



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

Matter 8 – Housing Land Supply and Delivery

Joint Matter Statement by
Cambridge City Council and
South Cambridgeshire District Council

January 2015

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Abbreviations

AMR	Annual Monitoring Report
DPD	Development Plan Document
HCA	Homes and Communities Agency
MoU	Memorandum of Understanding
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
RPG	Regional Planning Guidance
SA	Sustainability Appraisal
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

Introduction

1. This statement sets out both Councils' response in relation to the Inspector's Matter 8 regarding housing delivery.
2. All the documents referred to in this statement are listed in Appendix 1; and examination document reference numbers are used throughout for convenience.

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? Is there too much reliance on new settlements and will this prejudice the delivery of new housing in the plan period**
3. Cambridge City Council and South Cambridgeshire District Council aim to ensure that their housing trajectories, that together form the Joint Housing Trajectory for the Greater Cambridge area, are as robust and realistic as possible. The current trajectory is attached as Appendix 2 for convenience.
4. Each Council produces a housing trajectory as part of their respective Annual Monitoring Report (AMR) to set out the latest predictions of housing delivery. For Cambridge, the housing trajectory published as Table 2.3 and Figure 2.2 in the Cambridge Local Plan¹ has been superseded by information published in the Cambridge AMR 2014². For South Cambridgeshire, the housing trajectory published as Figure 3 in the South Cambridgeshire Local Plan³ has been superseded by the housing trajectory published in the South Cambridgeshire AMR November 2014⁴. For both Councils, the Joint Housing Trajectory for the Greater Cambridge area can be found in the Councils' AMRs⁵. In recognition of the regular updating of housing trajectories in the AMRs, the Major Modifications proposed to give effect to the Memorandum of Understanding (MoU) would see the removal of the trajectories from both Local Plans (see Matter 8B iii and Appendix 16).
5. The housing trajectories for both Councils are produced in consultation with the agents, developers and landowners responsible for the sites identified within them.
6. Both Councils send letters and questionnaires to agents, developers or landowners of sites asking them to provide details on whether their site is deliverable, available and achievable (as set out in the NPPF⁶), and their expected delivery timetable, based on the latest

¹ Pages 25 and 27 of RD/Sub/C/010.

² Cambridge City Council Annual Monitoring Report 2014 (RD/AD/360)

³ Page 39 in RD/Sub/SC/010.

⁴ South Cambridgeshire Annual Monitoring Report (Part 1) November 2014 covering the period 1 April 2013 to 31 March 2014 (RD/AD/370).

⁵ At paragraphs 5.18 – 5.21, pages 18 -19, and Appendix D, pages 114 -115 (RD/AD/360) and at paragraphs 4.10 – 4.14, pages 33 -34 and Figure 4.10, pages 39 -41 (RD/AD/370).

⁶ Paragraph 47, NPPF (RD/NP/010)

understanding of any constraints, including market conditions.⁷ A joint questionnaire is sent by the Councils to developers of joint sites on the edge of Cambridge.

7. Blank copies of the latest letter and questionnaire sent out by each Council are included as Appendix 3.
8. For the small number of sites where the Councils do not receive a completed questionnaire, annual completions are estimated based on survey data collected by Cambridgeshire County Council's Research and Monitoring Team; information included with the planning application or representations on the relevant Local Plan; or information known by the case officer. Where questionnaires are returned, but they are considered unrealistic and unreliable, both Councils take a cautious approach. Appendices 4 and 5 set out the Councils' approach in these circumstances, which has proved to be historically reliable and is intended to be continued into the plan period.

Cambridge

9. In order to develop the Cambridge Local Plan and the Council's latest housing trajectory within the AMR, considerable emphasis has been placed on production of robust evidence base documents. In accordance with the requirements of the NPPF⁸ and the NPPG⁹, the Council has prepared a comprehensive SHLAA¹⁰, which has assessed around 900 sites. A summary of the SHLAA's development can be found in Appendix 6. Furthermore, the Council undertook viability work on the sites assessed in the SHLAA.¹¹ The SHLAA involved two calls for sites and three stages of public consultation, including engagement with landowners, developers and agents.
10. Alongside the SHLAA, the Council also produced three technical documents which assessed the deliverability and developability of sites in the Green Belt and in the urban area at Issues and Options 2: Parts 1 and 2 stages and after Issues and Options 2 consultation.¹² These technical documents included a detailed pro forma for each site, which incorporated Sustainability Appraisal (SA). Further detail on this approach is summarised in Appendix 6.
11. The development of the SHLAA and the aforementioned technical assessments has directly informed the development of the residential allocations within the Cambridge Local

⁷ For Cambridge, the housing trajectory questionnaires are sent out for sites falling within a range of categories. These categories and the methodology for the housing trajectory can be found in Appendix D, Pages 90-91, RD/AD/360. For South Cambridgeshire, this same matter is explained at paragraphs 4.3 – 4.9, pages 32-33, RD/AD/370.

⁸ Paragraphs 47 – 48, NPPF, RD/NP/010.

⁹ Section 3 Housing and economic land availability assessment, NPPG, RD/NP/020.

¹⁰ SHLAA 2012 (RD/Strat/130) and SHLAA (RD/Strat/140).

¹¹ Cambridge Strategic Housing Land Availability Assessment (SHLAA) and Potential Site Allocations High Level Viability Assessment 2013 (RD/Strat/150).

¹² Cambridge Local Plan Towards 2031, South Cambridgeshire Local Plan – Issues and Options 2: Part 1 – Joint Consultation on Development Strategy & Site Options on the Edge of Cambridge – Technical Background Document Part 1 (RD/LP/170); Cambridge Local Plan – Towards 2031 Technical Background Document – Part 2 (RD/LP/260); and Technical Background Document – Part 2 Supplement 2013, Cambridge City Council (RD/LP/310).

Plan. Having gone through a thorough and robust process, which has involved engagement with key landowners, developers and agents, the Council believes that its expectations about the capacity, phasing and deliverability of new allocations are reasonable.

12. The joint housing trajectory provides an annual update on the deliverability and developability of the allocations in Cambridge. The latest housing trajectory in the AMR¹³ shows that Cambridge has a housing supply of 14,102 residential units through the plan period to 2031. The housing trajectory is a realistic assumption of housing delivery in Cambridge. 7,367 residential units have planning permission as of 31 March 2014 and 2,132 units have already been completed. In 2013/14, net housing completions in Cambridge comprised 1,299 units, both in the urban area and within the urban extensions. This serves to demonstrate that the spatial strategy for the Greater Cambridge area is delivering. Table 1 below provides analysis of sites in the housing trajectory in Cambridge, showing completions, existing commitments and windfall figures. Proposed modifications to Table 2.3 of the Cambridge Local Plan which provides detail on housing completions, commitments and windfall numbers are provided in Appendix 7.

Table 1 – Analysis of the Cambridge housing trajectory

Dwelling provision 2011 to 2031	Number of dwellings
Completions	
Completions 2011/12 to 2013/14	2,132
Commitments	
Allocations with planning permission	6,801*
Allocations without planning permission	2,753
Deliverable sites with planning permission (not allocated)	566
Windfall	1,850
Total	14,102
Surplus	102

*Of these 6,801 units, 1,850 are to be provided at North West Cambridge. This site is dealt with through the North West Cambridge Area Action Plan (RD/AD/290).

13. In terms of existing larger permissions, Cambridgeshire County Council's Quarterly Housing Report provides information on progress of sites of over 100 units (Appendix 8). This appendix notes that, as of September 2014, a significant amount of housing completions have already been recorded. In Cambridge, 441 units have already been completed and a further 421 units are under construction, indicating that the 2014/15 target will be met and mostly likely exceeded.

¹³ See Appendix D, page 90 onwards, RD/AD/360.

14. Of the new allocations, site M3 – Michael Young Centre, Purbeck Road recently received planning permission (13/1250/OUT) for 95 residential units. This allocation was originally noted in the Cambridge Local Plan 2014¹⁴ as having a potential to contain 50 units.
15. The total number of new allocations¹⁵ amount to 3,778 units, demonstrating that there is not an overreliance on new allocations. Of these sites, interest has been shown¹⁶ for delivery of housing on GB1 and GB2 early in the plan period, starting within the five-year supply period.
16. A number of the allocations in the Cambridge Local Plan have been criticised in relation to their developability and deliverability. The pro formas attached in Appendix 9 set out information on developability and deliverability of each allocation. These pro formas set out a brief description of the allocation, the anticipated timescale for development and the latest information from the 2013/2014 housing trajectory returns that informed the AMR. These have been compiled by the Council to show that deliverability has been a key consideration throughout the allocation process. For example, a number of sites in the urban area have a range of issues requiring resolution. This is not unusual on previously developed land. As a result, these sites have been phased later in the plan period in order to allow time to resolve complex issues, e.g. Site R10 Mill Road Depot requires relocation of waste and other services to a suitable site, and as a result the allocation has been phased later in the plan period. This is unsurprising, given the complex nature of the urban area and the type of available sites with development potential.
17. With regard to the contribution of urban extensions, the trajectory shows that they are now being delivered on the ground¹⁷. For example, 538 of the 1,299 completions in 2013/2014 were within the urban extensions. Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council have worked together to set up appropriate officer and member working arrangements to ensure effective delivery of the urban extensions, including a Joint Development Control Committee for the fringe sites. The Councils work with developers and key institutions to resolve issues as swiftly as possible and a significant educational commercial and residential growth agenda is being delivered in Greater Cambridge. Appendix 10 of this statement provides further information on the timescales for development of urban extensions. Appendix 11 addresses officer and member working arrangements for the urban extensions. The arrangements reflect member and public concerns that the new urban extensions to Cambridge should be a success and deliver a high quality of life and place. In recognition of this, both Councils have endorsed a 'Quality Charter for Growth'¹⁸ and have specialist support for growth related activities, use masterplans, design briefs, design codes and have independent design panels giving independent advice to the process. The quality of the urban extensions is already being recognised with a number of national housing design awards being secured.

¹⁴ See Appendix B, page 248, RD/Sub/C/010.

¹⁵ Those not currently included in the Cambridge Local Plan 2006 (RD/AD/300)

¹⁶ Through the submission of housing trajectory returns

¹⁷ See AMR 2014, Appendix D, page 90 onwards, RD/AD/360.

¹⁸ Cambridgeshire Quality Charter for Growth, RD/HQ/030

18. The Council therefore considers that they have a robust, realistic and, in some instances, cautious expectation of delivery for existing outstanding planning permissions and allocations and also for the new proposed allocations.

South Cambridgeshire

19. In order to develop the South Cambridgeshire Local Plan and the Council's latest housing trajectory within the AMR, considerable emphasis has been placed on production of robust evidence base documents. The SHLAA, associated SA and representations made during the Issues and Options consultations have directly informed the selection of the mixed use and residential allocations within the South Cambridgeshire Local Plan. In accordance with the requirements of the NPPF¹⁹ and the NPPG²⁰, the Council has prepared a comprehensive SHLAA²¹, which has assessed over 300 sites. A detailed methodology is set out in Chapter 3 of the SHLAA²², however in summary, the SHLAA considered the suitability, availability, achievability (including an assessment of viability), capacity and deliverability of each site. All the sites assessed in the SHLAA were subject to SA²³. Further detail on this approach is summarised in Appendix 12.
20. As an evidence base document, the SHLAA itself was not subject to separate public consultation, however all sites that were assessed as having development potential or limited development potential were subject to public consultation through the Issues and Options consultations²⁴. Representations were also accepted and considered relating to sites that were assessed as having no development potential (i.e. rejected) and additional sites put forward through the Issues and Options consultations were also assessed on a similar basis.
21. The development of the SHLAA and SA and the results of the two rounds of Issues and Options consultation directly informed the preferred residential allocations in the South Cambridgeshire Local Plan. Following publication of the Proposed Submission Local Plan in July 2013, discussions were undertaken with a number of the landowners, developers and agents of the larger proposed new allocations included in the draft plan to test the assumptions before agreeing the Local Plan for submission. Having gone through a thorough and robust process, the District Council believes that its expectations about the capacity, phasing and deliverability of its new allocations are reasonable.
22. An annual update of the deliverability and developability of all existing and proposed allocations and outstanding planning permissions is provided in the AMR²⁵. Alongside the housing trajectory, the AMR includes a summary of the information collected for each site²⁶.

¹⁹ Paragraphs 47 – 48, NPPF, RD/NP/010.

²⁰ Section 3 Housing and economic land availability assessment, NPPG, RD/NP/020.

²¹ South Cambridgeshire SHLAA (RD/Strat/120)

²² South Cambridgeshire SHLAA (RD/Strat/120), pages 5-16

²³ South Cambridgeshire Draft Final Sustainability Appraisal Report (RD/Sub/SC/060)

²⁴ South Cambridgeshire Issues & Options Report (RD/LP/030) and South Cambridgeshire Issues & Options 2 Report: Part 2 (RD/LP/050)

²⁵ South Cambridgeshire Annual Monitoring Report (Part 1) 2013-2014 (published in November 2014) (RD/AD/370) – pages 32-41 and pages 67-81

²⁶ South Cambridgeshire Annual Monitoring Report (Part 1) 2013-2014 (published in November 2014) (RD/AD/370) – Appendix 1, pages 67-81

The District Council accepts the information provided by the agents, developers and landowners for the majority of sites, as from past experience information provided by those directly involved in the development of a proposal has proven to be robust and reliable (see Appendix 5).

23. For small windfall sites of less than 9 dwellings, it is not practical to explore the delivery of each site by sending out a housing trajectory questionnaire, and therefore the Council has made realistic assumptions on their delivery based on past experience²⁷:
- Where the site is under construction, it is considered reasonable to anticipate that these dwellings will be completed within two years.
 - For those sites where development has yet to start, it is considered necessary to make an allowance that a proportion of the sites may not come forward and therefore a 10% discount is applied for non-delivery. This approach has been followed in South Cambridgeshire since the Local Plan 2004 and was most recently confirmed as a sound approach by the Inspectors considering the Site Specific Policies DPD²⁸.
24. For sites being developed by Registered Providers, a questionnaire is not completed. Information on these sites is provided by the Council's Housing Strategy Team and reflects the close working relationship and regular discussions with the Registered Providers on expected start and completion dates.
25. The latest joint housing trajectory shows that South Cambridgeshire has a housing supply of 22,287 dwellings that are anticipated to be delivered within the plan period (2011-2031) The housing trajectory is a realistic assumption of housing delivery in South Cambridgeshire. 7,546 dwellings have already been completed, have planning permission or a resolution to grant planning permission. Table 2 provides the components of the housing trajectory for South Cambridgeshire, showing completions, commitments and windfalls.

Table 2 – Analysis of the South Cambridgeshire housing trajectory

Dwelling provision 2011 to 2031	Number of dwellings
Completions	
Completions 2011-2014	1,873
Commitments	
Cambridge Urban Area	
Allocations with planning permission	140
Allocations without planning permission	120
Edge of Cambridge	
Allocations with planning permission	1,744 *
Allocations without planning permission	2,410

²⁷ South Cambridgeshire AMR, Appendix 1, paragraphs A.51-A.52, page 75 (RD/AD/370)

²⁸ Report of the Examination Into The South Cambridgeshire Site Specific Policies Development Plan Document (2009), paragraph 4.15 (RD/AD/210)

<i>New Settlements</i>	
Allocations with planning permission	1,500 ^
Allocations without planning permission	7,195
<i>Rural Area including village sites</i>	
Allocations with planning permission	1,195
Allocations without planning permission	2,416
'Identified' Windfall Sites (sites that are not allocated but that have planning permission)	1,094
Windfall allowance	2,600
Total	22,287
Surplus	3,287

*This includes: 1,155 dwellings at North West Cambridge, which was allocated in the North West Cambridge Area Action Plan²⁹ and 589 dwellings at Trumpington Meadows, which was allocated in the Cambridge Southern Fringe Area Action Plan³⁰.

^ This comprises 1,500 dwellings as a first phase of development at Northstowe, which was allocated in the Northstowe Area Action Plan³¹.

Note: As part of the Greater Cambridge City Deal, the partners have committed to delivering 1,000 additional new homes on rural exception sites by 2-31. These additional dwellings have not been included in the housing trajectory.

26. With regard to the contribution of urban extensions, the joint trajectory (Appendix 2) shows that they are now being delivered on the ground, but starting in Cambridge and not yet building in South Cambridgeshire. As set out in paragraph 15, Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council have worked together to set up appropriate officer and member working arrangements to ensure effective delivery of the urban extensions. Appendix 10 of this statement provides further information on the timescales for development of urban extensions. Appendix 11 addresses officer and member working arrangements for the urban extensions.
27. Joint arrangements have also been set up for Northstowe between South Cambridgeshire District Council and Cambridgeshire County Council involving officer and member working arrangements to ensure effective delivery of the new town. Appendix 13 of this statement provides further information on the timescales for development of Northstowe and the officer and members working arrangements.

²⁹ North West Cambridge Area Action Plan (RD/AD/290)

³⁰ Cambridge Southern Fringe Area Action Plan (RD/AD/140)

³¹ Northstowe Area Action Plan (RD/AD/130)

28. The arrangements reflect member and public concerns that the new urban extensions to Cambridge should be a success and deliver a high quality of life and place. In recognition of this, both Councils have endorsed a 'Quality Charter for Growth'³² and have specialist support for growth related activities, use masterplans, design briefs, design codes and have independent design panels giving independent advice to the process. The quality of the urban extensions is already being recognised with a number of national housing design awards being secured.
29. South Cambridgeshire's housing trajectories have proved to be reliable predictions of the trend of overall actual completions, even if there has been some variation across individual sites³³. Cambridgeshire County Council's Research and Monitoring Team survey sites of over 100 dwellings on a quarterly basis. The data for April – September 2014 shows that by the end of the first six months of 2014-2015, more than half the dwellings predicted to be completed on the sites of over 100 dwellings have actually been completed.

Table 3: Completions in South Cambridgeshire on sites of over 100 dwellings

	Predicted Completions 2014-2015	Completed April - September 2014	Under Construction at September 2014	% of predicted annual completions after 6 months
Trumpington Meadows	29	29	0	100%
Orchard Park	65	6	82	9%
Cambourne	175	118	68	67%
Windmill Estate, Fulbourn	21	21	0	100%
Summersfield, Papworth Everard	80	68	24	85%
Total	370	242	174	65%

30. The proposed new allocations in villages and Parish Council proposals are anticipated to be delivered early in the plan period. Work is already underway to deliver some of these new allocations. A planning application has already been considered and approved by the Council's Planning Committee in December 2014 for part of the proposed allocation at Melbourn (Policy H/1e). Pre-application discussions have also taken place with the promoters of the proposed allocations at Gamlingay (Policy H/1f) and Comberton (Policy H/1h).
31. Pro formas have been compiled by the Council to show that developability and deliverability have been key considerations throughout the allocation process and are attached in Appendix 14. These proformas set out a brief description of the allocation, the anticipated

³² Cambridgeshire Quality Charter for Growth, RD/HQ/030

³³ South Cambridgeshire Annual Monitoring Report (Part 1) 2013-2014 (published in November 2014) (RD/AD/370) – figure 4.7

timescale for development and the latest information from the 2013/2014 housing trajectory returns that informed the AMR. The exceptions to this are that for some allocations, new information that was not known at the time of the publication of the AMR and housing trajectory is now available and has been included in the pro formas. They also address criticisms made of individual sites in representations. In most instances the new information shows progress on delivering the allocations, however at the Fulbourn and Ida Darwin Hospitals site allocation, this new information is likely to result in changes to delivery during the five year supply period, with minor implications for overall supply.

32. There has been a change in circumstances at the Fulbourn and Ida Darwin Hospitals site since the AMR was published. The Council's Planning Committee in June 2014 endorsed a development brief for the redevelopment of the site as a material consideration for all subsequent planning applications; however Planning Committee refused the accompanying outline planning application against the officer recommendation due to the absence of any appropriate community facilities. The Cambridge and Peterborough NHS Foundation has now appointed a new planning agent to take forward the development and therefore the scheme and timetable for delivery is being reconsidered.
33. Initial discussions indicate that this development will not provide 180 dwellings within the five year supply period (2014-2019) as included in the published housing trajectory included in the AMR; however the redevelopment is still deliverable in the plan period. It is at present unclear how many (if any) dwellings will be provided within the five year supply period. Any further update will be provided at the hearing.
34. To understand the potential implications of this change in circumstances on five-year supply, assuming a worst case scenario that no dwellings are delivered by end of March 2019, there would only be minor changes to the Greater Cambridge and to the South Cambridgeshire five-year supply calculations. For the Greater Cambridge area the revised calculations would be 6.5 years supply with Liverpool and 6.0 years with Sedgefield when using a 5% buffer or 5.7 years with Liverpool and 5.3 years with Sedgefield when using a 20% buffer. The equivalent revised calculations for South Cambridgeshire, would be 5.1 years with Liverpool and 4.5 years with Sedgefield when using a 5% buffer or 4.5 years with Liverpool and 3.9 years with Sedgefield when using a 20% buffer. Issues concerning the buffer and the Sedgefield and Liverpool approaches are addressed in Matter 8B iv and vi.
35. The Council considers that it has taken a robust approach to preparing the housing trajectory and has taken a reasonable, and, in some instances, cautious expectation of delivery for existing outstanding planning permissions and allocations and also for the new proposed allocations.

Reliance on New Settlements

36. Based on the Greater Cambridge housing trajectory, the new settlements of Northstowe, Waterbeach New Town and Bourn Airfield New Village are anticipated to deliver 8,695

dwellings in the next 17 years (2014-2031)³⁴. This is just over 25% of the objectively assessed need of 33,000 dwellings for the Greater Cambridge area, and just over 45% of the 19,000 dwelling requirement for South Cambridgeshire. Whilst this is a significant level of housing, it forms part of a strategy that includes also significant levels of housing on the edge of Cambridge and some housing in more sustainable villages to provide a flexible strategy that can respond to any changing circumstances. Reliance on new settlements is consistent with the development strategy in the Local Plans, and the reasons for this development strategy are set out in the Councils' Matter 2 statement³⁵.

37. The first new settlement in the area was developed at Bar Hill in the 1970s. The 1989 Structure Plan³⁶ required the provision of two new settlements on the A10 and A428, which eventually resulted, after a major public inquiry concerning competing sites, in a new village on the A428 at 'Cambourne', which was granted planning permission in 1994. Regional Planning Guidance 6 in 2000³⁷ required the development of a new town close to Cambridge, and the 2003 Structure Plan required that this be sited north west of Cambridge on a new guided busway and resulted in 'Northstowe'. No other part of the country has such a concentration of new settlements which reflects the unique constraints and pressures on the area apparent from Council hearing statements for matters 2-8, and the acceptance by a succession of plan examinations that new settlements have an important role to play in housing supply in the Cambridge context.
38. As outlined in the Draft Final Sustainability Appraisal³⁸, South Cambridgeshire District Council is proposing that there will be a phased delivery of the new settlements now planned across the plan period so that all the new settlements are not delivering at the same time and therefore competing with each other.
39. The District Council's approach in the housing trajectory to predicted lead-in time and completions for the proposed new settlements is based on experience of delivering Cambourne and Northstowe³⁹. Experience of delivering these sites demonstrates that there are longer lead-in times for new settlements and therefore the delivery timetables included in the housing trajectory take a sensible, cautious and realistic approach for the delivery of the proposed new settlements. This particularly responds to experience with Northstowe where reliance on what proved to be an optimistic start date in the adopted plan that was not delivered due to the recession. Construction is about to start on site in Northstowe, some 11 years or so after the Structure Plan was adopted in October 2003 first identifying the location for the new town. A similar lead-in time has been included in the trajectory for Waterbeach new town. It is not anticipated that such a long lead-in time is necessary for Bourn Airfield given the difference in scale and nature of the proposal. Taking

³⁴ South Cambridgeshire Annual Monitoring Report (Part 1) 2013-2014 (published in November 2014) (RD/AD/370) – figure 4.10

³⁵ M2 – CCC & SCDC – Cambridge City Council and South Cambridgeshire District Council Matter Statement for Matter 2.

³⁶ Cambridgeshire Structure Plan 1989, Policies P5/2 and P20/2 (RD/AD/401).

³⁷ RD/NP/131 policy 25

³⁸ South Cambridgeshire Draft Final Sustainability Appraisal (March 2014) – Annex A: Audit Trail – 2: Spatial Strategy (pages A212-A213)

³⁹ South Cambridgeshire Draft Final Sustainability Appraisal (March 2014) – Annex A: Audit Trail – 2: Spatial Strategy (page A212)

a more cautious approach should safeguard against an undersupply arising in the plan period.

40. Delivery of Northstowe is now underway and the predicted housing completions in the housing trajectory therefore have a realistic prospect of being delivered. The Council has put in place officer and member arrangements to ensure an efficient process for dealing with applications and delivery at Northstowe (see Appendix 13). South Cambridgeshire District Council and its partners have considerable experience of delivering new settlements and have drawn on that experience in putting in place effective arrangements for determining planning applications for Northstowe efficiently within a wider context of bringing forward quality development. That experience has informed the assumptions in the housing trajectory and the Council has taken a positive but cautious approach to delivery rates. Outline planning permission for the first phase including 1,500 dwellings was granted in April 2014, and planning applications to discharge conditions and for reserved matters have been submitted. Development is due to start on site imminently. An application for the second phase of development was submitted in August 2014 and is anticipated to be considered by the Northstowe Development Control Committee in March 2015 on an accelerated timetable. The housing trajectory assumes that Northstowe will deliver a maximum of 400 dwellings per year. 400 per year is considered to be reasonable given the size of the site and that it is anticipated that several developers would be constructing and completing houses in several places on site simultaneously.
41. This is a lower annual delivery rate than the rates that were previously assumed for Northstowe. The Northstowe Area Action Plan 2007 included a trajectory with annual completions increasing up to 850 homes. Indeed, the Inspectors' Report said: *"we are optimistic that there can be a build up to high numbers of completions rather quickly ... on the basis of a slow start but fast build up to 600+ per annum. This is the sort of level that must be aimed for, and we would not set a lower target."*⁴⁰ This reflects that Northstowe will effectively have the characteristics of several large sites grouped together, and if construction takes place on different parts of the overall site, it is reasonable that it may be able to achieve on each part of the site that is under construction, the sort of rate that is typically achieved on a strategic site of say 1,000 homes or more. This was part of the Council's case considered and endorsed by the Core Strategy Inspectors. This was before the recession and the Council has taken a more conservative estimate in the latest trajectory in consultation with the promoters. There are no controls in the plan on the rate of delivery so if a higher level of delivery is possible then there are no policy barriers to that happening. Indeed, recent Government announcements in the Autumn Statement⁴¹ (and repeated in the National Infrastructure Plan 2014⁴²) on Northstowe give increased confidence about the delivery rates included in the trajectory and there is potential for delivery to be accelerated (see Matter 8A ii, paragraph 61). Northstowe also benefits from the Guided Busway already operating successfully, with patronage above anticipate levels

⁴⁰ Northstowe Area Action Plan Inspector's Report, paragraph 4.2 (RD/AD/190)

⁴¹ See Autumn Statement by HM Treasury: <https://www.gov.uk/government/topical-events/autumn-statement-2014>, paragraph 1.136

⁴² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/381884/2902895_NationalInfrastructurePlan2014_acc.pdf, paragraph 2.16

for this stage, which will help make it an attractive place to live, and in turn has potential to help boost demand and support delivery.

42. The trajectory does not anticipate Waterbeach New Town to be delivered until towards the end of the plan period as this allows sufficient lead-in time to prepare an Area Action Plan and for the masterplanning and planning application process to be undertaken and early infrastructure provision needed to support the new settlement. However, as outlined at paragraph 62 (see Matter 8A ii), the landowners/developers have indicated that development could start on site considerably earlier than anticipated by the District Council.
43. As part of the phasing strategy for new settlements, the District Council has proposed that the first housing completions at Bourn Airfield New Village should not be delivered before 2022. This start date is a year later than the District Council considers the site could be delivered. The Council took this approach for a number of reasons. In order to provide an element of early housing supply and flexibility in the Plan, as well as an element of local choice and to include some housing in the southern part of the district close to a number of rural business parks, the Council included a number of site allocations at larger villages. Taken with the anticipated delivery at the fringe sites and at Northstowe and Cambourne, the Council had already identified land to meet its 19,000 home objectively assessed need. In order to provide some flexibility and land that could come forward to meet an early shortfall in five-year supply, the Council decided to hold back delivery at Bourn Airfield⁴³. However, as for Waterbeach New Town, the developers and landowners propose that the site could start delivering earlier (see Matter 8A ii, paragraph 63).
44. The development strategy takes an appropriate balance between providing development at the top of the development sequence in and on the edge of Cambridge, as far as is possible without fundamental harm to Green Belt purposes, and development at new settlements that are well connected to Cambridge by sustainable transport modes. New settlements form an appropriate part of the sustainable development strategy (see Councils' statements to Matters 2, 6 and 7). South Cambridgeshire District Council has considerable experience of delivering new settlements and has drawn on that to put in place appropriate officer and member processes and arrangements to enable delivery of places that are of high quality and are well connected to Cambridge and has taken a robust approach to delivery in the housing trajectory.

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

Overview of the Councils' position

45. The Councils have worked closely together to ensure sufficient flexibility within the Joint Housing Trajectory for Greater Cambridge to deal with changing circumstances and/or uncertainty over the delivery of allocations. The joint trajectory shows that there is currently more than a five-year housing land supply for the period 2018/19, due to the delivery of the urban extensions, and that the surplus above five years will increase with each rolling

⁴³ South Cambridgeshire SA – Audit Trail page A244 and A245

five-year period as the new settlements also start to deliver providing flexibility (see Matter 8B).

46. Over the plan period, the housing targets for Cambridge and South Cambridgeshire are 14,000 and 19,000 respectively. The Councils have identified land for the provision of housing over and above the 33,000 combined figure for objectively assessed need. When the two housing trajectories are combined into the Joint Housing Trajectory for Greater Cambridge, it is anticipated that 36,389 dwellings will be provided within the plan period (2011-2031). This is a 10% (3,389 dwellings) surplus, which provides flexibility to respond to changing conditions⁴⁴.
47. Additional flexibility is provided by a number of sources that can be summarised as follows:
- Potential acceleration of delivery at Northstowe following the Government announcement in the Autumn Statement
 - Additional 1,000 homes on rural exception sites as part of the Greater Cambridge City Deal
 - Potential for additional housing provision at Cambridge Northern Fringe East through preparation of an Area Action Plan
 - Potential for additional housing at Cambridge East on land north of Cherry Hinton that is already allocated in the Cambridge East Area Action Plan.
 - Potential for development to be brought forward at Bourn Airfield and Waterbeach New Settlements if needed for five-year supply purposes – note objectors seek removal of the policy restriction on earlier development under other circumstances, which if successful could create further flexibility
 - The Councils are committed through City Deal to reviewing the Local Plans and preparing a joint Local Plan commencing by 2019.
48. Since the submission of the Local Plans, the Councils along with Cambridgeshire County Council, the University of Cambridge and the Greater Cambridge Greater Peterborough Local Enterprise Partnership signed a City Deal in June 2014⁴⁵. As part of the Greater Cambridge City Deal, the partners have committed to delivering an additional 1,000 new homes on rural exception sites by 2031. These additional dwellings have not been included in the Joint Housing Trajectory for Greater Cambridge⁴⁶ although there is a note under the trajectory referring to this additional supply, but this additional source of supply will provide extra flexibility to deal with changing circumstances (see also Matter 8B vii).

Cambridge

49. The housing trajectory⁴⁷ demonstrates that 6,225 residential units will have been built in Cambridge between 2014/15 and 2018/19 (the five year supply period). This is noted in

⁴⁴ Surplus of 102 in Cambridge and 3,287 in South Cambridgeshire. See Appendix D, page 114, RD/AD/360 and page 39, RD/AD/370.

⁴⁵ RD/Strat/300.

⁴⁶ See Appendix D, page 114, RD/AD/360 and page 39, RD/AD/370.

⁴⁷ Appendix D, page 90 onwards, RD/AD/360.

the Council's AMR 2014⁴⁸. Adding this figure to actual completions of 2,132 between 2011/12 to 2013/14 indicates that 8,357 residential units will be built by 31 March 2019 (over the first eight years of the plan).

50. The annualised average requirement needed in Cambridge to meet the target number of dwellings is 700 per annum. Over eight years, this requirement would amount to 5,600 units. The trajectory indicates that after the first eight years of the plan period, Cambridge will have exceeded its housing target by 2,757 units, providing the Council with 3.94 years of sufficient flexibility to deal with changing circumstances and uncertainty.
51. The Council believes that a surplus is highly likely. The housing trajectory⁴⁹ demonstrates that over the five-year supply period, 4,420 of the 6,225 units predicted to be completed will be delivered through the urban extensions (most of which are already under construction) and 1,037 units will be delivered through sites currently allocated in the Cambridge Local Plan 2006⁵⁰ and through large and small unallocated sites which have planning permission. Additionally, 95 units will be delivered on Site M3⁵¹ which has planning permission. A total of 5,552 units are therefore to be provided in the five year period from these sources.
52. The remaining 673 units are reliant on sites GB1 and 2 where early delivery starting within the five-year supply has been confirmed by the landowner/agents, site R42c⁵² and windfall completions which have been previously justified through the SHLAA 2013⁵³.
53. There are a number of other sources of flexibility as identified in paragraph 47 and elaborated on below.
54. A number of allocated sites in the Cambridge Local Plan are estimated to come forward towards the middle or end of the plan period, allowing for significant flexibility to deal with site-specific issues if they do arise. Furthermore, the City Deal agreement commits the Councils to an early review of their Local Plans starting in 2019, which coincides with the end of the five year period. This will allow for the reassessment of housing provision in the Greater Cambridge area and in particular for the latter part of the plan period and beyond.
55. Further flexibility could be provided through Cambridge East and Cambridge Northern Fringe East. In terms of Cambridge East, site R40 is coming forward earlier in the plan period than originally anticipated. In the light of this change in circumstances, including better information on constraints around Cambridge Airport, the Councils are exploring potential for an extension to the allocation, which would simply mean carrying forward a larger part of the allocation in the adopted Cambridge East Area Action Plan⁵⁴, rather than changing it to safeguarded land through the Local Plan that could only come forward through a plan review. Current indications are that this which could provide around 400

⁴⁸ Page 17, RD/AD/360.

⁴⁹ Appendix D, page 90 onwards, RD/AD/360.

⁵⁰ RD/AD/300.

⁵¹ M3 Michael Young Centre, Purbeck Road, Appendix B, page 248, RD/Sub/C/010.

⁵² Site R42c Glebe Farm 2, Appendix B, page 246, RD/Sub/C/010. The planning application 14/1792/FUL for residential development of 30 new mixed tenure dwellings with associated open space, landscaping, car parking and infrastructure has been submitted.

⁵³ Pages 69 – 72, RD/Strat/140.

⁵⁴ RD/AD/280

additional residential units. This is subject to further discussions and technical work with Marshall. The Councils consider this to be a pragmatic approach in order to avoid unnecessary sterilisation of land within the plan period. Detailed discussion of Cambridge East is a matter for a later hearing session.

56. The Cambridge Northern Fringe East Area Action Plan: Issues and Options report⁵⁵ sets out options for the area, some of which include residential development potentially in the order of 140-630 homes. The consultation document also asks whether more residential development should be included. The quantum of residential development that may or may not be included in the Area Action Plan for land within Cambridge is not yet known, but could contribute to overall flexibility in the plan period. Work to provide that clarification is at Issues and Options stage and is being progressed as a matter of urgency through the parallel development of the Area Action Plan.
57. The NPPG⁵⁶ allows student accommodation to be considered as part of the overall housing requirement, if it can be demonstrated that it will free up market housing. The Cambridge Local Plan policies are generally supportive of student accommodation. There is increasing interest in providing student accommodation within and close to Cambridge. By way of example, there is student housing planned at Cambridge North West within the City that has the benefit of outline planning permission (see Appendix 10, and also within South Cambridgeshire, see paragraph 67). Student housing has not been included in housing land supply calculations in the housing trajectory or five-year supply.
58. Taking account of all these factors, it is considered that there is good flexibility to deal with changing circumstances and/or uncertainty over when allocations will come forward for development.

South Cambridgeshire

59. The supply of housing in South Cambridgeshire to meet its objectively assessed need is made up of a range of types and sizes of sites in a variety of locations. This provides flexibility to deal with changing circumstances.
60. In South Cambridgeshire, the latest housing trajectory anticipates that 22,287 dwellings will be provided within the plan period 2011-2031. This is 15% (3,287 dwellings) above the Council's objectively assessed need of 19,000 dwellings, and therefore provides flexibility to respond to changing conditions as required by the NPPF⁵⁷. There are a number of other sources of flexibility as identified in paragraph 47 and elaborated on below.
61. The Government announced in December 2014 as part of its Autumn Statement⁵⁸ that it: *"will take forward the development of Northstowe. The government will trial a new delivery*

⁵⁵ Options 2 and 3, and Question 14, RD/LP/320.

⁵⁶ Reference ID: 3-038-20140306, NPPG, RD/NP/020.

⁵⁷ Paragraph 14, NPPF, RD/NP/010.

⁵⁸ See Autumn Statement by HM Treasury: <https://www.gov.uk/government/topical-events/autumn-statement-2014>, paragraph 1.136

model on the site, with the Homes and Communities Agency (HCA) taking the lead on delivery, including through master-planning and commissioning. This will support the construction of up to 10,000 new homes, up to twice as fast as conventional development routes. The government will undertake an evaluation of the Northstowe development, and of the feasibility and economic impacts of pursuing this model on a larger scale. The government will report by Budget 2015 on the delivery vehicle, governance and investment in the site.” If this pilot project is successful, there is potential for a significant number of additional homes at Northstowe to be delivered in the plan period. At this stage, the Council is not proposing any change to the housing trajectory and any acceleration of delivery would provide additional flexibility for the Plan. It also helps give additional confidence about the delivery of the numbers included in the trajectory.

62. South Cambridgeshire’s Local Plan includes flexibility in the form of Policy S/12 (part 1) which allows for the new settlements of Waterbeach New Town and Bourn Airfield to be brought forward should they be needed to ensure that the Council can deliver a five year housing land supply. This would also result in additional supply from these sites within the plan period, as both new settlements will continue delivery beyond 2031. The promoters of both these sites propose that the sites can be delivered earlier than anticipated by the Council in the housing trajectory. Any changes to the Council’s anticipated delivery timetable for these sites will need to be explored in the relevant later site-specific hearings.
63. For Bourn Airfield, the Council has been clear that it has phased the development later to provide flexibility. A Statement of Common Ground has been agreed with the landowners and promoters of the development which includes an identification of the earliest reasonable start date for completions on the site if there were no policy restriction, that would see development start 3 years earlier than in the latest trajectory. If the Inspector concludes that the policy restriction is not appropriate, this would provide flexibility for provision above that assumed in the trajectory, or the trajectory could be changed to reflect the agreed earlier start date.
64. For Waterbeach, the joint promoters say they can deliver considerably earlier than the trajectory assumes. The merits of any early phase of delivery would need to be considered in the context of ensuring comprehensive planning and delivery of the new settlement. Any changes to the Council’s anticipated delivery timetable for these sites will need to be explored in the relevant later site specific hearings. If the Inspector concludes that the policy restriction on the start date is not appropriate, this would provide flexibility for provision above that assumed in the trajectory if it proves appropriate and deliverable. This will be a matter for the future site specific hearing.
65. The joint Cambridge Northern Fringe East Area Action Plan: Issues and Options report sets out four options for the area, some of which include residential development within South Cambridgeshire potentially in the order of 300 homes. The consultation document also asks whether more residential development should be included. The quantum of residential development that may or may not be included in the Area Action Plan for land within South Cambridgeshire is not yet known, but could contribute to overall flexibility in the plan period.

66. South Cambridgeshire District Council is one of the pilot authorities for the Government's Right to Build Vanguard⁵⁹, an initiative to promote self build housing and potential for commissioning of smaller builders to play a part of delivering the growth agenda. The Council has secured £50,000 of government funding. There is a current application for 40 dwellings on the Orchard Park development on the Cambridge Northern Fringe, on land owned by Cambridge City Council but within South Cambridgeshire. Whilst numbers may not be large, it is also anticipated that self build or self commissioning will form part of delivery at major sites and will therefore provide flexibility and mean delivery is not only reliant on major housebuilders.
67. The NPPG allows student accommodation to be considered as part of the overall housing requirement, if it can be demonstrated that it will free up market housing. There is increasing interest in providing student accommodation within and close to Cambridge. By way of example, there is student housing planned at Cambridge North West within the district that has the benefit of outline planning permission (see Appendix 10, and also within Cambridge, see paragraph 57). Student housing has not been included in housing land supply calculations in the housing trajectory or five-year supply.
68. Windfall sites will provide an additional element of flexibility. The Council has compelling evidence that windfalls have been delivered at an average of 200 dwellings a year for the period 2006-2014, and there is no reason to suppose that this will decline over the plan period⁶⁰. See Matter 8B v.
69. In addition, as outlined below (Matter 8B v), it is possible that delivery from windfall sites will increase while the District Council is unable to demonstrate a five-year housing land supply, given that planning appeals in June 2014 relating to two sites in Waterbeach that concluded that the Council cannot currently demonstrate a five year housing land supply. A number of planning applications for large windfall sites have been submitted that are contrary to the Council's adopted planning policies and also are not included in the submitted Local Plan, but which the promoters argue will help the Council to deliver its five year supply. These will be determined on their merits and may or may not be granted planning permission. Any permissions that are granted due to the five-year supply situation will be included in a separate row in the trajectory. Once the Council is able to demonstrate a five-year supply, it is anticipated that windfalls will return to the 200 homes a year supported by evidence.
70. Nearly 40% of the Council's objectively assessed need of 19,000 dwellings will be provided on sites included in the housing trajectory that already have planning permission or a resolution to grant planning permission.
71. In addition to all the above, the City Deal agreement commits the Councils to an early review of their Local Plans starting in 2019, which coincides with the end of the five year period. This will allow for the reassessment of housing provision in the Greater Cambridge area.

⁵⁹ <https://www.gov.uk/government/news/new-right-to-build-areas-at-forefront-of-helping-aspiring-self-builders>

⁶⁰ RD/Sub/SC/060

72. Taking account of all these factors, it is considered that there is good flexibility to deal with changing circumstances and/or uncertainty over when allocations will come forward for development.

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

Overview of the Councils' Position

73. The Councils submitted their Local Plans on the basis that taking the Plans separately would ensure a rolling five year supply of specific deliverable sites, assuming for both a 5% buffer and that five-year supply was calculated using the Liverpool methodology.
74. Nevertheless, the Councils' Joint Working and Development Strategy Topic Paper⁶¹ submitted with the Local Plans stated that *"there is a logic in considering housing supply and delivery for both areas together to ensure that the government's overall sustainability objectives set out in the NPPF are not undermined. The recent Government announcement of a City Deal for Cambridge and South Cambridgeshire districts is founded on the strength of the relationship between the two areas and further supports a joined up consideration in housing supply terms. For these reasons it is appropriate to consider housing supply and in particular, the 5-year supply situation jointly across both districts"* (paragraph 5.2). This reflects *"the close functional relationship between the two areas and the nature of the development strategy and development sequence, it is also relevant to consider the issue of housing supply jointly. The delivery of the sustainable development strategy involves more development in Cambridge early in the plan period with many of the sites at the top of the search sequence now being well advanced, while the new settlements with their longer lead-in periods come forward later."* (paragraph 5.1). The Topic Paper showed that even under a worst case scenario of a 20% buffer and Sedgfield method of making up any early shortfall, there is a five-year supply of housing land in the Greater Cambridge⁶² area (Table 1). The joint housing trajectory has been updated in the Council's AMRs but confirms the same situation.
75. In September 2014, the Councils agreed a Memorandum of Understanding: Greater Cambridge Joint Housing Trajectory⁶³, which deals specifically with the phasing of development across the two areas. The Memorandum of Understanding (MoU) supplements the earlier Cambridgeshire and Peterborough Memorandum of Cooperation: Supporting the Spatial Approach 2011-2031 of May 2013⁶⁴, under which the Councils have committed to meeting in full their objectively assessed needs within their respective areas, as required by the NPPF.
76. The MoU of September 2014, whereby the Councils agree to a joint housing trajectory, responds to, and is justified by, four changes in circumstances since the Local Plans were

⁶¹ RD/Top/010, paragraphs 5.1 and 5.2, page 16

⁶² Greater Cambridge is the term used in the City Deal for Cambridge and South Cambridgeshire (RD/Strat/300)

⁶³ Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory. September 2014 (RD/Strat/350)

⁶⁴ Cambridgeshire and Peterborough Memorandum of Co-operation: Supporting the Spatial Approach 2011-2031 (RD/Strat/100)

submitted on 28 March 2014. These can be summarised as follows (for more detail see Appendix 15, paragraph 34 and the MoU, paragraph 6):

- i. The signing of the Greater Cambridge City Deal⁶⁵ on 19 June 2014, which defines the area covered by the two districts as 'Greater Cambridge' and recognises the strong inter-relationship between the two areas. The Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019. The joint housing trajectory is a logical response to the City Deal covering the two areas and a step towards the next joint Local Plan.
- ii. The NPPG was published too late to influence the submitted Local Plans but provides for the circumstances that where a local planning authority cannot demonstrate a five-year housing land supply that it can seek agreement with its neighbours under the Duty to Co-operate to meet that shortfall. This recent guidance justifies the joint trajectory approach, in the circumstances where South Cambridgeshire may not be able to demonstrate a five-year supply of housing land, depending how it is calculated.
- iii. Two Section 78 planning application appeals allowed on 25 June 2014⁶⁶ for sites in Waterbeach in South Cambridgeshire on the basis that the Inspector concluded that the Council was not able to satisfactorily demonstrate a 5-year supply of housing land as required by the NPPF. He commented that the approach of a joint trajectory is 'without precedent' and also concluded that there was no sound basis for taking the Greater Cambridge City Deal into account in the current 5-year housing land supply, which was at that time still to be signed. The City Deal has now been signed and good progress has been made on this significant initiative. The NPPG provides for agreement to be reached under duty to cooperate to address any shortfall in five-year supply. The MoU addresses the appeal Inspector's concerns by formalising the agreement between the Councils for a joint housing trajectory
- iv. The East Cambridgeshire Local Plan Inspector has endorsed the 2013 Memorandum of Co-operation in his interim conclusions of 14 July 2014⁶⁷, including the approach to part of East Cambridgeshire's objectively assessed needs being met in Peterborough under the Duty to Co-operate, commenting that the approach is consistent with the principles of localism and national planning policy. Whilst not directly comparable, the agreement made under duty to cooperate affecting East Cambridgeshire is more significant than the MoU for a joint housing trajectory, in that it is dealing with where part of the objectively assessed need of East Cambridgeshire is met. The approach the Councils have taken here in the MoU is not about where part of their respective objectively assessed needs should be met, and simply about the phasing of sites to meet their respective needs in a sustainable way, taking account of the joint development strategy and sequence.

⁶⁵ RD/Strat/300

⁶⁶ Appeal Decision: APP/W0530/A/13/2207961 Land to the west of Cody Road, Waterbeach, Cambridge, CB25 9LS. June 2014 (RD/Strat/330) and Appeal Decision: APP/W0530/A/13/2209166 Land north of Bannold Road, Waterbeach, Cambridgeshire. June 2014 (RD/Strat/340)

⁶⁷ East Cambridgeshire Local Examination Inspector's Interim Conclusions – 14 July 2014 (RD/Strat/310)

77. The MoU supports the joint development strategy and sequence and is specifically about the phasing of the delivery of housing to meet objectively assessed needs in the Greater Cambridge area during the plan period. It is about when (not where) the identified objectively assessed needs will be met in the Greater Cambridge area during the plan period. It formalises the development strategy contained in the submitted Local Plans, demonstrates that the plans are sound and that there has been appropriate and on-going collaboration in planning across the Greater Cambridge area, reflecting the duty to cooperate during the plan preparation stage. It will also ensure that both Councils can demonstrate a continuous 5 year housing land supply as required by the paragraph 47 of the NPPF on whatever basis it is calculated. As recognised in the MoU, consequential modifications to both Local Plans are required to make clear in policy that the housing trajectories, as updated each year in the AMR, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply for plan-making and decision-taking. Proposed main modifications to both Plans were included in the Councils' Matter 1 statement⁶⁸ and are included as Appendix 16 of this statement for convenience.
78. The Councils are firmly of the view that the MoU is soundly based and consistent with national policy. Both Plans are consistent with NPPF paragraph 47, first bullet, in ensuring that the full objectively assessed needs of the housing market area are met. The Memorandum of Cooperation between all the authorities comprising the Cambridge Sub Region Housing Market area and Peterborough confirms where the full identified needs will be met. Cambridge and South Cambridgeshire have committed in that agreement to meeting their identified needs in full within their respective areas. In terms of identifying a five year supply, there is nothing in the second bullet of NPPF paragraph 47 to say that a local planning authority must meet its five-year requirement within its area. It is perfectly within the scope of the wording of the NPPF and the duty to cooperate, and the rationale behind them, to have a joint housing trajectory approach.
79. Indeed the NPPG specifically provides for a local authority to take the approach adopted in the MoU⁶⁹, saying 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'.*" In view of the joint development strategy for the Greater Cambridge area and the way that it is being delivered, it is entirely appropriate for a joint approach to be taken to the housing trajectory. The MoU⁷⁰ demonstrates that Cambridge is delivering housing within the urban area and urban fringe sites in the early and middle parts of the plan period, and consequently well above a five-year supply, with South Cambridgeshire delivering housing in the urban fringe sites and at new settlements, with an emphasis on the middle and latter parts of the plan period, but with an element of village housing allocations to provide some early delivery, yet nonetheless potentially unable to show a five-year supply depending how it is calculated.

⁶⁸ • M1 – CCC & SCDC – Cambridge City Council and South Cambridgeshire District Council Matter Statement for Matter 1.

⁶⁹ Reference ID: 3-035-20140306 (RD/NP/020)

⁷⁰ Paragraphs 9 – 11 (RD/Strat/350)

80. The way the development strategy is being delivered on the ground is a logical and appropriate way of delivering sites that meet the combined housing need across the Greater Cambridge area while ensuring sustainable development. It reflects the unique circumstances of Cambridge and South Cambridgeshire as the only case in the country where a rural district entirely and tightly encircles an urban area. Cambridge is a major centre providing employment and services for the surrounding area and is home to the highly successful Cambridge economy as addressed in Matter 4⁷¹. The delivery of the development strategy is demonstrated at the large scale fringe sites that were released from the Green Belt in the last round of plan-making are now well underway and delivering new homes, jobs and associated infrastructure on the ground.
81. The number and scale of the edge of Cambridge sites in the Local Plans illustrate a need for cooperation and joint working due to the cross-boundary nature of these developments. In total, these sites account for the provision of 8,792 homes across the two authorities (see table below). To ensure the coordinated development of these sites it is logical to combine the trajectories in order to illustrate the phasing and progress of development across these sites⁷². (This is in line with NPPF paragraph 181 which states that “Cooperation should be a continuous process from initial thinking through to implementation...”.)

Table 4: Joint Strategic Sites

Site	Authority	Number of homes
Cambridge East	Cambridge	408
	South Cambridgeshire	1,410
Trumpington Meadows	Cambridge	600
	South Cambridgeshire	589
NIAB/Darwin Green	Cambridge	1,780
	South Cambridgeshire	1,000
North West Cambridge	Cambridge	1,850
	South Cambridgeshire	1,155
Total		8,792

82. These cross-boundary sites are logically building out from the edge of the existing built-up area. This is good planning and ensures an emphasis on place making, community development and integration with the existing urban area. The result is that more homes are being built in Cambridge in the early part of the plan period and then moving into South Cambridgeshire later on as demonstrated graphically in Appendix B to the MoU⁷³. One only has to visit the Trumpington Meadows site on the Cambridge Southern Fringe to see this happening on the ground. It would be illogical and contrary to the sustainable development strategy to say that due to the way a large site towards the top of the development sequence is being delivered on the ground, an alternative, additional site should be provided at the bottom of the development sequence in a village simply so that South Cambridgeshire could count it towards its five-year supply calculation. Taking this

⁷¹ M4 – CCC & SCDC – Cambridge City Council and South Cambridgeshire District Council Matter Statement for Matter 4;

⁷² RD/AD/360 and 370

⁷³ RD/Strat/350

approach, South Cambridgeshire could seek development to artificially start in its area simply to show a five-year supply on its own.

83. The planning system provides for local planning authorities to come to agreements under the duty to cooperate, which is precisely what the Councils have done. It is relevant to take account of the East Cambridgeshire Local Plan Inspector's interim conclusions⁷⁴ in which he comments in respect of the approach to part of East Cambridgeshire's objectively assessed needs being met in Peterborough under the duty to cooperate, that he has "*seen no substantive evidence that providing an element of the Cambridge HMA's needs within Peterborough would conflict with the Framework's sustainable development objectives. Indeed, given Peterborough's accessibility, infrastructure availability and range of service provision, the intended arrangement would broadly accord with general sustainable development principles*" (paragraph 23) and that "*furthermore, given that the intended apportionment of development has been agreed by local authorities working in co-operation as required by the legal duty already discussed, it seems to me that the approach that is now proposed is consistent with the principles of localism. National planning policy allows for circumstances where development requirements from one local authority area will be met in another*" (paragraph 24). Whilst not directly comparable, the agreement made under duty to cooperate affecting East Cambridgeshire is more significant than the MoU for a joint housing trajectory, in that it is dealing with where part of the objectively assessed need of East Cambridgeshire is met. The approach the Councils have taken here in the MoU is not about where part of their respective objectively assessed needs should be met, and simply about the phasing of sites to meet their respective needs in a sustainable way, taking account of the joint development strategy and sequence.
84. The Councils are mindful that the Inspector for the Waterbeach appeals concluded, before the City Deal was signed and before the MoU was agreed, that the joint trajectory approach for the purposes of calculating five-year supply was "*without precedent*" and he concluded it was not the right approach to take. That decision was made in the context of a Section 78 appeal on the basis of the scope of evidence before the Inspector and was prior to both the signing of the City Deal, with its commitment to prepare a joint Local Plan, and the formal agreement in the MoU between the two Councils under the duty to cooperate. It also preceded the East Cambridgeshire Local Plan Inspector's preliminary conclusions. The Councils do not consider that the Waterbeach appeal decisions set a precedent for the decisions as to the soundness of the approach to be taken through the Local Plan examinations. Nevertheless, there are a number of significant changes in circumstances since those decisions, as set out at paragraph 76. The Councils urge that a decision on the merits of the joint housing trajectory is made taking account of all the relevant circumstances to Cambridge and South Cambridgeshire and reach a decision based on those factors.
85. The MoU is partly about ensuring that both Councils can demonstrate a five-year housing land supply, whatever buffer or method of calculation is used. However, even if the Inspector concludes that South Cambridgeshire can demonstrate a five-year supply alone, the Councils are of the view that the housing trajectories should be considered together as part of testing the soundness of the Local Plans and in future calculations of five-year

⁷⁴ RD/Strat/310

housing land supply in AMRs and also in decisions on planning applications. This is a logical step towards the joint Local Plan that the Councils have committed to preparing under the City Deal, with work to start by 2019⁷⁵.

86. The Councils' respective 2014 AMRs⁷⁶ which have been agreed recently both include a joint housing trajectory for the Greater Cambridge area, updated in the light of up to date advice from developers and landowners for sites allocated or with planning permission. The joint trajectory shows that for the five-year period 2014-2019, there is at least a full rolling five-year housing land supply for the Greater Cambridge area under all scenarios (5% or 20% buffer and Liverpool or Sedgefield methodology), ranging from 5.4 years (20% buffer and Sedgefield method) to 6.6 years (5% buffer and Liverpool method). Appendix 17 provides a table showing that the Greater Cambridge area has a rolling five-year supply throughout the plan period and that the supply increases quickly as more of the strategic sites come forward and delivery continues at a high level throughout the plan period.

Matter 8B 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 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)? 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?

Memorandum of Understanding

87. As stated above, the Councils submitted their Local Plans on the basis that taking the Plans separately would ensure a rolling five year supply of specific deliverable sites, assuming for both a 5% buffer and that five-year supply was calculated using the Liverpool methodology, which on the basis of the latest housing trajectory in the 2014 AMRs, gives 8.5 years for Cambridge and 5.3 years for South Cambridgeshire.
88. Cambridge's AMR 2014⁷⁷ shows that Cambridge has a five-year housing land supply even under the circumstances of a 20% buffer and Sedgefield method⁷⁸, at 7.5 years. There is no shortfall from the earlier part of the plan period, due to a high number of completions in 2013-14 as shown in at Matter 8B vi, paragraph 122.
89. South Cambridgeshire's AMR (Part 1) 2014⁷⁹ shows that South Cambridgeshire alone would not have a five-year supply with either a 20% buffer (4.6 years with Liverpool and

⁷⁵ RD/Strat/300.

⁷⁶ Cambridge - RD/AD/360, South Cambridgeshire - RD/AD/370

⁷⁷ RD/AD/360, Appendix D

⁷⁸ Figure 4, page 17, RD/AD/360.

⁷⁹ RD/AD/370, paragraph 4.22 and table below it

4.1 years with Sedgefield) or using the Sedgefield methodology (4.7 years with 5% buffer and 4.1 years with 20% buffer).

90. The appropriate buffer to be applied is addressed at Matter 8B iv and the method of calculation is addressed at Matter 8B vi.
91. The MoU ensures that the Councils can demonstrate a five-year supply whatever buffer and methodology is used and is also a logical step towards the next joint Local Plan.
92. The Major Modifications proposed in the Councils' Matter 1 statement, and contained in Appendix 16 for convenience, will ensure compliance with paragraph 47 of the NPPF, as set out in paragraph 77.
93. The merits of the approach adopted by the Councils is addressed above and a particular parallel with the East Cambridgeshire Local Plan as endorsed by the Inspector's Interim Conclusions⁸⁰ is identified in paragraph 83 of this statement. Furthermore, the Councils set out their firmly held view that there are particular local circumstances that justify the approach contained in the MoU, that are consistent with national policy and the duty to cooperate contained in the Localism Act⁸¹.
94. The Inspector asks if there are other cases where such an approach has been supported. The approach proposed is actually not new for Cambridge and South Cambridgeshire. The Cambridgeshire and Peterborough Structure Plan 2003 housing distribution policy bracketed together the figures for the two areas for the urban area of Cambridge and the edge of Cambridge sites subject to a review of the Green Belt⁸². The policy explained that: *"The figures for Cambridge City and South Cambridgeshire are shown combined because these local planning authorities will work together to determine the most appropriate form and phasing of development on the edge of Cambridge, in order to meet the overall requirement for housing within Cambridge and in locations which are subject to Green Belt review"*. The Structure Plan Panel Report stated that⁸³: *"we welcome the extent of joint working and consultation between Cambridge City Council and South Cambridgeshire District Council on cross-boundary planning issues affecting Cambridge. This will assume greater importance in future because of the need for careful phasing and management of land releases on the edge of the city, not least because some of the strategic sites straddle the boundary between the two authorities. We have sought to introduce a degree of flexibility into the housing figures in order to reflect this."* This demonstrates that the approach agreed through the MoU has precedent and reflects an historic understanding of the close relationship between the two areas and the sensitivity that exists between the areas in terms of the identification and build out the fringe sites
95. The consequences of not endorsing the joint Greater Cambridge housing trajectory despite the MoU agreed under the duty to cooperate could be significant. If the Inspector concludes that the South Cambridgeshire Local Plan must be considered alone for the purposes of calculating five-year supply and if she concludes that either the 5% buffer or Liverpool

⁸⁰ RD/Strat/310

⁸¹ RD/Gov/040

⁸² Policy P9/1 (RD/AD/010)

⁸³ Paragraph 1.15 (RD/AD/011)

method of calculating five-year supply are not appropriate, that the Council would be unable to demonstrate a full five-year supply. In the circumstances of South Cambridgeshire, that would be likely to result in further development at villages, which are the locations where development is most likely to be capable of being delivered earlier on to contribute towards five-year supply. This would be contrary to the sustainable development strategy of the plan and would be additional development at the bottom of the search sequence over and above the total housing requirement, purely to make up a technical shortfall due to completions on the fringe sites being the Cambridge side of the administrative boundary for the next few years, creating an oversupply for Cambridge.

‘Stepped approach’

96. The Councils have considered the ‘stepped approach’ identified by the Inspector and compared it with the situation here to assess whether this approach would be supported by local evidence. It appears that the approach taken by the West Lancashire Local Plan Inspector’s Report⁸⁴ was a result of specific circumstances which arose in that District, in particular:

- the continuing effects of the post-2008 recession on delivery on anticipated rates of delivery for the early part of the plan period;
- waste water treatment infrastructure constraints in the early years of the plan period;
- the lead-in time required for allocations to be released from the Green Belt;
- the interim household projection figures that suggest a reduced demand for housing compared with the pre-2008 period will continue, at least in the first few years of the plan period.

97. The Inspector concluded that account must be taken of the fact that some allocations were currently Green Belt and had a long lead-in time *“in order not to set targets that are impossible for the Plan to meet”* (paragraph 60). He concluded that *“bearing these factors in mind, my view is that in the first five years of the Plan period, the Plan should seek to meet the average requirement derived from the 2011-based interim housing projections”* (paragraph 61). He also concluded that there was a shortfall from the earlier plan period that should be made up in the new Plan by being evenly spread throughout the plan period. The Council was therefore able to demonstrate adequate land supply to meet the lower target for the early years of the plan period. As such, the housing target was capable of being met.

98. The Inspector was particularly concerned about a shortfall in supply in the early part of the plan period due to a number of specific circumstances, but the Council was nevertheless able to demonstrate that their housing supply would meet demand as identified through the household projections.

99. It is considered that the circumstances in West Lancashire are not readily transferable to Cambridge and South Cambridgeshire and we doubt the collective considerations are

⁸⁴ West Lancashire Local Plan Inspector’s Report - September 2013, RD/AD/430

directly comparable. Whilst the recession had a direct impact on delivery in Cambridge and South Cambridgeshire, there is no evidence to suggest that these effects are continuing or will continue into the future. There are some major infrastructure requirements of the proposed housing developments, in particular the new settlements, but it is a different type of infrastructure consideration to West Lancashire and these have been taken into account in phasing and in delivery within the South Cambridgeshire Plan and the joint trajectory. There are proposed allocations at villages that rely on land being released from the Green Belt, and that also has been factored into the housing trajectory. In addition, the Inspector concluded that none of West Lancashire's neighbouring authorities were capable of meeting any of the need arising within West Lancashire. There is nothing to suggest that the phasing approach adopted by Cambridge and South Cambridgeshire would have been possible in West Lancashire.

100. A key factor in West Lancashire appears to be that the Council was able to show early delivery that met at least the lower level of their need using the CLG household projections plus a proportion of unmet need from the previous plan period. As addressed at Matter 3: Housing Needs⁸⁵, the methodology used in the Cambridge Sub Region Strategic Housing Market Assessment (SHMA) was not based on household projections but on population, using the 2011 Census as a baseline. There was no backlog from prior to 2011 to make up. The SHMA does not profile the overall objectively assessed need across the plan period. Whilst a stepped approach with a lower earlier target would fit with the development strategy and sequence and the five-year supply in South Cambridgeshire in the early part of the plan period, there is no straightforward directly comparable way of identifying whether it would necessarily meet the identified needs of the district.
101. The Councils remain of the view that there are particular local circumstances that justify and support the approach contained in the MoU. Specifically, there is a joint development strategy and sequence across the two areas that is being delivered in a sustainable way consistent with national policy. We consider that the considerations that arose in West Lancashire are not directly transferrable to the considerations that arise in the Greater Cambridge area.

Matter 8B 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?

102. The submitted Plans are on the basis of applying a 5% buffer. The plan period for the adopted plans started in 1999. However, those plans were not adopted until 2006 for the Cambridge Local Plan⁸⁶ and over the period 2007 to 2010 for the South Cambridgeshire Local Development Framework⁸⁷ documents. The adopted plans were put in place as soon as possible following the adoption of the Cambridgeshire and Peterborough Structure Plan in 2003⁸⁸. The Structure Plan proposed a step change in the level of housing delivery in

⁸⁵ M3 – CCC & SCDC – Cambridge City Council and South Cambridgeshire District Council Matter Statement for Matter 3

⁸⁶ RD/AD/300

⁸⁷ RD/AD/100, RD/AD/110, RD/AD/120, RD/AD/130, RD/AD/140, RD/AD/280, RD/AD/290

⁸⁸ RD/AD/010

Cambridge and South Cambridgeshire as a move away from a dispersed strategy, with more development in the surrounding market towns outside the Greater Cambridge area as part of a sustainable development strategy. Given the extent of change introduced by the Structure Plan it was clearly not possible for either district to deliver against the higher target until its adopted plans were in place, particularly as a new development strategy needed to be put in place with significant emphasis on major Green Belt releases on the edge of Cambridge and on the new settlement of Northstowe, in all cases requiring specific sites to be allocated through local plans prepared by the City and District Council. It would not have been realistically possible or desirable for planning applications to be determined ahead of adoption of those plans and there is also a longer lead-in times for such major developments in any event.

103. Appendix 18 provides tables showing housing completions in Cambridge and South Cambridgeshire between 1999/2000, being the beginning of the plan period of the adopted plans, and 2013/2014. It compares those with the annualised housing targets for all relevant plans covering that period. Where figures are shaded, this indicates years before the plan was adopted and therefore where it did not have full weight in decision making. It shows the low housing targets in Cambridge and the higher targets in South Cambridgeshire applicable before adoption of the Cambridgeshire and Peterborough Structure Plan 2003⁸⁹. It demonstrates the major step change in housing delivery for both Cambridge and South Cambridgeshire planned by the 2003 Structure Plan which reduced housing targets elsewhere in Cambridgeshire. The table shows:

- for Cambridge there was a steady rise in completions above the adopted target from 2002-2003 to 2005-2006. The adoption of the 2006 Local Plan included the higher targets but not surprisingly the target was not immediately met due to a time lag between land being released from the Green Belt and completions on the ground. The recession starting in 2008-2009 resulted in those major developments being delayed and completions dropped. Completions jumped dramatically in 2013-2014 as the fringe sites started to deliver in Cambridge, and shown in the housing trajectory to continue at a high level for some years.
- for South Cambridgeshire the adopted target was exceeded in five of the eight years between 1999-2000 and 2006-2007 and that in 2007-2008 completions exceeded even the step change in delivery. In addition, whilst the Core Strategy was adopted in 2007, the sites allocating land for development were included in the subsequent Area Action Plans for Northstowe (2007), Cambridge Southern Fringe (2008), Cambridge East (2008) and North West Cambridge (2009) and the Site Specific Policies DPD (2010). The table shows the positive benefits to housing completions of development at Cambourne since 1998 and the shortfalls seen since 2008 which have arisen primarily due to the economic recession and the delayed start of the Northstowe development and the urban extensions to Cambridge. The positive effect of housing completions in the urban extensions to Cambridge are currently benefiting Cambridge but will later benefit South Cambridgeshire as can be seen in the tables, graphs and maps attached

⁸⁹ RD/AD/010

to the Memorandum of Understanding between the Councils⁹⁰, and in the latest Cambridge Annual Monitoring Report⁹¹.

104. It was always recognised, for example in the Structure Plan (see paragraph 92), that the adopted development strategy would see delivery increase in the second part of the plan period. For South Cambridgeshire, there was a marked increase in completions in 2007-2008 above the average annual figure. For Cambridge, there was a steady upward increase in completions from 2003-2004 up until 2009-2010. The Councils would have expected that completions would have remained high had it not been for the recession. With the recession, completions halved in a year (2009-2010) and remained low for both Councils until 2013-2014 when completions increased significantly in Cambridge to 1,299 homes due to major progress in delivery on the fringe sites, notably Cambridge Southern Fringe. South Cambridgeshire has not yet seen an increase, with delivery of the fringe sites on the Cambridge side of the administrative boundary before extending into South Cambridgeshire. With the strengthening market conditions, the joint housing trajectory shows that Cambridge expects delivery to remain high of a number of years as the urban and fringe sites build out and South Cambridgeshire's numbers start to rise quickly once the fringe sites progress across the administrative boundary and as Northstowe starts to deliver homes.
105. Both Councils have always taken their plan making responsibilities seriously and regularly updated their plans. In particular both Councils put plans in place very quickly after the 2003 Structure Plan was adopted. Inspectors considering the soundness of the adopted and past plans have always found the plans to include appropriate development strategies and suitable site allocations to meet the housing requirements. Nevertheless, factors outside the Councils' control have meant that plan targets have not often been met. The Councils have put in place a wide range of officer and member structures and have streamlined their processes to help speed up the decision making process, particularly for the major sites (see Appendices 11 and 13).
106. The Councils note that the Brighton and Hove Local Plan Inspector's initial conclusions in December 2013⁹² give weight to the recession as a factor outside the Council's control, saying "*The lower rate of delivery in recent years is related to poor market conditions. In the circumstances, I consider there is not a record of persistent under delivery and therefore the appropriate buffer, in accordance with the Framework, is 5%.*"
107. The NPPF states that the purpose of applying a 20% buffer where there has been persistent under delivery is to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land⁹³. Appendix 18 shows that there has not been a persistent under delivery against the relevant adopted plan target for either area. In addition, the joint housing trajectory (Appendix 2) shows that now that the major sites are coming forward, there is a strong prospect of delivering the planned supply on a continuous basis throughout the plan period, as well as providing choice and

⁹⁰ RD/CR/460-RD/CR/480

⁹¹ RD/AD/360

⁹² At section on five-year supply (<http://www.brighton-hove.gov.uk/content/planning/local-development-framework/city-plan-part-one-examination>) (RD/H/730)

⁹³ Paragraph 47, second bullet (RD/NP/010)

competition for the market. This will provide for the objectively assessed needs of the Great Cambridge area in a sustainable way. Indeed, the trajectory shows over delivery across the Greater Cambridge area during the majority of the plan period.

Matter 8B 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?

108. For both Councils, analysis of historic housing completions on 'identified' windfall sites demonstrates that windfalls will contribute to the five year supply.

Cambridge

109. Cambridge City Council has taken a measured and robust approach to windfall calculations. Paragraph 48 of the NPPF allows local planning authorities to make allowance for windfall sites in their five-year supply, if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should have regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. In line with paragraph 48 of the NPPF, the approach taken by the Council excluded garden land, allocated land and any development on sites over 0.5 hectares from the windfall calculations⁹⁴. In terms of the approach taken to windfalls as the SHLAA was developed, the advice available at the time of the SHLAA's commencement was in Planning Policy Statement 3⁹⁵. This document at paragraph 59 advised that "*allowances for windfalls should not be included in the first ten years of land supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites from being identified.*" Based on the Planning Advisory Service's advice⁹⁶, the SHLAA 2012⁹⁷ identified small sites (9 dwellings or less and 0.25 hectares or under in broad locations. These broad locations were identified in lieu of windfall and included in Annex 2 of the 2012 SHLAA. Following the publication of the NPPF, reflecting the requirements of paragraph 48, the Council produced the SHLAA 2013⁹⁸ which focussed on strategic sites of 0.5ha or more and undertook detailed research on small windfall sites (up to 0.5 hectares).

110. The methodology for calculating a realistic windfall allowance is set out in the Council's Housing Land Supply Topic Paper⁹⁹. In summary, the identification of past windfall completions resulted in the following figures:

⁹⁴ Cambridge 2013 SHLAA (RD/Strat/140)

⁹⁵ Planning Policy Statement 3: Housing RD/NP/170

⁹⁶ Planning Advisory Service, Strategic Housing Land Availability Assessment and Development Plan Documents, July 2008.

⁹⁷ RD/Strat/130

⁹⁸ RD/Strat/140

⁹⁹ RD/Top/070

Table 5: Past Trends in Windfalls in Cambridge

Year	Completions
March 2002	93
March 2003	83
March 2004	163
March 2005	141
March 2006	268
March 2007	117
March 2008	257
March 2009	138
March 2010	59
March 2011	92
March 2012	119
Total	1,530

These results demonstrate a consistently high number of windfall completions over the course of eleven years. The figures in this table result in an annualised average of 139 dwellings per annum. To err on the side of caution, the two highest and lowest years of data were removed to allow for any potential anomalies in the data¹⁰⁰. This resulted in an annualised windfall figure of 123.3 residential units per annum.

111. The Council has performed a ‘health check’ on these calculations. As per the SHLAA methodology, the two highest and lowest years of data were removed to allow for any potential anomalies. The final annualised windfall allowance resulted in a figure of 122.44 residential units per annum. This very small variation is 0.86 units less than the original calculation (123.3). This highlights that the trend for windfall calculations is still consistently available in line with paragraph 48 of the NPPF.
112. Due to the highly built up nature of the city, the strength of the housing market and the continuing demand for housing, and scope for intensification of sites, the Council considers that windfall sites remain a significant and continuing component of housing supply. In line with paragraph 48 of the NPPF, this provides compelling evidence that such sites become consistently available.
113. The NPPF and NPPG allow for the inclusion of a windfall allowance in the five-year supply and in later years of the Plan. The Council has included this in the Plan, based on a robust evidence base.

South Cambridgeshire

114. South Cambridgeshire District Council has taken a robust approach to identifying a windfall allowance. The Draft Final SA Audit Trail (March 2014)¹⁰¹ sets out the analysis of historic windfall completions. At the Issues and Options stage, the period 1999 - 2010 was

¹⁰⁰ As set out in paragraphs 3.6 to 3.8, RD/Top/070.

¹⁰¹ South Cambridgeshire Draft Final Sustainability Appraisal (March 2014) – Annex A: Audit Trail, Chapter 2, pages A88-A94 (RD/Sub/SC/060)

considered, showing an average of 250 homes a year over the period, although this included garden land. Subsequently, the period 2006-2012 was assessed in more detail prior to the submission of the South Cambridgeshire Local Plan. This analysis is compliant with the NPPF¹⁰² in that it excludes any windfalls completed on garden land. It concluded that windfalls have delivered an average of 208 dwellings per year. The Council assumed that no more than 200 dwellings will be completed a year on 'unidentified' windfall sites.

115. A further two years of completions data is now available and therefore an analysis of historic windfall completions for 2006-2014 has been undertaken (see Appendix 19). This analysis follows the same methodology and concludes that windfalls have delivered an average of 203 dwellings per year, confirming that the Council's assumption of no more than 200 dwellings on 'unidentified' windfall sites a year is a realistic allowance.
116. The housing trajectory shows a continuing supply of housing on windfall sites. 'Identified' windfall sites, in other words unallocated sites with planning permission, for the first three years of the five year period (2014-2019) are anticipated to deliver over 200 dwellings a year (note: this does not take account of whether the sites are garden land or not). The trajectory does not include an allowance for unidentified windfall sites for the first 3 years of the five-year supply period and then a gradual building up of numbers, on the basis that identified windfalls with permission will be being built and that unidentified windfalls will not deliver houses on the ground until the planning application process has been completed, resulting in a time lag. This ensures no double counting. Within the five year period (2014-2019), 'identified' windfall sites are expected to deliver 1,089 dwellings, which accounts for nearly 20% of the dwellings anticipated to be delivered in this period, as shown in the table below, demonstrating that windfalls are an important element of future housing supply in South Cambridgeshire.

Table 6: Delivery within five-year period from windfall sites in South Cambridgeshire

	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	TOTAL 2014-2019
<i>Windfalls sites with permission</i>	355	298	176	76	34	939
<i>Windfall allowance</i>	0	0	0	100	150	250
<i>Windfalls granted due to lack of a five-year housing land supply</i>	0	75	75	0	0	150
Total	355	373	251	176	184	1,339

117. It is likely that delivery from windfall sites will increase in the next few years in South Cambridgeshire, reflecting the lack of a five-year housing land supply pending examination of the Local Plan. Planning appeals allowed in June 2014 relating to two sites in Waterbeach concluded that the Council cannot currently demonstrate a five year housing land supply. The Council's Planning Committee in November 2014 approved a further planning application for 36 dwellings in Waterbeach, having considered the Council's

¹⁰² NPPF, paragraph 48 (RD/NP/010)

housing land supply position. A number of planning applications for large windfall sites have been submitted that are contrary to the Council's adopted planning policies but which the promoters argue will help the Council to deliver its five-year supply. It is anticipated that some of these planning applications will be considered at the Council's Planning Committee in February 2015.

118. Paragraphs 2.65 and 2.66 of the South Cambridgeshire Local Plan are consistent with Policy S/12 (2)¹⁰³. The policy wording states that the Council will provide a 5% buffer as part of its 5-year housing land supply, which will be met mainly through windfalls. Paragraphs 2.65 and 2.66 explain that the Council has fully allocated land to deliver its housing requirement. Indeed, the latest housing trajectory shows that the Council has provided for 19,678 homes through permissions and allocations against the 19,000 home requirement, a surplus of 678 homes. The Council has not relied on windfall sites to deliver its housing requirement even though it is confident that there will be a continuing supply of housing from windfall sites. This is in order to provide greater certainty for meeting the objectively assessed needs. A further 2,600 homes are shown to come forward under the windfall allowance, providing an overall supply of 22,287 homes during the plan period. The windfall supply is expected to be relatively constant during the plan period and therefore can be available to contribute towards the buffer throughout the plan period. Both allocations and windfalls are considered to be reliable sources of supply over the plan period.
119. The trajectory notes that as part of the City Deal, the Councils have committed to delivering an additional 1,000 homes on rural exception sites. These are not included in the trajectory calculations, coming after the submission of the Plans. At this stage, the Councils cannot demonstrate specific deliverable sites or history of delivery to justify including an further windfall allowance for these additional homes. They will be included in the trajectory once specific sites can be identified or planning permissions are granted and homes completed.
120. Paragraph 2.66¹⁰⁴ also explains that there are a number of sites, including the new village at Bourn Airfield, that could be brought forward if needed to respond to rapid change. In view of its overall housing supply, the Council proposes that delivery of Bourn Airfield New Village is held back (see Policy S/12, part 1) even though the site could be delivered earlier; which will provide flexibility. This is addressed at Matter 8A ii.
121. Policy S/12¹⁰⁵ therefore states that the 5% buffer will be mainly met through windfalls because the windfall allowance effectively acts as the Council's buffer for the purposes of five-year housing supply, the Council having fully allocated land to meet its 19,000 home requirement.

¹⁰³ Page 36, RD/Sub/SC/010.

¹⁰⁴ Page 38, RD/Sub/SC/010.

¹⁰⁵ Page 36, RD/Sub/SC/010.

Matter 8B 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).

122. For Cambridge alone, there is no shortfall in delivery from the beginning of the plan period. The AMR 2014¹⁰⁶ shows completions of 2,132 between 2011/2012 and 2013/2014 resulting in a surplus of 32 homes.
123. For South Cambridgeshire alone, the AMR 2014¹⁰⁷ shows completions of 1,873 homes between 2011/2012 and 2013/2014 resulting in a shortfall of 977 units.
124. The joint housing trajectory shows an initial deficit of 945 residential units across Greater Cambridge from the period 2011/2012 to 2013/2014 (see Appendix 20). This is swiftly made up by 2016/2017 providing a surplus of 321 units. The NPPG¹⁰⁸ says that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible. This has been referred to as the Sedgefield method.
125. At the time the Plans were prepared, there was no national planning policy about how any early shortfall should be made up. The only national guidance had been as part of the previous Housing Delivery Grant where the Government's methodology had been to make up any early shortfall evenly over the remainder of the plan period, now known as the Liverpool method. This is the approach taken in both Local Plans, consistent with many others in the local area.
126. Appendix 20 shows that the identified undersupply across Greater Cambridge is estimated to be rectified in year six of the plan period (2016/17). This equates to it being made up within two years of the current monitoring year. This will therefore be addressed in full as part of the current five-year housing land supply. The reason for the lower level of provision in the early years of the Local Plans is mainly due to the phasing of the urban extensions as discussed previously. These sites span the local authority boundaries of both Councils and due to the nature of these developments, development on these sites begin in Cambridge developing outwards towards South Cambridgeshire to ensure comprehensive and coordinated development. Development in Northstowe was also held up by the recession (see response to 8B iii) resulting in a delay in delivery but work is due to start on site imminently and housing completions are expected to start in 2015/16.
127. The identified undersupply for South Cambridgeshire alone (absent the joint trajectory) is not estimated to be rectified until year 9 of the plan period (2019/20). This is 5 years from the current monitoring year. The reasons for this are as set out above for the Greater Cambridge area, but compounded for South Cambridgeshire, reflecting the development strategy, that the fringe sites are building out from Cambridge and not reach South

¹⁰⁶ Cambridge AMR – Appendix D, page 114 (RD/AD/360)

¹⁰⁷ RD/AD/370

¹⁰⁸ NPPG, Housing and economic land availability assessment, paragraph 35 ref id: 3-035-20140306 (RD/NP/020)

Cambridgeshire until the middle part of the plan period, and the lead-in time to deliver new settlements.

128. If the Inspector were not to accept the Councils' case for a joint housing trajectory, South Cambridgeshire District Council considers that the particular circumstances applying to the district justify use of the Liverpool method. In particular, the development strategy and sequence mean that to deliver sustainable development in South Cambridgeshire results in a focus on strategic scale developments on the edge of Cambridge at the top of the development sequence in the district and then at new settlements. These have a longer lead-in time that means they do not deliver early in the plan period but once they start delivering, they will provide significant levels of housing throughout the rest of the plan period. Allocations for 900 homes in villages provides some flexibility and early delivery. It is only the next few years that South Cambridgeshire on its own may not be able to demonstrate a five-year supply. The use of the NPPG (Sedgefield) method would require additional development beyond the housing requirement in less sustainable locations contrary to the sustainable development strategy.

Matter 8B 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?

129. The submission of the Local Plans preceded the completion of the City Deal and therefore did not include the extra 1,000 homes on rural exception sites that form part of the City Deal agreement signed in June 2014.
130. South Cambridgeshire District Council included an element of the City Deal 1,000 additional homes in its assessment of five-year supply at the Waterbeach appeal hearings held in April and May 2014. The Waterbeach S78 appeal Inspector concluded in his reports¹⁰⁹ that it was not appropriate to take account of the additional homes through City Deal as he considered there was considerable uncertainty at that time about the City Deal scheme including resolving joint governance and level of funding. He also considered that there were no specific deliverable sites identified that gave confidence that land was available and he concluded that there was no basis for categorising them as windfalls.
131. The City Deal agreement had not been signed at the time of the appeals and the Council could not point to specific deliverable sites. A more cautious approach has been taken since the appeal decisions and the City Deal additional 1,000 homes have not been included in the updated housing trajectory in the AMR. However, the partners have committed to delivering the 1,000 additional homes in the plan period as part of the City Deal and a note has been put under the trajectory to this effect. This provides an element of flexibility for land supply, could deliver additional homes towards the end of the five-year period and help to meet local village housing needs. The intention is that once sites gain planning permission and are built, they would be included in the trajectory in the usual way as windfalls. As they will be in addition to the normal annual 200 windfall completions, they will be listed in a separate row, which will also assist with monitoring the City Deal.

¹⁰⁹ RD/Strat/330 - paragraphs 39 and 40 on page 9, and RD/Strat/340 - paragraphs 34 and 35 on page 8

132. The City Deal has moved forward apace as discussed in Matter 7 and governance arrangements are now in place and there is expected to be greater clarity and certainty on the funding beyond the first five year phase by the end of January 2015. It is not clear what approach the Waterbeach Inspector would have taken under these circumstances. The Council has also made good progress towards putting in place the resources necessary to identify and deliver the additional 1,000 homes on exception sites with appointment of a Head of Housing Development (New Build) and the Council is proactively working with the County Council asset management team investigating potential sites that could be identified and brought forward for development. A first site has now been identified in principle in Litlington for potentially 27 homes, and has been subject to local consultation and local needs analysis with a view to preparing a planning application. It is hoped to announce a second site soon. The Council is also working closely with Parish Councils and social housing providers, and is soon to start a public call for sites through the Council's magazine. The Council also considers that given the good progress on the City Deal and greater confidence over future funding, there could now be a case for including the full 1,000 homes in the overall trajectory. Alternatively, the 1,000 additional homes could be retained as an added buffer and to provide increased flexibility as discussed in Matter 8A ii.

Matter 8C

Matter 8C: Should the more sustainable villages make an increased contribution to housing supply? Would this offer a more reliable contribution to land supply and delivery of new housing. (NB Specific policies for the rural areas – S/7, S/8, S/9, S/10, S/11 – will be considered in detail at a later hearing).

Should the more sustainable villages make an increased contribution to housing supply?

133. The NPPF states that the purpose of planning is to help achieve sustainable development¹¹⁰. Relevant policies which set out what this means in practice for the planning system in South Cambridgeshire include paragraphs:

- 30 – Local Plans to support a pattern of development which facilitates the use of sustainable transport modes.
- 34 – Developments generating significant movements to be located where need to travel is minimised and use of sustainable transport modes maximised.
- 37 – Planning policies to aim for a balance of land uses to encourage people to minimise journey lengths for employment, shopping, education and other activities.
- 38 – Where practical, key facilities such as primary schools and local shops should be within walking distance of most properties.
- 54 – In rural areas plans should reflect local needs particularly for affordable housing, including through rural exception sites.
- 55 – In rural areas locate housing where it will enhance or maintain the vitality of rural communities.

134. The more sustainable villages in the district are defined as Rural Centres and Minor Rural Centres in the submission Local Plan¹¹¹. These are the villages where development can most help to achieve sustainable development consistent with the NPPF. Evidence for the classification of villages is set out in a Village Classification Report and the proposed classification was subject to public consultation in the 2012 Issues and Options 1 document¹¹². The Draft Final SA records the outcome of consultation¹¹³. The 2014 Village Services and Facilities Study sets out details of the services and facilities in each village, including its shops, schools, and public transport services¹¹⁴.

135. Appendix 2 of the Village Classification Report consists of a detailed results table of village sustainability. Most of the more sustainable villages lie within or on the edge of the Green Belt¹¹⁵. Green Belt matters are addressed in the Council's Matter 6 statement. Regarding village sites beyond the Green Belt, these are generally less sustainable than locations higher up the development sequence as considered in the Councils' Matter 2 statement. Of the two Rural Centres outside the Green Belt, the Plan already includes a major extension to Cambourne, the appropriateness of which will be considered later in the

¹¹⁰ RD/NP/010 paragraph 6.

¹¹¹¹¹¹ RD/Sub/SC/010 policies S/8 and S/9.

¹¹² RD/LP/020 question 13.

¹¹³ RD/Sub/SC/060 Annex A in Chapter 2 page A185

¹¹⁴ RD/Strat/250

¹¹⁵ Rural Centres in the Green Belt: Histon & Impington, Sawston and Great Shelford & Stapleford with 1 on the edge (Cottenham). Minor Rural Centres in the Green Belt: Girton, Milton, Fulbourn and Comberton with 1 on the edge (Waterbeach).

examination process, and Cottenham has a constrained capacity to accommodate village scale growth due to significant capacity constraints at the landlocked primary school¹¹⁶. Of the Minor Rural Centres outside the Green Belt a number also have particular constraints, Linton has road safety issues¹¹⁷, land to the north of Waterbeach is allocated for a new town in the Local Plan, and Bar Hill is a previously planned new settlement that is tightly encircled and defined by an access road.

136. The Council has prepared a thorough SHLAA which includes sites proposed to the Council in a 2011 'Call for Sites', sites on the edge of Cambridge, and sites proposed in representations to Issues & Options consultations¹¹⁸. Over 300 sites have been assessed and these sites were also subject to SA¹¹⁹. Site options were identified in the larger and better served villages and consulted on in the two rounds of Issues & Options consultation.
137. The Council has proposed that this Local Plan should include some village site housing allocations to provide flexibility and to help ensure a continuous supply of housing land over the plan period¹²⁰. It has not imposed any arbitrary cap on the number or capacity of village housing site allocations in Rural Centres and Minor Rural Centres. Rather it was the findings and conclusions of the SHLAA assessments¹²¹ and the outcome of Issues and Options consultation on site development options¹²² and rejected site options¹²³ which assisted the Council in identifying the most appropriate sites for allocation in the Plan. The merits of individual allocations and omission sites will be considered under separate matters.
138. Notwithstanding, the Council considers that the overall capacity of village housing allocations should remain limited in the interest of achieving sustainable development. This view is consistent with that of previous plan examinations¹²⁴, where the Inspectors found the plan sound with no village allocations even though there were a large number of omission sites proposed through representations. Paragraph 2.10 of the Core Strategy Examination Report states:

“Very substantial development would be required to sustain village services. Villages in South Cambridgeshire received significant amounts of development under the previous planning strategy of dispersal, but this scale of past development does not appear to have led to the maintenance of services and facilities in the rural areas of the District as a whole”. And “There have been demographic and lifestyle changes in urban and rural areas which have a great influence on the sustainability and vitality of villages”.

¹¹⁶ SHLAA RD/Strat/120 appendix 7i, site 003, education comments page 265

¹¹⁷ SHLAA RD/Strat/120 appendix 7i, site 101, access comments page 968

¹¹⁸ SHLAA RD/Strat/120

¹¹⁹ RD/Sub/SC/060 Annex B

¹²⁰ RD/Sub/SC/060 Annex A, Chapter 2, pages A99-A105

¹²¹ SHLAA RD/Strat/, Appendices 7i, 7ii and 7iii

¹²² RD/Sub/SC/60 Annex A, Chapter 3 pages A225 – A248, and Annex A Appendix 2

¹²³ RD/Sub/SC/60 Annex A Appendix 3

¹²⁴ RD/AD/190 Core Strategy Examination 2006, paragraphs 2.10 and 2.11 and RD/AD/210 Site Specific Policies Examination 2009 paragraphs 4.10, 4.11 and 30.1.

Paragraph 2.11 states:

“The plan would be unsound if it allowed for large amounts of housing through extra flexibility in the approach to villages generally” and “.Development in villages should be limited in order to minimise commuting for employment purposes and unsustainable car journeys to larger centres for shopping and services”.

Paragraph 4.11 of the Site Specific Policies Examination Report reinforces this point as follows:

“...it is far more satisfactory in terms of the sequential approach and securing sustainable, low carbon development to identify a very small number of large sites, rather than spread planned development throughout the rural area”.

139. Villages are already proposed to make a substantial contribution to housing supply over the plan period. Village allocations in policy H/1 total 860 homes to which can be added the 59 homes in Great and Little Abington and Graveley included in the submitted Local Plan as proposed major modifications¹²⁵, total 919 homes and when sites with planning permission are included make a total of 4,705. The plan also provides for 2,600 windfalls¹²⁶ over the plan period. This figure includes rural affordable housing to meet local needs which over the past 10 years have averaged 49.2 completions per year¹²⁷. Table 2 shows that village homes provide for 32.8% of the total supply of 22,287 homes. Additional windfalls may also arise during the period in which the district has no five-year housing supply as detailed in this statement at paragraph 117. The Council has also committed to providing an extra 1,000 rural exception site affordable homes as part of the Greater Cambridge City Deal by 2031 which are not included in the housing trajectory (see Matter 8B vii). In total therefore the Council expect that 4,519 homes will be delivered in village locations by 2031 to meet local needs, which amounts to 24% of the 19,000 homes objectively assessed need for the district.

Would this offer a more reliable contribution to land supply and delivery of new housing?

140. The Councils' Matter 2 statement considers the preferred sequential approach for new development and the place of more sustainable villages in the sequence. Paragraph 17 sets out the transport implications of a village focussed pattern of development.
141. Spatial Planning for the Greater Cambridge Area over the last 24 years can be characterised as dispersed village growth in the early years of this period between 1991 and 1997, the period between 1998 and 2007 when dispersed village growth was complemented by increasing numbers of housing completions at Cambourne, and the period since 2007 when the policy has been to minimise village development in favour of the development of urban extensions to Cambridge on land taken out of the Green Belt, ongoing development at Cambourne and the development of a new town at Northstowe.

¹²⁵ RD/Sub/SC/030 MM/7/01 and MM/7/02. Parish Council led proposals.

¹²⁶ RD/Sub/SC/010 table page 39, Annual Monitoring Report 2013/2014- RD/AD/370 table page 35.

Essentially all windfalls will be on village sites given that the district has no towns and all existing urban areas adjoining Cambridge have been built in the recent past.

¹²⁷ AMR – RD/AD/370 table 4.20 page 55.

142. The Council considers it would not be appropriate to consider a more dispersed pattern of development in the Greater Cambridge area. Regular monitoring through the AMR will assess whether the urban extensions to Cambridge are built out into South Cambridgeshire according to plan and how successful the development of Northstowe is after development commences given the commitment of Government in the Autumn Statement to speeding up its delivery¹²⁸. The Councils are confident that the strategy will be delivered, particularly as there is now clear evidence of delivery at the urban fringe sites and with Northstowe to start on site imminently. They have also committed to preparing a joint Local Plan starting by 2019 which can respond as appropriate to any delivery issues that might arise.
143. Notwithstanding, the Council is not opposed to locally supported village developments as is demonstrated by its commitment to provide an additional 1,000 rural exception site affordable homes as part of the Greater Cambridge City Deal and by its inclusion of Parish Council led development proposals in Great Abington, Little Abington and Graveley as proposed major modifications to the Local Plan¹²⁹. A number of Parish Councils are in the early stages of Neighbourhood Plan preparation and some of these may also include additional village housing developments¹³⁰.

¹²⁸ See <https://www.gov.uk/government/topical-events/autumn-statement-2014>

¹²⁹ RD/Sub/SC/020, MM/7/01 and MM/7/02, pages 2-4

¹³⁰ Linton and Hildersham, Histon and Impington and Gamlingay have declared neighbourhood areas or are consulting on them and 5 other parishes are showing an interest in neighbourhood planning.

