



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

**Matter 1 – Legal Process and Requirements**

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

October 2014



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## List of Abbreviations

DPD	Development Plan Document
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEA	Strategic Environmental Assessment
SPD	Supplementary Planning Document

## Introduction

1. This statement sets out both Councils' response in relation to the Inspector's Matters 1a to 1g regarding legal process and requirements.
2. All the documents referred to in this statement are listed at Appendix 1; and examination document reference numbers are used throughout for convenience.

### **Matter 1a: Have the Local Plans been prepared in accordance with the relevant Local Development Schemes?**

3. The Cambridge and South Cambridgeshire Local Plans are considered to accord with the Councils' respective LDSs.
4. Cambridge City Council's current Local Development Scheme<sup>1</sup> (LDS) was published on 26 March 2014, whilst South Cambridgeshire District Council's current LDS<sup>2</sup> was published on 21 February 2014. The progress against each Local Development Scheme has been set out in the Annual Monitoring Report produced by each respective Council on an annual basis. Timetables for the development of DPDs are available on the Councils' websites<sup>3</sup>.

### **Matter 1b: Have the Local Plans been prepared in compliance with the relevant Statement of Community Involvement?**

5. For Cambridge, a Consultation and Community Engagement Strategy for the Local Plan Review<sup>4</sup> was drawn up and approved by Councillors<sup>5</sup>. This document set out the approach to consultation and community engagement from the early stages of the review process and was drafted having regard to the Council's 2007 Statement of Community Involvement (SCI) and the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended in 2008 and 2009) as well as the emerging Town and Country Planning (Local Planning) (England) Regulations (2012). This strategy was taken forward into Cambridge's current SCI<sup>6</sup>, adopted in November 2013.
6. South Cambridgeshire District Council's current SCI<sup>7</sup> was adopted in 2010.
7. Consultation processes for both Local Plans are considered to be compliant with the relevant SCI and regulations in place at the time of drafting. Further details on consultation and community engagement for both Local Plans can be found in the

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<sup>1</sup> Cambridge City Council Local Development Scheme (RD/Sub/C/130)

<sup>2</sup> South Cambridgeshire Local Development Scheme (RD/Sub/SC/130)

<sup>3</sup> See <https://www.cambridge.gov.uk/local-development-scheme-and-latest-information> and <https://www.scambs.gov.uk/content/local-development-scheme> for further information.

<sup>4</sup> Cambridge City Council: Consultation and community engagement strategy (RD/LP/190)

<sup>5</sup> See Development Plan Scrutiny Sub-Committee minutes, November 2011 (RD/CR/230)

<sup>6</sup> Cambridge City Council Statement of Community Involvement (RD/Sub/C/140)

<sup>7</sup> South Cambridgeshire District Council Statement of Community Involvement (RD/Sub/SC/140)

respective Statements of Consultation<sup>8</sup>, which address compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The Councils have not received any objections in respect of preparing the Local Plans based on non-compliance with their SCIs. Further information on how the Councils have addressed issues raised in representations throughout the plan-making process can be found in Cambridge's Statement of Consultation and Audit Trails<sup>9</sup> and in South Cambridgeshire's Sustainability Appraisal (Annex A: Audit Trails)<sup>10</sup>.

### **Matter 1c: Have the Local Plans had regard to the Sustainable Communities Strategies?**

8. The Local Plans are key documents in the delivery of the priorities set out in the sustainable community strategies<sup>11</sup>, which seek to deliver sustainable communities that are thriving, safe, environmentally sensitive, and affordable places in which to live, and where the growth of the city and sub-region does not jeopardise the interests of current or future generations.
9. In 2011, the Secretary of State for Communities and Local Government confirmed the intention to repeal the duty to prepare a Sustainable Community Strategy<sup>12</sup>. The revocation of the duty is currently going through Parliament as part of the Deregulation Bill 2014 (Clause 75). As a result of this, the authorities have not updated their current Sustainable Community Strategies, although during the preparation of the Local Plans for Cambridge and South Cambridgeshire consideration has been given to those produced for Cambridge, South Cambridgeshire and for the whole county.

### **Matter 1d: Have the Local Plans been subject to adequate Sustainability Appraisal?**

10. The Sustainability Appraisal (SA) Reports<sup>13</sup> which accompany the plans meet the requirements of the Planning and Compulsory Purchase Act 2004<sup>14</sup>, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Strategic Environmental Assessment (SEA) requirements of the Environmental Assessment of Plans and Programmes Regulations 2004<sup>15</sup>. Both plans have been subject to adequate Sustainability Appraisal, incorporating Strategic Environmental Assessment.

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<sup>8</sup> Paragraphs 1.3 – 5.6 of Cambridge's Statement of Consultation (RD/Sub/C/080) and South Cambridgeshire's Statement of Consultation (RD/Sub/SC/090)

<sup>9</sup> Cambridge Statement of Consultation and Audit Trails (RD/Sub/C/080)

<sup>10</sup> South Cambridgeshire SA (RD/Sub/SC/060) Annex A

<sup>11</sup> The relevant Sustainable Communities strategies for the area are 2007 Cambridge Sustainable Community Strategy (RD/SPD/170); the South Cambridgeshire Sustainable Community Strategy 2008-2011 (January 2008) (RD/SPD/171); and the Cambridgeshire Vision: County-wide Sustainable Community Strategy 2007 - 2021 (RD/CSF/110)

<sup>12</sup> For further information, see Best Value Statutory Guidance at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/5945/1976926.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5945/1976926.pdf)

<sup>13</sup> South Cambridgeshire SA (RD/Sub/SC/060); Cambridge SA (RD/Sub/C/030)

<sup>14</sup> Planning and Compulsory Purchase Act 2004 (RD/Gov/090)

<sup>15</sup> See <http://www.legislation.gov.uk/ukxi/2004/1633/made>.

11. From the outset of both Local Plans' preparation, and throughout the subsequent processes, a series of iterative appraisals has been published and consulted upon<sup>16</sup>. At each stage, comments were considered and, where appropriate, resulted in changes to the Plans<sup>17</sup>.
12. Each authority's SA objectives were established early in the process and set out in the Councils' respective Scoping Reports<sup>18</sup>, alongside baseline information, plans, programmes and policies and their objectives and local sustainability issues. After consultation with key organisations, the SA objectives were revised, where appropriate, and were then used for subsequent appraisals. The key environmental organisations were consulted at each plan-making stage as the SA evolved alongside the plans. The final objectives are detailed in the Sustainability Appraisals<sup>19</sup>.
13. At each appraisal stage, the likely effects of the reasonable alternatives available were identified, described and evaluated and possible mitigation measures to minimise adverse effects identified were proposed<sup>20</sup>. The SA findings informed the choice of preferred options and helped to refine policies taken forward in the Plans<sup>21</sup>. The SAs provide an appropriate level of detail, focusing on significant effects identified at the strategic level and giving reasons for the selection of the preferred approach and the rejection of alternatives<sup>22</sup>.
14. Both Councils' SAs considered a range of jobs and homes targets<sup>23</sup>. After considering alternatives, both authorities settled on the objectively assessed needs identified by the Strategic Housing Market Assessment, which took an integrated approach to jobs and homes<sup>24</sup>. In the case of Cambridge, the jobs target was higher than the options considered at the Issues and Options 2012 stage, but there was a clear justification for this approach<sup>25</sup>.

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<sup>16</sup> See Appendix 2 of this statement for a table illustrating the Sustainability Appraisal stages.

<sup>17</sup> Responses to Issues Raised: South Cambridgeshire SA (RD/Sub/SC/060) Part 3 Appendix 2 and Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080)

<sup>18</sup> Scoping Reports were incorporated into the Final SA Reports: South Cambridgeshire SA (RD/Sub/SC/060) – Part 2; Cambridge SA. (RD/Sub/C/030) Volume 1 Part 3

<sup>19</sup> South Cambridgeshire SA (RD/Sub/SC/060) Part 3 Section 2.4 (Page 3-4); Cambridge SA (RD/Sub/SC/060): Volume 1: Paragraph 1.14.

<sup>20</sup> South Cambridgeshire SA (RD/Sub/SC/060): Part 3 Section 3 The Identification and Assessment of Alternatives; Cambridge SA (RD/Sub/C/030): Part 4.5.

<sup>21</sup> South Cambridgeshire SA (RD/Sub/SC/060): Part 3 Section 4 Results of the Appraisal of the Local Plan; Cambridge SA (RD/Sub/C/030): Part 4.

<sup>22</sup> South Cambridgeshire SA (RD/Sub/SC/060): Part 3 Section 3 - 3.2.6 Reasons for choosing the preferred option for the further sites in South Cambridgeshire; Cambridge SA (RD/Sub/C/030): Part 4.5.

<sup>23</sup> South Cambridgeshire Issues and Options 2012 Issues 3 and 4 – Initial Sustainability Appraisal (RD/LP/040) Appendix 5, Final SA Reports: South Cambridgeshire SA (RD/Sub/SC/060) Part 3 Appendix 3, Annex A Chapter 2; Cambridge SA (RD/Sub/C/030) Volume 1 Sections 4.2, 4.3, 4.5 and 4.6

<sup>24</sup> South Cambridgeshire SA (RD/Sub/SC/060) Annex A Chapter 2 Spatial Strategy – (Housing Provision Page A65) (Jobs Page A51); Cambridge SA (RD/Sub/C/030): Parts 4.3 and 4.6.

<sup>25</sup> Cambridge SA Volume 1 (RD/Sub/C/030) paragraph 4.5.7 to 4.5.13.

15. The Councils worked together to appraise alternatives related to the development strategy, and particularly options related to the edge of Cambridge.
16. A pro forma was developed to appraise sites on the edge of Cambridge, in order to take into account both Councils' sustainability issues. The links between the sustainability objectives and the criteria were clearly established<sup>26</sup>. The pro formas included a number of issues related to deliverability, which are reasonable considerations for assessing whether a site should be included in a development plan.
17. The Local Plans did not approach Green Belt status as an absolute constraint on development and, indeed, propose removal of some sites from the Green Belt. The Green Belt is recognised in the SAs, having been identified through the scoping process as an important issue related to the area's context in terms of landscape, townscape and the historic environment<sup>27</sup>. This importance is acknowledged by the joint SA of the Development Strategy which notes that the characteristics afforded to Cambridge by the Green Belt "are valued assets and significantly contribute to the character and attractiveness of the historic city and the wider Cambridge area, and the quality of life enjoyed here. The Green Belt around Cambridge has an inextricable relationship with the preservation of the character of the city, which is derived from the interplay between the historic centre, the suburbs around it and the rural setting that encircles it"<sup>28</sup> Where the SA identified that the impact of development was not considered to be capable of mitigation, sites have been removed from consideration on the basis that development in these locations would not be sustainable. This is consistent with the Government's view of sustainable development defined by its National Planning Policy Framework<sup>29</sup> (NPPF) and National Planning Practice Guidance (NPPG). Indeed, the revision to the NPPG on 6 October 2014 emphasises that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."<sup>30</sup>
18. The SAs provide information on the relative merits of different strategic approaches to delivering growth, including options which would result in no growth on the edge of Cambridge, through to significant growth<sup>31</sup>. The two Councils worked together to review the Development Strategy for the Cambridge area. A joint SA of the Development Strategy<sup>32</sup> provides an assessment of the sustainability implications of focussing on different stages of the development sequence (Cambridge Urban Area, Edge of Cambridge, New Settlements, more sustainable villages, and less

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<sup>26</sup> Green Belt Site and Sustainability Appraisal Assessment Pro forma Table Showing links to Cambridge SA Topics and South Cambridgeshire Sustainability Objectives - Issues & Options 2 Part 1 - Joint Consultation on Development Strategy & Site Options on the Edge of Cambridge (RD/LP/160) – Appendix 1.

<sup>27</sup> South Cambridgeshire SA (RD/Sub/SC/060) Part 2 (Scoping) Appendix 1 Issue 13.2. Green Belt; Cambridge SA (RD/Sub/C/030)– Part 3, Sections 3.13 – 3.15.

<sup>28</sup> South Cambridgeshire SA (RD/Sub/SC/060) Part 3 Appendix 1 paragraph 58.

<sup>29</sup> NPPF (RD/NP/010) Paragraphs 83-85

<sup>30</sup> NPPG (RD/NP/020) Housing and Economic Land Availability Assessments Reference ID: 3-044-20141006

<sup>31</sup> Cambridge SA (RD/Sub/C/030) Volume 1 Section 4.2 and 4.3 (options 2 to 5).

<sup>32</sup> Cambridge SA (RD/Sub/C/030) Volume 1 Section 4.2; and South Cambridgeshire SA (RD/Sub/SC/060) Part 3, Appendix 1



sustainable villages). This was undertaken in light of the SA topics/objectives/issues identified by the two Councils. In addition, a range of development packages were considered, which included comparisons with edge of Cambridge development, new settlement, or village focused strategies<sup>33</sup>.

19. The SAs identified various positive and negative effects related to strategic alternatives. The comparison of options; the reason for selecting the preferred approach; and rejection of others is fully explained. The cumulative and residual effects of the preferred strategy were identified<sup>34</sup>. The SA process has made an effective contribution to the plan-making process.

### **Matter 1e: Have the Local Plans been prepared in accordance with the Habitat Directive?**

20. Both Local Plans have been subject to a Habitats Regulations Assessment (HRA) Screening Report<sup>35</sup>. These assessments both concluded that there was no likelihood of significant effects on the identified Natura 2000 sites as a consequence of the policies and allocations contained within each authority's Plan. These conclusions were supported by Natural England<sup>36</sup>, in a letter to Cambridge City Council dated 18 July 2013<sup>37</sup> and in a letter to South Cambridgeshire District Council dated 21 February 2014<sup>38</sup>. When preparing Minor Modifications as set out in the Schedule of Proposed Changes following Proposed Submission Consultation<sup>39</sup>, Cambridge City Council considered the need to make changes to both the SA and the HRA. It was concluded that none of the proposed minor modifications impacted on the findings of the SA or HRA. South Cambridgeshire District Council also concluded that the Minor Modifications proposed<sup>40</sup> would not impact on the findings of the SA and HRA, which followed a screening by the Council and a review by Environ. Proposed Major Modifications<sup>41</sup> were reviewed through the South Cambridgeshire HRA prior to submission<sup>42</sup>, and it concluded that there was no likelihood of significant effects.

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<sup>33</sup> South Cambridgeshire SA (RD/Sub/SC/060) Part 3 Appendix 4.

<sup>34</sup> South Cambridgeshire SA (RD/Sub/SC/060) Part 3 section 4 table 4.5; Cambridge SA (RD/Sub/C/030): Part 4.2.

<sup>35</sup> As set out in the Cambridge City Council Habitats Regulations Assessment Parts 1 and 2 (RD/Sub/C/120) and South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060).

<sup>36</sup> The statutory consultation body for HRA.

<sup>37</sup> See Appendix 8 of the Cambridge Statement of Consultation (RD/Sub/C/080).

<sup>38</sup> See Habitats Regulations Assessment Screening Report (Annex E: Correspondence from Natural England – Page 117) within South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060).

<sup>39</sup> Addendum to the Cambridge Local Plan 2014 Proposed Submission Document (July 2013): Schedule of proposed changes following proposed submission consultation (RD /Sub/C/050)

<sup>40</sup> South Cambridgeshire Schedule of Proposed Minor Changes (RD/Sub/SC/040)

<sup>41</sup> South Cambridgeshire Schedule of Proposed Major Modifications (RD/Sub/SC/030)

<sup>42</sup> South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060) Table 5.2, page 21.

**Matter 1f: Have all the procedural requirements for publicity been met?**

21. The consultation and publicity processes undertaken for each stage of plan-making for Cambridge are set out in the Council's Statement of Consultation and Audit Trails<sup>43</sup>. Cambridge City Council also prepared a Consultation and Community Engagement Strategy for the Local Plan review<sup>44</sup>, which set out the Council's consultation arrangements.
22. South Cambridgeshire District Council produced the South Cambridgeshire Statement of Consultation<sup>45</sup>, which sets out consultation and publicity arrangements for each stage of plan-making.
23. Both Councils consider that the procedural requirements for publicity have been met in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>46</sup> and earlier regulations, relevant to the point of preparation of the plan.
24. A number of specific points regarding the form of consultation were raised in representations to the South Cambridgeshire Proposed Submission Consultation. The Council considers it has carried out a comprehensive consultation exercise to support plan-making. Responses to detailed points can be found in South Cambridgeshire's audit trail document which forms part of the SA<sup>47</sup>.

**Matter 1g: Have the Councils submitted robust evidence to demonstrate that they have met the Duty to Co-operate?**

25. In line with Section 33A of the Planning and Compulsory Purchase Act 2004<sup>48</sup>, the NPPF<sup>49</sup> states that public bodies have a Duty to Co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Councils have engaged constructively, actively and on an ongoing basis during the preparation of the two Local Plans, both with each other and with other Duty to Co-operate bodies to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters. Both Councils consider that the Local Plans have been prepared in accordance with the Duty to Co-operate set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and are also consistent with the NPPG<sup>50</sup>.

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<sup>43</sup> See RD/SUB/C/080, pages 5 – 14 (paragraphs 1.3 to 5.6).

<sup>44</sup> RD/LP/190

<sup>45</sup> RD/Sub/SC/090

<sup>46</sup> RD/Gov/020

<sup>47</sup> South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060) Annex A, in particular Chapter 1 - Page A5 to A14, Issues on Bourn Airfield site Chapter 3 A282 to A289.

<sup>48</sup> RD/Gov/090

<sup>49</sup> RD/NP/010

<sup>50</sup> RD/NP/020

26. The Councils have submitted statements of compliance with the Duty to Co-operate<sup>51</sup>. These documents set out the Councils' extensive engagement with the prescribed Duty to Co-operate bodies, as appropriate to the Local Plans, throughout the stages of evidence base production and plan-making. Additionally, a statement of co-operation between the Greater Cambridgeshire Local Nature Partnership and the Cambridgeshire and Peterborough local planning authorities<sup>52</sup> sets out how the organisations will continue to co-operate. South Cambridgeshire District Council, Anglian Water and the Environment Agency have also produced and submitted a Joint Position Statement on foul water and environmental capacity in relation to proposed development within South Cambridgeshire<sup>53</sup>.
27. The Cambridgeshire Councils have a long history of joint working, through the preparation of structure plans, regional plans and transport strategy documents. In particular, there is a close functional relationship between Cambridge and South Cambridgeshire, reflecting the closely drawn city boundary and its rural surroundings. Cambridge and South Cambridgeshire's long history of co-operation includes working together on key strategic issues at both officer and member levels, preparation of joint Area Action Plans for major development and production of joint evidence base documents on a wide range of topics.
28. In accordance with the Duty to Co-operate, the Councils have worked together to prepare joint evidence base documents, topic papers, hearing statements, statements of common ground and their respective and complementary Local Plans on similar timescales to set out a clear development strategy for the Greater Cambridge area. At member level, the Cambridgeshire and Peterborough Joint Strategic Planning and Transport Member Group<sup>54</sup> and the Cambridge and South Cambridgeshire Joint Strategic Transport and Spatial Planning Group<sup>55</sup> have met specifically to address issues affecting the long-term planning of Cambridgeshire. Regular officer-level meetings have also taken place throughout the plan-making stages and continue to take place.<sup>56</sup>
29. Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council have worked together closely on progressing work from Issues and Options stages for the Local Plans and Transport Strategy<sup>57</sup> through to the Local Plans' submission and the Transport Strategy's adoption and beyond. A key part of developing and delivering a sustainable development strategy has involved the

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<sup>51</sup> RD/Sub/C/100 for Cambridge and RD/Sub/SC/080 for South Cambridgeshire

<sup>52</sup> RD/Sub/SC/081

<sup>53</sup> RD/Sub/SC/082

<sup>54</sup> Cambridge City Council, South Cambridgeshire District Council, Cambridgeshire County Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council and Peterborough City Council.

<sup>55</sup> Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council

<sup>56</sup> Regular Cambridgeshire and Peterborough Chief Planning Officers' meetings, Planning Policy Forum meetings of the planning policy managers across the county, and meetings between officers from Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council.

<sup>57</sup> Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)

Transport Strategy's preparation, which takes into account planned growth. Given the close linkages between planning for growth and development and for transport and accessibility, the Plans and the Transport Strategy must ensure that growth can be accommodated in the most sustainable way and that people can access the services and facilities they need in an efficient and affordable way. An important aspect of identifying the preferred development strategy involved testing the transport implications by modelling to assess likely implications of development in terms of impact on network, journey time, commuting patterns and impacts on accessibility. This also considers what measures and enhancements might be put in place to help mitigate impacts of development and enhance accessibility. During the preparation of the Transport Strategy, Cambridgeshire County Council also engaged with adjoining highways authorities. South Cambridgeshire District Council has also completed a statement of common ground with Hertfordshire County Council<sup>58</sup>.

30. Local authorities are responsible for setting the level of housing and employment provision for their areas, based on a clear understanding of the relevant housing market area and functional economic market area. The authorities forming the Cambridge Sub Region Housing Market area prepared a joint Strategic Housing Market Assessment (SHMA) as part of fulfilling the Duty to Co-operate (RD/Strat/090). The Cambridgeshire authorities, together with Peterborough City Council, then agreed a Memorandum of Co-operation which was published in May 2013<sup>59</sup>. Building on the local authorities' strong legacy of joint working, the Memorandum demonstrates that the full objectively assessed needs of the Cambridge Sub-Region housing market area identified in the SHMA will be met. It also sets out the vision and objectives for the long-term development of the area, an overview of the evidence for future levels of growth, and the broad spatial approach that will help realise the vision and the area's growth needs. South Cambridgeshire District Council has also agreed Statements of Common Ground with Uttlesford District Council<sup>60</sup> and North Hertfordshire District Council<sup>61</sup> that each district is planning to deliver sites to meet their objectively assessed housing need within their respective administrative boundaries.
31. This Memorandum of Co-operation has already been subject to scrutiny through the examinations of Fenland Local Plan – Core Strategy (adopted May 2014) and the East Cambridgeshire Local Plan. Fenland's Inspector's Report<sup>62</sup> and East Cambridgeshire's Inspector's Interim Conclusions<sup>63</sup> both conclude that the

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<sup>58</sup> South Cambridgeshire District Council and Hertfordshire County Council – Local Plan – Statement of Common Ground (RD/SCG0/050)

<sup>59</sup> RD/Strat/100

<sup>60</sup> South Cambridgeshire District Council and Uttlesford District Council: Local Plan – Statement of Common Ground (RD/030)

<sup>61</sup> South Cambridgeshire District Council and North Hertfordshire District Council: Local Plan – Statement of Common Ground (RD/040)

<sup>62</sup> Paragraph 15 of the Inspector's Report on the Fenland District Council Core Strategy Local Plan Examination – April 2014 (Rd/Strat/320).

<sup>63</sup> Paragraph 5 of East Cambridgeshire Local Examination Inspector's Interim Conclusions – 14 July 2014 (RD/Strat/310)

Memorandum of Co-operation provides clear evidence that co-operation has taken place constructively, actively and on an on-going basis.

32. The plans together provide a coherent development strategy for the Greater Cambridge area. Both Councils have committed to meeting their objectively assessed housing development needs in full in their respective areas. The phasing of development outlined in the submitted plans follows the development sequence and carries forward the development strategy from adopted plans. As expected, development is coming forward within the urban area of Cambridge and on the edge of Cambridge early in the plan period with new settlements following later in the plan period as they have a longer lead-in time before the start of delivery. In particular, the 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. These cross-boundary sites are building out from the edge of the existing built-up area with more homes being built in Cambridge in the early part of the plan period and then moving into South Cambridgeshire later on. This is a logical and appropriate way of delivering sites to meet the combined objectively assessed housing need across the Greater Cambridge area.
33. In September 2014, the Councils also agreed a further Memorandum of Understanding on the Greater Cambridge Joint Housing Trajectory<sup>64</sup>. The Memorandum of Understanding supplements the Memorandum of Cooperation of May 2013, under which the Councils have committed to meeting in full their objectively assessed needs within their respective areas, as required by the NPPF.
34. This Memorandum responds to a number of changes in circumstances since the Local Plans were submitted and is justified for the reasons set out in the subsequent paragraphs:
  - i. The Councils signed up to a City Deal agreement on 19 June 2014, along with Cambridgeshire County Council, Cambridge University and the Greater Cambridgeshire and Greater Peterborough Local Enterprise Partnership. This defines the area covered by the two districts as 'Greater Cambridge' and recognises the strong inter-relationship between the two areas. In particular, it acknowledges that Cambridge City and South Cambridgeshire District Councils, along with Cambridgeshire County Council as the Transport Authority, "have worked closely together on new Local Plans and the associated Transport Strategy and have aligned plan-making processes to achieve the benefits of what amounts to a single overarching development, infrastructure and delivery strategy for Cambridge" (City Deal document page 7<sup>65</sup>). Furthermore, as part of the City Deal arrangements, the Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019.

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<sup>64</sup> Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory. September 2014 (RD/Strat/350)

<sup>65</sup> Greater Cambridge City Deal, page 7 (RD/Strat/300)

- ii. Two Section 78 planning application appeals were allowed on 25 June 2014<sup>66</sup> 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. The Inspector did not consider that it would be the correct approach to take account of the housing supply situation in Cambridge. He commented that this approach is 'without precedent'. The Inspector 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.
  - iii. The NPPG, published on 6 March 2014 and therefore too late to influence the Local Plans submitted on 28 March 2014, provides for the circumstances that where a local planning authority cannot demonstrate a 5-year housing land supply that it can seek agreement with its neighbours under the Duty to Co-operate to meet that shortfall (Reference ID: 3-035-20140306).
  - iv. The Councils note that the East Cambridgeshire Local Plan Inspector has endorsed the 2013 Memorandum of Co-operation in his interim conclusions of 14 July 2014<sup>67</sup>. He comments in respect of the approach to part of East Cambridgeshire's objectively assessed needs being met in Peterborough under the Duty to Co-operate, 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).
35. The Memorandum of Understanding supports the joint development strategy and sequence and 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. 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. As recognised in the Memorandum of Understanding consequential modifications to both local plans are required to make clear in policy

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<sup>66</sup> 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)

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

that the housing trajectories, as updated each year in the Annual Monitoring Report, 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 are set out in Appendix 3 of this statement.

36. A number of representations have been made to both plans referencing the Duty to Co-operate. These primarily relate to the delivery of spatial strategy for the location of further housing and other uses, including whether or not Green Belt sites should be allocated for development and whether there should be more housing in villages. Some representations are also about methodologies used for various assessments. The Councils consider that these representations relate to an outcome of the Duty to Co-operate (and hence are associated with soundness concerns), rather than relating to the legal and procedural aspect of the Duty to Co-operate. Issues relating to the overarching development strategy for Cambridge and South Cambridgeshire are addressed in the Councils' Matter 2 hearing statement, whilst issues relating to housing and employment and retail needs are set out in the Councils' Matter 3 and 4 hearing statements respectively. Methodologies for housing and other assessments are considered in statements to other matters.

## **Appendix 1: List of Reference Documents**

The Councils' evidence in relation to legal process and requirements is set out in the following documents in Reference Document Library order:

### **National policy:**

- National Planning Policy Framework (NPPF) (RD/NP/010);
- National Planning Practice Guidance (NPPG)(RD/NP/020).

### **Government regulations and acts:**

- Town and Country Planning (Local Planning) (England) Regulations 2012 (RD/Gov/020);
- Planning and Compulsory Purchase Act 2004 (RD/Gov/090).

### **South Cambridgeshire District Council submission documents:**

- South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060);
- South Cambridgeshire Sustainability Appraisal Scoping Report (RD/Sub/SC/070);
- South Cambridgeshire Statement of Compliance with the Duty to Co-operate (RD/Sub/SC/080);
- Greater Cambridgeshire Local Nature Partnership Statement of Cooperation (RD/Sub/SC/081);
- Joint Position Statement on foul water and environmental capacity in relation to proposed development within South Cambridgeshire (RD/Sub/SC/082);
- South Cambridgeshire Statement of Consultation (RD/Sub/SC/090);
- South Cambridgeshire District Council Local Development Scheme (RD/Sub/SC/130);
- South Cambridgeshire Statement of Community Involvement (RD/Sub/SC/140);
- South Cambridgeshire Legal Compliance Checklist (RD/Sub/SC/150);
- South Cambridgeshire Local Plan Self-Assessment of Soundness (RD/Sub/SC/160).

### **Cambridge City Council submission documents:**

- Cambridge City Council Sustainability Appraisal of the Cambridge Local Plan 2014. Volume 1: Final Appraisal for the Submission to the Secretary of State (RD/Sub/C/030);
- Cambridge City Council Sustainability Appraisal of the Cambridge Local Plan 2014. Volume 2: History of Site Allocations (RD/Sub/C/040);
- Addendum to the Cambridge Local Plan 2014 Proposed Submission Document (July 2013): Schedule of proposed changes following proposed submission consultation (RD /Sub/C/050);
- Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080);
- Cambridge Local Plan 2014 Site Allocations: Flood Risk Sequential Test Evidence Report (RD/Sub/C/090);
- Cambridge Local Plan 2014: Submission Statement of Compliance with the, 'Duty to Cooperate' (RD/Sub/C/100);
- Cambridge City Council Habitats Regulations Assessment Parts 1 and 2 (RD/Sub/C/120);
- Cambridge City Council Local Development Scheme (RD/Sub/C/130);



- Cambridge City Council Statement of Community Involvement (RD/Sub/C/140);
- Cambridge Local Plan 2014. Application of the PAS Self-Assessment Toolkit, Comprising Soundness and Legal Compliance Tests (RD/Sub/C/160).

**Topic papers:**

- Cambridge and South Cambridgeshire Joint Working and Development Strategy Topic Paper (RD/Top/010).

**Earlier stages of plan-making:**

- South Cambridgeshire District Council Initial Sustainability Appraisal Report to accompany Local Plan Issues and Options Report (RD/LP/040);
- South Cambridgeshire District Council Supplementary Initial Sustainability Appraisal to accompany Local Plan Issues & Options 2 Report (Part 2) (RD/LP/060);
- South Cambridgeshire District Council Single Issue Consultation on Football Stadium at Sawston (RD/LP/070);
- Cambridge City Council and South Cambridgeshire District Council Interim Sustainability Appraisal to accompany Local Plan Issues & Options 2 Report (Part 1) (RD/LP/160);
- Cambridge City Council Consultation and community engagement strategy (RD/LP/190);
- Cambridge City Council Sustainability Appraisal Scoping Report (RD/LP/210);
- Cambridge City Council Issues and Options – Interim Sustainability Appraisal (RD/LP/220);
- Cambridge City Council Issues and Options Part 2, 'Site Options within Cambridge' – Interim Sustainability Appraisal (RD/LP/280);
- Cambridge City Council Sustainability Appraisal of the Cambridge Local Plan - SA Report - Appraisal of the Cambridge Local Plan 2014 - Proposed Submission (RD/LP/290).

**Adopted supplementary planning documents:**

- Cambridge Sustainable Community Strategy (RD/SPD/170);
- South Cambridgeshire Sustainable Community Strategy (RD/SPD/171).

**Development strategy:**

- Cambridgeshire and Peterborough Memorandum of Co-operation: Supporting the Spatial Approach 2011-2031 (RD/Strat/100);
- East Cambridgeshire Local Plan Examination Inspector's Interim Conclusions (14 July 2014) (RD/Strat/310);
- Report on the Examination into Fenland District Council Core Strategy Local Plan (April 2014) (RD/Strat/320);
- Appeal Decision: APP/W0530/A/13/2207961 Land to the west of Cody Road, Waterbeach, Cambridge, CB25 9LS. June 2014 (RD/Strat/330);
- Appeal Decision: APP/W0530/A/13/2209166 Land north of Bannold Road, Waterbeach, Cambridgeshire. June 2014 (RD/Strat/340);

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

**Communities, services and facilities:**

- Cambridgeshire Vision: County-wide Sustainable Community Strategy 2007 -2021 (RD/CSF/110).

**Transport and infrastructure:**

- Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120).

**Statements of Common Ground:**

- South Cambridgeshire District Council and Uttlesford District Council: Local Plan – Statement of Common Ground (RD/SCG/030)
- South Cambridgeshire District Council and North Hertfordshire District Council: Local Plan – Statement of Common Ground(RD/SCG/040);
- South Cambridgeshire District Council and Hertfordshire County Council – Local Plan – Statement of Common Ground (RD/SCG0/050).

## Appendix 2: Stages of Sustainability Appraisal Preparation

Timescales	Local Plan Preparation Stage	SA Stage
2011 – mid 2012	Initial evidence gathering	<p><b>Cambridge:</b> June 2012 – SA Scoping Report for the Cambridge Local Plan<sup>68</sup>, carried out by URS Limited. Consultation: 17 February - 26 March 2012.</p> <p><b>South Cambridgeshire:</b> June 2012 – SA Scoping Report for South Cambridgeshire Local Plan<sup>69</sup>. Consultation: February 2012.</p>
June – September 2012	Issues and Options consultation including Broad Locations	<p><b>Cambridge:</b> May 2012 – Interim SA of the Issues and Options Report<sup>70</sup>, carried out by URS Limited. Consultation: 15 June - 27 July 2012.</p> <p><b>South Cambridgeshire:</b> July 2012 – Initial SA Report for Issues and Options Report<sup>71</sup>. Consultation: 12 July – 28 September 2012.</p>
January – February 2013	Issues and Options 2 consultation	<p><b>Cambridge and South Cambridgeshire:</b> January 2013 – Issues and Options 2: Part 1 Interim SA, carried out by officers from Cambridge City Council and South Cambridgeshire District Council with advice from URS (includes SA of the Development Strategy and sites on the edge of Cambridge).<sup>72</sup></p> <p><b>Cambridge:</b> January 2013 – Interim SA Report 2. Issues and Options 2 Part 2 Site Options<sup>73</sup>, carried out by URS Limited.</p> <p><b>South Cambridgeshire:</b> January 2013 – Supplementary Initial SA Report on Issues and Options 2 (Part 2)<sup>74</sup></p> <p>Consultation on all 3 documents: 7 January - 18 February 2013.</p>

<sup>68</sup> Cambridge City Council Sustainability Appraisal Scoping Report (RD/LP/210)

<sup>69</sup> South Cambridgeshire Sustainability Appraisal Scoping Report (RD/Sub/SC/070)

<sup>70</sup> Cambridge City Council Issues and Options – Interim Sustainability Appraisal (RD/LP/220)

<sup>71</sup> South Cambridgeshire District Council Initial Sustainability Appraisal Report to accompany Local Plan Issues & Options Report (RD/LP/040)

<sup>72</sup> Cambridge City Council and South Cambridgeshire District Council Interim Sustainability Appraisal to accompany Local Plan Issues & Options 2 Report (Part 1) (RD/LP/160)

<sup>73</sup> Cambridge City Council Part 2, 'Site Options within Cambridge' – Interim Sustainability Appraisal (RD/LP/280)

<sup>74</sup> South Cambridgeshire District Council Supplementary Initial Sustainability Appraisal to accompany Local Plan Issues & Options 2 Report (Part 2) (RD/LP/060).

<b>Timescales</b>	<b>Local Plan Preparation Stage</b>	<b>SA Stage</b>
March – May 2013	South Cambridgeshire Single Issue Consultation – Football Stadium at Sawston	<b>South Cambridgeshire:</b> Supplement to the Initial SA - Single Issue Consultation – Football Stadium at Sawston document <sup>75</sup> . Consultation: 25 March – 6 May 2013.
Early – mid 2013	Internal consideration of the development strategy	<b>Cambridge and South Cambridgeshire:</b> May 2013 – Further Joint Sustainability Appraisal of the Development Strategy carried out by officers from both Councils and reviewed by independent consultants ENVIRON, contained within the report “Reviewing the Sustainable Development Strategy for the Cambridge Area <sup>76</sup> ”.
July – September 2013	Proposed Submission consultation	<b>Cambridge:</b> July 2013 – Appraisal of the Cambridge Local Plan 2014 – Proposed Submission <sup>77</sup> , carried out by URS Limited. Consultation: 19 July – 30 September 2013. <b>South Cambridgeshire:</b> July 2013 – South Cambridgeshire Local Plan Submission Draft Sustainability Appraisal <sup>78</sup> , prepared by ENVIRON. Consultation: 19 July – 14 October 2013.
March 2014	Proposed Major Modifications to South Cambridgeshire Proposed Submission Local Plan	<b>South Cambridgeshire:</b> Addendum to Part 3 of the South Cambridgeshire SA <sup>79</sup> was produced which considered proposed major modifications to South Cambridgeshire Proposed Submission Local Plan
March 2014	Submission of the Cambridge and South Cambridgeshire Local Plans to the Secretary of State.	Publication of the Cambridge Final SA <sup>80</sup> and the South Cambridgeshire Draft Final SA <sup>81</sup> reports for Submission to the Secretary of State.

<sup>75</sup> South Cambridgeshire District Council Single Issue Consultation on Football Stadium at Sawston (RD/LP/070).

<sup>76</sup> Cambridge Local Plan 2014: Reviewing the Development Strategy for the Cambridge Area: Joint Sustainability Appraisal (RD/LP/180).

<sup>77</sup> Cambridge City Council Sustainability Appraisal of the Cambridge Local Plan - SA Report - Appraisal of the Cambridge Local Plan 2014 - Proposed Submission (RD/LP/290).

<sup>78</sup> See South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060)

<sup>79</sup> South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060) Part 3 Appendix 6.

<sup>80</sup> Sustainability Appraisal of the Cambridge Local Plan 2014. Volume 1: Final Appraisal for the Submission to the Secretary of State (RD/Sub/C/030) and Sustainability Appraisal of the Cambridge Local Plan 2014. Volume 2: History of Site Allocations (RD/Sub/C/040).

<sup>81</sup> South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060).

**Appendix 3: Greater Cambridge Housing Trajectory: Proposed Main Modifications to the Cambridge Local Plan 2014: Proposed Submission (RD/Sub/C/010) and the Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)**

The modifications below relate to the changes required to reflect the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). The changes are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the relevant Local Plan, and do not take account of the deletion or addition of text.

**Table 3.1: Main Modifications to the Cambridge Local Plan**

Page	Policy/ Paragraph	Main Modification
18	After paragraph 2.17	<p><i>Add new paragraph 2.17a to read:</i></p> <p><u>In September 2014, a Memorandum of Understanding was agreed by Cambridge City Council and South Cambridgeshire District Council. The Memorandum recorded an agreement between the Councils under the duty to co-operate, that the housing trajectories for the two areas should be considered together, including for the purposes of calculating 5-year housing land supply in development management decisions that concern housing development.</u></p>
24	Policy 3: Spatial strategy for the location of residential development	<p><i>Amend the second paragraph of Policy 3 to read:</i></p> <p>Provision will be made for the development of not less than 14,000 additional dwellings within Cambridge City Council’s administrative boundary over the period from April 2011 to March 2031 to meet the objectively assessed need for homes in Cambridge. This will enable continuous delivery of housing for at least 15 years from the anticipated date of adoption of this local plan. <u>The housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development.</u> This <del>p</del>Provision includes two small sites to be released from the Cambridge Green Belt at Worts’ Causeway, which will deliver up to 430 dwellings.</p>

Page	Policy/ Paragraph	Main Modification
26	Paragraph 2.45	<p><i>Amend paragraph 2.45 to read:</i></p> <p><u>The Cambridge housing trajectory set out in Figure 2.2 included and updated each year in the Annual Monitoring Report illustrates the expected rate of delivery of new dwellings. It demonstrates how the objectively assessed need for an additional 14,000 homes to 2031 could be achieved. To meet objectively assessed need, an average of 700 additional dwellings a year are required between 2011 and 2031. As outlined in paragraph 2.17a, the Councils have agreed that the housing trajectories for both areas be considered together for the purposes of housing delivery, including calculation of 5 year housing land supply in development management decisions that concern housing development. This is consistent with the development sequence and spatial development strategy for Cambridge and South Cambridgeshire, and the phasing of housing delivery reflecting that strategy. As such, sites at the top of the development sequence in and on the edge of the urban area of Cambridge will deliver in the early and middle part of the plan period. Delivery in South Cambridgeshire will be greater in the middle and latter parts of the plan period, in particular as the fringe sites build out from the edge of Cambridge and move across the administrative boundary into South Cambridgeshire and as the new settlements come forward. There will also be some housing in larger villages early in the plan period.</u></p>
26 & 27	Paragraphs 2.46, 2.47, and Figure 2.2: Housing trajectory	<p><i>Delete paragraphs 2.46, 2.47, and Figure 2.2: Housing trajectory</i></p>
26	Paragraph 2.48	<p><i>Amend paragraph numbering and paragraph to read:</i></p> <p>The <del>trajectory relies</del> <u>trajectories rely</u> on information about sites that have the potential to deliver dwellings over the next 15 years and beyond., taken from the strategic housing land availability assessment (SHLAA) and work on local plan allocation sites.</p>

**Table 3.2: Main Modifications to the South Cambridgeshire Local Plan**

Page	Policy/ Paragraph	Main Modification
15	After paragraph 2.12	<p><i>Add new paragraph 2.12a to read:</i></p> <p><u>A Memorandum of Understanding was also agreed between Cambridge City Council and South Cambridgeshire District Council in September 2014, which agrees that the housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development.</u></p>
26	Paragraph 2.39	<p><i>Add an additional sentence to the end of paragraph 2.39:</i></p> <p>Over the plan period, the figure of 19,000 new homes implies an average delivery rate of 950 homes per year. While less than the Core Strategy 2007 annualised average of 1,176 homes, for comparison over the period 2001 to 2011 a total of 7,663 homes were built at an average of 766 homes per year and the Local Plan therefore represents a consistent step change in housing delivery over a lengthy period. <u>The phasing of housing delivery is dealt with in Policy S/12.</u></p>
36	Policy S/12: Phasing, Delivery and Monitoring	<p><i>Amend the first paragraph of Policy S/12 to read:</i></p> <p>1. The Local Plan aims to achieve a continuous high level of housing production throughout the plan period to support predicted and actual jobs growth. <u>The housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development.</u> Housing sites are not <u>deliberately</u> phased with the exception of:</p>
37	Paragraph 2.61	<p><i>Amend paragraph 2.61 to read:</i></p> <p>The South Cambridgeshire Housing Trajectory <u>set out in Figure 3 included and updated each year in the Annual Monitoring Report</u> illustrates the expected rate and phasing of delivery of new homes. It demonstrates how the objectively assessed need for an additional 19,000 homes between 2011 and 2031 could be achieved. This represents an average of 950 homes a year but the delivery of homes will vary over the plan period responding to individual site circumstances and changes in the</p>

Page	Policy/ Paragraph	Main Modification
		<p>national economy. <u>As outlined in paragraph 2.12a, the Councils have agreed that the housing trajectories for both areas be considered together for the purposes of housing delivery, including calculation of 5-year housing land supply in development management decisions that concern housing development. This is consistent with the development sequence and spatial development strategy for Cambridge and South Cambridgeshire, and the phasing of housing delivery reflecting that strategy. As such, sites at the top of the development sequence in and on the edge of the urban area of Cambridge will deliver in the early and middle part of the plan period. Delivery in South Cambridgeshire will be greater in the middle and latter parts of the plan period, in particular as the fringe sites build out from the edge of Cambridge and move across the administrative boundary into South Cambridgeshire and as the new settlements come forward. There will also be some housing in larger villages early in the plan period. All dwelling figures in the trajectory are net additional dwellings (i.e. completed dwellings minus losses of dwellings). The trajectory relies trajectories rely on information about sites which have the potential to deliver dwellings over the next 15 years and beyond, taken from the Strategic Housing Land Availability Assessment and work on Local Plan allocation sites.</u></p>
39	Figure 3: Housing Trajectory	<i>Delete Figure 3: Housing Trajectory</i>