



South
Cambridgeshire
District Council

Local Development Framework
Site Specific Policies DPD

Responding to a Housing Shortfall

Technical Annex

DRAFT

October 2008

Responding to a Housing Shortfall

Technical Annex

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INDEPENDENT EXAMINATIONS LOCAL DEVELOPMENT FRAMEWORK SOUTH CAMBRIDGESHIRE

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Our Ref: GA/NWCAAP
Your Ref:

14th March 2008

Mr K Miles
Planning Policy Manager
South Cambridgeshire District Council

Dear Mr Miles

North West Cambridge AAP

The Inspectors have concluded that there is a shortfall of housing provision provided through the Site Specific Policies DPD (SSDPDP), of about 1600 dwellings, in meeting the requirement set out in the Core Strategy DPD. From the examination so far, there are not obvious sites suitable for allocation of this number of dwellings without a further sustainability assessment which makes an independent comparative analysis of the most suitable sites. Alongside this statement we are asking the Council to undertake such a comparative assessment. It is understood that the Council will be willing to undertake this work, but inevitably this will take a significant period of time, including the public consultation which is an integral part of such an assessment.

At the same time, the Inspectors note the recent announcement by the Council that the submission of the North West Cambridge AAP (NWCAAP) is being brought forward, with a new submission date of mid May. The Planning Inspectorate, in consequence, will be appointing the same Inspectors to hold this examination as were appointed to examine the 6 documents submitted in January 2006.

It will be remembered that the Inspectors have, in addressing any housing shortfall, resisted the contention that they could take into account possible housing provision arising from the NWCAAP. However, the delay in finalising the examination of the SSPDPD makes it possible for the examination of the NWCAAP to be co-ordinated with the closing stages of the SSP examination. In this way, any

contribution to the shortfall made by the provisions of the NWCAAP can be taken into account.

Before making a public announcement, the Council's reactions to the above are sought.

Yours sincerely

Gloria Alexander
Programme Officer

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14th March 2008

Mr K Miles
Planning Policy Manager
South Cambridgeshire District Council

Dear Mr Miles

SITE SPECIFIC POLICIES DPD PROGRESSING THE EXAMINATION

As previously indicated, the Inspectors have found a substantial shortfall in the dwelling capacity of the land allocated in the various DPDs submitted in January 2006. That shortfall amounts to about 1600 dwellings. The Site Specific Policies DPD fails to make up the deficiency, and will be found to be unsound unless changed to include sufficient land to make up the deficit.

The Inspectors consider that, in the interests of the proper planning of the area, the DPD should be changed to allocate sufficient housing land to meet the Core Strategy requirement. It is their view that this cannot be done without more comparative analysis of the omission sites put forward by objectors, and that this is a task only the Council can do.

Accordingly, the Inspectors request the Council to carry out a comparative assessment of omission sites and submit a list of the Council's preferred sites for allocation, with reasons why these are the sites most suited to make up the shortfall. The Inspectors will then take account of this work in their further examination of the DPD.

When considering sites for comparison from those put forward in the representations, clearly the Council should select on the basis of the sequential approach set out in the Core Strategy DPD. If the Council is agreeable to undertaking this work, the Inspectors would request that, before the assessment is begun, they are given sight of the list of sites intended to be compared.

In view of the decision that is being conveyed to the Council, at the same time as this request, that the remainder of the examination of the Site Specific Policies DPD continues alongside the examination of the shortly to be submitted North West Cambridge AAP (NWCAAP), if possible the NWCAAP location should be included in the comparative assessment. Without making any assumptions about the outcome of the AAP examination, the Inspectors are aware that the Council has sought to include a figure of 400 dwellings in its Housing Trajectory: the area that would provide for such a number might be used for the assessment.

Yours sincerely

Gloria Alexander
Programme Officer

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Our ref:
Your ref:
Date: 22 April 2008

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Dear Gloria

SITE SPECIFIC POLICIES DPD PROGRESSING THE EXAMINATION – RESPONDING TO THE HOUSING SHORTFALL

The Inspectors advised the Council in December 2007 that they were minded to find a substantial housing supply shortfall against a requirement of 20,000 dwellings by 2016, in the range 1,000 to 2,000 dwellings. Further to the Council's request of the Inspectors for confirmation of any actual housing shortfall, the Inspectors wrote to the Council on 14 March advising that they have concluded that there is a shortfall of 1,600 dwellings in the district.

The Inspectors have requested that the Council carry out a comparative assessment of objection sites and submit a list of the Council's preferred sites for allocation, with reasons why these are the sites most suited to make up the shortfall. They state that these should be selected on the basis of the sequential approach set out in the Core Strategy DPD. They recognise that this will include the need for further Sustainability Assessment and public consultation upon it. They have asked to be given sight of the list of sites intended to be compared before the assessment is begun.

The Inspectors have recognised that this will take a significant period of time and that this delay makes it possible for the examination of the NW Cambridge AAP to be coordinated with the closing stages of the SSP examination such that any contribution made by NW Cambridge can be taken into account. The Council welcomes the advice that the Inspectors feel circumstances are such that the North West Cambridge AAP can now be taken into account, which had always been the Council's position.

The Inspectors' clarification on the actual housing shortfall they have found is helpful and they have reached the same conclusions as the Council on the need for a further process to be undertaken including sustainability appraisal and public consultation before they can issue a

binding report that includes any new housing allocations. The Council now considers that it can assist the Inspectors to take forward the necessary process.

A constraint on the Council in assisting the Inspectors is now that whilst the overall shortfall has been established, the Inspectors have not provided any information on how they reached their conclusion. This does result in some problems for the Council in carrying out the assessment requested.

Questions include whether the Inspectors have included any allowance for windfalls. This will be relevant in advising the Inspectors on sites to make up the shortfall. For example, sites consistent with policy within village frameworks or on sites such as Major Developed Sites in the Green Belt that would not normally have been allocated but would have formed part of the windfall allowance could now reasonably become prospective new allocations to assist with making up the shortfall where there is sufficient certainty using the PPS3 tests that they will come forward. Indeed, PPS3 advises that supply can include sites that are not allocated where the necessary tests are met, but the Inspectors have indicated a wish to fully meet the housing requirement through allocations and therefore if the Inspectors have rejected a windfall allowance in reaching their conclusions on the shortfall, this has implications for the process to be undertaken.

Other questions are whether the Inspectors have rejected any of the Council's proposed housing allocations or assumptions on capacity at particular sites and the reasons for reaching such a view. This information would inform our consideration of potential new allocations. It may also be that circumstances have or will move on in relation to particular sites where the Inspectors have concerns and the Council may be in a position to provide new evidence on those sites as if for example they gain planning permission for a particular level of development.

It would therefore be helpful and enable the Council to provide a better and more complete response which does not include any guess work on the Inspectors' conclusions, if the Inspectors could provide an early statement on their conclusions on housing land supply and conclusions on housing allocations and capacity. If this is not possible, confirmation of whether they have included a windfalls allowance would be helpful as an informative to the housing shortfall.

The Council has given consideration to the process it intends to follow in considering site allocations to make up the housing shortfall. It would be helpful if the Inspectors could confirm whether this process would provide them with the necessary robust consideration they need to reach conclusions in their Report. The process proposed is attached to this letter.

Also attached is the list of sites on the edge of Cambridge that the Council intends to include in its assessment, as well as the list of sites at Rural Centres and other locations consistent with policy, eg. Major Developed Sites in the Green Belt that will be assessed if the shortfall cannot be fully met at the top of sequence. These lists include all objection sites in these locations to ensure a holistic and consistent approach. At this stage it is the locations that are considered as reasonable alternative locations for new housing allocations. Initial assessment of all the objection sites at these locations will narrow down to a list of reasonable alternative site options with the least and no fundamental planning objections for more detailed assessment.

The process clearly involves a number of stages which will inevitably run into a number of months, particularly taking account of sustainability appraisal by independent consultants, public

consultation and consideration of representations. At this time the Council would hope that it would be in a position to undertake public consultation on its draft preferred sites and sustainability appraisal in October/November and advise the Inspectors of its preferred sites to make up the housing shortfall by the end of January 2009.

Yours sincerely

Keith Miles

Keith Miles

Planning Policy Manager

SITE SPECIFIC POLICIES DPD EXAMINATION

COUNCIL'S PROPOSED PROCESS TO IDENTIFY PREFERRED SITES TO MAKE UP THE HOUSING SHORTFALL

Process

The broad process that officers consider is necessary to respond to the Inspectors request is as follows (Member stages in bold):

1. Identify and take account of other sources of housing supply:
 - a. NW Cambridge Area Action Plan – the Submission AAP was agreed by South Cambridgeshire District Council on 7 April 2008 and Cambridge City Council will consider the report on 24 April 2008. The plan will be submitted to the Secretary of State on 19 May 2008. The Submission AAP housing trajectory shows 550 dwelling completions in South Cambs for the period to 2016.
 - b. An update of housing completions and planning permissions to end March 2008 (this is particularly relevant if the Inspectors have not included an allowance for windfalls in concluding the 1600 dwelling shortfall).
2. Identify the residue of housing shortfall to be identified through new allocations in the SSPDPD.
3. Identify the stages in the sequence that will be considered in the assessment of alternative site options to make up the shortfall. Consistent with the sequence set out in the Core Strategy, this will be sites at:
 - a. the edge of Cambridge, followed by
 - b. the Rural Centres, as the most sustainable villages in the rural area and top of the rural settlement hierarchy.

Note: There are no objection sites at Northstowe in relation to the SSPDPD and no potential for it to provide further dwellings in the plan period.

4. Identify the relative sustainability merits of those locations both in terms of proximity / access to high order services in Cambridge and local sustainability within the specific settlement. The relative sustainability merits of the Rural Centres and how they relate to the overall development strategy having regard to proximity to Cambridge and accessibility to High Quantity Public Transport will also be taken into account.
5. Identify the alternative site options for assessment. This will be consistent with the Core Strategy development sequence and will therefore include all the objection sites relating to the edge of Cambridge. Only if the shortfall cannot be fully met at the top of the sequence will the next available stage in the sequence be considered. This will include sites at Rural Centres and any other objection sites close to Cambridge where housing

development would be consistent with policy, eg. Major Developed Sites in the Green Belt.

6. Carry out an initial consistent, comparative assessment of the alternative site options against key planning considerations. Reject any sites that fail against key planning criteria. Carry out more detailed comparative assessment of the remaining reasonable alternative site options.
7. Submit the alternative site options to a Sustainability Appraisal (SA).
8. Consider the results of the planning assessment, the SA, and consider the representations made against the site at the Objection Sites consultation.
9. Officer initial conclusion on the sites that should be put forward for public consultation to make up the housing shortfall.
10. Sustainability Appraisal of the cumulative and synergistic effects of the proposed additional housing allocations on the SSPDPD as a whole.
11. Habitats Directive Assessment (HDA) of the proposed additional housing allocations.
12. Officer conclusion on the sites that should be put forward for public consultation to make up the housing shortfall taking account of the results of SA and HDA. Incorporate in a consultation document that provides an audit trail to the site assessment process with necessary supporting documents (including SA, HDA). It will set out the preferred sites to make up the shortfall and also detail the alternative options considered, and why they were not identified as the preferred approach.
13. **Portfolio Holder decision to undertake public consultation on proposed additional housing allocations and agree consultation documents.**
14. Undertake public consultation.
15. Consider results of public consultation and any revision to proposed housing allocations.
16. **Cabinet decision on proposed housing allocations to be commended to the Inspectors and the reasons why these are the sites most suited to make up the shortfall.**
17. Submit proposed housing allocations to make up the shortfall and supporting documents to the Inspectors.

List of sites to be considered

The sites are organised by stage in the Core Strategy Sequence. Edge of Cambridge sites will be considered first and sites below this stage will only be considered if the shortfall cannot be met in full at the first stage in the development sequence.

Edge of Cambridge

Location	Rep. Numbers	Site Address	Green Belt	Site Area
Edge of Cambridge	N/A	North West Cambridge Area Action Plan – Submission Draft	See note 1	31.88
	12320 / 12329	Land between Huntingdon Road, Histon Road and A14, North West Cambridge	Yes	80.12
	12023	Land north of Fen Road, Milton	Yes	1.75
	11839	Chesterton Fen, Milton	Yes	46.79
	12336	Land West of Fulbrooke Road, Grantchester	Yes	0.44
	12858	Land North of Barton Road	Yes	99.44

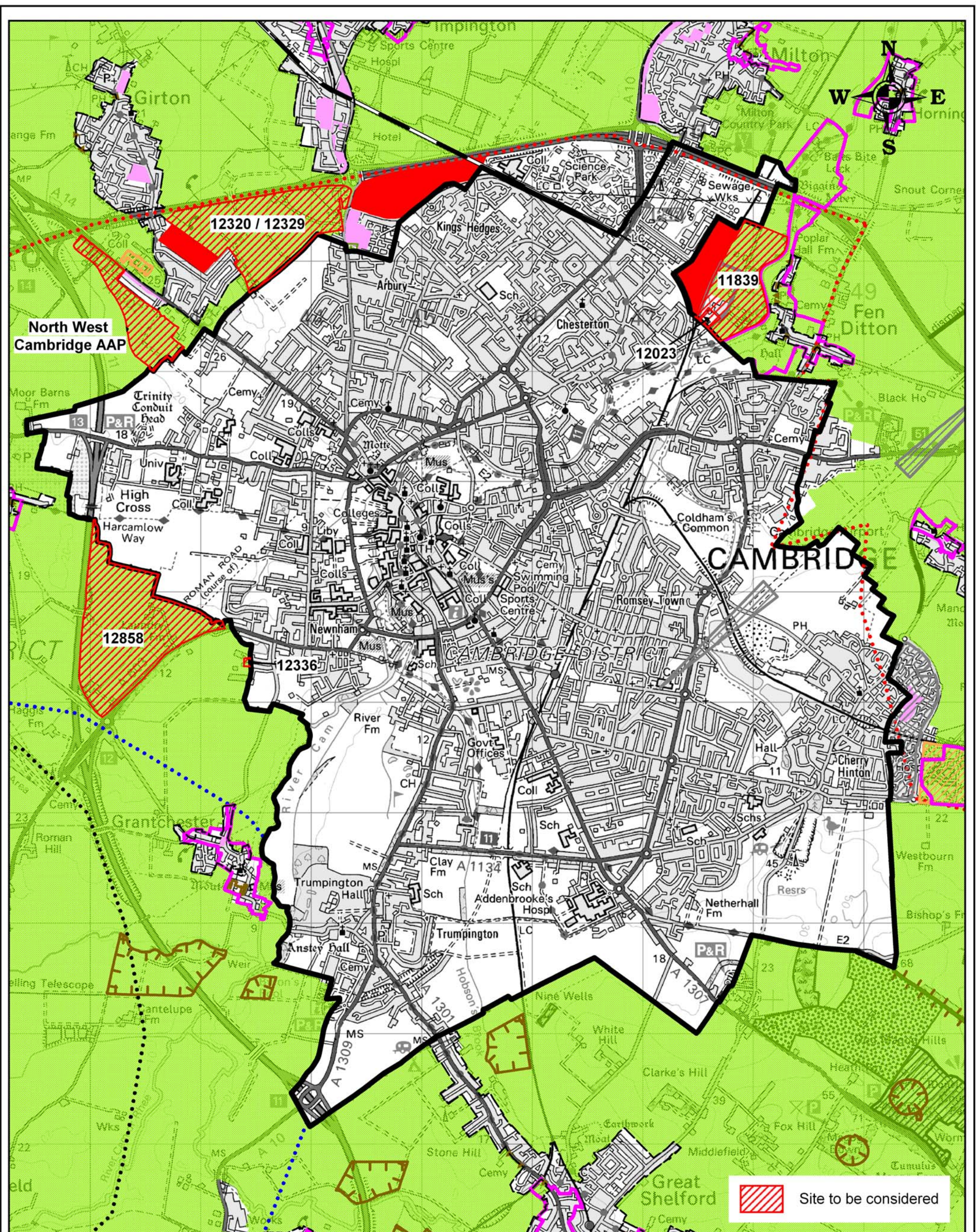
Note 1: The Submission Draft North West Cambridge AAP proposes to delete the site from Green Belt.

Rural Centres

Location	Rep. Numbers	Site Address	Green Belt	Site Area
Cambourne	15856	Land West of Cambourne	No	161.94
	13298	Land to the North of the A428 and East of the A1198	No	111.44
	15855 / 15859	Land North of A428	No	482.56
	15857	Bourn Airfield (1)	No	200.41
	15858	Bourn Airfield (2)	No	109.49
Fulbourn	14613 / 15433	The Ida Darwin Hospital	Yes (Major Developed Site)	14.06
	12290	Land between Teversham Road and Cow Lane	No	6.00

Location	Rep. Numbers	Site Address	Green Belt	Site Area
	13163	Land west of Station Road / north of the Chantry	Yes	12.53
	11967	Land at Home End	Yes	0.53
	11969	Land either side of Hinds Loder (Track)	Yes	13.84
	14720 / 14721 / 14722 / 14723	Land behind 3-7 Dogget Lane	No	0.76
	14724	Land at 9 Dogget Lane	No	0.74
Great Shelford and Stapleford	13886	Land at Cabbage Moor	Yes	1.81
	13898	Land behind 34 – 60 Hinton Way	Yes	2.29
	12100	Land at Mingle Lane / Hinton Way	Yes	10.10
	12533	Land north of Gog Magog Way	Yes	0.38
	13529	Land to the South of Peacocks	Yes	2.21
	13528	Land immediately South of Peacocks	Yes	0.95
	14372	Powells garage, Wollards Lane	No	0.27
	14328	Land north west of 11 Cambridge Road	Yes	1.43
	14400	North of Stonehill Road, South of Westfield Road	Yes	3.92
Histon and Impington	12117 / 12119	59 & 61 Cottenham Road	Yes	0.43
	11778	Land south of Clay Close Lane	Yes	1.02
	13083 / 13676	Land North of the Holiday Inn	Yes	4.23
Sawston	11772	Land at 41 Mill Lane	No	1.58

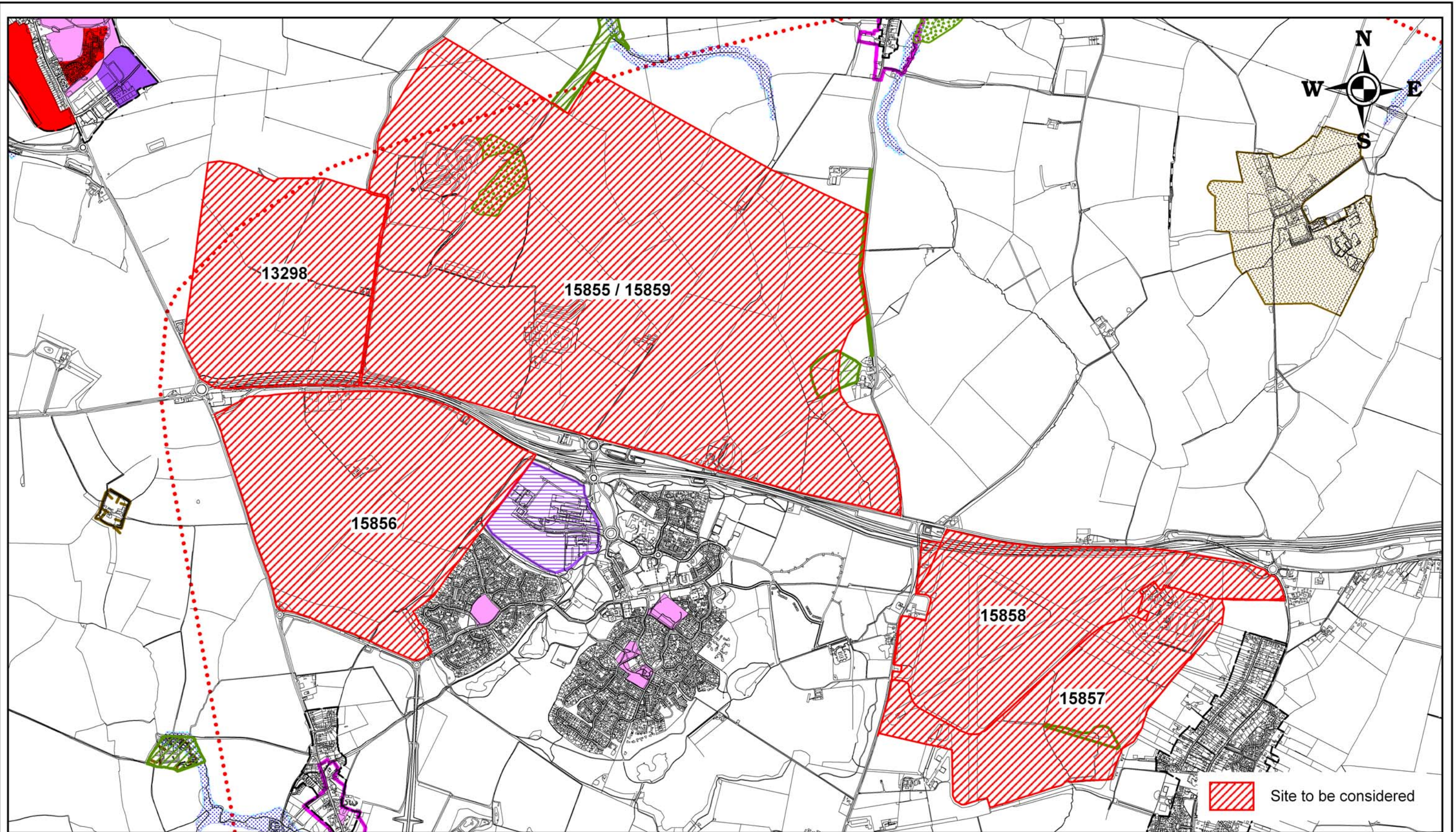
Location	Rep. Numbers	Site Address	Green Belt	Site Area
	11999	Land Behind White Field Way	Yes	2.90
	14432	Land at 64 Cambridge Road	Yes	0.16
	12242	Land at Deal Grove	Yes	18.97



Sites on the Edge of Cambridge

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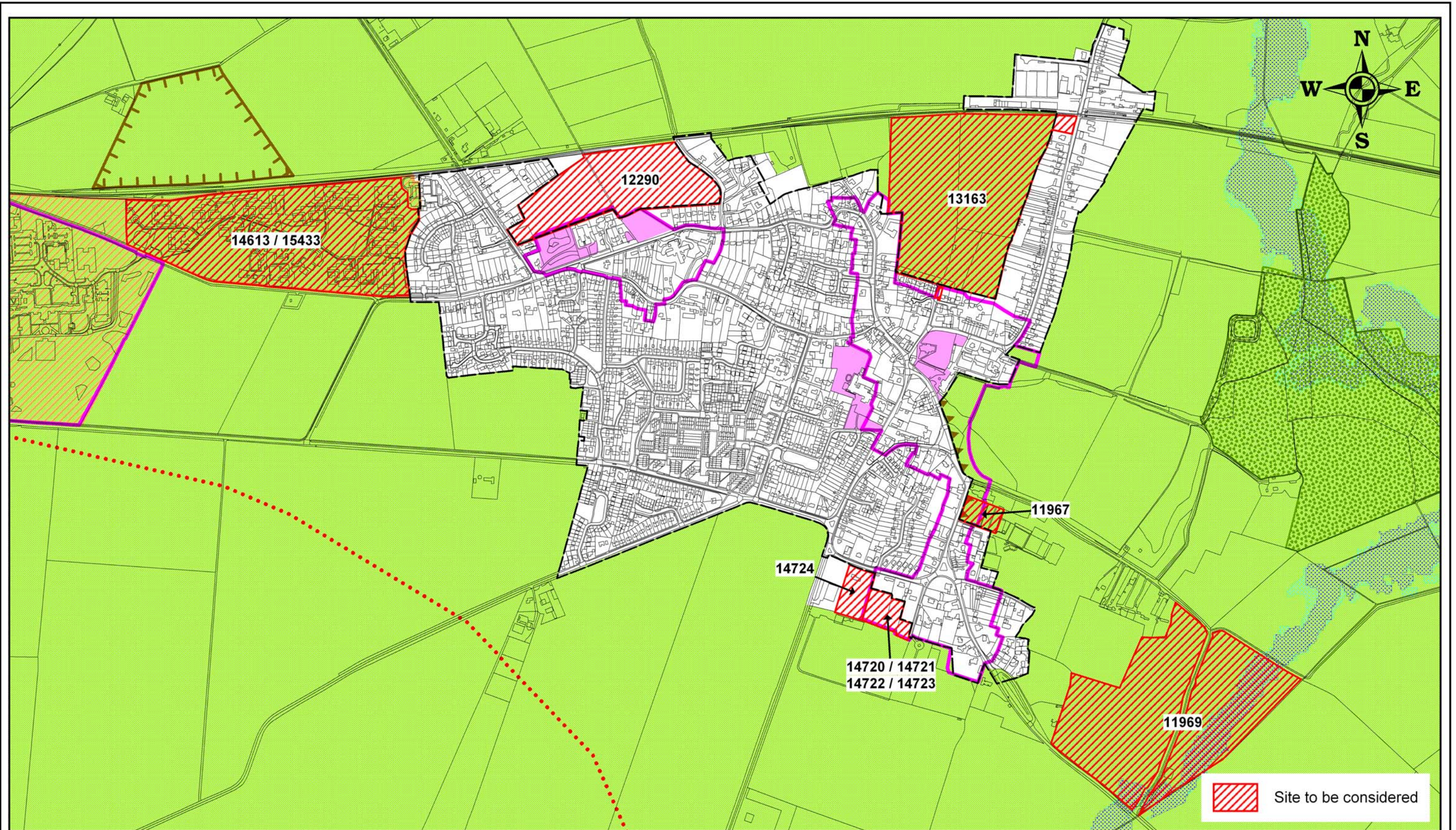
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Cambourne

Date:	April 2008
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 Site to be considered



Fulbourn

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