

## **Councils' Joint Response to CEG's Matter 8 Statement**

- 1.1 The Matter 8 Statement submitted by CEG (M8/17653) includes paragraph 1.1, point 3 which states:

*There are also number of errors in respect of individual assumptions on sites in the trajectory. Amongst other things, both of the Councils have made a number of errors in utilising gross instead of net figures where existing permissions include demolition, amounting to an over-estimate of circa 200 units.*

### **Cambridge City Council**

- 1.2 Cambridge City Council notes this statement and has reviewed the trajectory in light of it.
- 1.3 Cambridge City Council's current housing trajectory in the Council's 2014 Annual Monitoring Report (RD/AD/360) takes into account the following split of sites:
- Urban extensions;
  - Local Plan 2006 allocations;
  - Large sites with planning permission for over 50 units (windfall);
  - Small sites with planning permission for between 10 and 49 units (windfall);
  - Cambridge Local Plan 2014 additional allocations. This includes both parts of sites which are larger than Cambridge Local Plan 2006 allocations and entirely new allocations;
  - Strategic Housing Land Availability Assessment windfall figures.
- 1.4 This 2014 housing trajectory takes into account net figures for urban extensions, existing Local Plan 2006 allocations, and new Cambridge Local Plan 2014 allocations, and Strategic Housing Land Availability Assessment windfall figures. Historically, the large sites with planning permission for over 50 units (windfall) and small sites with planning permission for between 10 and 49 units (windfall) have used gross instead of net figures looking forward and have not taken into account any developments of 9 units or less<sup>1</sup>. For past completions within the trajectory, demolitions were accounted for in the year that they occurred. For example, if planning permission for a site involved the demolition of three dwellings in order to erect fifteen dwellings, the Council has placed fifteen dwellings in the expected year of completion within the trajectory. The three existing dwellings have not been netted off the total figure of fifteen dwellings. However, this loss of three dwellings has been recorded in the *Total Completions – Indicators H2 (a & b)* row which can be found in the *Housing Trajectory Summary Tables* in the year that the demolitions occur. However, in terms of future years, windfalls from sites with planning permission have been expressed as gross additions rather than net of any additions.

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<sup>1</sup> It should be noted that the only large sites with planning permission for over 50 units (Cambridge Water Company Site, Rustat Road and Homerton College) were not previously used for residential purposes. As such, the gross/net figure was the same. Homerton College has been discounted as the college have no intention of bringing the planning permission forward.

1.5 In the context of the point made by CEG, the Council considers that the methodology of the Cambridge housing trajectory should be revised to reflect the full assessment of windfall and to express all sites as net. This has involved a) adding into the revised trajectory sites with planning permission for nine or less units; and b) to express all windfalls as net rather than gross. This overall has resulted in a net increase in housing supply from 14,102 to 14,117 and is illustrated in the revised housing trajectory.

1.6 As such, the Council's updated trajectory now takes the form of:

- Urban extensions;
- Local Plan 2006 allocations;
- Windfall, which is split into:
  - Identified windfall on large sites with planning permission for over 50 units;
  - Identified windfall on small sites with planning permission for between 10 and 49 units;
  - Identified windfall on sites of 9 units or less;
  - Unidentified windfalls (Strategic Housing Land Availability Assessment windfall figures).
- Cambridge Local Plan 2014 additional allocations. This includes parts of sites which are larger than Cambridge Local Plan 2006 allocations and entirely new allocations;

1.7 The Council's approach to inclusion of future completions from windfall development is now as follows:

- The trajectory now identifies all large unallocated sites with planning permission that will deliver a net increase of 50 or more dwellings. As before, this excludes any sites that in the Council's opinion will not come forward, e.g Homerton College referred to in footnote 1 above. Future completions are apportioned taking into account questionnaire returns from the site developer and case officer information. Net rather than gross completions are used;
- The trajectory now identifies all small unallocated sites with planning permission that will deliver a net increase of 10-49 dwellings. As before, this excludes any sites that in the Council's opinion will not come forward. Future completions are apportioned taking into account questionnaire returns from the site developer and case officer information. Net rather than gross completions are used;
- The trajectory now identifies all very small unallocated sites with planning permission that will deliver a net increase of under 10 dwellings. This excludes any sites that in the Council's opinion will not come forward. Future completions for sites under construction are apportioned 75% in 2014/15 and 25% in 2015/16. Future completions for site where construction has not started are discounted by 10% to account for schemes not being implemented. The remaining dwelling completions are split over the five year supply period (currently years 2014/15 to 2018/19) at approximately the following percentages: 10%; 25%; 35%; 20%; and 10%. Net completions are used;

- The trajectory now identifies dwellings coming forward from unidentified windfalls commencing in 2017/18 and continuing until the end of the plan period. Previously, the trajectory identified this source commencing in 2016/17. Future completions from unidentified windfalls in 2016/17, 2017/18 and 2018/19 are modified such that the total from this source summed with other windfall sources does not exceed the level of windfall completions identified in the Council's Strategic Housing Land Availability Assessment<sup>2</sup> (i.e. does not exceed 123 or 124). This approach avoids double counting. Future completions from unidentified windfalls from 2019/20 onwards are set at the level of windfall identified in the Council's Strategic Housing Land Availability Assessment<sup>3</sup> as appropriate for Cambridge (123 or 124 dwellings).

1.8 These changes are reflected in the revised housing trajectory as part of note M8/CCC&SCDC-1.

### **South Cambridgeshire District Council**

1.9 South Cambridgeshire District Council notes the points raised by CEG in their Matter 8 statement at paragraph 1.1, point 3 and has reviewed the housing trajectory.

1.10 The net number of dwellings is used for all sites included in the housing trajectory. All demolitions are recorded in the year that they have either happened or are anticipated to happen, which can be in an earlier monitoring year than any completions.

1.11 CEG identify six estate sized windfall sites with planning permission as using gross figures:

- Windmill Estate, Fulbourn
- Green Street, Willingham
- MacFarlane Grieve House, Papworth Everard
- Robson Court, Waterbeach
- Cambridge Road, Linton
- Cinques Road, Gamlingay

1.12 The demolitions on five of these sites have been included in the net figure for historic completions as they happened between 2011/2012 and 2013/2014. These demolitions do not therefore need to be counted in 2014/2015 or later years; to do so would be double counting. For the MacFarlane Grieve House site, the loss of the existing units does not need to be counted within the housing trajectory as the existing buildings did not contain self-contained dwellings (each unit consists of a bedroom and bathroom, but kitchen facilities are shared), and therefore on this site only the new dwellings being created should be counted.

1.13 South Cambridgeshire District Council has therefore properly used net figures in the housing trajectory and there are no errors or double counting.

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<sup>2</sup> RD/Strat/140, page 69.

<sup>3</sup> RD/Strat/140, page 69.

## **Appendix A: Schedule of Changes in Cambridge City Council's Housing Trajectory**

- A.1 This document is in response to comments made by Commercial Estates Group (CEG) in relation to the inclusion of gross instead of net figures in Cambridge City Council's 2014 housing trajectory<sup>4</sup>. As a result of these comments, the 2014 housing trajectory referenced in Appendix 2 of the Councils' Matter 8 Written Statement<sup>5</sup> and found in the Annual Monitoring Report 2014<sup>6</sup> has been amended to include a comprehensive windfall calculation for Cambridge City Council and to express all completions within the revised trajectory as net completions.
- A.2 This document sets out the site specific comments made by CEG, the Council's response and any changes that have occurred to the revised housing trajectory as a result of that response.

### **Urban Extensions Table**

- A.3 No amendments have been made to this table in the revised housing trajectory.

### **Local Plan Allocations Table**

- A.4 No changes have been made to this table in the revised housing trajectory, however comments made by CEG (M8 – 17653, table 2.1 on P10) suggest a discrepancy in the Council's Willowcroft allocation (currently named site 5.07 in the Cambridge Local Plan 2006 and named Site R2 in the Cambridge Local Plan 2014: Proposed Submission).

<b>Site</b>	<b>Comments from Commercial Estates Group</b>	<b>Council's Response</b>
Willowcroft (5.07/R2)	Application 14/1254/FUL includes demolishing one dwelling (15-1=14), as such one dwelling has been removed from the net total to account for this, the remaining dwellings add up to SHLAA total and are not disputed.	The planning permission referred to by CEG does include the demolition of an existing residential unit. However, this planning permission affects only is on a small portion of the allocated site. The Council's assessment of the overall allocation site identifies the net capacity as 78. This assessment includes the demolition

<sup>4</sup> Appendix of CEG's Matter 8 Statement (M8 – 17653) in table 2.1 on page P10 and in the housing trajectory table on page P23.

<sup>5</sup> M8-CCC-SCDC. pp.48-53

<sup>6</sup> RD/AD/360, pp.92-98

Site	Comments from Commercial Estates Group	Council's Response
		of any residential units currently on site and as such there is no need to assume a deduction of one unit.

## The Windfall Table

A.5 All windfall has now been consolidated into one table in the revised housing trajectory. This table includes the following sub-categories:

- Identified Windfall – Large sites over 50 dwellings
- Identified Windfall - Small sites (10 to 49 dwellings)
- Identified Windfall – Very small sites (0 to 9 dwellings) with planning permission
- Unidentified Windfall

An explanation of these sub-categories is detailed below.

### Large sites of 50 or more

A.6 This section in the revised housing trajectory includes the same information as in the 2014 trajectory table of the same name. No changes are required to be made to the data and all figures represented in the data are now net.

### Small sites 10 – 49 dwellings

A.7 This section in the revised housing trajectory includes the same information as in the 2014 trajectory table of the same name. The table below lists the comments made by CEG and the Council's response.

Site	Comments from Commercial Estates Group	Council's Response
141 Ditton Walk	Application 11/0596/FUL for 14 units expired on the 16/12/14, the 2014 AMR identified no material start has been made on site. Application 13/0804/FUL for 2 units remains live, and as such the trajectory is reduced to 2.	This site (141 Ditton Walk) has been removed from the small sites section of the revised housing trajectory as planning permission 11/0596/FUL has recently expired.

Site	Comments from Commercial Estates Group	Council's Response
		Planning permission 13/0804/FUL to which CEG refer concerns land at 89a Cherry Hinton Road which is a different site to 141 Ditton Walk, this site has been included in the <i>Identified Windfall – Very Small Sites (0 to 9 dwellings) with planning permission</i> as a result of planning permission 13/0804/FUL for 2 units.
Roman Courts (East and West)	Applications live on this site 12/0932/FUL (converting 15 into 8) 12/0931/FUL (converting 14 into 9) equate to a net housing figure of -12, as such the trajectory figure for this site is altered from the gross figure used -12 by the Council.	This site has been removed from the small sites section of the revised trajectory as the net completions figure for the site is -12. These figures are now accounted for, as a deduction, in the <i>Identified Windfall – Very Small Sites (0 to 9 dwellings) with planning permission</i> section of the windfall table.
18-19 Regent Terrace	Application live 11/1375/FUL (includes demolition of 3 dwellings, net = 8). Trajectory is reduced to the net figure of 8 as opposed to the Council's gross figure of 11.	This is incorrect. The 3 demolitions were recorded in the 2013/14 monitoring year in the 2014 housing trajectory's net completions figure. Therefore the number of completions with regard to this site is correct and should be 11. This site remains in the revised trajectory.
51 Barnwell Road	Application live 13/0776/FUL. Existing 24 dwellings demolished to make way for 21 new, net =-3. Trajectory is reduced to the net figure of -3 as opposed to the Council's gross -3 figure of 21.	23 demolitions were recorded in the 2013/14 monitoring year as part of the 2014 housing trajectory's net completions figure. There is one demolition left to be recorded and therefore the number of completions with regard to this site is 20. This has been amended in the revised trajectory.
Latimer Close	Application live 12/1598/FUL, demolishing 20 units and building 20, the net gain is 0. The trajectory has been updated accordingly.	This site has been removed from the small sites section of the revised trajectory as the net completions figure for the site is 0.
189 Histon Road	Application 13/0231/FUL includes demolition of 2 dwellings, net = 10. The trajectory is updated to use the net figure of 10 as opposed to the Council's gross figure of 12.	This is correct and has been amended in the revised trajectory. The site has also been renamed 186–188 Histon Road to reflect the address in the planning permission.
6-14 Water Lane	Application 13/1386/FUL demolishes 24 units and builds 24, net = 0. The trajectory is updated to use the net figure of 0 as opposed to the Council's gross figure of 24.	This is correct and the site has been removed from the small sites section of the revised trajectory.
Land to the rear of	Application 12/1537/FUL demolishes one dwelling and	This is incorrect. The demolition was recorded in the 2013/14

Site	Comments from Commercial Estates Group	Council's Response
231-247 Milton Road	builds 13, net = 12. The trajectory is updated to use the net figure of 12 as opposed to the Council's gross figure of 13.	monitoring year in the 2014 housing trajectory's net completions figure. Therefore the number of completions with regard to this site is correct and should be 13.

A.8 Further to this assessment, the Council has identified a further revision which is required to be made as consequence of the use of net rather than gross figures. That amendment is as follows:

Site	Amendment
55 – 57 Regent Street	The planning permission has been removed from the small sites section of the revised trajectory as the net completions figure for the site is 8. These figures are now accounted for in the <i>Identified Windfall – Very Small Sites (0 to 9 dwellings)</i>

#### Identified Windfall – Very Small Sites (0 to 9 dwellings) with planning permission

A.9 This is a new addition to the Council's housing trajectory approach and identifies all sites which have planning permission for 9 or less dwellings. It is split into two categories: sites with planning permission that are under construction and sites with planning permission where construction has not yet commenced. All entries are expressed as net completions.

#### Unidentified Windfall

A.10 This section includes windfall information, which was previously found in the *Additional Allocations in the Local Plan 2014* table of the 2014 trajectory. Certain deductions were made to figures apportioned to years 2016/17, 2017/18 and 2018/19 in the revised trajectory to ensure that the total windfall figure for the year did not exceed 123. Unidentified windfalls are expressed as net completions.

#### **Additional Allocations in the Local Plan 2014 Table**

A.11 This table no longer includes a windfall figure in the revised trajectory as it has been consolidated into the new Windfall table and renamed *Unidentified Windfall* (see above).

**Housing Trajectory Summary Tables**

A.12 The uppermost summary table in the revised housing trajectory (Housing Trajectory Summary 2014/15 to 2030/31) has been adapted to reflect the amended housing trajectory table headings. This has meant that the figures in some years (in both summary tables) have changed and that the Council now has a surplus of 117 residential units against its objectively assessed need of 14,000 as opposed to a surplus of 102 dwellings as previously indicated in the 2014 trajectory.