for any solution to a shortfall to be "*genuinely plan-led... [and] should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency*" (para 17). The absence of a plan-led response or contingency is problematic.

2.6 The risks of failure are real. Although the Councils have correctly responded to some of the problems with the previous housing trajectories²⁰ – the Analysis at Annex 1 of this Matters Statement shows how many of the major schemes are reliant on early delivery of City Deal infrastructure schemes where there are significant levels of uncertainty.

PM1B.4 - The Memorandum of Understanding (RD/Strat/350) indicated that, as part of the City Deal arrangements, the Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019. Should this commitment be expressly included in the Local Plans?

2.7 Yes. CEG's position on this is set out in paragraphs 3.19-3.23 (pp 28-29) of its document summarising its representations to the Main Modifications.

2.8 The failure to put in place any firm commitments in policy for the preparation of a Joint Local Plan means that insofar as an early review is part of the matrix for finding the Plans sound (as the PPG permits at ID 12-008-20140306), it is not captured in the development plan.

2.9 In response to CEG's representations, we note that the Councils have [RD/MC/120] conceded that it might be appropriate to include a reference to the commencement of an early review, but do not believe it is necessary to make the plan sound, and do not accept that the Plans should define the likely scope of the review or set a timetable for its completion.

2.10 There are two clear reasons for the Plans to include details of the **scope** of the review:

- 1 The Councils' commitment to early review is founded on the reference in the City Deal document²² and within RD/Strat/350. If soundness of the

¹⁹ In terms of the requirement to "*set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.*"

²⁰ Notably by responding to CEG's comments on build rates for the new settlements

²² The City Deal document (RD/STRAT/300) states: "*in order to establish what impact the anticipated changed infrastructure landscape and economic growth might have on housing need and other aspects of spatial and transport planning.*"

Plan is conditional upon a Plan Review (as it is, being a condition of the City Deal upon which the Plans rely for infrastructure funding²³), it is important for it to be clear on whether it is a review in whole or part²⁴, and, if the latter, then on what basis. Further, the Councils Development Strategy document states the plan strikes “*the right balance [between new settlements and edge of Cambridge sites] for this plan period*”. If this balance changes (e.g. as a result of the City Deal), it will be inevitable that a Plan review (which will cover a period extending beyond “*this plan period*”) is required to review the development strategy²⁵ in light of the infrastructure landscape, economic growth, housing need, and other aspects of spatial and transport planning that exists at that time. This might include, for example, how the development at the Bio-Medical campus had impacted on the balance for scale of development in South East Cambridge. It is wholly necessary that a review revisit the Green Belt question to see if this balance should change in light of evidence.

- 2 There are clear shortcomings in respect of the evidence on Green Belt (which CEG covers in its Matters Statement for PM2) which mean that it cannot be relied upon as sound basis for concluding on the contribution of land to Green Belt purposes. Insofar as the Inspectors conclude the Plan can proceed – subject to further Main Modifications – without further Green Belt evidence, it can only be on the basis that the early Plan review is based on a fresh Green Belt review.

2.11 In respect of **timetable** for review, of the 21 Local Plans that have been adopted since the NPPF was published subject to an ‘early review’, none have yet completed the task, and very many have breached the timescales they were set, in conflict with the reasoning applied by Inspectors in concluding that the Plans could be found sound, despite shortcomings. Without a clear timetable being set in policy, the Inspectors here can have no confidence that **both** parts of any rationale for finding the Plans sound subject to early review will be satisfied.

2.12 Annex 2 shows a number of recent examples of plans which include a clear commitment to complete the review within a set time period and to define the scope accordingly²⁶

²³ Paragraph 4.5 of RD/MC/120 states that “*The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.*” (NLP emphasis)

²⁴ A distinction made clear in the PPG

²⁵ Which in principle favours edge of Cambridge sites over new settlements.

²⁶ The recent plans are Lichfield (adopted February 2015), South Somerset (March 2015), Swindon (March 2015), Chichester (July 2015), West Dorset (October 2015), Gosport (October 2015), Stroud (November 2015), Horsham (November 2015), North Dorset (January 2016), Tamworth (February 2016), East Riding of Yorkshire (April 2016),

- 2.13 The proposed wording set out by CEG in paragraph 3.23 of its representations document is justified as it:
- Includes a policy committing to commencement of the Review in line with the City Deal (the success of which is a pre-requisite of the Plans being effective in terms of infrastructure delivery);
 - Sets a clear deadline for completion of the Plan review which, in the context of the review being “*early*” is by definition a period of less than five years from the likely date of adoption²⁷; and
 - Sets out a sensible scope for the review, consistent with the reasoning in the City Deal as to why such a review is necessary.
- 2.14 Expressed in the simplest of terms, it is not at all clear what it is about the above provisions that the Councils find unacceptable and why, and they have not justified proceeding on the basis set out in the Main Modifications.

2,975 Words

²⁷ The PPG (ID 12-008-20140306) sets an expectation that Plans are reviewed “*at least*” every five years (a period consistent with the Government’s recent Technical Consultation on Local Plans which uses a five year period as the benchmark for plans being ‘up to date’)

Annex 1: Housing Trajectory and Infrastructure Triggers

Annex 2: Development Plan commitments to Local Plan Early Reviews

Local Authority	Document (& adoption)	Full/Partial Review	Inspector's Comments	Local Plan Extract
Chichester	Chichester Local Plan: Key Policies 2014-2029; Adopted July 2015	Partial Review to ensure OAN is met.	"Include a commitment to an early review of the Plan in recognition of the limitations of the transport study and to enable full and detailed consideration of the potential offered through proposed government funding for upgrading of the A27". (Non-Tech Summary) "...the Plan should be adopted now, subject to a commitment to a review to be completed within five years . This will ensure that housing delivery after the first five years of the Plan period can be updated to take account of emerging evidence on highway infrastructure and rigorous testing of the impacts of providing housing up to the OAN or any updated OAN. The Council's proposed modification MM09 includes a commitment to an early review." (para. 56)	"For this reason the Council will review the Local Plan within five years to aim to ensure that OAN is met" (para. 7.9)
East Riding of Yorkshire	Strategy Document; Adopted April 2016	Partial Review To consider: * The implications of changing market conditions. * New or revised evidence such as the AHVA and/or SHMA. * The proportion of affordable housing being delivered by the policy. * The potential to allocate additional housing sites for purely affordable housing development.	"... the Council has unequivocally committed to an early review of the plan..." (para. 75) "Moreover, the Council told me that the SHMA will soon be updated, and if the evidence of need alters significantly then a partial review of the plan will be necessary. Indeed, the Council has proposed to add to the plan a commitment to an early review of Policy H2 (MM55). In these circumstances, and given the Council's previously mentioned commitment (MM45) to reviewing the whole plan by no later than 2020, I consider the method used to be adequate." (para. 146)	"The Council is committed to an early review of Policy H2 . This review will consider: * The implications of changing market conditions. * New or revised evidence such as the AHVA and/or SHMA. * The proportion of affordable housing being delivered by the policy. * The potential to allocate additional housing sites for purely affordable housing development." (supporting text para. 629)

Local Authority	Document (& adoption)	Full/Partial Review	Inspector's Comments	Local Plan Extract
Gosport	Local Plan 2011-2029; Adopted Oct 2015	<p>Dependent on outcome of Hampshire Strategy Review (due to be completed in 2016) but will be either full or partial Review depending on outcome the Strategy Review.</p> <p>To address OAN, housing targets. South Hampshire Strategy Review will allocate a housing figure for Gosport for the period 2016-2036.</p>	<p>Required Mod to para. 13.14 of Local Plan.</p> <p><i>"The Local Plan has been prepared through the Duty to Cooperate having regard to the PUSH South Hampshire Strategy 2012. The PUSH authorities are now committed to a review of the South Hampshire Strategy and it is programmed for completion in 2016. The evidence gathering for this new strategy has already started with the publication of a SHMA."</i></p> <p><i>"The SHMA identifies that Gosport fits within the wider Portsmouth HMA. Gosport is not a separate housing market in itself so arguably does not have an entirely distinct district housing need. However, to the extent that there can be an objectively assessed housing need specifically for Gosport, if environmental/infrastructure considerations indicate that this cannot be fully met within Gosport, the intention is that the SHS will in effect relocate this to other districts. This will be as a result of the Strategy's district level housing targets being based on what can be delivered in terms of environmental/infrastructure capacity, with the district level targets collectively summing to the total Portsmouth HMA/South Hampshire objectively assessed need. The South Hampshire Strategy Review will allocate a housing figure for Gosport for the period 2016-2036.</i></p> <p><i>Accordingly, the publication of the South Hampshire Strategy Review will necessitate a full or partial review of the Local Plan. The Council have recognised the need for an early review and have published a revised Local Development Scheme setting out a timetable for a review of this Local Plan. This review will also take into account any revisions to the National Planning Policy Framework" (Mod MM2 to para. 13.14)</i></p>	Local Plan 2011-2029; supporting text. As per Inspector comments.
Horsham	Horsham District Planning Framework; Adopted Nov 2015	<p>Early review to cover:</p> <ul style="list-style-type: none"> * to review housing requirement (particularly to take into account implications of decision on 3rd runway), * to identify areas for new housing development needed towards the end of the Plan period to meet the increased housing requirement 	<p><i>"... it became clear during the examination that the Plan should be the subject of an early review for two main reasons: firstly, to review the housing requirement, particularly to take into account the implications of the forthcoming government decision on the location of a third runway for the London airports, as always envisaged; and secondly, to identify the areas for new housing development needed towards the end of the Plan period to meet the increased housing requirement of 800 dpa." (para. 15)</i></p> <p><i>"The review work should include an assessment of potential sustainable sites falling between the likely maximum limit of any NP sites, probably about 150, and the strategic allocations of 500 plus." (para. 51)</i></p>	<p>Supporting text para. 3.27</p> <p><i>"...the Council is committed to a review of the plan which will commence within the first three years from the adoption of the HDPF".</i></p> <p><i>"The purposes of the review will take into account any updated housing needs requirements together with a review of the process for housing delivery, including Neighbourhood Development Plans. Prior to this review, the Council has also programmed a Site Allocations document which will enable a range of smaller sites including Gypsies and Travellers, employment and smaller scale housing sites to meet local need."</i></p>

Local Authority	Document (& adoption)	Full/Partial Review	Inspector's Comments	Local Plan Extract
Lichfield	Local Plan Strategy 2008-2029; Adopted Feb 2015	Early/Partial Review	<p><i>"That the Council will carry out an early review or partial review of the plan if further housing provision is needed to meet the needs of Birmingham or Tamworth. Alternatively, in the case of Tamworth, the need for further housing provision could be dealt with through the Lichfield District Local Plan: Allocations document." (Non-tech summary)</i></p> <p><i>"It was established at the initial hearings that the Council had agreed with Tamworth Borough Council and with Cannock Chase District Council that provision should be made in the Plan for agreed amounts of housing to meet the needs of those neighbouring councils. The joint level of housing provision for South Eastern Staffordshire has also been agreed with those councils." (para. 10)</i></p> <p><i>"By the time of the resumed hearings the situation in relation to Tamworth had moved on. Previously it was estimated that Tamworth's housing shortfall amounted to 1,000 dwellings, 500 of which would be located in Lichfield. Now it was estimated that the shortfall amounted to 2,000 dwellings and 14 ha of employment land. The Council has signed a Memorandum of Understanding in which it and North Warwickshire District Council agree to deliver a proportion of the remaining 1,000 dwellings. It has, however, yet to be established how many of the 1,000 additional houses will be located in Lichfield. The Council proposes to deal with this by way of MM1 which includes a reference to Lichfield accommodating some of Tamworth's growth which, depending on the scale of that growth, would be done either through an early review or partial review of the Plan or through the Lichfield District Local Plan: Allocations document which the Council intends to prepare." (para. 11)</i></p> <p><i>"A failure to carry out such a review would conflict with MM1 and could be argued to render the housing policies in the Plan out of date" (para. 20).</i></p> <p><i>"MM1 commits the Council to an early review of the Plan if there is a need for further housing." (para. 22)</i></p> <p><i>"That being so I do not consider it necessary to specify a time by which this review will take place nor do I consider that there is a need, as was suggested at the resumed hearings, to start afresh and prepare a new plan once the amount of the shortfall in housing provision which will be accommodated in Lichfield has been established." (para. 23)</i></p>	<p><i>"Lichfield District Council will work collaboratively with Birmingham, Tamworth and other authorities and with the GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review or partial review of the Lichfield District Local Plan Strategy 2015. The Spatial Strategy for Lichfield District Lichfield District Local Plan will be brought forward to address this matter" (para. 4.6)</i></p>

Local Authority	Document (& adoption)	Full/Partial Review	Inspector's Comments	Local Plan Extract
North Dorset	North Dorset Local Plan Part 1; Adopted Jan 2016	Full Review of policies in DPDs. Inspector sought review of Affordable housing & OAN.	"...the commitment to an early review of the Local Plan, starting by March 2016" (Non-tech summary) "In order to ensure that the Council is promoting the most appropriate strategy, which is consistent with national policy, then a commitment to an early review of LP1 (in conjunction with the preparation of LP2) is required." (para. 15). "To that end the Council has confirmed that it will start the review by the end of March 2016 with anticipated adoption of the revised plan by the end of November 2018." (para. 15).	
South Somerset	South Somerset Local Plan; Adopted March 2015	Partial Review Review of the housing and employment policies for Wincanton.	"Confirmation of an early review regarding housing and employment provision in Wincanton" (non-tech summary). "...review of the LP in part within three years ". (para. 3) "In Wincanton there is a residual requirement for only 5 dwellings up to 2028 (698 being already committed). The LP provides no indication of how any longer-term development needs, including those for affordable housing, would be met and the Council confirmed that it would be relying on the AMR to identify needs . This approach is not sound because it does not reflect an appropriate strategy for the town and incorporates insufficient flexibility. Therefore it is recommended that additional text be included in the LP which sets out a commitment from the Council to undertake a review of the housing and employment policies for Wincanton within three years and to take a permissive approach towards the consideration of housing proposals prior to the adoption of the Site Allocations DPD" (para. 100)	Policy SS3 and SS5. "The Council will undertake an early review of Local Plan policy relating to housing and employment provision in Wincanton. This will be in accordance with statutory requirements and completed within three years of the date of adoption of the Local Plan."
Stroud	Stroud District Local Plan; Adopted Nov 2015	Not specified but to address unmet housing need.	"Amend the commitment in Policy CP2 to an early review of the Plan commencing within five years of adoption or by December 2019, whichever is the sooner , and recognise the possibility of considering the need to assist other local planning authorities in the housing market area in meeting their future unmet objectively assessed development and infrastructure needs".	Policy CP2 (stated in policy) "Stroud District Council will give due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority's local plan process) are provided for in sustainable locations." Supporting text "If local planning authorities in the housing market area can demonstrate through their local plan process that there are unmet development and infrastructure needs that could be met more sustainably through provision in Stroud District, these will be considered, including through an early review of this Local Plan, commencing within five years from adoption or by December 2019, whichever is the sooner ." (para. 2.72)

Local Authority	Document (& adoption)	Full/Partial Review	Inspector's Comments	Local Plan Extract
Swindon	Swindon Borough Local Plan 2026; Adopted March 2015	Not specified but to include an objective assessment of need and a basis for housing and employment land provision and infrastructure provision.	<i>"Introduce a clear commitment to an early review of the Plan (policy SD2 and supporting text), to provide an objective assessment of need and a basis for housing and employment land provision and infrastructure provision over the period to 2031"</i>	Policy SD2: The Sustainable Development Strategy <i>"The strategy shall be reviewed by 2016 at the latest, to assess future levels of need for new homes and employment land over the period to 2031, to provide an appropriate basis for employment land and infrastructure provision."</i>
Tamworth	Tamworth Local Plan 2006-2031; Adopted Feb 2016	Scope not specified. To address OAN/housing need and employment land.	<i>"The Council now confirms through a modification that a review of its unmet housing (and employment land) requirements would be undertaken if broad development locations (BDLs) in neighbouring local plans have not been identified, or permissions granted to meet needs arising from Tamworth by the end of 2017/2018". (para 46, iii).</i> <i>"The Council, however, has made a constructive attempt to meet as much of its OAN and employment land as possible within its own boundaries without using its Green Belt, whilst securing a large proportion of the remaining part of its development needs through co-operating with its neighbouring authorities through DTC. Currently, there is an element of its OAN, of around 825 dwellings (just over 13% of OAN) that has not been fully agreed through DTC, with a review process built into the Plan to address this shortfall if progress has not been made by the end of 2017/18." (para. 110)</i>	Policy SS1 - The Spatial Strategy for Tamworth <i>"The three local authorities have committed to continue this co- operation on strategic planning issues to deliver the remaining unmet need of 825 dwellings and a minimum of 14 hectares of employment land. However if it has not been possible to propose sites for allocation through a statutory development plan for Lichfield District or North Warwickshire Borough or through the granting of planning permissions in either district by the end of the year 2017/18 an early review of the Tamworth Plan will seek to address any outstanding issues. This will ensure that the appropriate housing and employment land provision is allocated within the relevant Local Plans; in sustainable locations in relation to Tamworth's needs; and that the appropriate infrastructure is identified within agreed programmes."</i>
West Dorset	West Dorset, Weymouth and Portland Local Plan; Adopted Oct 2015	Scope not specified. To include review on housing land supply issues (to provide additional allocations to meet development needs).	<i>"Acknowledgement of the need for an early review of the Local Plan by 2021 to ensure provision of sufficient housing land for the remainder of the plan period".</i> <i>"In light of the conclusions I have reached regarding the overall housing supply situation, I find I am not fully in accord with their conclusions. Instead I consider it is imperative that an early review is undertaken to identify additional land capable of meeting housing needs to the end of the current plan period as well as the broad location for development in the five year period thereafter, in the expectation that current Government guidance will not change. (para 82)</i> <i>"A review will also provide an opportunity to consider growth options at Dorchester. The need to do so is expressed in MM60. It is a crucial, albeit difficult, matter for the Councils' to resolve but one which it is vital to address when examining options for further growth. The failure to do so is an unsatisfactory feature of the current LP but I do not consider it is a reason for finding the Plan unsound." (para. 83)</i> <i>"There is inconsistency between the timescales for a review as set out in MM4 and MM60 which needs to be resolved. I therefore recommend a review should be in place no later than 2021, if not earlier, to avoid development having to be allowed in locations which are not favoured or are in less sustainable location" (para. 84).</i>	Supporting text: <i>"Although the plan is written to cover 20 years to 2031, it is likely that a review of the plan will be put in place by 2021. This is necessary not only to ensure provision of sufficient housing land to 2031, but also to ensure a continuity of policy beyond 2031 and to respond to unforeseen changes that are likely to occur during the plan's lifetime." (para. 1.5.1)</i> Policy SUS1 - The Level of Economic and Housing Growth <i>"ii) Further land to meet outstanding needs beyond 2031 will be provided in the next review of the plan."</i> Supporting text <i>"Against a total requirement of 15,500 new homes, the plan provides land for around 14,855 new homes, a shortfall of about 645 homes. This is particularly relevant to the last five years of the plan period. The position will be monitored and additional sites brought forward, if necessary, through an early review of the Local Plan. This will ensure the identification of sites to provide an on-going housing land supply for the remainder of the plan period and the broad identification of sites for a five-year period after 2031.(para. 3.3.24).</i>